

REPORT OF THE HEAD OF PARK DIRECTION

SUBJECT: SUPPLEMENTARY PLANNING GUIDANCE DOCUMENTS

- **CUMULATIVE IMPACT OF WIND TURBINES ON LANDSCAPE AND VISUAL AMENITY (NEW GUIDANCE)**
- **SEASCAPES (NEW GUIDANCE)**
- **SUSTAINABLE DESIGN (UPDATE)**

Purpose of the report

1. To advise Members of the responses received on the above public consultation and to recommend to Members to adopt the guidance documents for development management purposes. Officers also require delegated powers to update the Cumulative Impact of Wind Turbines Guidance to take account of recently published advice from Natural Resources Wales prior to final publication.

Background

2. The new and updated guidance was approved for public consultation by the National Park Authority on 26th June 2013. The 12 week consultation began in August 2013 and closed on 1st November 2013.
3. Letters were sent to various consultees. These included Agents, Architects, Town and Community Councils within the Park, Housing Associations, Estate Agents, Developers, Local Community Groups, local AM's and MP's, County Councillors, Utilities, Chambers of Trade, Environmental Groups, Government agencies, and other people who had expressed an interest.
4. Letters and CD copies of the consultation documents were provided to libraries within Pembrokeshire, St Clears and Cardigan. They were also available at the National Park centres in Newport, St David's and Tenby in this format. Paper copies of the documents were available to view at the National Park Offices in Llanion Park, Pembroke Dock.
5. The consultation was advertised via the Authority's web site and via public notices in the Western Telegraph which appeared on the 7th August 2013. Towards the end of the consultation we also placed reminders in the Tenby Observer, Friday October 18th 2013, the Western Telegraph, Wednesday October 16th 2013, the Tivyside Advertiser, Tuesday October 22nd 2013 and the Pembrokeshire Herald, Friday October 18th 2013. Pembrokeshire Radio also advertised the consultation. As at 15th October 2013 660 individuals saw the 'post' the Authority made on Facebook regarding the consultation. It was also advertised on Twitter.

Report of Consultations

6. A total of 28 people/organisations responded to this consultation. A total of 172 responses were received. The majority of them related to the cumulative impact of wind turbines guidance. Officer responses are shown in appendix 1, 2 and 3 to this report), along with an Officer response and recommendation to each of the individual comments. As a result of the consultation and further observations by your officers minor changes are recommended, prior to publication. Figures 2 and 3 were inadvertently omitted from the cumulative impact of wind turbines guidance consultation document; these will be re-inserted into the final document and are included within Appendix 1a for reference.
7. Officers also require delegated powers to update existing references and the Glossary of the Cumulative Impact of Wind Turbines Guidance to coincide with the recently published or imminent publication of good practice guidance documents which comprise:
 - a. the revised Guidelines for Visual Impact Assessment 3rd Edition (Landscape Institute, 2013),
 - b. Guidance on Visual Representation of Wind Farms (Scottish Natural Heritage) and'
 - c. LANDMAP Guidance Note 3 (Natural Resources Wales, 2013).

Conclusion

8. As a result of this exercise, there are minor changes recommended to the Supplementary Planning Guidance documents. These proposed amendments are attached at Appendix 1a to 3a. Further amendment is required to the Cumulative Impact of Wind Turbines on Landscape and Visual Amenity as set out above. Subject to approval by Members, these documents will be adopted and used in conjunction with the Pembrokeshire Coast National Park Local Development Plan Adopted September 2010 when considering planning applications within the National Park.

RECOMMENDATION

1. That the Officer Responses set out in Appendix 1, 2 and 3 be agreed as the National Park Authority response to this consultation;
2. That the Cumulative Impact of Wind Turbines on Landscape Visual Amenity Supplementary Planning Guidance; the Seascapes Guidance and the Sustainable Design Guidance be approved as supplementary planning guidance to the Pembrokeshire Coast National Park Local Development Plan and be adopted for development management purposes;
3. That delegated powers be given to the Head of Park Direction to further amend the Cumulative Impact of Wind Turbines on Landscape and Visual Amenity guidance as set in this covering report prior to publication.

Background papers:

Committee Report and Draft Supplementary Planning Guidance for consultation.

[Pembrokeshire Coast National Park - Committee Papers](#)

Planning Policy Wales (Edition 5, 2012):

<http://wales.gov.uk/topics/planning/policy/ppw/?jsessionid=959D17CBE44B4C21C123285AA5AE6E99?lang=en>

Local Development Plan (Adopted 2010)

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>

Wind Turbines - Richard James on extension 4875, richardj@pembrokeshirecoast.org.uk and

Seascapes - Michel Regelous on extension 4827 michelr@pembrokeshirecoast.org.uk

Sustainable Design – Robert Scourfield on extension 4862

robs@pembrokeshirecoast.org.uk)

Authors: Richard James & Michel Regelous & Martina Dunne (Park Direction)

Consultees: Jane Gibson, Director of Park Direction and Planning; Tegryn Jones, Chief Executive

Appendix 1 – Supplementary Planning Guidance – The Cumulative Impact of Wind Turbines – Comments Received and Officer Responses

Ref	Comment	Officer Response
WT 176/SPG/J13/1 Brecon Beacons NPA	The Authority is supportive of the contents of this draft SPG and has no further comments to make.	Comments are noted. No change required.
WT 1408/SPG/J13/1 Mr M Bell	I thank you for the opportunity to comment on the Draft SPG which I welcome particularly as it covers three Planning Authorities. It would obviously be of benefit if Ceredigion could be encouraged to join thus ensuring that comparable assessments of applications could be made across Pembrokeshire and along its borders.	This Authority was leading on a number of PIF (Planning Improvement Fund) bids for various projects. Other Authorities were made aware of these bids and whilst Ceredigion County Council has been involved in some, it did not join on this one. The production of this document began with Pembrokeshire Coast National Park Authority (PCNPA) working in partnership with Carmarthenshire County Council, Pembrokeshire County Council then joined later on in the production process. No change required. It is important to note that the consultation document is intended as Supplementary Planning Guidance to the PCNP Local Development Plan only. The document has been adopted as good practice guidance within Pembrokeshire County Council. Copies of the final guidance and report of consultations will be forwarded to neighbouring authorities.
WT 1408/SPG/J13/2 Mr M Bell	In addition I was pleased to note:- Para 2.11 The SPG notes that <i>there is potential for cumulative effects (of turbines) with the pylons</i> , whereas the attitude from the County County's Consultants, Hyder, would appear to be that turbines and pylons can be seen as complementary structures. It is not only the presence of the towers that needs to be considered but the fact that turbines have the added components of revolving blades which are more likely to catch the eye and contribute to visual clutter. Although it is possible to discern the landscape behind the rotating blades, the movement produces visually impaired space for the area of the blade-sweep	The blade diameter is acknowledged as an important consideration in determining the individual visual impact of a turbine in addition to its overall height. It is also a consideration in terms of judging the impact of turbines in combination with other turbines with different turbine blade diameters. However, when considering the categorisation of turbine scales for the purposes of this Supplementary Planning Guidance, it was considered more appropriate to use turbine height, in the interests of remaining consistent with existing policy and Supplementary Planning Guidance and to maintain a level of simplicity when conducting initial scoping

Ref	Comment	Officer Response
	and its immediately affected surroundings. Because the swept area increases radially with blade length this should also be a factor calculated on the basis of the familiar formula πr^2 , where r is the radius described by the turbine blades. The importance of this is shown in the examples below: (Rep includes a table to show increase in Swept Area and Colloquial Equivalent as blade length increases)	assessments. No change is required.
WT 1408/SPG/J13/3 Mr M Bell	Para 2.14 second bullet point. Dyfed Archaeological Trust in their response to the application for a turbine at Hill, Ludchurch, 12/0624/PA, expressed concern that approving the turbine would require the LANDMAP assessment for this area to be reviewed and downwards, ie contrary to the proposed approach of para 2.14. This application remains undetermined. The new SPG recognises the importance of maintaining the recognised areas of higher quality landscapes (based on the five LANDMAP themes and for these themes to be assessed singly not just as an aggregated judgement. A aggregated judgement tends to avoid recognition of the evaluation of the most sensitive aspect / aspects).	Comments are noted and agreed. For clarification the application referred to is within Pembrokeshire County Council jurisdiction. The bullet points follow from paragraph 2.15 and not 2.14 as stated.
WT 1408/SPG/J13/4 Mr M Bell	Para 8.7 Recognises that cumulative impact assessments should take into account not only installed turbines and permitted turbines but also undetermined applications at the time of registration - and if further applications have been received during a prolonged assessment of the application in question; ie try to show the whole picture when determining whether there will be a significant cumulative impact. This approach would be a definite improvement on current practice whereby only operating and permitted turbines are included (ie excluding those known to be in the planning process but as yet undetermined). Normal procedure at Public Inquiries is even to include all applications for which screening opinions have been issued. This	We do not include applications for turbines that are received after the application has been registered within its respective Cumulative Landscape Visual Impact Assessment as it is unreasonable to expect agents to continuously update them during the life of an application. However, where there is a lengthy time period between issuing Screening/Scoping Opinions or pre-application advice and making an application, the applicant would be advised to get an up to date representation of neighbouring proposals, this is reflected in the text. No change is required.

Ref	Comment	Officer Response
	important aspect is also referred to in para 1.12.	
WT 1408/SPG/J13/5 Mr M Bell	<p>Para 10.22. That Pembrokeshire CC is proposing an SPG on Renewable Energy and Landscape and hope that this will</p> <ul style="list-style-type: none"> • Be completed in the near future as the cumulative impact of turbines is beginning to alter the character of the County • The proposed SPG can incorporate / link with this SPG on Cumulative Impact and with the "Guidelines for Landscape etc", published in August 2012, to make a single reference point. 	Comments are noted. It is important to note that the consultation document is intended as Supplementary Planning Guidance to the Pembrokeshire Coast National Park Local Development Plan only. The document has been adopted as good practice guidance within Pembrokeshire County Council.
WT 1408/SPG/J13/6 Mr M Bell	Finally there is no reference [<i>I assume this to be the case</i>] to the Welsh Government's July 2010 Practice Guidance 'Planning for Renewable and Low Carbon Energy - A Toolkit for Planners' which is heavily focussed on wind energy and at section E1 includes a worked example entitled 'Pembrokeshire County Council area wide renewable energy assessment' (pages 22-41).	The document referred to was produced primarily to aid local authorities during plan preparation. It sets out how a local authority can prepare a robust evidence base to underpin a number of local development plan policies that can support and facilitate the deployment of renewable and low carbon energy systems. The authority has already conducted this assessment for the National Park. Whilst this document is relevant to a certain degree, being linked with renewable energy planning policy, it underpins the main national planning policy, which the Supplementary Planning Guidance outlines. No change is required.
WT 1408/SPG/J13/7 Mr M Bell	I would hope that the three Planning Authorities will consider the Draft SPG to be a material consideration in their treatment of all undetermined applications and not wait until adoption of the SPG. After all what is proposed in the SPG appears to be 'good practice' and of benefit to residents and visitors to West Wales.	<p>Noted, recognised good practice techniques are currently used by the authority when assessing cumulative impact. As noted above, the draft Supplementary Planning Guidance under this consultation is intended for Pembrokeshire Coast National Park Authority only.</p> <p>Copies of the final guidance and report of consultations will be forwarded to neighbouring authorities.</p>
WT	Natural Resources Wales welcome	Agreed, references to the previous

Ref	Comment	Officer Response
1633/SPG/J13/1 Natural Resources Wales	<p>consideration of this issue as Supplementary Planning Guidance (SPG) and the general approach taken.</p> <p>There are however a number of definitions and a few references should be updated and harmonised with recent published guidance to avoid confusion, as recommended below.</p> <ul style="list-style-type: none"> The 3rd edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 2013, published by The Landscape Institute, with input and sponsorship from Natural Resources Wales and others, which represents the universal industry standard in the UK, and also covers the issue of cumulative impacts; 	document within the Supplementary Planning Guidance to be updated.
WT 1633/SPG/J13/2 Natural Resources Wales	<ul style="list-style-type: none"> the revised Guidance on Visual Representation of Wind Farms by Scottish Natural Heritage, which is by far the most comprehensive guidance on this matter, and whose approach has changed significantly from the 2006 version referred to; 	The revised document has been out to consultation but the updated guidance has not been issued yet although due imminently. This will be monitored and the references changed as appropriate before finalisation.
WT 1633/SPG/J13/3 Natural Resources Wales	<ul style="list-style-type: none"> LANDMAP Guidance Note 3, on using LANDMAP information in landscape and visual impact assessments for wind farms, which has been updated and published by Natural Resources Wales in 2013. 	Agreed, references to the previous document within the Supplementary Planning Guidance to be updated.
WT 1633/SPG/J13/4 Natural Resources Wales	Of particular note is the revised approach that Guidelines for Landscape and Visual Impact Assessment (GLVIA) takes in relation to defining 'sensitivity' and 'value' - suffice it here to say that the draft SPG is not currently aligned with this, which could lead to confusion. For example in the consultation paragraph 3.3.	Agreed. Text in 3.3, glossary and elsewhere should be updated as necessary to be fully in line with Guidelines for Landscape and Visual Impact Assessment 3.

Ref	Comment	Officer Response
WT 1633/SPG/J13/5 Natural Resources Wales	<p>Paragraph 1.7 Subject to paragraph 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, these regulations apply to England only. We therefore recommend that reference should instead be made to Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.</p>	Agreed, reference to be changed.
WT 1633/SPG/J13/6 Natural Resources Wales	<p>Paragraph 1.9 To ensure that the SPG better reflects EIA Directive requirements, we recommend that the paragraph is amended to read: <i>“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....”</i></p>	Agreed, this would give a clearer reflection of the Environmental Impact Assessment Directive and existing planning practice. Text to be changed accordingly.
WT 1633/SPG/J13/7 Natural Resources Wales	<p>Paragraph 1.12 We consider that an assessment of cumulative impact should include an assessment of any development proposal alongside other development associated or separate to it. This can include but is not limited to development of a similar type to that being proposed, and should also refer to other development which exists, has been consented, or is likely to be developed in the future.</p> <p>We therefore recommend that the SPG should be informed by the definition of cumulative landscape and visual effects as set out in paragraph 7.2 of the <i>Guidelines for Landscape and Visual Impact Assessment</i> (3rd edition), which defines cumulative effects as those that: <i>“result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments (associated with or separate to it), or actions that occurred in the past, present or are likely to occur in the</i></p>	Disagree. The Scottish Natural Heritage (SNH) 2012 definition is very important to this document in that it mentions both combined and additional effects. The definition quoted by Natural Resources Wales is the old definition from Guidelines for Landscape and Visual Impact Assessment (GLVIA) 2002 guidance quoted in the updated GLVIA3 before going on to mention the SNH and other definitions i.e. it does not wish to be definitive. The issue of assessing cumulative effects with other types of development is a secondary issue dealt with elsewhere in the Supplementary Planning Guidance.

Ref	Comment	Officer Response
	<i>foreseeable future.”</i>	
WT 1633/SPG/J13/8 Natural Resources Wales	<p>Paragraph 1.15 We welcome and support the clarification that the assessment of cumulative effect will involve an assessment of effects alongside existing and consented wind turbines, as well as those at planning application stage. However, it is not clear how the proposed ‘scoping assessments’ referred to in paragraph 1.15 of the Draft SPG ‘fits’ within the EIA process.</p> <p>Whilst the term ‘scoping assessment’ is used, it is not clear whether such an assessment is expected to be undertaken at the screening or scoping stage of the EIA process.</p>	<p>The scoping assessment forms part of the Cumulative Landscape Visual Impact Assessment (CLVIA) and is to be completed by the developer. This does not necessarily have to be conducted at Environmental Impact Assessment (EIA) Scoping stage, hence located within a different section of the Supplementary Planning Guidance. In order to avoid confusion, a brief definition of what is meant by a Scoping assessment and CLVIA Scoping assessment can be inserted into the Glossary:</p> <p>Scoping assessment: 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 <i>CLVIA scoping assessment</i>.</p> <p>CLVIA Scoping assessment: 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.</p>
WT 1633/SPG/J13/9 Natural Resources Wales	Further, the potential for cumulative effect with development other than wind turbines, including those associated or separate to the main proposal, should be considered at the earliest opportunity during the planning application process.	The Supplementary Planning Guidance highlights the need to consider other forms of development with distinct vertical structures such as dwellings with large chimneys or pylons (i.e. other than turbines) at paragraph 6.1. No change is required.
WT 1633/SPG/J13/10 Natural Resources Wales	We therefore suggest that the SPG should ensure that any decision on which other development within the study area should be considered as part of a ‘scoping assessment’ should be determined in consultation with the local planning authority as part of any pre-application consultation or as part	Early engagement with the authority is encouraged in para 1.22 of the Supplementary Planning Guidance. No change is required.

Ref	Comment	Officer Response
	of the scoping stage of an EIA.	
WT 1633/SPG/J13/11 Natural Resources Wales	Paragraph 1.22 Natural Resources Wales will also welcome the opportunity to participate in pre-application discussions to help ensure potential environmental adverse impacts are identified and addressed at the earliest opportunity in informing the location, layout and design of development. As part of this process we could help identify viewpoints which should be considered as part of any landscape and visual impact assessment.	The authority welcomes the involvement of Natural Resources Wales where appropriate and in these cases will lead in actively consulting it on proposals. No change is required.
WT 1633/SPG/J13/12 Natural Resources Wales	Paragraph 5.6 Natural Resource Wales advises that it would be useful to clarify the relationship between the regional seascape assessment and the SPG on seascape character currently being consulted on.	Comments are noted and agreed. Subject to adoption of the Seascapes Supplementary Planning Guidance, it is suggested to add the following paragraph in at 10.12, where National Park policy specifically is dealt with: “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, referred to in paragraph 5.6. The National Park Authority’s Seascape 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.”
WT 1633/SPG/J13/13 Natural Resources Wales	Paragraph 6.1 Paragraph 7.2 of the <i>Guidelines for Landscape and Visual Impact Assessment</i> (3 rd edition), defines cumulative effects as those that: <i>“result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments (associated with or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future.”</i>	See comments as above on 1.12. The Natural Resources Wales Guidance Note 3 is the best source to refer to here as in the text.

Ref	Comment	Officer Response
WT 1633/SPG/J13/14 Natural Resources Wales	This definition therefore also suggests that an assessment of cumulative effect should not solely focus on the cumulative effects with developments of the same type.	The Supplementary Planning Guidance highlights the need to consider other forms of development with distinct vertical structures such as dwellings with large chimneys or pylons (i.e. other than turbines) at paragraph 6.1. No change is required.
WT 1633/SPG/J13/15 Natural Resources Wales	We advise that the SPG should ensure that the scope of the assessment, including which other development within the study should be considered as part of the assessment, should be determined in consultation with the local planning authority.	Early engagement with the authority is encouraged in para 1.22 of the Supplementary Planning Guidance. No change is required.
WT 1633/SPG/J13/16 Natural Resources Wales	Paragraph 10.4 Section 12.10 of <i>Planning Policy Wales</i> also states that local planning authorities should take into account any grid connection issues where renewable (electricity) energy developments are proposed. We suggest this is also clarified in the SPG.	Agreed, as this can also create cumulative landscape impacts, it should be noted. The text can be amended accordingly.
WT 1633/SPG/J13/17 Natural Resources Wales	We welcome the thumbnail sketches within the documents as we believe that they provide clarity. Figure 6 is especially welcome, as it provides real clarity in its approach and communicates it in an instant.	Comments made are noted. No change is required.
WT 1633/SPG/J13/18 Natural Resources Wales	Natural Resources Wales suggests that table 3 (recommended areas for cumulative assessment search and study) would benefit from a reference as to how these distances have been arrived at, and how they relate to what others are typically using. Adding this would demonstrate robustness and add transparency. We suggest that table 4 needs clarification: the repeated comment "Agree with LPA" implies it is the author (contractor), making these comments rather than PCNPA providing specific guidance.	Agreed, it is proposed to insert a rationale as an appendix to the main document. This would also help to enhance the weight of the Supplementary Planning Guidance as a material consideration during the determination of applications and during scrutiny at appeal. As this document may be referred to by three different local authorities, it is not considered appropriate to specify Pembrokeshire Coast National Park Authority here. No is change required.
WT 2046/SPG/J13/1	As with any structure to be erected adjacent to our property Network Rail	Whilst not directly related to cumulative impact, the issues raised

Ref	Comment	Officer Response
Network Rail	is keen to ensure that promoters of such schemes consider the constructability, structural integrity and maintainability of the proposed turbine installations when planning the scheme. A wind turbine mast is considered to be a fixed structure which, subject to planning consent, could be constructed in close proximity to our property boundary. However, the wind turbine blades are clearly not fixed structures and their placement and operation needs to be considered as a specific issue.	would form material planning considerations that would be taken into account at pre-application and application stage where relevant to the proposal. In these cases, it is agreed that Network Rail should be consulted during the determination of the application or when giving pre-application advice. However, as this document relates solely to assessing the cumulative visual impact of wind turbines within the landscape, it is not considered appropriate to give reference to the issues raised. No change recommended.
WT 2046/SPG/J13/2 Network Rail	On the basis that Network Rail will not permit third party operation of turbine blades above our operational infrastructure we would require the mast to be situated a minimum distance of at least one blade length away from our property boundary. Any operator intending to construct new turbines in close proximity to the operational railway would then be expected to demonstrate how both the construction and operation of the wind turbine would be managed.	As above.
WT 2046/SPG/J13/3 Network Rail	This should include detailed consideration of successful erection of the mast, without disruption to rail operations, and then once operational how the risk of material fatigue would be managed for both the mast and movable parts. In the event of sudden mechanical/material failure we would also expect the operator to demonstrate the expected trajectory to ground of a detached turbine blade. We would not expect this failure zone to impact on Network Rail owned/managed property.	As above.
WT 2046/SPG/J13/4 Network Rail	Developers must consider shadow flicker and its effect upon railway infrastructure. Network Rail would request that developers must consider when constructing wind turbines or wind farms the likely effect upon the railway, particularly where safety is critical. There may be a minimal risk to	As above.

Ref	Comment	Officer Response
	driver's vision (how they perceive signalling, the route ahead, stopping in the case of emergency etc) which may be impacted by a wind turbine(s).	
WT 2046/SPG/J13/5 Network Rail	Network Rail utilises radio/signalling equipment and we would not want to see this interfered with by wind farms/wind turbines, particularly as it is safety critical and absolutely integral to the operation of the railway.	As above.
WT 2046/SPG/J13/6 Network Rail	There is some concern that vibration from turbines can affect ground conditions; with the possible issue here being embankments and potential instability, in which case Network Rail would raise an objection to any applications for turbines close enough to the railway to create these issues and would wish consultation on a possible repositioning. The construction of the towers, heavy blades, gearbox and generator as well as guy lines to hold the tower in place put strain on the ground at the base of the structure.	As above.
WT 2046/SPG/J13/7 Network Rail	Many wind turbines are now a minimum of a 45 metre long tall tower with concomitant long blades, as such it may be necessary for the developer of any proposal for a wind turbine or turbines to gain consent from Network Rail's Structures Engineers and Level Crossing Managers to gain permission to cross Network Rail infrastructure in particular over a Network Rail bridge prior to construction on site. Consent may be needed as bridges have a maximum load and a wind turbine(s) plus blades and vehicle transporting said equipment may be over the limit for that bridge.	As above.
WT 2046/SPG/J13/8 Network Rail	Network Rail should be consulted on applications for wind turbine(s) as standard, and this should be added to the council's policy. We would also request the policy to require applicants to engage in pre-application consultation with the Network Rail	As above.

Ref	Comment	Officer Response
	Asset Protection Team to determine if a proposed wind turbine(s) / wind farm(s) impacts upon Network Rail land and the safety, integrity and operation of the railway and its infrastructure for the reasons as stated above.	
WT 2046/SPG/J13/9 Network Rail	At this stage the construction and usage of wind turbine(s) is relatively rare, but Network Rail Town Planning has seen an increase in applications and it is highly probable that the numbers of developments with wind turbine(s) will increase as the drive toward sustainable, renewable, carbon neutral energy production increases.	As above.
WT 2046/SPG/J13/10 Network Rail	Pembrokeshire Coast National Park Authority should be made aware that any proposed Wind Turbine scheme that includes as part of the remit the installation of cables under the railway to facilitate any works on site or any method of electricity transmission would invariably be objected too as this would necessitate works that could damage or undermine the safety, operation and integrity of the railway. Any proposal for a wind turbine that necessitated any cabling/high tension lines over the railway would also be objected too pending negotiation/consents/agreements with our National Business Team.	As above.
WT 2046/SPG/J13/11 Network Rail	Network Rail would wish to see our comments as above included in council documentation in connection with wind turbine(s) highlighted to developers for consideration and action.	As above.
WT 2367/SPG/J13/1 Mr and Mrs Jones	We write most vehemently to oppose the future development of wind turbines in the National Park and for that matter anywhere in our beautiful county of Pembrokeshire. Wind turbines are a massive scar on our landscape, creating unacceptable visual intrusion over a considerable distance. The industrial destruction caused by these turbines of the natural landscape and environment will have a negative impact on the National Park	The comments made are noted. It is important to highlight that the document is not intended solely to prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly assessed to facilitate informed

Ref	Comment	Officer Response
	and consequently local employment. People do not visit the National Park to see wind turbines. They are a total scam.	decisions. No change is required.
WT 2660/SPG/J13/1 Chartered Institution of Wastes Management	CIWM Cymru Wales would like to be in a position to respond to this and all similar documents, however we do not normally comment on these, as the plans cover all aspects of land use planning. There may be occasions when we will respond when the policies being changed refer to waste. Unfortunately in this instance we are not able to respond. Please continue to send similar documents to CIWM Cymru Wales, these are of interest to members and will be logged accordingly.	The comments made are noted. No change required.
WT 2743/SPG/J13/1 R Shepherd, Western Planning	<p>As far as it goes this SPG is OK. However they are sited, wind turbines ARE very intrusive and I do wonder if applications could be more honest!</p> <p>Frequently the rated (maximum output) power is all that is cited; frequently we are also told how many homes such turbines would power. Yet wind turbines are only about 20% efficient i.e. on an annual basis they can only deliver 20% of their rated output; this needs to be honestly recognised when quoting outputs. So a 10 MW turbine will only deliver 2MW at best over a year. Similarly with solar panels. Both are heavily subsidised by a Welsh Govt that doesn't begin to understand these realities; they just assume Brussels knows what it is talking about!</p> <p>People who would be affected by renewable energy projects of this kind deserve to know the facts when weighing the pros and cons, and I assume the NP would agree. I am attaching a note on a report by the John Muir Trust; you have probably read it but I can email a copy if needed.</p>	The comments made are noted. It is important to highlight that the document is not intended solely to prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly assessed to facilitate informed decisions. No change is required. Whilst overall contribution to renewable energy targets does form a material planning consideration, whether individual turbines are meeting their maximum potential is not considered relevant in the planning context.
WT 2873/SPG/J13/1 Angle Community	We as representatives of Angle community support any initiative to prevent the proliferation of wind	The comments made are noted. It is important to highlight that the document is not intended solely to

Ref	Comment	Officer Response
Council	turbines within our community or within close proximity. We have serious concerns that any medium or large scale development or structure, in particular those that move, will have a severe detrimental effect on the visual amenity of the area. Not only are there health and wellbeing concerns for those potentially living in close proximity of moving structures, there are potential detrimental ecological impacts known potential distortion and corruption of radio and TV signals and a potentially catastrophic effect on the fragile tourist industry which is critical for the survival of many local amenities, bus service, shop and pubs, and critical for the local jobs provided by the hospitality and accommodation business.	prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly assessed to facilitate informed decisions. The other impacts mentioned by Angle Community Council here and in the following rows of this table, do form material planning considerations, which are taken into account, however for the purposes of this Supplementary Planning Guidance, no change is required.
WT 2873/SPG/J13/2 Angle Community Council	This matter has been discussed widely within the community and despite some empathy with the need for renewable energy it is the collective view that we are already close enough to existing energy providing industrial plants that any further encroachment within our boundaries, or within sight from our patch, will be unfairly damaging and will bring no meaningful benefits to the community.	In addition to the above comments, the Authority is consulted on applications within adjoining local authority jurisdictions and comments in respect of potential impact upon the National Park landscape.
WT 2873/SPG/J13/3 Angle Community Council	The current fragile tourist industry in Angle is a direct result of previous industrial development but good quality and long term employment was a bi-product which has benefitted the community in return. Renewable energy developments by their very nature are not likely to offer any such compensation to the community and any financial incentives to win support are so far considered totally inadequate. Apart from the visual impact on the landscape any such development can only serve to jeopardise the hard work and persistence of local businesses and community groups to secure the very fabric of the community for negligible perceived benefit.	As above.
WT 2873/SPG/J13/4 Angle Community	We therefore support the intentions of this document and would welcome more stringent restrictions on future	As above.

Ref	Comment	Officer Response
Council	wind turbine developments in areas affecting our community.	
WT 2874/SPG/J13/1 Brawdy Community Council	<p>Thank you for allowing us additional time to comment on the above subject. Would you please add the attached comments to the survey.</p> <p>Possible introduction of a quota system within the National Park, only allowing a certain agreed number of turbines at any one time.</p>	It is not considered appropriate or enforceable to introduce a quota. Each individual proposal is judged on its own merits against material planning considerations such as cumulative visual impact. The existing Renewable Energy Supplementary Planning Guidance assigns different 'landscape sensitivity' levels to each area of the National Park in relation to wind turbine development. No change is required.
WT 2874/SPG/J13/2 Brawdy Community Council	It is felt that some of the diagrams are misleading, by showing the turbines too close together. This is not representative, and can be very misleading, as some of the diagrams look massive, and give the effect that the turbines are much bigger than they actually are.	The diagrams are considered to give a good indication of how different levels or scenarios of wind turbines within a given landscape can appear. They show a mixture of number and scales of turbines and are for illustrative purposes only. No change is required.
WT 3011/SPG/J13/1 Cllr Mrs Sally Williams	My conviction is that there should be NO wind turbines in this outstandingly beautiful county of Pembrokeshire, and especially within the National Park area.	The comments made are noted. It is important to highlight that the document is not intended solely to prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly assessed to facilitate informed decisions. No change is required.
WT 3011/SPG/J13/2 Cllr Mrs Sally Williams	The unspoilt landscapes, seascapes, coastal scenery, etc are a precious heritage which should be handed down to future generations. We should not be giving our children and grandchildren these appalling monstrosities or their huge concrete bases, one of which was pictured in the Daily Telegraph in October, and which ruin the eco-system. We should not be damaging our wildlife, especially birds and bats, or disturbing habitats.	As above.
WT 3011/SPG/J13/3	We should not contemplate any offshore wind developments. Many	Offshore turbines are considered within the context of nation policy

Ref	Comment	Officer Response
Cllr Mrs Sally Williams	come to admire our marine life which would be deterred by the presence of the ugly turbines.	drafted by UK government. Protection is afforded to national parks but this is not unqualified protection. Local planning authorities affected by proposals are provided with an opportunity to comment, for example, Atlantic Array. This Authority has raised an objection to this proposal.
WT 3011/SPG/J13/4 Cllr Mrs Sally Williams	We should not deter tourists, our only viable industry, from coming to this so beautiful part of the world. My husband and I will not stay in an area which is blighted by turbines.	The impact upon tourism does form a material planning consideration, although for the purposes of this Supplementary Planning Guidance, no change is required.
WT 3011/SPG/J13/5 Cllr Mrs Sally Williams	We should not be lowering the value of properties in the county	The impact upon the value of neighbouring properties does not form a valid material planning consideration. As a result, no change is required.
WT 3011/SPG/J13/6 Cllr Mrs Sally Williams	We should not be harming the health of residents with noise and flicker.	The impact of shadow flicker and noise is assessed as part of the determination process of wind turbine applications; however for the purposes of this report, no change is required.
WT 3457/SPG/J13/1 Friends of Pembs Coast National Park	We endorse the guidance as a very practical way of dealing with such a sensitive issue, especially the fact that it: <ul style="list-style-type: none"> • Is to be used not only in the National Park but also in Pembrokeshire and Carmarthenshire. • Recognises that turbines outside the Park can have a negative impact on it. 	The comments made are noted. No change required.
WT 3457/SPG/J13/2 Friends of Pembs Coast National Park	We welcome the reference to seascapes at various points in the guidance. However, we are concerned that it appears to be only in the context of the impact of turbines out to sea. That is, of course, a very important matter. But, given that the National Park is currently consulting on its seascape character assessment, it would seem to be important that the point is made in the guidance that wind turbines on land can impact on seascape character and, in the context of the National Park, on people's enjoyment of both the marine dimension of the Park and of the enjoyment of the land when viewed	The impact when viewing inland from the sea or rivers is considered relevant during the assessment of visual impact. Recreational sea users are highlighted as sensitive receptors that may undergo sequential effects in Table 2. As such, no change is required.

Ref	Comment	Officer Response
	from the sea.	
WT 3457/SPG/J13/3 Friends of Pembs Coast National Park	There is one matter, however, that might be a source of confusion. In tables 3 and 4 of the consultation draft a classification of turbines by blade height is used that is different to that used in the adopted SPG on renewable energy. Are we correct in assuming that this is simply for the purpose of the cumulative assessment exercise that developers will be required to undertake and not a change in the advice in the Renewable Energy SPG? If it were to be a change, presumably that is something you would consult on and on which the Friends would wish to comment since we would not wish to see any relaxation in the height classification of each category of turbine, i.e., what is a small, medium or large turbine.	This is correct. No change required.
WT 4215/SPG/J13/1 Mr Martin Horne	It is encouraging that PCNP have undertaken a comprehensive review of their current assessment of cumulative impacts of wind turbines on landscape and visual amenity in Pembrokeshire and Carmarthenshire. The principal of establishing guidance for the use of development management purposes by developers, consultants and planning officers should be fully supported by all stakeholders. In general terms, I support the principals within the draft guidance currently under consideration.	Comments made are noted. No change required.
WT 4215/SPG/J13/2 Mr Martin Horne	With respect to specific items within the document, I offer the following comments: Figure 5 Flow Chart of process It would appear unclear in Box 3 'List all wind turbine developments' as to whether this applies to proposals of 50 m and over or whether it is intended to include existing consented and in planning turbines of 50 m and above. Box 2 'map wind energy developments' makes no reference to size of turbines to be considered, if one assumes to include all turbines regardless of size, box 3 indicating 50 m + turbines should be clarified as to what this is intended for. Is the	This is based on the size of the proposed turbine and it is agreed that further clarity in this regard would help. This is also confirmed in Table 4. Figure 5 will be updated accordingly.

Ref	Comment	Officer Response
	<p>intention to map only wind turbines above 50 m that are consented and in planning or is it intended to map all turbines regardless of size for wind turbines where the proposed development is 50 m and above?</p> <p>Additionally, box 5 'Prepare scoping report' indicates for turbines 50 m and above, is this based on size of proposal or size of existing/consented turbines?</p>	
<p>WT 4215/SPG/J13/3 Mr Martin Horne</p>	<p>In either case, clarity should be provided to ensure all stakeholders are aware of what consented/in planning turbines need to be included based on the size of a proposal. For instance, what are the requirements for a proposed development of a turbine with an 18 m hub and 24 m blade tip? It is clear that this size development would entail a 10 km broad study area and 5 km detailed study area but unclear as to how this relates to the scoping stage.</p>	<p>As above.</p>
<p>WT 4215/SPG/J13/4 Mr Martin Horne</p>	<p>Reference is made within the document and within other best practice guidelines that assessments for wind turbines should be proportionate to scale. There appears to be a lack of recognition of this within the proposed guidance as I am unaware of any consideration given to small scale developments not needing to assess cumulative impact. In the absence of specific criteria, there is an apparent assumption that all turbines, regardless of size, have the potential to cause significant cumulative effects thus a need to conduct scoping for even the smallest of developments. If this is the intention, the added cost and complexity will undoubtedly prevent many small scale proposals from coming forward as the viability of such projects will be severely jeopardized.</p>	<p>Sporadic, individual small scale developments can collectively cause cumulative impact issues upon a landscape. However, the level of detail required for Cumulative Landscape Visual Impact Assessments (CLVIAs) for small scale proposals is considerably less than large scale, as can be seen in Table 4. The Authority can provide information on neighbouring turbine development and so the cost of CLVIA's for small scale turbines will be considerably less and thus proportionate. No change is required.</p>
<p>WT 4215/SPG/J13/5 Mr Martin Horne</p>	<p>This will lead to unintended consequences of seeing larger scale developments in order to justify the cost of submitting a planning application. This can currently be seen in PCC where there are currently 32 applications in planning and only 2 for</p>	<p>As above.</p>

Ref	Comment	Officer Response
	turbines under 25 m tip height.	
WT 4215/SPG/J13/6 Mr Martin Horne	Recognition should be given to turbines up to a certain threshold in size, perhaps 35 m tip, that there is unlikely to be significant cumulative impacts from the proposal therefore the scoping process would not apply. Caveats to this approach could be tied to LANDMAP whereby scoping and CLVIA would not be necessary for development sites that do not have an 'outstanding' classification in terms of Visual & Sensory or Historic landscapes, AONB or other appropriately defined landscape designations.	In certain cases and particularly within the National Park, a high number of small scale turbines within a landscape area can cause significant visual impacts and so each case should be judged on its own merits. For applications within the National Park, the authority's Landscape Character Assessment Supplementary Planning Guidance, which has been based on LANDMAP, should form the first point of reference when defining landscape character in assessments.
WT 4215/SPG/J13/7 Mr Martin Horne	Table 1 Landscape types with regard to wind turbine development-descriptions Table 1 clearly identifies 5 landscape types. The appropriate categorization of existing landscape areas is fundamental in assessing any potential impact a proposal may have. PCNP have mapped the area within the Park to show sensitivity to turbine development based on small-medium-large scale developments. A similar undertaking to map areas as outlined in Table 1 would add considerable value and clarity when assessing impact of turbines. This would give a bench mark as to the current classification of landscape areas in terms of turbine development.	Comments are noted and agreed. No change is required although this highlights a potential project to undertake in the future.
WT 4215/SPG/J13/8 Mr Martin Horne	At present there is very limited development of wind turbines within the PCNP and I would respectfully suggest that should the current policies be applied in a consistent manner as they have been in past, there is unlikely to be a concern related to the cumulative impact of wind turbines within the PCNP.	Comments made are noted, each case will be judged on its own merits. No change required.
WT 4215/SPG/J13/9 Mr Martin Horne	Conversely, turbine development outside of the PCNP has continued in a modest manner. PCNP have found it appropriate to comment on applications outside of the Park boundaries and one would expect this to continue. If this is the case, it is imperative that the areas outside of the Park boundaries be classified in a	Comments made are noted and it is agreed that Table 1 will inform representations made on applications within neighbouring local authority jurisdiction. No change is required.

Ref	Comment	Officer Response
	manner consistent with Table 1.	
WT 4215/SPG/J13/10 Mr Martin Horne	There have been numerous objections from PCNP on applications on the grounds of cumulative impact on the setting of the PCNP. These objections may or may not be appropriate however it would appear the methodology in assessing the cumulative impact is not consistent with the proposed guidance perhaps due to the lack of characterization of the landscape in terms of wind turbine development.	As above.
WT 4215/SPG/J13/11 Mr Martin Horne	Providing PCNP do adopt the proposed guidance and accept the principals within Table 1, a mapping exercise should be undertaken to classify landscape areas outside of the PCNP boundaries. This will provide a bench mark to assess future proposals against and would add clarity as to where future turbine proposals may be considered without causing significant cumulative effects.	Comments are noted and it is agreed that this would be useful in the future. Although for the purposes of this draft Supplementary Planning Guidance, no change is required.
WT 4215/SPG/J13/12 Mr Martin Horne	In summary, the adoption of the proposed guidance is a positive step towards the establishment of an appropriate assessment process. I hope you are able to consider the points raised within my response and that you are able to incorporate the suggested minor modifications to the document. Trusting you find the above in order, I look forward to seeing the final report in due course.	Comments made are noted. No change required.
WT 4218/SPG/J13/1 Mr Hugh Morgan	(1) The BP Trading Act 1957 contained provisions expressly intended to protect the then newly-created National Park and BP were, to say the least, disappointed when the trouble and expense which they took to build their Ocean Terminal into the landscape were negated by the construction of the Refinery on immediately adjacent land by Regent Refining instead of following the precedent set by BP and piping crude oil to a Refinery in an existing industrial area.	Comments made are noted. No change required.
WT 4218/SPG/J13/2	(2) The explosion at the Refinery (then operated by Texaco) in the early	Comments made are noted. Public safety does form a material

Ref	Comment	Officer Response
Mr Hugh Morgan	Nineties resulting in widespread damage illustrated that industrial development on an exposed site liable to damage from extreme weather conditions (including lightening) can be a danger to all concerned and it is to be feared that this could well be augmented if very large Turbines are erected in front of the Refinery should a rotor-blade come off and hit into the Refinery.	consideration and in cases where turbine development is within proximity to existing industrial areas or installations, the respective operators would be consulted as part of the determination process. No change is required.
WT 4218/SPG/J13/3 Mr Hugh Morgan	(3) The area to the South of the Refinery is particularly sensitive from an environmental standpoint as it forms an integral part of the landscape viewed as a whole whether just within or just outside the National Park (whose boundary is determined by a line on a map rather than a physical feature).	Comments made are noted. This Supplementary Planning Guidance will aid both applicants and Officers in assessing the potential landscape impact of proposals, together with other existing Supplementary Planning Guidance available, most notably 'Renewable Energy and 'Landscape Character Assessment', whether within or outside of the National Park. No change required.
WT 4218/SPG/J13/4 Mr Hugh Morgan	(4) This area is now threatened (using the word in relation to schemes being actively promoted or under actual or possible appeal) by Solar voltaic Parks at Hoplass and Wogaston, massive Wind Turbines close to the Refinery and distribution facilities from the LNG Terminal at South Hook.	As above.
WT 4218/SPG/J13/5 Mr Hugh Morgan	(5) The existing Wind Turbines located on the North side of the Haven already dominate the landscape and it is to be feared that the Turbines proposed to be erected in front of the Refinery will be larger and possibly much larger so that they will dominate the whole Peninsular.	As above.
WT 4218/SPG/J13/6 Mr Hugh Morgan	(6) While there is said to be a need to improve facilities for generation of electricity from a country-wide perspective it is to be apprehended that the current rash of 'cherry-picking' schemes may be motivated in part or in whole by prospective financial gain and that long term planning should be able to identify a few sites where the damage to the environment can be minimised consistently with any National policy for renewable energy.	As above.
WT	7) You will no doubt have seen press	Comments made are noted.

Ref	Comment	Officer Response
4218/SPG/J13/7 Mr Hugh Morgan	reports to the effect that the Power Station (built, as it is, into the Pwllcrochan Valley with only the chimneys protruding above the crest) already provides or will provide a significant contribution to the overall mix of electricity generation so to this extent the area has already borne its fair share of environmental damage in what might be termed the National interest.	Although it is acknowledged that extensive energy production is already present along the Milford Haven Waterway, this in itself would not form a material planning consideration, upon which a turbine application could be refused. No change required.
WT 4218/SPG/J13/8 Mr Hugh Morgan	(8) My attention has been drawn to press reports of a large 'community fund' being discussed with the Pembroke Dock Town Council by the developers of the proposed Wind Farm in front of the Refinery but previous experience at Rhoscrowther (where the Parish Rate which was supporting local facilities was deployed away from the immediate area when that was incorporated into Hundleton) leads me to fear that the fund will not benefit the area immediately affected and in this context one might perhaps recall the aphorism 'beware the Greeks when they come bearing gifts' !	Comments made are noted. No change required.
WT 4219/SPG/J13/1 Mr J M V Williams	I live in Angle and am becoming increasingly concerned at the creeping industrialisation of the Haven Waterway and its effect on the beautiful Angle Peninsular. We have a new Power Station already and there are now plans for a Wind Farm at Rhoscrowther. On the Northern side of the waterway the new LNG plant at South Hook is about to have a Power Plant installed at the western end, yet again encroaching closer and closer to the boundaries of the National Park.	This Supplementary Planning Guidance will aid both applicants and Officers in assessing the potential added landscape impact of proposals within this area, together with other existing Supplementary Planning Guidance available, most notably 'Renewable Energy and 'Landscape Character Assessment', whether within or outside of the National Park. No change required.
WT 4219/SPG/J13/2 Mr J M V Williams	We in Angle have had to put up with very intrusive noise from the new tankers offloading at the South Hook LNG plant and, although this is gradually being reduced by modification to the ships, we now learn that the cooling system to be used on the new Power Plant at South Hook will involve turbine cooling fans. We are very concerned at the noise levels	Comments made are noted. No change required.

Ref	Comment	Officer Response
	that these will inevitably produce.	
WT 4219/SPG/J13/3 Mr J M V Williams	We are told that these sites and others in the vicinity provide about 25% of the UK's power needs. Now we already have 6 new huge wind turbines on the north of the waterway providing a further blot of the landscape of the waterway and surrounding countryside.	This Supplementary Planning Guidance will aid both applicants and Officers in assessing the potential added landscape impact of proposals within this area, together with other existing Supplementary Planning Guidance available, most notably 'Renewable Energy and 'Landscape Character Assessment', whether within or outside of the National Park. No change required.
WT 4219/SPG/J13/4 Mr J M V Williams	The proposals for a further set of wind turbines at Rhoscrowther is a step too far. Although just outside the National Park boundary these will have an immediate adverse effect on the beauty of the area and will be visible by anyone in the local National Park. It is not just the huge height of these wind turbines that disturbs the beauty of the area but the movement of the blades instinctively draws the eye to them, ruining the view from some distance away.	As above.
WT 4219/SPG/J13/5 Mr J M V Williams	I believe that the time has come to call a halt to the increasing industrialisation of the Milford Haven Waterway and surrounding countryside, particularly by these large wind turbines which have such a disastrous effect of the scenery and enjoyment of the natural outstanding beauty of the area.	As above.
WT 4219/SPG/J13/6 Mr J M V Williams	The Milford Haven Waterway and the surrounding industrial sites are already providing huge benefits to the UK's power requirements and it is doing more than its fair share. Further installations will only continue to degrade the beauty of the area and should be resisted at all costs, or we will be in danger of losing the only other source of income for the area, namely tourism.	Following from the above comments, although it is acknowledged that extensive energy production is already present along the Milford Haven Waterway, this in itself would not form a material planning consideration, upon which a turbine application could be refused. However the impact upon tourism and the local economy, whether positive or negative, does form a material planning consideration, however for the purposes of this Supplementary Planning Guidance, no change required.

Ref	Comment	Officer Response
WT 4219/SPG/J13/7 Mr J M V Williams	I trust you will consider my remarks when taking your decisions on the requests for new Wind Farms and also consider whether they are absolutely necessary as figures show that, despite all the recent Wind Farm developments on land and at sea they only provide 0.30% of the energy requirements of the UK. Not a very efficient use of a very expensive and visibly intrusive means of generating power.	National and local planning policy establishes the principle of wind turbine development, subject to there being no overriding environmental or amenity considerations, as such each application needs to be considered on its own merits. No change is required.
WT 4220/SPG/J13/1 Mr P Wooldridge	<p>Having read your turbine consultation document, I would like to add a further piece of information.</p> <p>Pembrokeshire is heavily dependent on the Tourist Industry for employment in this area, bearing in mind that Wind Turbines do not supply employment, but would probably cause unemployment by being unsightly and spoiling the general landscape and beauty of this area.</p> <p>I have also attached a document that proves that Wind Farms can actually cost the TAX payer and add to the household bills, by us having to pay these Firms to have these Wind Turbines stand idle.</p> <p>The Six Wind Turbines on the Milford Haven side of the Cleddau are large and unsightly to the eye, this new proposed area is on the National Parks side, so it is the responsibility of the Planning Department to oppose this.</p>	<p>The impact on tourism is a material planning consideration in the determination of planning applications. The overall intention of the Supplementary Planning Guidance is to provide guidance on assessing cumulative visual impact, in the interests of conserving the natural landscape. No change is required.</p> <p>Comments made are noted. No change is required.</p> <p>The overall intention of the Supplementary Planning Guidance is to provide guidance on assessing cumulative visual impact, in the interests of conserving the natural landscape. The authority cannot determine any application prior to proper assessments being carried out and considered. No change is required.</p>
WT 4221/SPG/J13/1 Mr D Green	Any wind turbine intrudes upon any landscape over which it is visible. The intrusion is vastly amplified because its blades move. Any moving object automatically focuses the human eye upon it (as it does the eyes of any other animal which has them) to the virtual exclusion of all else. Movement implies possible danger. It's focussed perception is a simple, evolutionary	It is important to highlight that the document is not intended solely to prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly

Ref	Comment	Officer Response
	<p>consequence of species survival. And movement in a landscape effectively causes the rest of the landscape to disappear.</p> <p>Even one prominent turbine may thus damage any landscape and particularly one of special value. And cumulatively the more turbines there are the more the damage is exacerbated.</p>	<p>assessed to facilitate informed decisions. No change is required.</p>
<p>WT 4222/SPG/J13/1 Mr M Goldacre</p>	<p>I understand that you are holding a consultation on wind turbines. I'm reasonably confident that turbines are a fad that will pass, as people realise that they are not an energy solution that will have major impact. They are, however, a blight on the landscape. I have been holidaying in Pembrokeshire for the best part of 50 years, and am disappointed to see the turbines that are springing up. I hope that the planning authorities will 'zone' areas in which turbines may be permitted and areas in which they will not. Tourists who dislike turbines would then be able to choose tourist-friendly, turbine-free parts of Pembrokeshire and avoid the areas with turbines. I hope that north Pembrokeshire, in particular, will be a turbine-free and tourist-friendly zone.</p>	<p>The zoning of areas for turbines is relevant for Strategic Search Areas in relation to large scale turbine development but this does not translate down to individual small and medium scale developments within the National Park. Our Renewable Energy Supplementary Planning Guidance does however assign levels of landscape sensitivity to National Park landscape character areas and provides guidance on circumstances where turbines will and will not be considered acceptable. No change is required.</p>
<p>WT 4223/SPG/13/1 Peter and Theresa Arkle</p>	<p>There have been an outstanding number of wind turbine applications both within the boundary of the National Park and within the jurisdiction of Pembrokeshire Council. We ourselves have had our lives blighted over the past 18 months by two applications for two 79 metre turbines at Penybanc in Castlemorris which are on the council's planning agenda next Tuesday. Thank goodness, though, that today they have been recommended for refusal. Also the Park have objected to them as well – thank you!</p>	<p>It is important to highlight that the document is not intended solely to prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly assessed to facilitate informed decisions.</p>
<p>WT 4223/SPG/13/2 Peter and</p>	<p>We cannot keep having wind turbines pop up everywhere all over the whole of the county. Tourism adds greatly to</p>	<p>As above, the impact upon tourism and the local economy, whether positive or negative, forms a</p>

Ref	Comment	Officer Response
Theresa Arkle	the economy of the county and we are already seeing people coming here now instead of going to places like Norfolk and Cornwall. Tourists will turn their back on the county if it is turned into a windfarm.	material planning consideration, however for the purposes of this Supplementary Planning Guidance, no change is required.
WT 4223/SPG/13/3 Peter and Theresa Arkle	The benefit of the renewable energy that these turbines produce is not nearly enough to outweigh the harmful effects on the environment, on the landscape or, indeed, on the wildlife.	The impact on wildlife and environment in general is considered as part of the determination process of an application. However for the purposes of this Supplementary Planning Guidance, no change is required.
WT 4223/SPG/13/4 Peter and Theresa Arkle	There is no proper consultation with residents living near to where these applications are sited. For example, my husband and I were the only residents to receive notification from the council, as we live 300m from the proposed development. But many more people would be affected by them as the report from the planning officer today says that the Penybanc and Melin turbines would be “visible over an east-west distance of some 30 kilometres from St David’s in the west to the Preseli mountains in the east..... it would also be visible over a north-south distance of some 20 kilometres from the summit of Garn Fawr by Strumble Head in the north to Haverfordwest in the south.” Yet it was only us to get formal notification!	This Supplementary Planning Guidance deals specifically with assessing the cumulative visual impact of wind turbines. The matter raised is a separate issue for consideration. No change required.
WT 4223/SPG/13/5 Peter and Theresa Arkle	We understand from both Stephen Crabb MP and Paul Davies AM that there is a new planning paper under consultation at The Assembly in Cardiff due out before the end of this year. In England, residents have to be approached for their views even before a wind application is lodged with a council. If most of the residents decide they do not want a wind turbine near them, then the application cannot even be lodged with the council. This needs to happen in Wales before it is too late.	Officers will investigate the new paper referred to. At present, the consultation of planning applications in Wales enables people to make representations, which are taken into account during the determination of applications. No change is required.
WT 4223/SPG/13/6	Pembrokeshire is a wonderful county and that is why we started taking our	Comments made are noted. No change required.

Ref	Comment	Officer Response
Peter and Theresa Arkle	holidays here in 1991. In 1999 we were fortunate enough to have the opportunity to move here and work here. There is no other county like it in the UK. Last year the Pembrokeshire coast was voted the second best coastal location in the world in the National Geographic magazine. How amazing is that?	
WT 4223/SPG/13/7 Peter and Theresa Arkle	Pembrokeshire has unique qualities that need preserving. The visual intrusion on the character and appearance of the landscape that wind turbines have is entirely unacceptable. Such wide-ranging views can be had from the Preselis and from the Coast Path. Residents and tourists that use these amenities do not want to have wind turbines causing visual clutter on the landscape.	This Supplementary Planning Guidance will aid both applicants and Officers in assessing the potential added landscape impact of proposals within this area, together with other existing Supplementary Planning Guidance available, most notably 'Renewable Energy and 'Landscape Character Assessment', whether within or outside of the National Park. No change required.
WT 4223/SPG/13/8 Peter and Theresa Arkle	It is pure greed that is generating these applications from individuals intent on "lining their pockets" without a care to those that would have their lives blighted by these turbines.	The financial gain derived from turbines does not form a material planning consideration, although the impact upon the amenity of neighbouring properties and the area, in addition to landscape impact is considered during the determination of a planning application. No change is required.
WT 4223/SPG/13/9 Peter and Theresa Arkle	Your new draft guidelines do seem to go some way to improving the current planning guidelines – so thank you for that. I do hope that you can adopt these new guidelines as soon as possible, which will help protect our lovely, ancient countryside.	Comments made are noted. No change required.
WT 4224/SPG/J13/1 James Chesters	As a local resident for five years and previous regular tourist to North Pembrokeshire, I am one of many who chose to live in or near the Pembrokeshire Coast National Park because of its unique qualities especially the ancient and non industrial landscape. I walk in and enjoy the National Park on a daily basis and actively encourage family and friends to visit frequently.	Comments made are noted. No change required.

Ref	Comment	Officer Response
	I wish to add my views to the consultation as follows:-	
WT 4224/SPG/J13/2 James Chesters	I definitely find any large or medium sized turbine installations an alien intrusion on this unique landscape. This is also a view I have found echoed by my visitors and neighbours alike. We are all very worried that money and political influence will outweigh what is clear to us all i.e. there is no sensible place for such commercial constructions that must impact on our local beauty.	It is important to highlight that the document is not intended solely to prevent wind turbine development, but to provide guidance to both local authority planning officers and Members when determining applications for wind turbines and to applicants/agents when submitting wind turbine applications, so that potential impacts can be properly assessed to facilitate informed decisions.
WT 4224/SPG/J13/3 James Chesters	Any turbine installation should be an exception and of benefit to the community not just a means of returning a profit to an individual.	As above and in addition, the financial gain derived from wind turbines does not form a material planning consideration. No change is required.
WT 4224/SPG/J13/4 James Chesters	There should be measures and finance in place to ensure that maintenance and de-commissioning are carried out, such as a bond taken at the outset. We need such protection against future problems such as the bankruptcy of landowners or suppliers.	Planning conditions can be placed on approvals to require the removal of the turbine and re-instatement of the land once a turbine has ceased to operate. Conditions can also be placed to ensure the protection of neighbouring residents in perpetuity (for example from unacceptable noise impact). Thus the planning system can control these issues to an extent. However the planning system is unable control the future economic wellbeing of suppliers or landowners. No change is required.
WT 4224/SPG/J13/5 James Chesters	No turbine installation should be considered near residential property. This is a matter of social justice that one individual should not profit whilst their neighbour suffers a real loss either financially or from a loss of amenity. I believe the Welsh Assembly originally intended a guideline of 500 metres but with some of these large and medium commercial proposals I would consider that inadequate.	Residential amenity forms an important planning consideration and is given substantial weight in the determination process. For the purposes of this Supplementary Planning Guidance however, no change is required.
WT 4224/SPG/J13/6 James Chesters	A site visit and a cumulative impact study should be a pre requisite for any application.	This Supplementary Planning Guidance, together with other guidance, will help to outline the requirements for planning applications. No change is required.

Ref	Comment	Officer Response
WT 4224/SPG/J13/7 James Chesters	A fixed period of time, say three years, should elapse before any refused application can be resubmitted albeit in an altered format.	This relates to planning legislation and is outside the direct control of the authority. No change required.
WT 4225/SPG/J13/1 Linda Hammond	Wind farms are already springing up on the Milford side of the Haven and are spreading ever further along the waterway, WHY? Have the Greenies infiltrated our society to the extent that local objections no longer matter and their stupid turbines are becoming the norm?	Comments made are noted. No change required.
WT 4225/SPG/J13/2 Linda Hammond	These ugly structures only work at a maximum of 38% of output at best and can only operate in moderate wind conditions, no more please, we have to live here in what is fast becoming an industrial county which will be bereft of tourists, who love them or loathe them, keep West Wales a place to enjoy. National Parks Planning where are you?	National and local planning policy establishes the principle of wind turbine development, subject to there being no overriding environmental or amenity considerations, as such each application needs to be considered on its own merits. This Supplementary Planning Guidance, together with existing guidance will aid in ensuring impacts are properly assessed for each proposal. No change is required.
WT 4226/SPG/J13/1 Sian Williams, Kite Ecology	I have read through the above document and am very concerned that there is no reference to ecology, specifically bats, within the document. As a European Protected Species, bats are a material consideration in the planning process, so it is my understanding that they would have to be considered as part of any planning application. Pembrokeshire has a high proportion of bats and Natural Resources Wales are already in the process of producing guidance on where bats are most likely to be at risk in the county. To me, this SPG document is the ideal opportunity to include this guidance on survey effort in relation to bats.	The impact upon existing levels of biodiversity is a material planning consideration, which is given considerable weight during the determination of planning applications. However, this document is intended to provide guidance on the cumulative visual impact of wind turbines only. Biodiversity issues are highlighted within the existing Renewable Energy Supplementary Planning Guidance. Advice on validation requirements for applications can be provided by the Authority, where requested. No change is required.
WT 4226/SPG/J13/2 Sian Williams, Kite Ecology	All current National Guidance has a bias towards wind farms rather than the cumulative effects of single turbines in close proximity to each other. This SPG should be used as an opportunity to reference all the work that the different organisations are producing. As an ecological	As above.

Ref	Comment	Officer Response
	consultant, it would be invaluable to have a document that I could refer to that was produced by the LPA which set out survey parameters. This would provide a reference point to ensure all applications are undertaking the same level of survey effort throughout the county.	
WT 4226/SPG/J13/3 Sian Williams, Kite Ecology	SPG is designed to inform applicants about the information required in their application. Without any reference to ecology in it, the current draft document is not giving people the whole picture and may well lead to unnecessary delays if applications are submitted with insufficient information.	As above.
WT 4226/SPG/J13/4 Sian Williams, Kite Ecology	I am more than happy to work with the LPA's and statutory bodies on this matter as the benefits of a well produced document will ultimately help everyone involved in the process. I do feel that the current draft guidance is missing an opportunity with regard to ecology and hope that this can be addressed before it is adopted.	As above.
WT 4228/SPG/J13/1 Mr C W Johns	I absolutely detest them. NO w.p.gs. should be permitted anywhere near or in or visible from the Park, in short ban all over 10 meters to the blade tip, and certainly no multiples, if you have to have 'green' energy the solar, & hydro schemes in particular should be given preference. Carew Mill, Blackpool Mill, Pembroke River barrage why are these not being used? Wales already can generate more power than it can use, this is just about profit. No more 'whirling dervishes' ruining the countryside. Why are there no anaerobic digesters creating gas to power generators instead of farmers spreading slurry on the fields with damaging run off? Take the lead P.C.N.P.!!	National and local planning policy establishes the principle of wind turbine development, subject to there being no overriding environmental or amenity considerations, as such each application needs to be considered on its own merits. Existing planning policy and guidance also establishes the principle of other forms of renewable energy as mentioned. This Supplementary Planning Guidance, together with existing guidance will aid in ensuring impacts are properly assessed for each proposal. No change is required.
WT 2897/SPG/J13/1 Marloes and St Brides Community Council	1) Ref Table 4 – there is an inconsistency in turbine height definitions: under the second column, “height range to blade tip”, the measurements are quoted with reference to hub height. There is also a clash with definitions in sections 1.8 and 1.18	Agreed, insert “unless otherwise stated” into second column, to coincide with Table 3. There is not considered to be any clash between paragraphs 1.8 and 1.18 and so no change is required in this regard.

Ref	Comment	Officer Response
WT 2897/SPG/J13/2 Marloes and St Brides Community Council	<p>2) Ref Planning Context – it is not sufficient for the PCNPA to just make passing reference to Planning Policy Wales: this document must highlight the official Welsh Government guidance about how landscape impact and visual amenity considerations must be counterbalanced:</p> <p>Planning Policy Wales, Edition 5 (November 2012) requires local authorities to "ensure that the economic benefits associated with a proposed development are understood" and that these are given "equal consideration with social and environmental issues in the decision-making process". It also says that local authorities should recognise that there will be occasions when the economic benefits will <u>outweigh</u> social and environmental considerations. (Our underlining).</p>	<p>Planning Policy Wales (PPW), Technical Advice Notes (TANs) the Local Development Plan (LDP) and Supplementary Planning Guidance (SPG) should be read as a whole, as such PPW Chapter 7 Economic Development does inform the determination process. Economic development considerations are also highlighted throughout the planning policy of the LDP. Within the National Park, the primary purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park. The economic benefits of wind turbine proposals (other than private financial gain) for example, employment benefits, forms one of the many other material planning considerations that are not dealt with in this SPG. As this SPG seeks to deal specifically with the issue of cumulative visual impact, Section 10 sets the planning context in relation to visual impact only; no change is required in this regard.</p>
WT 2897/SPG/J13/3 Marloes and St Brides Community Council	<p>The policy also requires local authorities to consult their Economic Development Officers on proposals which have the potential to generate or retain jobs locally so that the potential benefits of such developments can be fully understood; we are not aware of this test being applied so far to wind turbine applications coming before the PCNPA.</p>	<p>Consultation of Economic Development Officers is recognised as being relevant in some cases, however, to date the scale of wind turbines proposed within the National Park has not warranted consultation as employment opportunities tend to be limited to the supplier and the individual farm. However it is agreed that the preservation or generation of local employment opportunities does form a material planning consideration to be taken into account and afforded appropriate weight. No change is required.</p>
WT 2897/SPG/J13/4 Marloes and St Brides Community Council	<p>Therefore, in future, - a wind turbine must be acknowledged by the PCNPA as a potential wealth generator just as much as farm units, rural industry buildings, or holiday cottage complexes are; - a wind turbine must be recognised by the PCNPA as crucial to an applicant's diversification strategy; - against the cumulative</p>	<p>Comments are noted, officers and members are aware of the need to consider planning policy as a whole as mentioned above and as such, no change is required.</p>

Ref	Comment	Officer Response
	visual effects of more wind turbines appearing, the PCNPA should set the cumulative benefit to rural renewable energy businesses and agricultural partnerships of an expanded market. We think these issues should be specifically highlighted in the Planning Context section of this document, so that they cannot ever be overlooked, and the Development Committee is always reminded to take them into account.	
WT 2897/SPG/J13/5 Marloes and St Brides Community Council	3) A crucial item of Planning Context has been totally omitted: the importance of local opinion. This is surely at odds with Westminster's and Cardiff's stated aims of increased localism in decision making. As it is not unusual for planning applications which are supported by Community Councils being refused by the PCNPA and then being granted on appeal, it is surely time that the crucial role of local residents in planning decisions is formally acknowledged?	As mentioned above, this Supplementary Planning Guidance seeks to deal with the cumulative visual impact of wind turbines only. The role of local residents in planning decisions is a separate issue. No change is required.
WT 2897/SPG/J13/6 Marloes and St Brides Community Council	4) We feel that further research is needed into just how "visible" micro or small wind turbines are, to human perception, other than in the short term. In our area the overnight appearance of a new 20 kW wind turbine on the skyline resulted in some comments in the first week; after that, neither residents or visitors have since paid it any attention.	It is agreed that over time, initial visual impact can be reduced for local residents. However, whilst some people see wind turbines as elegant and attractive structures, for others they are an unwelcome intrusion within a landscape and so a consistent, unbiased method of assessing both individual visual impact and cumulative visual impact is required. Whilst the existing Renewable Energy Supplementary Planning Guidance is intended to provide the former, this Supplementary Planning Guidance is intended to provide the latter. No change is required.
WT 1092/SPG/J13/1 Bourne Leisure	Tourism is a significant contributor to the local and regional economy. Indeed, paragraph 4.158 of the adopted Pembrokeshire Local Development Plan (LDP) states that <i>"tourism is a dominant factor in Pembrokeshire's economy"</i> . The exceptional natural environment of	Comments made are noted. No change is required.

Ref	Comment	Officer Response
	Pembrokeshire Coast National Park (PCNP) comprises the key visitor attraction to the area and therefore the desire to protect and where possible enhance the natural environment is supported by Bourne Leisure.	
WT 1092/SPG/J13/2 Bourne Leisure	Bourne Leisure supports in principle development proposals which seek to address the present and increasing threat of climate change. However, the Company considers that the consideration of the need for wind turbines within the National Park should be considered within a balanced, but pragmatic policy framework, whereby the desire to preserve the exceptional natural environment as a key 'visitor attraction' is afforded significant weight in the light of the significant contribution that tourism makes to both the local and regional economy.	Comments made are noted. No change required.
WT 1092/SPG/J13/3 Bourne Leisure	Bourne Leisure supports the approach set out in the draft SPG which seeks to assess the cumulative impact that wind turbines may have on sensitive areas such as the National Park. Bourne Leisure endorses the key objectives of the SPG as they seek to maintain the integrity and quality of the landscape character whilst providing a positive framework for onshore wind energy.	Comments made are noted. No change required.
WT 1092/SPG/J13/4 Bourne Leisure	Bourne Leisure considers that it is vitally important for existing holiday parks, which are usually located along the coast, but beyond existing settlement boundaries to be specifically identified as static sensitive visual receptors. This is important because existing holiday parks have a key role to play in providing for a wide range of holiday accommodation within the National Park and the potential development of wind farms individually or cumulatively may result in a negative impact on the key visitor attraction i.e. the natural environment.	It is agreed that holiday parks could form sensitive receptors, particularly when located along the coast and would be taken into account during application assessments where relevant. Table 2 provides examples of sensitive receptors for explanatory purposes, within which the Pembrokeshire coast is listed. It is not a definitive list of all receptors. As such no change is considered necessary.
WT 1092/SPG/J13/5 Bourne Leisure	Bourne Leisure considers that the approach to the consideration of wind turbines should specifically take into account the potential effect on sensitive receptors such as visitors to	Comments made are noted. No change required for reasons detailed above.

Ref	Comment	Officer Response
	viewpoints and heritage features as well as users of the Pembrokeshire Coast Path. It is pertinent that Pembrokeshire Coast NPA acknowledge the important relationship between the quality of the natural environment, tourism and the local economy.	
WT 1092/SPG/J13/6 Bourne Leisure	It is important that any on/offshore wind turbine development in the Park and beyond should be determined with a pragmatic and balanced approach to ensure that the tourism industry and in turn, both the local and regional economy is not harmed.	Comments made are noted. No change required.
WT 1092/SPG/J13/7 Bourne Leisure	Tourism has a significant role to play in the economic performance of Pembrokeshire Coast. The Company therefore emphasise the need to adopt a balanced, but pragmatic approach, whereby the desire to preserve the exceptional natural environment as a key 'visitor attraction' is afforded significant weight in the light of the significant contribution tourism makes to both the local and regional economy. We trust that the above comments will be thoroughly considered going forwards	Comments made are noted. No change required.
WT 4229/SPG/J13/1 Mr Clive Studd	1. I think the second paragraph of 1.22 is too vague and weak. In relation to areas bounded by two LPA's, eg the Lower Teifi estuary, where turbines would potentially have significant impacts on Ceredigion receptors, it should be a requirement, not a vague suggestion that formal consultation and publicity occurs.	Whilst the local authority is required to consult all relevant authorities during the determination of applications once registered and can also follow this process for pre-application advice, this paragraph is aimed at developers, who have no such statutory requirement to do so. It is therefore encouraged as good practice. No change is required.
WT 4229/SPG/J13/2 Mr Clive Studd	para 1.22. 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.	As above.
WT 4229/SPG/J13/3 Mr Clive Studd	Reciprocal arrangements should be put in place for developments proposals within neighbouring LPA's.	In addition to the above, consultation arrangements are already in place between respective authorities. No

Ref	Comment	Officer Response
		change is required.
WT 4229/SPG/J13/4 Mr Clive Studd	2. I think the Table 4 Hub height < 15m criteria in the matrix should be changed so that the height is irrelevant where the area is sensitive. It is inaccurate to describe such developments as 'micro/domestic'. The recent proposal for a turbine at Trebared Farm, which is opposite the Moorings in St Dogmaels, had a hub height of just marginally less than 15m to avoid EIA, was for a farm and would have been placed in a field overlooking the Lower Teifi estuary and clearly visible for miles from the Coast Path and Park.	This table provides a guide to the level of information likely to be required and is not definitive. It will be at the officer's discretion on which level of information to require. Therefore in certain cases a turbine with a hub height less than 15m may warrant the level of information associated with the guidance for "Small" turbines. Whilst it is acknowledged that these turbines may not appear as "Micro/Domestic" in certain contexts, with regard to the different scales of turbine models available, this description is considered appropriate and consistent with other recognised guidance referred to in the Supplementary Planning Guidance. No change is required.
WT 4230/SPG/J13/1 Ms Sue Jackson	Having read the supplementary planning guidance above, I agree wholeheartedly with the methodology of your approach to the assessment of the cumulative impact of wind turbines. I understand this assessment is based on the cumulative impact in terms of landscape and visual amenity. However, I strongly believe that a third parameter should be included in the assessment, and that is the AUDITORY impact of wind turbine developments.	Whilst the noise impact of wind turbines does form a material planning consideration, which is given significant weight during the determination process, this guidance deals with cumulative visual impact and so for the purposes of this guidance, no change is required. ETSU guidance is available for the proper assessment of noise impact and is referred to by the Public Protection Department of Pembrokeshire County Council when providing consultation responses on wind turbine applications. No change is required.
WT 4230/SPG/J13/2 Ms Sue Jackson	The noise generated by even small scale wind turbines is significant even at low wind speeds when they are sited in areas which are normally tranquil with low natural background noise levels. The decibel level produced from a wind turbine at the height of the moving blades is notably greater than at ground level, and is transmitted a significant distance.	As above.
WT 4230/SPG/J13/3 Ms Sue Jackson	I live in the PCNP, close to a very picturesque wooded valley. A small-scale 15m-wind turbine has recently been erected outside the PCNPA boundary but only 0.4km away from	As above.

Ref	Comment	Officer Response
	<p>one of the woodland walks. Whilst the height of this wind turbine is below the threshold at which an Environmental Impact Assessment is mandatory, the auditory impact of this single turbine on the tranquility of the area is very significant. The woodland is very sheltered and even on an extremely windy day the area remains undisturbed by air turbulence. However, during high winds there are locations along the wooded valley where the noise from the turbine is very loud, sounding like a heavy goods train, which is quite at odds with the peace of the valley.</p>	
<p>WT 4230/SPG/J13/4 Ms Sue Jackson</p>	<p>This is an example where the visual and landscape impact of a single turbine is not significant, whereas the auditory impact is highly significant. The same can be extrapolated to the impact of several wind turbine developments and I urge you to consider including auditory impact as an additional parameter when assessing the cumulative impact of wind turbine development.</p>	<p>As above.</p>
<p>WT 4231/SPG/J13/1 Mr Colin Osborne</p>	<p>a. In general, this document seems a positive way forward.</p>	<p>Comments are noted. No change required.</p>
<p>WT 4231/SPG/J13/2 Mr Colin Osborne</p>	<p>b. It is important that it embraces three adjoining admin domains, as the very nature of turbine impact crosses county boundaries with disdain. My only sadness is that Ceredigion was not part of the same process, as much activity in north Pembrokeshire will impact Ceredigion, & vice versa.</p>	<p>Comments are noted. The final document together with the response to consultations will be forwarded to Carmarthenshire, Ceredigion and Pembrokeshire County Councils. No change required.</p>
<p>WT 4231/SPG/J13/3 Mr Colin Osborne</p>	<p>c. The joint document will much reduce the scope for different policies within a small geographic area. That is to be commended, as it provides us all with greater consistency.</p>	<p>Comments are noted. No change required.</p>
<p>WT 4231/SPG/J13/4 Mr Colin Osborne</p>	<p>d. I find the single most useful page to be P13 – i.e. the key objectives. It is important that these are unambiguous & not open to interpretation. I struggled with the layout & wording of this page, whereas the remainder of the document was clear (especially by the standards of planning documents).</p>	<p>Comments are noted. No change required.</p>

Ref	Comment	Officer Response
WT 4231/SPG/J13/5 Mr Colin Osborne	The document makes the point early on that it is designed to address a wide range of readers, including those who are not professional planners. I think it mainly succeeds, but the objectives page (Sections 2.14 & 2.15) would benefit from reformatting, & some internal rewording. Phrases such as "sensitive receptors" are not common currency outside planning circles. Words such as "stakeholders", "onlookers", etc would be rather more reassuring & familiar to the lay reader, who probably had no idea he/she was a receptor.....	A 'receptor, visual', is already defined in the glossary. However the following combined definition would provide additional clarity: Sensitive receptor: 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. 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. The glossary will be updated accordingly.
WT 4231/SPG/J13/6 Mr Colin Osborne	d. The objectives cover two main themes - within specific locations, & across locations (all, or more than one type). I believe it is much easier to immediately grasp the intention of the objectives if they are split in this way.	The comments made are noted. However the current text is considered to be adequate. The objectives move up the scale of acceptable landscape change from the National Park, to the Strategic Search Area, with more general points following. No change required.
WT 4231/SPG/J13/7 Mr Colin Osborne	e. I found the statement accompanying the National Park objective was of critical importance, yet tortuous. I suggest a rewrite to something closer to "The barriers to change in the National Park are likely to be high". The statement needs to be crystal clear as to its intent, & the threshold statement as worded may be that clear to planners, but I suggest less so to the broader audience.	Inserting words such as "barriers" may suggest a pre-determined ethos against wind turbine development by the authority, which should not be the case. The current text is considered to be appropriate. No change required.
WT 4231/SPG/J13/8 Mr Colin Osborne	f. The final objective re conjunction with other development is highly significant. By definition, it demands a more holistic consideration of the impacted area, & is much welcomed.	Whilst the comments are noted, this issue is considered to be adequately highlighted within the Supplementary Planning Guidance. Other non-renewable energy

Ref	Comment	Officer Response
	This objective does get some discussion within the overall document, but I get the impression is treated rather as an afterthought, when it should indeed have significant importance, especially in the context of visual impact. I do hope this criteria is also strengthened as a checklist item for single turbines.	developments, for example vertical structures such as large chimneys on dwellings, pylons etc should form part of the baseline landscape context within Cumulative Landscape Visual Impact Assessments. No change is required.
WT 4231/SPG/J13/9 Mr Colin Osborne	g. The Step by Step Guide flow chart on p26 defines the need to identify the search area. When this search area extends beyond the three signatory counties, I believe it is important to highlight the need to involve those adjacent administrations as part of the application process.	Comments made are noted and agreed. Neighbouring authorities are consulted on National Park applications and pre-application enquiries and vice versa. No change is required.
WT 4231/SPG/J13/10 Mr Colin Osborne	h. A developer in a recent application in North Pembrokeshire claimed the major impact of that turbine would be across the Teifi in Ceredigion, yet those sensitive receptors stated as most affected had no notification of the planned installation other than on yellow notices up farm tracks five miles away by road. We must be able to do better in an internet age.	Comments are noted. For the purposes of this Supplementary Planning Guidance no change is required.
WT 4231/SPG/J13/11 Mr Colin Osborne	Overall, a positive set of documents which will help us all. I attach a possible reformat of the key objectives sections. I hope you will agree that the modifications give a clearer map through the objectives, whilst in no way changing any of them. Please forgive the weird fonts -- trying to change a .pdf document isn't easy!	Comments are noted. No change required see response to comment (d).

Ref	Comment	Officer Response
	<p>Key Objectives</p> <p>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.</p> <p>2.15. The key objectives are defined :</p> <p style="padding-left: 40px;">a. By Location</p> <p style="padding-left: 40px;">b. Across Locations</p> <p>a1. <i>Within the National Park</i> - To maintain the integrity and quality of the landscape character</p> <ul style="list-style-type: none"> - No significant adverse change to its special qualities and sensitive characteristics from cumulative wind turbine development. The barriers to change in the National Park are likely to be high. <p>a2. <i>Within the TAN 8 [Brechfa] strategic search area</i></p> <ul style="list-style-type: none"> - To accept landscape change - Significant change in the landscape character permitted by wind turbine development. <p>a3. <i>In other landscapes outside the TAN8 strategic search area</i></p> <ul style="list-style-type: none"> - To maintain the landscape character - 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. <p>b1 • To avoid development which, in combination, creates the experience of a settlement⁵ being in a wind turbine landscape</p> <ul style="list-style-type: none"> - such as being surrounded by wind turbines on two or more sides. <p>b2 • To avoid development cumulatively creating significant adverse effects on stakeholders</p> <ul style="list-style-type: none"> - such as residents, users of recreational/tourism features such as the Wales/Pembrokeshire Coast Path and heritage sites. <p>b3 • To avoid turbines of markedly different designs or scales being located or viewed in juxtaposition with each other.</p> <p>b4 • To avoid significant adverse effects when viewed in conjunction with other types of development.</p> <p><small>⁵ To be read as a settlement in general terms, not as specifically defined in the Development Plans.</small></p>	
WT 4227/SPG/J13/1 Valero Energy Ltd	Thank you for this opportunity to respond to the Pembrokeshire Coast National Park Authority's public consultation on the Draft Supplementary Planning Guidance (SPG) to the Local Development Plan. As the owner and operator of	Comments are noted, no change is required.

Ref	Comment	Officer Response
	Pembroke Refinery - situated on the boundary of the national park - Valero is greatly interested in all developments concerning planning guidance in and around our area of operations.	
WT 4227/SPG/J13/2 Valero Energy Ltd	In particular, we welcome the opportunity to comment on the 'Cumulative Impact of Wind Turbines on Landscape and Visual Amenity guidance'. Valero welcomes this detailed assessment of the visual impact that renewable wind energy developments may have on the landscape of the national park, and we consider much of the guidance in this SPG to be of significance to the future development of the areas surrounding Pembroke Refinery.	Comments made are noted, no change is required.
WT 4227/SPG/J13/3 Valero Energy Ltd	However, before commenting on the specifics of this draft SPG, we would like to make a broader point concerning the importance of assessing visual amenity impacts alongside other key planning criteria. Whilst Valero recognises that visual amenity is a considerable factor in assessing wind turbine development, we nonetheless believe that it must not be the only contributing factor. Wider considerations of environmental costs and benefits, as well as socio-economic factors must all play a role in determining planning consent for potential renewable energy developments.	Planning Policy Wales, the Local Development Plan and Supplementary Planning Guidance should be read as a whole. National and local planning policy and guidance also deals with other socio-economic and wider environmental issues. These considerations are all taken into account during the determination of planning applications. As this Supplementary Planning Guidance seeks to deal specifically with the issue of cumulative visual impact, no change is required in this regard, although the Authority recognises the need to afford appropriate weight to other material planning considerations as mentioned.
WT 4227/SPG/J13/4 Valero Energy Ltd	On the specifics of the SPG, however, Valero's principal concern throughout the document remains the contextual interpretation of landscape character, and in particular the importance of recognising the industrial and energy-related character and heritage of the areas surrounding the oil and gas installations on the Milford Haven Waterway.	Comments are noted and a response is provided below.
WT 4227/SPG/J13/5 Valero Energy Ltd	According to the draft SPG, the factors that "contribute to the cumulative impact of wind turbine	Comments are noted and a response is provided below.

Ref	Comment	Officer Response
	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."	
WT 4227/SPG/J13/6 Valero Energy Ltd	Of these contributory factors, we are keen to stress the importance of the third point ('overall character of landscape') and fifth point ('way in which landscape is experienced') within the context of the Milford Haven Waterway's industrial landscape. Whilst we in no way dispute the cultural, historic and natural physical landscape of the Milford Haven Waterway area, and people's experiences of them, Valero nonetheless considers the Waterway's industrial and economic make-up to be a prime feature when interpreting the baseline landscape of the area. We would therefore welcome a greater emphasis in the SPG on the energy-related character of the current landscape on the Waterway, and suggest that planning proposals for visually significant developments (such as wind turbines) within or near the boundaries of the national park might find greater favour within this zone, as opposed to unspoilt or remote settings elsewhere within the Pembrokeshire Coast National Park area.	It is agreed that the Milford Haven Waterway represents a heavily industrialised landscape. The Authority's existing Landscape Character Assessment Supplementary Planning Guidance and Renewable Energy Supplementary Planning Guidance acknowledge the presence of the existing refineries and other industrial installations as visual detractors, specifically in relation to Landscape Character Areas 7 (Angle Peninsula) and 11 (Herbrandston). Within the Renewable Energy SPG Annex 2, LCAs 7 and 11, it is stated that there may be some scope to site medium to large scale turbines on land close to the refineries. It is expected that the existing industrial landscape character of this area will be acknowledged when describing the baseline position within Cumulative Landscape Visual Impact Assessments, as detailed within the Supplementary Planning Guidance, upon which potential additional impact from proposed developments will be assessed. As a result, no change is required.
WT 4227/SPG/J13/7 Valero Energy Ltd	However, the current SPG draft seems to suggest the opposite: that proposed wind energy developments, rather than be in keeping with the industrial landscape around the Milford Haven Waterway, may potentially lead to "a cluttered landscape/seascape of vertical elements." Valero believes that this description fails to	Planning Policy Wales, the Local Development Plan and Supplementary Planning Guidance should be read as a whole. National and local planning policy and guidance also deals with other socio-economic and wider environmental issues. These considerations are all taken into account during the determination of

Ref	Comment	Officer Response
	<p>appreciate or consider the socioeconomic significance of the energy sector surrounding the Milford Haven Waterway, and the potential for renewable energy development in this area.</p>	<p>planning applications. As this Supplementary Planning Guidance seeks to deal specifically with the issue of cumulative visual impact, no change is required in this regard, although the Authority recognises the need to afford appropriate weight to other material planning considerations as mentioned.</p>
<p>WT 4227/SPG/J13/8 Valero Energy Ltd</p>	<p>Valero believes the questions posed' in the draft SPG, concerning the cumulative effects of wind energy development alongside other types of development (defined as "large modern vertical elements", i.e. chimneys or pylons) cover the substance of the issues that need to be addressed by renewable energy planning proposals on pre-existing industrial landscapes. However, we are concerned there may be an inherent pessimism in the wording of the questions, and in the overall approach to such planning development proposals.</p>	<p>Comments are noted. It is however not considered that the text used is particularly pessimistic. Within paragraph 6.1 it is acknowledged that, due to an industrial baseline, further turbine development may be "in character". The following questions seek to clarify the tests to use in order to come to a conclusion in this respect.</p>
<p>WT 4227/SPG/J13/9 Valero Energy Ltd</p>	<p>Another example of this seeming presumption to maintain the <i>status quo</i> of landscape characteristics can be found in the draft SPG's statement that assessment of cumulative effects should be "informed by a series of assessments from representative and/or worst-case viewpoints" Valero agrees that individual planning proposals must be assessed according to a range of viewpoints. However, we would argue that whilst they should be measured with a focus on worst-case scenarios, there should also be as assessment of best-case scenarios as well.</p>	<p>The viewpoint analysis, wire lines and photomontages help inform site visits within the surrounding landscape, from which a wider and continuous assessment of visibility is conducted whilst. Assessments are not therefore constrained to the viewpoints provided and areas where the proposal is screened or causes no significant impact will be noted. It will be at the applicant's discretion whether they wish to provide viewpoints in addition to those agreed by the local authority to support their application. No change is required.</p>
<p>WT 4227/SPG/J13/10 Valero Energy Ltd</p>	<p>This draft SPG is concerned solely with renewable wind energy developments. Nonetheless, Valero believes that many of the arguments contained within could potentially apply to non-renewable developments with similar visual impacts as well. It is for this reason</p>	<p>Comments made are noted. No change is required.</p>

Ref	Comment	Officer Response
	that we have felt the need to engage with the Pembrokeshire Coast National Park Authority on this matter, and we look forward to any further discussions with the Authority that this correspondence might generate.	

1. Introduction and scope of guidance

- 1.1. The Pembrokeshire Coast National Park Authority has adopted the Pembrokeshire Coast National Park Local Development Plan (September 2010). This supplementary planning provides more detailed guidance on the way in which the Local Development Plan policy (in particular, Policy 33 Renewable Energy) is applied. Paragraph 5.7.1, of Planning Policy Wales 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 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.
- 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 Assembly 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

~~1.3.~~

~~1.4.1.3.~~ This document was prepared by three local planning authorities (Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Carmarthenshire County Council) to assessing the cumulative impact of onshore wind turbines on landscape and visual amenity in Pembrokeshire and Carmarthenshire. The guidance² is intended to be used for development management purposes by developers, consultants and planning officers.

~~1.5.1.4.~~ The document focuses on cumulative impact issues and should be read in conjunction with other national and local policies (see 1.19 and **Appendix A**) and guidance on landscape, seascape and visual impact assessment (LVIA).

~~1.6.1.5.~~ It is structured so that the background context and objectives are

¹ Page 27 <http://www.wlga.gov.uk/publications-and-consultation-responses-imp/planning-handbook-a-guide-for-local-authority-members/>

² Supplementary planning guidance in Carmarthenshire and Pembrokeshire Coast National Park and practice guidance in Pembrokeshire

set out in **Part A** (Sections 1-6) and **Appendix A- Section 10** and the step by step guide, tools and checklists set out in **Part B** (Sections 7-9).

Environmental Impact Assessment requirements in relation to cumulative effects

~~1.7.1.6.~~ 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 ~~2011~~1999³, consolidate previous regulations and set out the current requirements for meeting European Directive 85/337/EEC.

~~1.8.1.7.~~ 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)).

~~1.9.1.8.~~ ~~Below this threshold, EIA is not mandatory but the Local Planning Authorities will provide a 'screening opinion' if requested~~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

.....'

~~1.10.1.9.~~ 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)

~~1.11.1.10.~~ Circular 02/99, which provides guidance on the Regulations, states:

'in judging.... the effects of a development....local planning authorities should always have regard to the possible cumulative effects with any existing or approved development' (paragraph 46).

Definition of cumulative impact

~~1.12.1.11.~~ For the purposes of this guidance the following definition of

³ SI No. ~~482~~40293

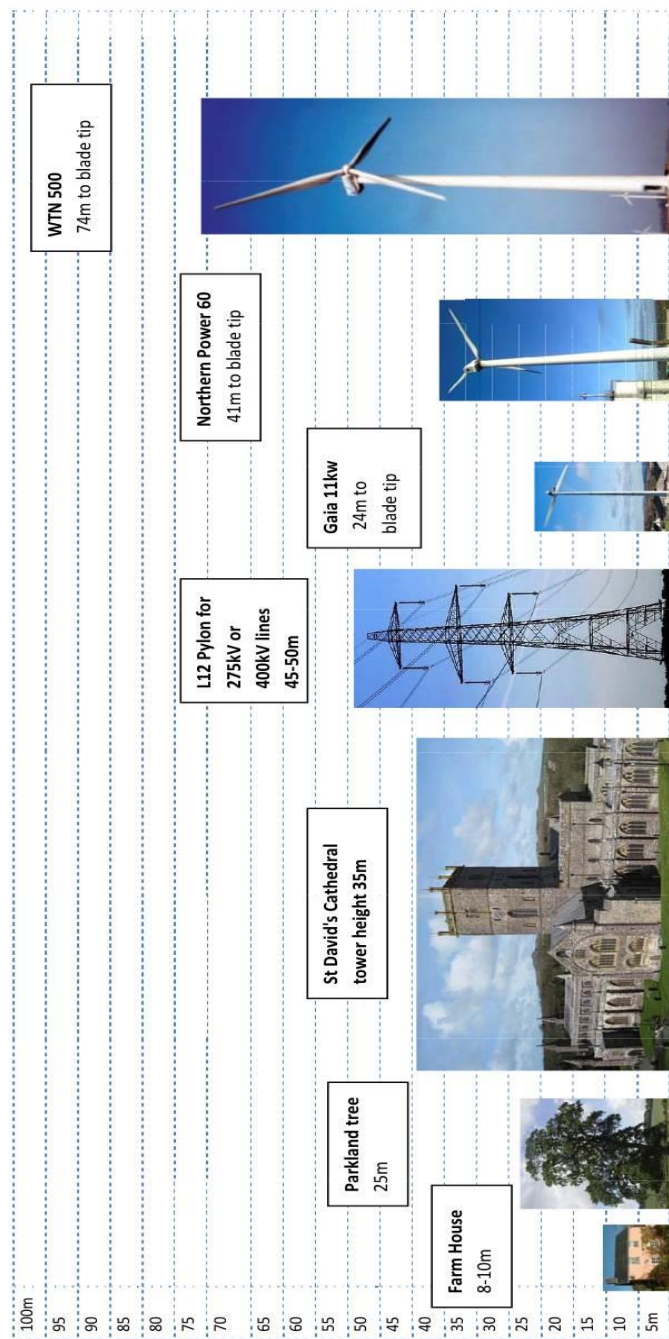


Figure 2: Turbine types and size comparison - small to medium sized turbines

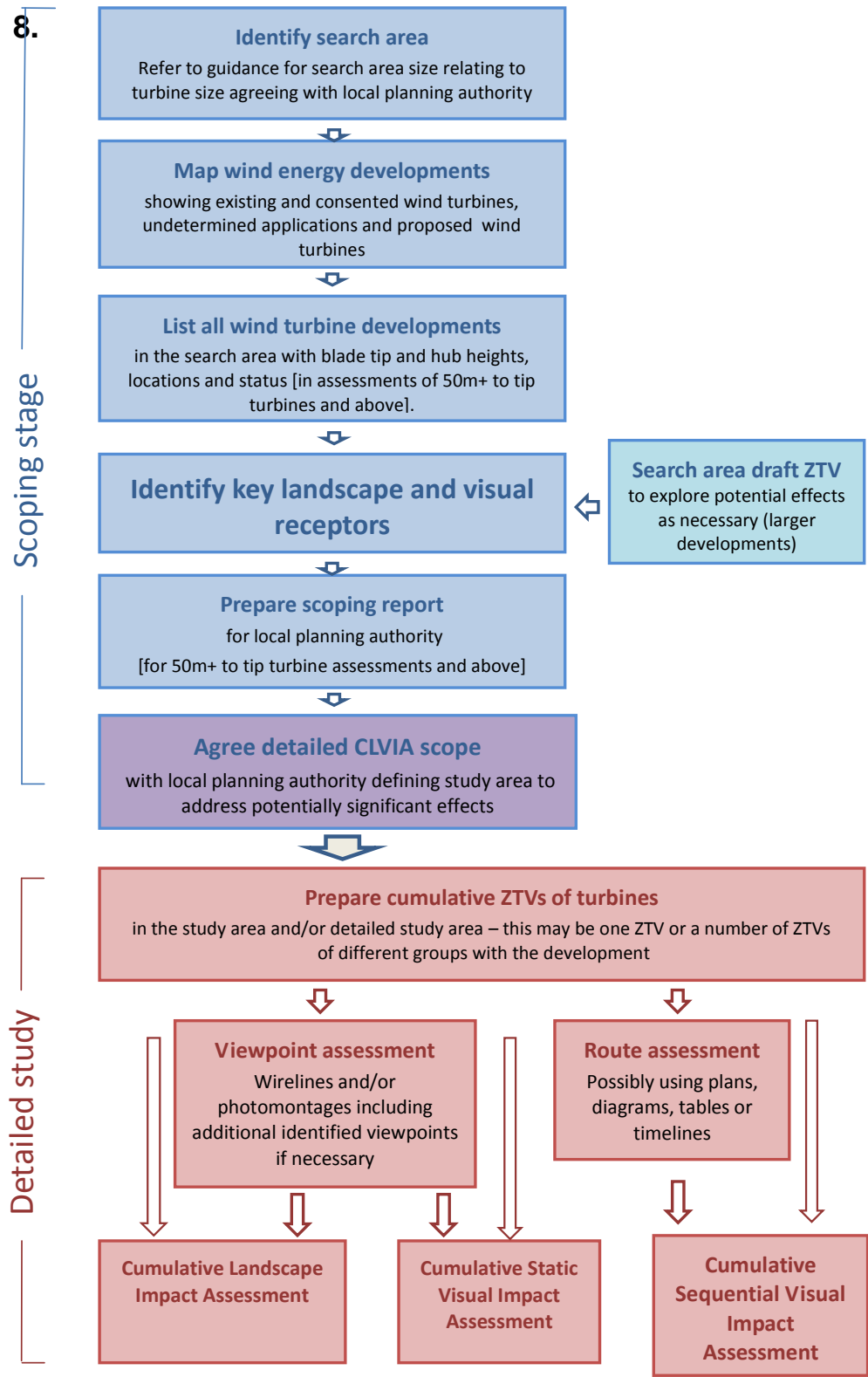


Figure 3: Turbine types and size comparison - medium large sized turbines

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Figure 5 Flow chart of process



Comment [RJ1]: Table has been amended

Table 4 Cumulative impact assessment information requirements for turbine size ranges

Turbine size	Height range to blade tip [m]** <i>unless otherwise stated</i>	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"> In the information supporting the planning application, (eg 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.
Small	above 15m hub height- 35m	10	<p>Agree with LPA:</p> <ul style="list-style-type: none"> 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 (see 8.7). Define key landscape and visual receptors that may undergo significant cumulative effects in the scoping area. Define detailed study area focusing on where significant cumulative effects may be possible. Define if ZTV is necessary Define a limited number of viewpoints for assessment and if wirelines are necessary- say 2 unless in sensitive area 	5	<ul style="list-style-type: none"> Prepare a cumulative ZTV of all turbines in study area if necessary (see 8.8-8.12). Prepare wirelines from key viewpoints if necessary (see 8.13). Provide a brief assessment of combined and additional cumulative landscape effects (see Section 3.0) concentrating mainly on interaction with closest turbines eg 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? Provide a brief assessment of combined and additional cumulative visual 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 effect and does the proposed turbine with others meet the objectives for the area

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10. Planning context and background

- 10.1. 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

- 10.2. Under the Planning Act 2008, the National Policy Statements EN-1 and EN-3 for Renewable Energy Infrastructure July 2011 applies to nationally significant onshore wind turbine developments in England and Wales i.e. above 50MW output. This forms the primary basis for decisions by the National Infrastructure Directorate which is part of the Planning Inspectorate. Planning authorities are only statutory consultees in relation to these developments.
- 10.3. The only location for such developments in the current planning framework in Wales are the Strategic Search Areas (SSAs) defined by TAN8 which includes Strategic Search Area G in Carmarthenshire (see below).
- 10.4. **Planning Policy Wales** Edition 5 November 2012 (PPW) sets out the land use planning policies of the Welsh Government. It states that renewable energy projects should generally be supported by local planning authorities. However, it also states that in determining applications LOCAL PLANNING AUTHORITYs should take into account:

'the impact on natural heritage, the coast and the historic environment....

-the need to minimise impacts on local communities, to safeguard the quality of life for existing and future generations;

-ways to avoid, mitigate or compensate identified adverse impacts,

-grid connection issues where renewable (electricity) energy developments are proposed.....' (12.10)

- 10.5. **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

- 10.6. 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

potential for them in the Park:

'On wind energy developments: there is potential for small-scale proposals (10 kW-50 kW) and to a lesser degree medium scale proposals (50 kW -330 kW). Finally, there are extremely limited opportunities from large-scale proposals (> 330 kW-3 MW).' (4.148 f).

10.12. A Landscape Character Assessment SPG for Pembrokeshire Coast National Park was completed in 2006 and updated in 2011. 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.

~~10.12.~~**10.13.** "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, referred to in paragraph 5.6. 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."

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~~10.13.~~**10.14.** The Pembrokeshire Coast National Park Authority **Renewable Energy SPG 2011** supports the positive implementation of Policy 33. Turbines are classified in four sizes to blade tip 'to reflect the landscape sensitivities' of Pembrokeshire Coast National Park- Large- 65-125m; 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. These should be taken into consideration in any CLVIA where the landscape impact assessment study area includes the National Park.

~~10.14.~~**10.15.** 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...

Pembrokeshire County Council Policies

~~10.15.~~**10.16.** Pembrokeshire County Council adopted their Local Development Plan covering the county excluding the Pembrokeshire Coast National Park

APPENDIX B

Rationale for recommended areas for cumulative assessment search and study

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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, 2006 (which is soon to be updated) puts forward recommended ZTV distances as follows [p34]:

Table 2: recommended distance of ZTV	
Height of turbines including rotors (m)	Recommended ZTV distance from nearest turbine or outer circle of windfarm (km)
up to 50	15
51-70	20
71-85	25
86-100	30
101-130*	35*

These figures are based on recommendations within 'Visual Assessment of Windfarms: Best Practice' (University of Newcastle, 2002). * This category was recommended by the late John Benson, based on experience and extrapolation of evidence presented within the publication cited above.

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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 LVIA's 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.

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Appendix CD: Glossary of landscape, seascape and visual terms

Term	Definition
Amenity Planting	planting to provide environmental benefit such as decorative or screen planting.
Analysis	the process of dividing up the seascape/landscape into its component parts to gain a better understanding of it.
Ancient Woodland	land continuously wooded since AD 1600. It is an extremely valuable ecological resource, usually with a high diversity of flora and fauna.
Apparent	object visible in the seascape/landscape.
Approach	the step-by-step process by which seascape/landscape assessment is undertaken.
Arable	land used for growing crops other than grass or woody species.
Aspect	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.
Aspect area	areas defined in each of the LANDMAP aspect assessments which are mutually exclusive
Assessment	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.
Biodiversity	the variety of life including all the different habitats and species in the world.
Character	see landscape/seascape character.
Characteristics	elements, features and qualities which make a particular contribution to distinctive character. *
Characterisation	the process of identifying areas of similar character, classifying and mapping them and describing their character. *
Classification	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.*
<u>CLVIA Scoping assessment</u>	<u>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.</u>
Compensation	the measures taken to offset or compensate for adverse effects that cannot be mitigated, or for which mitigation cannot entirely eliminate adverse effects.
Combined visibility and effects	the observer is able to see two or more developments from one viewpoint. This divided into 'in combination'- several wind turbine developments are within the observer's arc of vision at

Mitigation	measures including any process, activity or design to avoid, reduce or remedy adverse effects of a development proposal. It does not include compensation.
Term	Definition
Mixed Farmland	a combination of arable and pastoral farmland
Mosaic	mix of different landcovers at a fine grain such as woodland, pasture and heath.
Objective	method of assessment in which personal feelings and opinions do not influence characterisation or judgements.
Perceived effects	The perceptions of the impact on the landscape by people who <i>know</i> of other developments even when they cannot see them.
Physiography	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.
Polygon	discrete digitised area in a geographic information system(GIS).
Prominent	noticeable feature or pattern in the landscape.
Protect	to keep from harm.
Qualities	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.
Receptor, visual	people in different situations who can experience views within an area and who may be affected by change or development. Receptors can include users of public rights of way, open access land, people in and around their own homes and tourists.
Receptor, seascape/landscape	seascape/landscape character areas, designations, elements or features which may be affected by development.
Remoteness	physical isolation, removal from the presence of people, infrastructure (roads and railways, ferry and shipping routes) and settlement and noise.
Renewable Energy	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.
Resource	see landscape resource.
Sensory	that which is received through the senses i.e. sight, hearing, smell, touch.
Scenic quality	seascape/landscape with scenes of a picturesque quality with aesthetically pleasing elements in composition (<i>derived from LANDMAP visual and sensory aspect</i>).
<u>Scoping assessment</u>	<u>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.</u>

	<u>(source: GLVIA3). See also CLVIA scoping assessment.</u>
Semi-natural vegetation	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.
Term	Definition
<u>Sensitive receptor</u>	<u>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.</u> <u>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.</u>
<u>Sensory</u>	<u>that which is received through the senses i.e. sight, hearing, smell, touch.</u>
Sense Of Place	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
Sequential cumulative visual effects	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.
Setting, of a heritage asset	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.
Significance/ significant effect	in environmental impact assessment- the importance of an effect. A significant effect needs to be taken into account in decision-making.
Subjective	method of assessment in which personal views and reaction are used in the characterisation process.
Topography	term used to describe the geological features of the Earth's surface e.g. mountains, hills, valleys, plains.
Unity	consistency of pattern over a wide area i.e. the repetition of similar elements, balance and proportion, scale and enclosure.
Value	see landscape value
Viewing distance	The distance between the eye and an image/visualisation of a development.

Appendix 2 – Draft Supplementary Planning Guidance – Seascape Character Assessment – Comments Received and Officer Response

Ref	Comment	Officer Response
SCA 176/SPG/J13 Brecon Beacons NPA	The Authority is supportive of the contents of this draft SPG and has no further comments to make.	Noted, support welcomed.
SCA 2046/SPG/J13/1 Network Rail	<p>On specific matters, clearly our interest is to protect the physical railway infrastructure and we need to be satisfied that there will be no adverse safety issues arising as a result of the development to users of the railway.</p> <p>We would have serious reservations if during the construction or operation of any sites, abnormal loads will use routes that include Network Rail assets (e.g. Level Crossings, Bridges etc). Network Rail would request that contact is made with our Asset Protection Engineers email AssetProtectionWales@networkrail.co.uk to confirm if any proposed route is viable and to agree a strategy to protect our asset(s) from any potential damage caused by abnormal loads. I would also advise that where any damage, injury or delay to the rail network is caused by abnormal load (related to the application site), the applicant or developer will incur full liability.</p> <p>Any proposal that includes as part of the remit the installation of cables under or over the railway to facilitate any works on site or any methods of electricity transmissions across Network Rail's land would be objected to pending negotiation/consents/agreements with our National Business Team.</p>	<p>Whilst not directly related to the seascape character assessment, the issues raised would form material planning considerations that would be taken into account at pre-application and application stage where relevant to the proposal. In these cases, it is agreed that Network Rail should be consulted during the determination of the application or when giving pre-application advice. However, as this document relates solely to seascape character assessment, it is not considered appropriate to give reference to the issues raised. No change recommended.</p>
SCA 2046/SPG/J13/2 Network Rail	Network Rail would need to be consulted on any planning application submitted as our primary concern is the safety of the operational railway.	See above (response to SCA 2046/SPG/J13/1). No change recommended.
SCA 3457/SPG/J13/1 Friends of Pembs Coast National Park	We congratulate the NPA on the preparation of this ground-breaking piece of work – certainly a first in Wales if not the UK. However, most importantly, it represents an important step in making the connection between land and sea and, in the context of the National Park, of the recognition that it has a fundamental relationship with the marine environment.	Noted, support welcomed.
SCA 3457/SPG/J13/2 Friends of Pembs Coast National Park	Understanding the character of the marine environment associated with the Park is an important part of the process of ensuring the conservation of all of its special qualities whether derived from the land or the sea or	Noted. No change required.

Ref	Comment	Officer Response
	from its association with it.	
SCA 1092/SPG/J13/1 Bourne Leisure	<p>Both Kiln Park and Lydstep Beach Holiday Village are located along the coast and form an integral component of the local seascape. It is therefore important that the draft SPG specifically acknowledges opportunities to minimise the visual impact existing holiday parks present to the wider landscape by way of enabling development.</p> <p>Seascape Character Assessment No.38 Lydstep Haven Coastal Waters</p> <p>The character assessment describes Lydstep Haven Coastal Waters as: <i>"From the water the most apparent features are Lydstep Point, Giltar Point, St Margarets Island and the caravan park at Lydstep. This is the only significant intrusion in this coast appearing as an organised block and sweep of white static caravans Climbing from the beach to the cliff tops albeit framed by surrounding woodland."</i></p> <p>The above character assessment reflects the wider trend of existing holiday parks being usually located along the coast in order to take advantage of the exceptional natural environment i.e. the 'visitor attraction'. It is also important to recognise that tourism, including existing holiday parks are a significant contributor to the local and regional economy. Indeed, paragraph 4.158 of the adopted Pembrokeshire Local Development Plan (LDP) states that <i>"tourism is a dominant factor in Pembrokeshire's economy"</i>.</p> <p>The Company considers that the draft SPG should therefore recognise the need to expand holiday parks, including the provision of additional units, in order to finance improvements to the layout, landscaping and facilities of the park. Bourne Leisure therefore considers that the draft SPG should specifically support and encourage further development proposals at existing holiday parks which can deliver improvements in the range and quality of accommodation and facilities on site and result in permanent and significant improvements to the layout and appearance of the site and its setting in the surrounding landscape.</p>	<p>The draft SPG provides more detailed guidance on the way in which the Local Development Plan policies (in particular, Policy 8 Special Qualities and Policy 15 Conservation of the Pembrokeshire Coast National Park) are applied. Paragraph 5.7.1, of Planning Policy Wales advises that local planning authorities need to consider both landward and seaward pressures and the impacts of these pressures. Other policies in the Local Development Plan clearly set out the Authority's adopted policy position on Holiday Parks. Any change to this position will need to be considered when the Plan is reviewed or superseded.</p> <p>No change is recommended.</p>
SCA 1092/SPG/J13/2 Bourne Leisure	<p>Seascape Character Assessment No. 39: Tenby and Caldey Island</p> <p>Kiln Park is located further inland than Lydstep</p>	<p>The draft SPG provides more detailed guidance on the way in which the Local Development Plan policies (in</p>

Ref	Comment	Officer Response
	<p>Beach Holiday Village and therefore does not feature in the Seascape Character Assessment. However given its location immediately north of Tenby Golf Course which sits alongside the coast, Bourne Leisure believes that Kiln Park is also an important contributor to the local seascape. As set out above, the Company considers that the draft SPG should specifically support and encourage further development proposals at existing holiday parks which can result in permanent and significant improvements to the layout and appearance of the site and its setting in the surrounding landscape.</p>	<p>particular, Policy 8 Special Qualities and Policy 15 Conservation of the Pembrokeshire Coast National Park) are applied. Paragraph 5.7.1, of Planning Policy Wales advises that local planning authorities need to consider both landward and seaward pressures and the impacts of these pressures. Other policies in the Local Development Plan clearly set out the Authority's adopted policy position on Holiday Parks. Any change to this position will need to be considered when the Plan is reviewed or superseded.</p> <p>No change is recommended.</p>
SCA 2897/SPG/J13/1 Marloes and St Brides Community Council	<p>Ref Area 23:</p> <p>1. Under "Cultural Influences" It would be nice to have our community correctly named!</p>	<p>Agree. Replace 'Marloes and Brides' with "Marloes and St. Brides" where necessary.</p>
SCA 2897/SPG/J13/2 Marloes and St Brides Community Council	<p>2. Under "Key sensitivities": They cannot claim that there is a lack of light pollution. The eastern hemisphere of the Marloes night sky is very badly compromised by light pollution, most particularly from the Murco refinery.</p>	<p>Amend to reflect need to reduce existing light pollution where possible and to prevent additional light pollution.</p>
SCA 2897/SPG/J13/3 Marloes and St Brides Community Council	<p>Ref Area 25:</p> <p>1. Under "Cultural Influences" Again, it would be nice to have our community correctly named!</p>	<p>Agree. Replace 'Marloes and Brides' with "Marloes and St. Brides" where necessary.</p>
SCA 2897/SPG/J13/4 Marloes and St Brides Community Council	<p>2. Under "Forces for Change" The comment "Generally low erosion of coastal cliffs" is only true north of Albion Bay. Apparently in common with other locations near the Ritec Fault, there are numerous fresh cliff slips all along Marloes Sands.</p>	<p>Noted. Amend text to reflect the differing erosion rates either side of Albion Bay.</p>
SCA 2897/SPG/J13/5 Marloes and St Brides Community Council	<p>Also, re "Factors detracting from sensitivity", please add "Light pollution from Milford Haven waterway oil and gas facilities". N.B. as well as spoiling the visitor experience, it is reported that this light pollution helps gulls on Skomer to attack night-flying seabirds such as shearwaters, compromising their breeding &</p>	<p>Noted. Amend text to include reference to light pollution from Milford Haven waterway oil and gas facilities.</p>

Ref	Comment	Officer Response
	survival rates.	
SCA 2897/SPG/J13/6 Marloes and St Brides Community Council	3. Under "Aesthetic, perceptual and experiential qualities". Please delete "The peninsula hinterland is smooth and bleak with no trees..." and insert "The peninsula hinterland is smooth and bleak with few trees".	Noted. Amend text to read "The peninsula hinterland is smooth and bleak with few trees". Also, for consistency, amend 'Forces for Change' to read "Any development pressure in Marloes would be likely to be prominent in an open landscape with few trees."
SCA 2660/SPG/J13/1 Chartered Institution of Wastes Management	CIWM Cymru Wales would like to be in a position to respond to this and all similar documents, however we do not normally comment on these, as the plans cover all aspects of landuse planning. There may be occasions when we will respond when the policies being changed refer to waste. Unfortunately in this instance we are not able to respond. Please continue to send similar documents to CIWM Cymru Wales, these are of interest to members and will be logged accordingly.	Noted. No change is required.
SCA 4231/SPG/J13/1 Mr Colin Osborne	The Seascape Assessments are interesting. The narrative within them does have a flavour of being heavily accented by the views of the compiler, rather than from a more representative stakeholder mix. For example, in the Teifi Estuary document, facilities such as hotels & the boat club are classed as dis-benefits, whereas to residents, visitors & the local economy they are important assets as the primary wealth generators in the area.	A number of different contributors input to the draft SPG, and the consultation period was intended to seek a range of stakeholders' views. The draft SPG refers to the significant contribution that Seascape Character Area (SCA) 1, <i>Teifi Estuary</i> , makes towards leisure and recreational services (section 1-4). Recreational use, visitor volumes, housing, caravans and roads are identified as "factors detracting from sensitivity". This is not intended to imply that they are disbenefits, merely that their presence decreases seascape sensitivity to change relative to that of a (for example) undeveloped seascape. No change is proposed.

Ref	Comment	Officer Response
SCA 4231/SPG/J13/2 Mr Colin Osborne	There are inaccurate & judgemental factual statements which cause one to doubt the veracity of the documents. For example, in the Cardigan Island document there is significant debate about the wreck on the SS Herefordshire, of which there has been no sign for the 25 years I've lived here. Other examples are claims of detrimental military activity in areas where no resident would recognise the validity of such claims, other than the rare overflight found anywhere in the UK.	<p>The draft SPG for SCA 2, <i>Cardigan Island to Cemaes Head</i>, refers to the wreck of the <i>Herefordshire</i>, which came to grief in 1934. While fairly intact in the late 1960s, with the boilers and machinery in situ, the wreck is now supposed to be well broken up. This appears to be compatible with the interesting observation made.</p> <p>While military activity is noted as a regular or intermittent factor affecting various Seascape Character areas, it is only cited as a factor detracting from sensitivity in three areas: SCA 2, <i>Cardigan Island to Cemaes Head</i> (primarily due to MoD Aberporth) SCA 35, <i>Castlemartin coastal waters</i> (primarily due to Castlemartin Training Areas and Ranges) SCA 38, <i>Lydstep Haven coastal waters</i> (primarily due to Air Defence Range Manorbier and Penally Training Camp firing range).</p> <p>No change is proposed.</p>
SCA 4231/SPG/J13/3 Mr Colin Osborne	Overall, a positive set of documents which will help us all.	Noted and welcomed. No change proposed.
SCA 1633/SPG/J13/1 Natural Resources Wales (NRW)	Natural Resources Wales (NRW) very much welcomes the development of this supplementary planning guidance (SPG). You will of course be aware that one of our predecessor bodies, Countryside Council for Wales, was involved in the steering group taking this work forwards. We therefore have no specific detailed comments but rather, would like to make some more general points below:	Noted and welcomed. No change proposed.
SCA 1633/SPG/J13/2 Natural Resources Wales (NRW)	We believe that this SPG recognises the importance of the seascapes of Pembrokeshire to development planning. NRW believes that this SPG shows the link this work makes between land and sea issues affecting coastal landscapes. The SPG also recognises	Noted and welcomed. No change proposed.

Ref	Comment	Officer Response
	the importance of landscapes as an integrating concept between people and place (and in this instance, coastal and marine places).	
SCA 1633/SPG/J13/3 Natural Resources Wales (NRW)	Going forwards, NRW can see the potential this work has for spatialising and framing future, more locally detailed, community scale studies that recognise and promote what people value and why (the cultural benefits and services) about their local seascape.	Noted and welcomed. No change proposed.

Summary Description
A west facing red mudstone and sandstone coastline on the southern edge of St Brides Bay with generally low cliffs with a broken and jagged rocky shoreline and small beaches at St Brides Haven and Musselwick Sands. This open coast of mixed farming is generally sparsely settled and remote with key buildings being a small Norman parish church and St Bride's Castle, now a hotel.
Key Characteristics
<ul style="list-style-type: none"> • Jagged and broken low mudstone and sandstone cliffs • Inland plateau with rectilinear fields of pasture and arable • No good anchorages, but kayak launch point and diving location at St Brides Haven • The coastal path runs along the cliff edge but otherwise the coast is fairly inaccessible. • A remote seascape with a few farmsteads and a hotel. • Wide views out to sea and westwards to Skomer Island and to tankers anchored in St Bride's Bay.
Physical Influences
<p>This coastal headland in east-west striking Devonian (Raglan Formation and St Maughan's Formation) is composed of crumbling red mudstones and sandstones. Submerged rocks and rocky fingers flank the low coastal cliffs which average 20m in height although in one place rises to 50m. The intertidal areas are predominantly exposed rocky shores (93%), with caves and minor sandy beaches, the main one of which is St Bride's Haven and Musselwick to the south. Wind and wave erosion take place through abrasion, attrition and hydraulic action.</p> <p>A shallow (<20m, gently northwest sloping (<1°) sandy sea floor covers the red beds. Seas are exposed to high wave stress. The main tidal currents set north and south across the outer St Brides Bay and an eddy creates a tidal stream that runs west from Goulthrop Roads to St Brides Haven for over 9 hours. The tidal range is ~6m.</p> <p>The cliff edge vegetation is semi-natural with coastal grasses and bracken but is of limited width, with fields coming close to the cliff edge. Inland is a gently rolling landscape, rising to 60m AOD, which is both pasture and arable, including potato cropping. The field pattern tends to be formal/rectilinear near the coast with hedgebanks and few trees. There are some stream courses and ponds with associated natural vegetation, and a belt of mature deciduous woodland associated with the historic landscape of St Brides.</p>
Cultural influences
<p>Mesolithic and possibly later material has been recovered from Nab Head. There are several defended coastal sites within this character area, such as Tower Point rath, which consists of triple banks with intermediate ditches, having a central causeway entrance, defining a cliff-top promontory.</p> <p>The wreck of the <i>Englishman</i> schooner is visible in St Bride's Bay. It ran ashore near Musselwick on 5 May 1933. Talbenny airfield opened on 1 May 1942 as 19 Group Coastal Command station and is still apparent, though unused.</p> <p>Scheduled monuments include:</p> <ul style="list-style-type: none"> • PE281 (Tower Point rath promontory fort): community: Marloes and St. Brides • PE537 (Castle Head promontory fort): community: Marloes and St. Brides <p>The name St Bride's Bay indicates a link with St Bridget of Kildare. The artist, John Piper painted 'St Brides Bay' from St Brides.</p> <p>Kayaking is popular around the coast as is angling from both the shore and boat, especially close to nearby Stack Rocks and the Hen & Chicks. There is a beach and slipway with adjacent car park at St Bride's with a church behind and St Bride's Castle close by. This is the only vehicular access to the coast. Musselwick Sands are accessed from the Coast Path with steps cut into the rock. The clear water in the area means it is a good diving spot, with divers and kayakers</p>

Forces for change								
Summary		Key forces for change						
<p>Generally low erosion of rocky cliffs. Shoreline management plan states ‘do nothing’.</p> <p>Intensification of agriculture could lead to changes in field pattern and field boundaries.</p> <p>Car park at St Brides Haven may enable intensification of visitor use.</p> <p>Round 24 Oil and Gas licence area may result in exploration and subsequent extraction with associated effects.</p>	Special Qualities	Natural processes/ climate change	Visitor pressure	Marine use- commercial and fishing	Offshore energy or minerals	Development pressure	Land management changes	MOD use
	Coastal Splendour							
	Islands							
	Diversity of Landscape							
	Remoteness, Tranquillity and Wilderness							
	Diverse Geology							
	Richness of Habitats and Biodiversity							
	Rich Archaeology							
	Distinctive Settlement Character							
	Cultural Heritage							
	Accessing the Park							
	Space to Breathe							
	Key		Change occurring in the area affecting the selected special quality					
Key sensitivities								
Factors making the area more sensitive				Factors making the area less sensitive				
<p>Natural character and wildness of sea edge.</p> <p><u>Sensitivity to further</u> Lack of light pollution.</p> <p>Historic setting at St Brides Haven.</p> <p>Open views over the bay and from the bay to the cliffs and cliff top.</p> <p>Pembrokeshire Coast Path as a sensitive receptor.</p>				<p>More intensive agriculture.</p>				

exposed to high wave stress from the south west and tidal currents. Tidal currents set north and south through Jack Sound and to the west of Skomer. Tidal flow is <6 knots in Jack Sound, where there are rough waters and tidal rips. West of Skomer, tidal flow is <4 knots, and waters are rough to the west and north (Garland Stones) of the island. The tidal range at Martin's Haven is 6.9m.

Skomer Island and its surrounding seas are a Marine Nature Reserve with a rich biodiversity and several species at their northern or southern-most limits. The wildlife is abundant including puffins, auks, manx shearwaters, storm petrels, seals, dolphins and porpoises. Skomer is a national nature reserve, an SPA, SSSI, an important bird area and the waters lie within Pembrokeshire Marine SAC, and much research takes place on and around the island. The interior of Skomer Island the island is covered with extensive areas of bracken with bluebells and red campion giving way to thrift and sea campion on the coastal slopes.

There is a HPM CZ proposed which roughly follows the MNR boundary but extends further east to include Gateholm and Marloes Sands. The important habitats include sponge and anthozoan communities on sub tidal rocks, Ross 'coral' and seagrass beds.

The peninsula is predominantly arable in a rectilinear field pattern. An area of raised wetland mere is managed for waterfowl. The Deer Park is an area of semi-natural heathland.

Cultural influences

Skomer Island is an island on the western seaways whose Norse name makes clear its connections with the Viking polity of Scandinavia, Britain and Ireland. Lying just off the south Pembrokeshire coast, it shows human activity in a closed microcosm, with extensive, well-preserved, relict remains of prehistoric settlements, field systems and recent farming activity- the farmhouse was inhabited until 1948. The island was used for pasturage in recent centuries, possibly reflected in the ramp near the Lantern natural arch. There are two large 19th century lime-kilns on the island. Skomer Island ranks among the finest archaeological landscapes in Britain.

SAMs include:

- PE180 (hut circle settlement): community: Marloes and [St. Brides](#) (partly in SCA26)
- PE181 (hut groups, cairns and cliff castle): community: Marloes and [St. Brides](#)
- PE194 (promontory fort): community: Marloes and [St. Brides](#)
- PE323 (promontory fort): community: Marloes and [St. Brides](#)
- PE566 (airfield): community: Marloes and [St. Brides](#) (partly in SCA26 and SCA31)

There are a number of wrecks especially clustered around Jack Sound which indicate the potentially treacherous nature of the waters and are dangerous themselves. Some, like the Lonsdale and Molesey have been sighted by divers.

This area lies within the Skomer Island Landscape of Outstanding Historic Interest.

The Norse name 'Skomer', as with Ramsey and Skokholm, indicates its Norse links- it refers to the cloven shape of the island. The Prehistoric 'Harold Stone' is said by Giraldus Cambrensis to have been erected by Earl Harold to commemorate his victory over the Welsh in 1063. The Deer Park on the tip of the peninsula takes its name from a failed attempt to establish a deer park at the turn of the 20th century.

Motor and sailing cruisers, along with motorised day boats come out from the Milford Haven Waterway to visit the Skomer Island and anchor. It forms part of a heavily used coastal cruising route linking Milford north across St Brides Bay and west to Ireland. Navigation through the channel between Skomer and the Deer Park, The Jack Sounds, is particularly hazardous. Diving is popular in this area as there are many wrecks and the waters are rich in wildlife and other fauna. Sea angling from the rocks on Marloes headland and from boats is popular as is inshore potting. Kayaks and day boats launch from Martins Haven which also offers swinging moorings for inshore fishing boats, research vessels and private craft. A temporary anchorage at South Haven is good in northerly winds.

Skomer Island is extremely popular with tourists who take the boat from the landing stage at Martin's Haven out to the island. The boat runs from 10am and starts bringing visitors back from 3pm - total number of visitors allowed on the island at any one time is 250 for conservation

reasons. Fishing in the area is restricted by the MNR but could include set nets and lobster and crab potting.

A minor road runs along the spine of Marloes peninsula through the isolated settlement of Marloes as far as a car park close the St Martin's Haven where boat trips depart for Skomer. On the peninsula, overlooking Skomer, is the Deer Park which is popular for walking and wildlife watching as is the Pembrokeshire Coast Path. There is a coastguard lookout here. Climbing takes place on the cliffs of the Deer Park, especially at Wooltack Point. Marloes is a good beach with associated beach activities, especially popular when the wind is from the north. The beach is also used for fossil hunting. Marloes Mere is a birdwatching hotspot attracting a large number of waterfowl in winter.

There are several camp and caravan sites in the area but these tend to avoid permanent caravans. A disused airfield lies south of Marloes.

The Deer Park and some land in the peninsula is owned and managed by the National Trust and Skomer is managed by the Wildlife Trust of South and West Wales.

Passing ferries to Ireland from Pembroke Dock and oil tankers and other freight ships for the terminals and the power station in Milford Haven can be viewed at a distance.

Aesthetic, perceptual and experiential qualities

The island and end of the peninsula have a highly exposed and wild character and feel very large scale and open. The cliffs and rock shores, islets and rocks are dramatic, jagged and angular. At sea the character is dominated by the disturbed water and tidal races and the rocky shores and cliffs adjacent with associated seabirds. There are wide views to the sea and islands from the peninsula. There are strong sea smells and wind exposure in most places, with crashing noise of waves in rough seas. Marloes Sands is a popular beach and can feel sheltered. Tranquillity can be reduced in summer. However, overall there is a high degree of naturalness, remoteness and tranquillity along the coast and the islands.

The peninsula hinterland is smooth and bleak with ~~no~~^{few} trees and low hedgerows or walls. The settlement of Marloes feels isolated and exposed.

Cultural benefits and services

The area contributes significantly towards leisure and recreational services in the form of wildlife watching, walking and beaches, to natural heritage in the form of the unspoilt coast, marine and national nature reserves, geological and nature conservation importance, and to cultural and spiritual services in respect of the diverse history and a strong sense of space and escape.

Forces for change								
Summary	Key forces for change							
<p>Generally low erosion <u>north of Albion Bay of coastal cliffs</u>. Shoreline management plan states ‘do nothing’.</p> <p>Skomer MNR may be designated as an HPMCZ (or version of this which is under discussion) which may increase no take areas and may restrict boating and other activities in some areas.</p> <p>Visitor pressure on peninsula attractions eg Marloes Beach and access, Martins Haven and associated car parks.</p> <p>Fossil hunting on Marloes Beach.</p> <p>Coast path compaction and erosion in places.</p> <p>Any development pressure in Marloes would be likely to be prominent in <u>an open treeless</u> landscape <u>with few trees</u>.</p>	Special Qualities	Natural processes/ climate change	Visitor pressure	Marine use- commercial and fishing	Offshore energy or minerals	Development pressure	Land management changes	MOD use
	Coastal Splendour							
	Islands							
	Diversity of Landscape							
	Remoteness, Tranquillity and Wilderness							
	Diverse Geology							
	Richness of Habitats and Biodiversity							
	Rich Archaeology							
	Distinctive Settlement Character							
	Cultural Heritage							
	Accessing the Park							
	Space to Breathe							
Key	Change occurring in the area affecting the selected special quality							
Key sensitivities								
Factors contributing to sensitivity				Factors detracting from sensitivity				
Remote, unspoilt, and open rural coastline and islands of nature conservation and geological importance.				Visitor activity and car parks.				
<u>Sensitivity to further light pollution from Milford Haven waterway oil and gas facilities.</u>				Presence of established recreational use.				
Historic character of the area.				Large ships passing on way to Milford Haven or anchored in St Brides Bay.				
Pembrokeshire Coast Path as a sensitive receptor.								

Skokholm Island shows traces of at least two periods of settlement - probably from the Medieval period, evident in the form of earthworks of field systems and plough ridges, and probably from the 18th century, evident in the farmhouse. There is also a modern lighthouse at the western end of the island, and a quarry.

Gateholm Island shows traces of a hut circle settlement which is now difficult to access due to separation from the nearby mainland.

Scheduled monuments include:

- PE180 (hut circle settlement): community: Marloes and St. Brides (partly also in SCA 25)
- PE195 (promontory fort): community: Marloes and St. Brides
- PE322 (promontory fort): community: Dale
- PE335 (fort): community: Dale
- PE536 (promontory fort): community: Dale
- PE566 (airfield): community: Marloes and St. Brides (partly also in SCA 25 and SCA 31)

There are a number of wrecks with three around Skokholm and one on the mainland which indicate the potentially treacherous nature of the waters and are dangerous themselves. The Angelica, Burry and Queen on Skokholm's shores have been sighted by divers.

The Norse name for the island indicates its Viking links. Skokholm was made famous by the naturalist Ronald Lockley, who arrived in 1927 to take up a 21-year lease. Lockley was one of the first people to study the breeding biology of storm petrels, Manx shearwaters, puffins and rabbits. His rabbit research formed the basis for Richard Adams' novel *Watership Down*.

Key landmark features include Skokholm's Trinity House Lighthouse, which is visible from the south west well before St Anns Head, which has a lighthouse, towers and a coastguard lookout point.

The sea is heavily used as a coastal cruising route linking Milford with Skomer and points north across St Brides Bay and west to Ireland and the area is visited on a 'day trip' basis by both sailing and motor craft. Skokholm Island is further offshore and, consequently, does not attract as much marine traffic as its neighbour Skomer Island. Wildlife boat trips do visit Skokholm but not as regularly or as often as Skomer. Sea angling from boats is popular around Skokholm. Diving is present along the south and west coasts of Skokholm and to the north of Gateholm. There is kayak activity around Gateholm Island. Sea conditions to the west of Skokholm can be challenging at certain states of tide and wind conditions due to the Wildgoose Race.

On Skokholm Island there is a small inlet with jetty on the island to receive goods and visitors who can stay on the island controlled by the local Wildlife Trust. Westdale beach is small but popular for beach activities and especially for surfing.

Fishing in the area comprises of set nets, whelk, lobster and crab potting [especially around Skokholm] and potential for light otter trawling.

Passing ferries to Ireland from Pembroke Dock are visible as are oil tankers and other freight ships for the terminals and the power station in Milford Haven.

Aesthetic, perceptual and experiential qualities

Skokholm Island is an isolated, wild and highly exposed island in open waters. The cliffs and rock shores, islets and rocks are dramatic, red and layered. At sea, the character is dominated by the disturbed water and tidal races and the rocky shores and cliffs can feel distant. There are wide views of the mainland and Skomer to the north. There are strong sea smells and wind exposure in most places.

The peninsula hinterland is smooth and bleak with trees limited to valleys. The red sandstone cliffs dominate the west facing coast with its exposed character and the crashing noise of waves in rough seas. Westdale is the only small beach and only access.

Overall, there is a high degree of naturalness, remoteness and tranquillity in many sea edges and the islands although ships entering Milford Haven to the south and east are apparent.

slope (1010o) across the channel mouth (<25m). Areas of rocks form local shallows across the channel. The seas of the Haven are sheltered from wave stress, and are strongly tidal. Tidal currents west of St Ann's Head set northwest and southeast, with tidal flow <3 knots. In the mouth of the Haven tidal currents set northeast southwest, with tidal flow <2 knots. The tidal range is 6.1m.

The landcover is mixed farmland of arable and pasture with low cut hedgebanks and fencing in medium-sized semi-regular fields to the north and west in the Dale peninsula and around St Ishmaels and in small fields including linear burgage plots associated with the village of Angle to the east. Small, steep sided wooded valleys cut through the rolling lowland plateau to the north. North of Dale the bay turns to a large marshy area with retained water.

The waters form part of the Pembrokeshire Marine SAC. The coast to the west forms part of the Dale and South Marloes Coast SSSI, the northern coast, estuaries and wetlands form part of the Milford Haven Waterway SSSI and the south east is part of the Angle Peninsula Coast SSSI. Semi-natural habitats range from sheltered inter-tidal mud flats in the shallow embayment of Angle Bay, to lowland mixed deciduous woodland. Cliff areas comprise a mosaic of rough pasture and scrub, with species including chough and peregrine falcon. The small tributary estuary of Sandy Haven supports several species of birds during the winter. There is a HPM CZ proposed which runs from the shore at Dale [Gann Flats] out east to Watch House Point and south and then west to Dale Point. The important habitats include sheltered muddy gravels and subtidal mixed muddy sediments.

Cultural influences

Milford Haven is the fourth busiest waterway in the British Isles, with freight tonnage expected to increase in the coming years. Milford Haven is one of the few deep water natural harbours in the British Isles capable of being entered in all weathers and at any stage of the tide. It is the entrance to a classic 'harbour of refuge', home to the Royal Navy and is now an integral part of Britain's oil and gas infrastructure.

The area is an exceptionally rich area in terms of historic seascape character. Medieval burials are confirmed in West Angle Bay. A pair of blockhouses was built by Henry VIII to guard Milford Haven. A chain of forts was later built to defend it from Napoleon III - Thorn island on the south side, South Hook on the north, Stock Rock on a mid-channel rock, and Dale Fort, set within ramparts of an earlier promontory enclosure.

Scheduled monuments include:

- PE307 (promontory fort): community: Herbrandston
- PE334 (fort): community: Herbrandston
- PE411 (promontory fort): community: Angle
- PE554 (cemetery): community: Angle
- PE566 (airfield): community: Marloes and St. Brides (partly in SCA25 and SCA26)

Part of this area lies within the Milford Haven Waterway Landscape of Outstanding Historic Interest. Angle is a Conservation Area extending as far as West Angle Bay.

There are over 20 wrecks in the area which is symptomatic of its intensive use. These include military craft such as HMS Leda which lies in West Angle Bay and HMS Caroline and HM MGB12 which lie near the main channel. Some wrecks are in the late 19th century while others were sunk in the 1970's.

As with seascape character area 32- Milford Haven was the landing-place of Henry Tudor, Henry VII, who marched from here to defeat and kill Richard III at Bosworth field. In *Cymbeline*, Imogen refers to Milford.

The main settlement in the area is Dale which is focussed on sailing and recreation with the fringes of the rural settlement of St Ishmaels to the north. Elsewhere the settlement is dispersed rural farmsteads and dwellings. The large scale structures of the LNG terminal, refinery and other associated infrastructure lie to the east.

Access to the Haven for large tankers is through a narrow passage, passing beneath the lighthouse on St Ann's Head, although the opposing headlands stand over two kilometres apart at their narrowest point.

**Appendix 3 – Draft Supplementary Planning Guidance – Sustainable Design
(update) – Comments and Officer Response**

Ref	Comment	Officer Response
SD 176/SPG/J13/1 Brecon Beacons NPA	The Authority is supportive of the contents of this draft SPG and has no further comments to make.	Noted. No change required.
SD 2046/SPG/J13/1 Network Rail	Thank you for providing us with this opportunity to comment on this Planning Policy document. Upon the review of this document, Network Rail has no comments to make.	Noted. No change required.
SD 2660/SPG/J13/1 Chartered Institution of Wastes Management	CIWM Cymru Wales would like to be in a position to respond to this and all similar documents, however we do not normally comment on these, as the plans cover all aspects of landuse planning. There may be occasions when we will respond when the policies being changed refer to waste. Unfortunately in this instance we are not able to respond. Please continue to send similar documents to CIWM Cymru Wales, these are of interest to members and will be logged accordingly.	Noted. No change required.

Sustainable Design SPG – An update to the Adopted Sustainable Design Guidance
for consultation – changes underlined.

English	Cymraeg
<p>Insert a new paragraph on page 3 under the heading ‘Purpose of this guidance’ to follow the first paragraph:</p> <p>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.¹ In making decisions on matters that come before it, the Assembly 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.² Put simply the requirements of the legislation mean that the following needs to be taken into account when considering a proposal:</p> <ul style="list-style-type: none"> • 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.³ 	<p>Diben y canllawiau hyn</p> <p>Er mai dim ond y polisiau yn y cynllun datblygu sydd â statws arbennig wrth benderfynu ar geisiadau cynllunio (h.y. at ddiben unrhyw benderfyniad dan y Deddfau Cynllunio, rhaid gwneud y penderfyniad yn unol â'r Cynllun oni bai bod ystyriaethau perthnasol yn nodi'n wahanol), gellir ystyried Canllawiau Cynllunio Atodol fel ystyriaeth berthnasol.⁴ Wrth wneud penderfyniadau ar faterion sy'n dod ger eu bron, bydd Llywodraeth Cymru a'r Arolygiaeth Cynllunio'n rhoi pwysau sylweddol i ganllawiau cynllunio atodol cymeradwy sy'n deillio o'r dull a amlinellir yn y polisi cenedlaethol ar baratoi Cynlluniau Datblygu Lleol ac sy'n gyson â'r dull hwnnw⁵. Yn syml mae gofynion y ddeddfwriaeth yn golygu bod angen ystyried yr anghenion canlynol wrth ystyried cynnig.</p> <ul style="list-style-type: none"> • A yw'r cynnig yn bodloni gofynion polisiau o fewn y Cynllun Datblygu; • Pwysu'r holl ystyriaethau cynllunio eraill i weld a ydyn nhw'n gorbwyso casgliad y Cynllun Datblygu⁶.

¹ Paragraph 5.2, page 33, [Local Development Plans Wales, Policy on Preparation of Local Development Plans, Welsh Assembly Government, 2005](#)

² Paragraph 5.3, page 33, Local Development Plans Wales, Policy on Preparation of Local Development Plans, Welsh Assembly Government, 2005

³ Page 27 <http://www.wlga.gov.uk/publications-and-consultation-responses-imp/planning-handbook-a-guide-for-local-authority-members/>

⁴ Paragraff 5.2, tudalen 33, [Cynlluniau Datblygu Lleol Cymru, Polisi ar Baratoi Cynlluniau Datblygu Lleol, Llywodraeth Cymru 2005](#)

⁵ Paragraff 5.3, tudalen 33, [Cynlluniau Datblygu Lleol Cymru, Polisi ar Baratoi Cynlluniau Datblygu Lleol, Llywodraeth Cymru 2005](#)

⁶ Tudalen 27 <http://www.wlga.gov.uk/cyhoeddiadau-ac-ymatebion-i-ymgynggori-imp/llawlyfr-cynllunio-arweiniad-ar-gyfer-aelodau-awdurdodau/>

English	Cymraeg
<p><u>6.6 Place and Local/Historic Distinctiveness</u></p> <p>‘Local planning authorities have an important role in securing the conservation of the historic environment while ensuring that it accommodates and remains responsive to present-day needs. This is a key aspect of local authorities’ wider sustainable development responsibilities.’ Planning Policy Wales Edition 4 (p.87)</p> <p>The problem defined - background and measures</p> <p>The design of new buildings must enhance the quality of their surroundings, being sympathetic to the immediate and wider context. This does not eliminate contemporary design; rather it should promote it</p>	<p><u>6.6 Lleoliad ac Arbenigedd Lleol/Hanesyddol</u></p> <p>‘Mae gan awdurdodau cynllunio lleol rôl i'w chyflawni o safbwynt diogelu cadwraeth yr amgylchedd hanesyddol tra ar un pryd yn sicrhau eu bod yn ymwybodol o'r oes bresennol ac yn parhau yn ymwybodol ohonynt. Mae hyn yn agwedd allweddol o gyfrifoldebau datblygu cynaliadwy awdurdodau lleol.’ Polisi Cynllunio Cymru Rhifyn 4 (tud. 87)</p> <p>Y broblem wedi ei diffinio – cefndir a mesurau</p> <p>Mae'n hanfodol bod dyluniad adeiladau newydd yn gwella ansawdd yr ardal o'u cwrmpas, ac yn gweddu i gydestun lleol ac ehangach. Nid yw hyn yn llesteirio dylunio cyfoes yn hytrach dylai ei hyrwyddo.</p>
<p>Buildings, building groups and settlements must respond to their landscape settings and their visual, aesthetic, historical, cultural and ecological aspects. <u>Pre 1939 buildings which represent over 30% of the existing built structures will be treated with respect for their traditional form and vernacular details.</u> However creating new, modern contexts can also be encouraged, by designing a modern sustainable building which differs from the historical aesthetic of an area, but contributes to the landscape and ecology.</p>	<p>Mae'n rhaid i adeiladau ymateb i'w cydestun tirwedd a'i agweddau gweledol, esthetig, hanesyddol, diwylliannol ac ecolegol. <u>Caiff adeiladau sy'n dyddio o'r cyfnod cyn 1939, sy'n cynrychioli 30% o'r strwythurau adeiledig presennol, eu trin â pharch i'w ffurf draddodiadol a'u manylion brodorol.</u></p> <p>Fodd bynnag gellir annog cyd-destunau cyfoes hefyd, trwy ddylunio adeilad cynaliadwy cyfoes sydd yn wahanol i esthetig hanesyddol ardal, ond sy'n cyfrannu tuag at y cyd-destun o ran y dirwedd, a'r ecoleg.</p>
<p>Measures</p> <p>Your Design and Access Statement should demonstrate an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal. Statements should deal with all relevant aspects of design throughout the process and the life of the development, clearly stating the design principles adopted and including illustrative material in plan, elevation and section where relevant.</p>	<p>Mesurau</p> <p>Dylai'ch Datganiad Dylunio a Mynediad ddangos ymagwedd integredig a chynhwysol at ddylunio cynaliadwy, sydd mewn cyfrannedd â maint a graddfa datblygiad arfaethedig. Dylai datganiadau ddelio gyda'r holl agweddau perthnasol o ddylunio trwy gydol y broses ac oes y datblygiad, yn nodi'n glir yr egwyddorion dylunio a fabwysiadwyd ac yn cynnwys deunydd dangosol yng nghyd destun drychiad a rhannau'r cynllun lle bo</p>

English	Cymraeg
<ul style="list-style-type: none"> • <u>Modifications to pre 1939 buildings will need to reflect the local character and historic context. Traditional vernacular design and materials would be requested for applications affecting windows, doors, porches, chimney stacks, roofs and curtilage buildings. All proposed schemes should be taken through the Planning Authorities pre-application service, which will closely consider conservation aspects</u> • For small scale developments, illustrated design and access statement must be produced dealing with form, scale, mass and materials. Applications should include scheme design drawings at an appropriate scale in the context of their surrounding landscape and adjoining buildings. • In addition, for other developments, a comprehensive illustrated design and access statement must be produced dealing with form, scale, mass and materials. • The conversion or change of use of a building must be considerate to its architectural and historical qualities. • See matrix for further details of what needs to be included in the design and access statement for each development. 	<p>hynny'n berthnasol.</p> <ul style="list-style-type: none"> • <u>Bydd angen i addasiadau i adeiladau sy'n dyddio o'r cyfnod cyn 1939 adlewyrchu cymeriad lleol a chyd-destun hanesyddol. Byddai gofyn am ddylunio a deunyddiau traddodiadol brodorol ar gyfer ceisiadau'n effeithio ar ffenestri, drysau, cynteddau, simneiau, toi ac adeiladau cwrtil. Dylai'r holl gynlluniau arfaethedig gael eu tywys drwy wasanaeth cyn-ymgeisio Awdurdod y Parciau, a fydd yn ystyried agweddau cadwraeth yn ofalus.</u> • Ar gyfer datblygiadau graddfa fach, rhaid cynhyrchu datganiad dylunio a mynediad sy'n cynnwys darluniau, a rhaid eu bod yn delio â ffurf, graddfa, mas a defnyddiau. Dylai pob cais gyflwyno lluniadau dylunio cynllun ar raddfa berthnasol yng nghyd-destun y dirwedd o gwmpas a'r adeiladau sydd gerllaw. • Hefyd, ar gyfer datblygiadau eraill, mae'n rhaid cyflwyno datganiad dylunio a mynediad cyfansawdd gyda lluniau yn ymwneud â ffurf, graddfa, mas a deunyddiau. • Mae'n rhaid i addasiadau neu newid defnydd adeilad ystyried nodweddion pensaernïol a hanesyddol yr adeilad hwnnw. • Gweler y matrices am ragor o fanylion ynghylch beth sydd angen cael eu cynnwys yn y datganiad dylunio a mynediad ar gyfer pob datblygiad.