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**Date: 2nd December 2015**

Dear Sir/Madam,

A meeting of the **Regeneration and Environment Scrutiny Committee** will be held in the **Sirhowy Room, Penallta House, Tredomen, Ystrad Mynach** on **Tuesday, 8th December, 2015** at **5.30 pm** to consider the matters contained in the following agenda.

Yours faithfully,

A handwritten signature in blue ink that reads 'Chris Burns'.

**Chris Burns**  
INTERIM CHIEF EXECUTIVE

## AGENDA

	Pages
1 To receive apologies for absence.	
2 Declarations of Interest Councillors and Officers are reminded of their personal responsibility to declare any personal and/or prejudicial interest(s) in respect of any item of business on this agenda in accordance with the Local Government Act 2000, the Council's Constitution and the Code of Conduct for both Councillors and Officers.	
To approve and sign the following minutes: -	
3 Regeneration and Environment Scrutiny Committee - 27th October 2015 (minute nos 1 - 11).	1 - 10

**A greener place Man gwyrdach**

Correspondence may be in any language or format | Gallwch ohebu mewn unrhyw iaith neu fformat



- 4 Consideration of any matter referred to this Committee in accordance with the call-in procedure.
- 5 To receive a verbal report by the Cabinet Member(s).
- 6 To receive and consider the following Cabinet reports\*: -
1. Rhymney Town Centre Loans Scheme – 28th October 2015;
  2. Flood Risk Management Plan – 11th November 2015;
  3. Risca – Tesco Section 106 Options Report – 25th November 2015.

*\* If a member of the Scrutiny Committee wishes for any of the above Cabinet reports to be brought forward for review at the meeting please contact Rebecca Barrett, 01443 864245, by 10.00 a.m. on Monday, 7th December 2015.*

To receive and consider the following Scrutiny reports:-

- |    |  |           |
|----|--|-----------|
| 7  | Planning Guidance for Smaller Scale Wind Turbine Development/Caerphilly County Borough Landscape Sensitivity and Capacity Study. | 11 - 198  |
| 8  | Part Night Lighting and Future Lighting Energy Saving Proposals.   | 199 - 236 |
| 9  | Active Travel Consultation on Existing Routes Map.   | 237 - 276 |
| 10 | To record any requests for an item to be included on the next available agenda.  |           |

To receive and note the following information items\*:-

- |    |   |           |
|----|---|-----------|
| 11 | Public Consultation on Waste Management, Highways and Environmental Maintenance Services. | 277 - 282 |
| 12 | Grants to the Voluntary Sector Minutes - 15th July 2015.                                  | 283 - 286 |
| 13 | Bargoed Town Centre Management Group Minutes - 7th October 2015.                          | 287 - 290 |
| 14 | Blackwood Town Centre Management Group Minutes - 16th October 2015.                       | 291 - 294 |
| 15 | Risca Town Centre Management Group Minutes - 2nd November 2015.                           | 295 - 298 |
| 16 | Summary of Members' Attendance - Quarter 2 - 1st July 2015 to 30th September 2015.        | 299 - 302 |

*\* If a member of the Scrutiny Committee wishes for any of the above Information Items to be brought forward for review at the meeting please contact Rebecca Barrett, 01443 864245, by 10.00 am on Monday, 7th December 2015.*

**Circulation:**

Councillors M.A. Adams, Mrs E.M. Aldworth (Vice Chair), J. Bevan, Mrs A. Blackman, C.J. Cuss, D.T. Davies (Chair), N. Dix, C. Elsbury, R.W. Gough, Ms J.G. Jones, S. Kent, Ms P. Leonard, M.J. Prew, Mrs D. Price, A. Rees and Mrs E. Stenner

And Appropriate Officers

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## REGENERATION AND ENVIRONMENT SCRUTINY COMMITTEE

MINUTES OF THE MEETING HELD AT PENALLTA HOUSE, YSTRAD MYNACH ON  
TUESDAY, 27TH OCTOBER 2015 AT 5.30 P.M.

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### PRESENT:

Mrs E.M. Aldworth – Vice-Chair – Presiding

### Councillors:

M. Adams, Mrs A. Blackman, N. Dix, R.W. Gough, Ms J.G. Jones, S. Kent, Mrs P. Leonard,  
A. Rees, Mrs E. Stenner

### Cabinet Members:

N. George (Community and Leisure Services), K. James (Regeneration, Planning and  
Sustainable Development), T.J. Williams (Highways, Transportation and Engineering)

### Together with:

C. Harray (Corporate Director – Communities), P. Elliott (Head of Regeneration and  
Planning), T. Shaw (Head of Engineering Services), M. Eedy (Finance Manager -  
Environment Directorate), G. Parry (Operations Group Manager), R. Kyte (Team Leader -  
Strategic and Development Plans), C. Forbes-Thompson (Scrutiny Research Officer),  
B. Davies (Assistant Solicitor) and R. Barrett (Committee Services Officer)

### 1. **BEREAVEMENT – COUNCILLOR GINA BEVAN**

The Chair referred to the sad news that Councillor Gina Bevan had recently passed away. All present stood for a moment of silence as a mark of respect and extended their condolences to the bereaved family.

### 2. **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors J. Bevan, C.J. Cuss, D.T. Davies (Chair), C. Elsbury, M.J. Prew and Mrs D. Price.

### 3. **DECLARATIONS OF INTEREST**

Councillor Mrs E.M. Aldworth declared an interest in Agenda Item 7 (Proposed Change to the Caerphilly County Borough Council CIL Regulation 123 List of Infrastructure). Details are minuted with the respective item.

#### **4. MINUTES – 15TH SEPTEMBER 2015**

RESOLVED that the minutes of the Regeneration and Environment Scrutiny Committee meeting held on 15th September 2015 (minute nos. 1 – 15) be approved as a correct record and signed by the Chair.

#### **5. CALL-IN PROCEDURE**

There had been no matters referred to the Scrutiny Committee in accordance with the call-in procedure.

#### **6. REPORT OF THE CABINET MEMBERS**

The Scrutiny Committee received verbal reports from Cabinet Members N. George T.J. Williams and K. James.

Councillor N. George, Cabinet Member for Community and Leisure Services, informed Members that he had recently presented a number of Refuse and Cleansing staff with their NVQ (National Vocational Qualification) Certificates. For many of these recipients, it represented their first achievement of formal qualifications, and over 100 staff within this department have now attained formal NVQ qualifications. In addition to this, a number of Sports and Leisure Services staff have recently completed NVQ Level 5 in Sport and Leisure Management, which is an excellent achievement that will continue to assist the service in its aim of delivering with a skilled and passionate workforce. Members were pleased to note the news of these achievements.

Relocation works are well underway to move Community and Leisure Services office staff from Pontllanfraith House to Tiryberth Depot. Some alterations are currently being made to Tiryberth Depot to accommodate the move which will take place in January 2016.

The Cabinet Member announced that during October 2015, leisure centres within the county borough record recorded their highest level of Direct Debit Memberships (5055) and Direct Debit income collection (£112,000), which has driven an increase in leisure centre usage and active lifestyles.

The Scrutiny Committee were informed that the Council's Exercise Referral Service will be trialling a programme for patients suffering from Parkinson's Disease in conjunction with Aneurin Bevan Health Board and Parkinson's UK. This trial will be conducted at Risca Leisure Centre and involve patients referred from Ysbyty Ystrad Fawr.

Members were advised that Sport Caerphilly have received £23,000 in funding through the Youth Crime Prevention Fund Partnership with Safer Caerphilly for investment into the Positive Futures Programme to deliver key diversionary activities (particularly around Halloween and Bonfire night).

Members were also informed of recent success in respect of the Green Flag Award, which is the benchmark national standard for parks and green spaces, with Council staff recently achieving 3 such awards for Morgan Jones Park, Nelson Wern Park and Waunfawr Park, Crosskeys.

Councillor T.J. Williams, Cabinet Member for Highways, Transportation and Engineering, presented his report and updated Members on the Multi-hog pilot being undertaken by the Highways Operation Group, which should greatly improve productivity levels within the department. The Multi-hog is a compact and robust hydraulically operated vehicle which can accept a diverse range of attachments to the front and rear for use throughout the year. It has been trialled over the last six weeks and an efficiency assessment is currently being

undertaken. If the outcome of the trial proves positive, Highways will be looking to increase its usage to augment the current work load capability. The Multi-hog has many uses, including road patching, water pumping for flooded areas, gritting capabilities, and mowing grass verges.

In response to a Member's query, the Cabinet Member explained that should it be decided to proceed with the purchase of the Multi-hog, it was anticipated that significant savings would be made in respect of highways maintenance.

Members were informed that the consultation on the Active Travel Existing routes maps has now been completed, with 80% of the responses received in support of the routes shown. It was explained that a further update would be reported to the next meeting of the Regeneration and Environment Scrutiny Committee.

The Cabinet Member advised that the Engineering Projects Group, in conjunction with the Coal Authority, had recently investigated a hole which opened up in the road at the Prince of Wales Industrial Estate in Abercarn. It was initially thought to be connected with old colliery buildings that once occupied the site but it was later confirmed that there was no linkage with any disused mine entry points. A CCTV survey of the voiding concluded that it was isolated in nature and related to one buried structure. No further investigation was proposed and the void is currently being backfilled. Officers will continue to monitor the affected area once the carriageway and verge areas have been reinstated.

Councillor K. James, Cabinet Member for Regeneration and Planning, updated Members on the annual Christmas Voucher Booklet scheme, which is run by the Council's Town Centre Management Team, and aims to provide local retailers with the opportunity to participate in a co-ordinated marketing campaign in the run-up to Christmas. This year's booklet contains 105 offers across the five main town centres within the county borough, with the intention to help retain consumer spend within the County Borough's town centres during the crucial festival trading period. Newspapers, radios and social media will be utilised to support the campaign and the booklets will be handed out in town centres and local supermarkets. In response to feedback from retailers and customers, the scheme will commence earlier this year, running from 16th November 2015 to 31st December 2015.

Other events due to take place this winter include the Bargoed Ice Rink and the River of Light Lantern Parade and full details are included in the winter 'What's On' guide that will be distributed in and around the county borough.

Members were informed that Caerphilly County Borough has been named in the top five Welsh council areas where benefit claimants have started their own business. In total, more than 4,000 new businesses have been started by jobless claimants in using the government's New Enterprise Allowance. In Caerphilly County Borough 270 new business starts have been created.

The Cabinet Member advised that staff from the Winding House Museums and Heritage Centre, recently attended a ceremony hosted by the Telegraph to announce the winner of the Telegraph's Family Friendly Museum Award. The Winding House staff were delighted to be given an unprecedented new award, created especially for the Museum for "Outstanding contribution to their local community".

Blackwood Miners Institute and Cwmcarn Visitor Centre were also the recipients of recent success, having both achieved a 'V' Award from Voice Magazine in their recent marketing campaigns. Blackwood Miners Institute were awarded 'Theatre of the Year' and Cwmcarn 'Family Day out of the Year' Award.

Members congratulated staff from the Winding House, Blackwood Miners Institute and Cwmcarn Visitor Centre on their achievements. It was confirmed that arrangements would be made to present the staff with their awards at the next meeting of Council.

The Cabinet Members were thanked for their reports.

## **REPORTS OF OFFICERS**

Consideration was given to the following reports.

### **7. FLOOD RISK MANAGEMENT PLAN**

Terry Shaw (Head of Engineering Services) and Graham Parry (Highways Operations Group Manager) presented the report, which provided an update on the progress of the preparation of the Council's Flood Risk Management Plan (FRMP), and sought Members' comments on the contents of the draft Plan, prior to its presentation to Cabinet for approval.

Members were advised that under the Flood Risk Regulations 2009, the Council has been designated as a Lead Local Flood Authority (LLFA) and has responsibility to produce a FRMP. The draft FRMP, which was published on the Council's website, must be submitted to Natural Resource Wales (NRW), who may approve it (with or without modification) or reject it.

The FRMP provides an overview of the flood risk within the county borough and details flood risk management objectives, together with a series of mitigation measures to ensure that the flood risk to the local area is addressed and reduced. The FRMP, which has been the subject of public consultation in draft form, must be published by December 2015 in accordance with the Flood Risk Regulations 2009, and will be subject to review after a 6-year period.

As part of the statutory consultation process in developing the plan an informal draft was forwarded to NRW during the public consultation period and they responded back with positive feedback which has been taken into account. Should any significant further comments be received from NRW then a further report to Cabinet will be provided.

During the course of the ensuing debate, Members stressed the importance of continued community engagement in addressing flood risk and flooding incidents. Officers outlined the ways in which this is carried out by the Authority and referred Members to Appendix C of the report, which has identified a number of local wards as being within a flood risk area and which have subsequently been included in the FRMP.

Officers responded to queries in respect of funding implications to implement the measures set out in the FRMP. Members were advised that funding has already been received from the Welsh Government (WG) to enable the Authority to prepare and implement a number of flood risk documents as required by the Flood Risk Regulations 2009. Funding at a much more significant level will be required in order to implement all the flood risk management measures for the county borough as set out in Appendix C of the report. Further discussion with WG will be required in the future to identify additional revenue/capital funding.

It was explained by Officers that there are indications that future funding for flood management infrastructure will be significantly reduced. This may also affect future funding in respect of the staff recruited to continue work on the Flood and Water Management Act, with a potential need for appropriate staff resources to be considered in the future.

In response to a Member's query, it was confirmed that the final FRMP would be split into sections relating to each ward within the county borough, and that copies of the relevant section would be distributed to the appropriate local ward Members.

Officers responded to a number of technical queries relating to flood risk management infrastructure within the county borough. Members were informed of the methods available to tackle surface water arising from large volumes of rainfall, including the use of drainage systems and attenuation tanks that slowly release accumulated water. Officers outlined the

maintenance processes in place regarding drains and waterways, and discussion took place regarding the recourse available from insurance companies and the government in respect of flooding arising from river sources.

Following consideration of the report, it was moved and seconded that the following recommendations be forwarded to Cabinet for approval. By a show of hands, this was unanimously agreed.

RECOMMENDED to Cabinet that:-

- (i) the draft Flood Risk Management Plan be accepted as the mechanism for the reduction of flood risk within Caerphilly County Borough Council;
- (ii) Natural Resources Wales be updated on Caerphilly's approach to the Flood Risk Management Plan.

## **8. PROPOSED CHANGE TO THE CAERPHILLY COUNTY BOROUGH COUNCIL CIL REGULATION 123 LIST OF INFRASTRUCTURE**

Councillor Mrs E.M. Aldworth declared an interest in this item in that she lives near one of the developments referenced in the report. In that the report related to technical regulatory matters and not a specific planning development, the interest was determined to be personal (non-prejudicial) and the Member remained in the room during consideration of the item.

Pauline Elliott (Head of Regeneration and Planning) and Rhian Kyte (Team Leader, Strategic and Development Plans) presented the report, which detailed the findings of the public consultation exercise undertaken in respect of the proposed changes to the Regulation 123 List,. The report sought the endorsement of Members on the publication of the Replacement Regulation 123 List in accordance with the implementation of Community Infrastructure Levy (CIL), prior to its presentation to Cabinet and thereafter Council.

Members were advised that Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended) sets out the requirement for the CIL Charging Authority to publish a list of the infrastructure that can be funded through CIL, which is a system of charges that local authorities can choose to levy against new development in their areas. Different rates of charge are identified for different types of development, dependent upon how viable each type of development is. The revenue generated from CIL is then used to fund infrastructure that will support future planned development in the county borough. Once introduced it is a mandatory charge that is levied against all new qualifying development.

The report proposed changes to this list which will enable school provision to be sought on-site in line with the aspirations of the adopted LDP. The proposed changes to the Regulation 123 List (as appended to the report) will have a minimal impact on the viability evidence that was considered by the CIL Examiner in that it will only impact on two specific sites (namely Waterloo Works and Bedwas Colliery).

Officers explained that the Replacement Regulation 123 List had been the subject of appropriate consultation in line with guidance contained in Planning Practice Guidance (as amended June 2015) at which time the reasoned justification for the change to the list was outlined. Two representations arising from the consultation had been submitted for consideration and a summary of the representations received, together with an officer response to each of the points raised, were contained within the report appendices.

Discussion took place regarding the impact of the proposed changes on the use of Section 106 agreements. Officers outlined the different scenarios in respect of planning applications, explaining that infrastructure involving on-site school provision will subject to Section 106 obligations, and infrastructure relating to off-site school provision will be retained on the 123

list and funded through CIL.

Officers also responded to a number of queries in respect of the CIL Charging Schedule, including an explanation of how this charge is levied in relation to the Local Development Plan, together with details of the income generated for the Authority as a result of CIL and the exemptions in place for social housing and self-build developments.

Following consideration of the report, it was moved and seconded that the following recommendations be forwarded to Cabinet (and thereafter Council) for approval. By a show of hands, this was unanimously agreed.

RECOMMENDED to Cabinet (and thereafter Council) that:-

- (i) the findings of the public consultation exercise undertaken in August/September 2015 in respect of the proposed changes to the Regulation 123 List be considered and noted;
- (ii) the Replacement Regulation 123 List be approved for publication in accordance with the implementation of Community Infrastructure Levy.

## **9. BUDGET MONITORING REPORT 2015/2016**

Mike Eedy (Finance Manager - Environment Directorate) presented the report, which informed Members of the most recent budget monitoring position for 2015/2016 for the Environment Directorate service divisions, namely Regeneration and Planning, Engineering Services, Public Protection and Community and Leisure Services.

Reference was made to the revenue budget position for each of the service divisions based on the most current financial information available. Projected outturn figures for the financial year are compared with the budget to show anticipated under/overspends, and more detailed budget monitoring figures were outlined in Appendix 1 of the report.

Members were asked to note that as part of the budget efficiency savings in 2015/2016 to meet Medium Term Financial Plan (MTFP) targets and achieve budget strategy aims, the Environment Directorate were targeted to achieve new budget efficiency savings of £3.861m. The most recent figures indicated a total under spend of £1.182m, but it was explained that a number of ring-fenced budgets (as outlined in Section 4.1.3 of the report) meant this under spend was reduced to £607,000. Members' attention was drawn to a number of over spends and under spends within each of the service divisions and full details were contained within the report.

The Regeneration and Planning division presently have a projected underspend of £216,000. An underspend of £22,000 was reported within Countryside Services, with a shortfall in income generation for car parking charges at country parks offset by under spends in relation to a staff vacant post (which is a MTFP saving in advance for 2016/2017) and other operational costs. Planning Services reported an over spend of £112,000, which included an under spend of £33,000 within Development Control. Planning income is projected to achieve budget targets for the first year in a number of years and reflects an increase in planning applications. There was an overspend of £74,000 in Building Control, where income is projected to be £91,000 below budget, but is partly offset by under spend in staffing costs due to the delayed filling of a vacant post. Search fee income is £11,000 below the £112,000 budget. Planning-related income is dependant on the number of applications received and this will be monitored closely as the numbers of applications and fee levels can vary.

Members noted a significant under spend of £328,000 within Economic Development and Tourism which has been partly achieved by a number of vacant posts (most of which are proposed MTFP savings for 2016/2017) and savings in relation to promotion/publicity and

office costs. There is a projected £76,000 under spend regarding industrial estates due to income from rents in excess of targets and reduced maintenance, and a MTFP saving of £100,000 is proposed in this area for 2016/2017. Tourism have achieved a net under spend of £13,000 with additional income from the Big Cheese event being partly offset by one-off costs relating to the Urdd Eisteddfod event. Tourism venues are reporting an overall under spend of £84,000 due to combination of income generation above target and reduced operational costs. It was explained that MTFP savings are being considered for a number of tourism venues in 2016/2017.

The Engineering Services division have reported a net under spend of £700,000, but after excluding ring-fenced budget variations there is an under spend of £400,000. An overspend in relation to highway reactive maintenance repairs has been offset by an under spend in street lighting energy, which has arisen from low energy prices, together with capital investment in low-energy LED lighting as part of previous MTFP savings and a subsequent reduction in maintenance requirements. MTFP savings of £350,000 have already been approved with further a £100,000 saving against street lighting proposed for 2016/2017. The severity of winter weather in relation to snow, gritting and flooding will have an impact on the overall outturn position. Engineering are reviewing the highway maintenance programme and endeavouring to balance the budget by financial year end.

Engineering Services have achieved an overall staffing under spend of £182,000 due to vacant posts and the delayed filling of posts, and an element of this under spend has been allocated as MTFP savings in advance for 2016/2017. Officers also explained that budget variation in relation to Home to School Transport and Social Services Transport will be ring-fenced back to the service directorates. Home to School Transport is presently projecting a £257,000 under spend which is primarily due to new bus contracts, although taxi contracts are due for renewal shortly, which may impact on the overall financial position. Social Services Transport is projecting an under spend of £43,000, which is partly due to reduced vehicle costs resulting from investment in new vehicles.

Public Protection is presently projecting an under spend of £210,000 on a revised budget of £7.2m. Environmental Health have achieved a significant under spend of £61,000, which is due to additional income from Blaenau Gwent in relation to pest control together with a number of vacant posts. Catering are projecting an overall under spend of £20,000, primarily due to reduced operating costs in respect of staffing and food costs. This will need to be carefully monitored as any school closures due to adverse weather conditions will have an impact upon school meals income.

Community and Leisure Services are currently projecting an overall under spend of £56,000, but £275,000 of the budget relates to cemeteries, where any under spend is ring fenced for future improvement and enhancement works, and hence there is an over spend of £219,000 in this area. A significant overspend within Waste Management and Cleansing has arisen from revised contract arrangements for dry recycling treatments, which has resulted in a higher cost per tonne. There has been an overspend relating to waste treatment and disposal costs, due to a need to divert some residual waste to landfill during close-down periods at the Viridor EfW Plant. There will also be a one-off payment to Viridor this year for the processing of incinerator bottom ash arising from this waste treatment process, which will assist in increasing the Council's recycling targets and achieve the statutory target required to avoid the imposition of fines.

Officers explained that it is anticipated that the overspend within Waste Management and Cleansing will be partly offset by an under spend in relation to civic amenity site treatment, which has arisen from reduced tonnage as a result of the new permit scheme. There is also an under spend in relation to staffing and operational costs in this area. Volumes of waste tonnage and the treatment costs from the various waste streams are monitored closely as any fluctuations during the year can have a significant impact on the overall financial position, and it is with this in mind that a £240,000 contingency fund is retained in the event of an overspend in this area.

Leisure Services are reporting an overall over spend of £34,000. There is an over spend for Leisure Centres mainly due to a projected underachievement in income targets, where income generation is subject to variation in consumer demand and also from competition from other private sector facilities. This has been partly offset due to under spend as a result of a vacant post and other central costs, together with an under spend in Sports and Health Development. Income targets will be monitored closely as income generation is subject to variation depending on customer demand.

Members were asked to note Section 4.6.1 of the report, which outlined the targeted MTFP savings for 2015/2016 of £3.861m. The projected over spends and under spends outlined in the report have taken account of these savings targets. As reflected in the budget monitoring figures, most of the approved MTFP savings introduced for 2015/2016 have or will be achieved by the end of the financial year. However, there are some that require further review and monitoring, including increased income generating targets in relation to leisure centres, outdoor facilities, licensing and waste collection charges/replacement bin charges.

Some service under spends and overspends will be appropriated to ring-fenced reserves for specific requirements. The remaining Directorate under spend (presently projected at £607,000) will be appropriated to the Environment Directorate strategic reserve and 50% of this pooled under spend/profit will then be appropriated to the Authority working balance. Subject to Members' approval, the remaining 50% will be utilised for Directorate-based service initiatives or investment requirements.

Discussion of the report ensued and reference was made to the shortfall regarding income from car parking charges at country parks. Officers advised that the target income of £85,000 per annum had been an estimate linked to visitor numbers. There had been a lower target in the first year of charging, due to a delay in the implementation of the pay and display machines, together with an unseasonably wet summer in 2015 which accounted for a shortfall in revenue. Officers also explained that some customers had taken up the option of a season ticket, and in clarifying the reduced price of these tickets against daily charges, explained that this had resulted in a shortfall in anticipated income.

A Member suggested that the parking charge be reduced to encourage greater use of country parks. Officers explained that as the current charges were considered to be nominal in respect of all-day usage, it would not be feasible to lower these further. It was confirmed that Countryside Services staff monitor the use of car parks within country parks as part of their normal duties, with no subsequent additional workload costs as a result of these charges. A Member also suggested the increased promotion of country parks as a means to increasing income within this area.

Reference was made to a projected overspend in relation to the under occupancy of a number of retail units within Bargoed Town Centre. Officers outlined the progress made in respect of this area, explaining that they are currently in advanced negotiations with a prominent retailer regarding the use of a vacant unit, with it anticipated that other businesses will express interest in the remaining units once the potential retailer is established.

Discussion also took place regarding the underachievement in income targets within Leisure Centres. Reference was made to the increased level of Direct Debit memberships, with Officers explaining that current facilities are linked to customer demand. Members were referred to the ongoing strategic review of leisure facilities, which will examine the services offered and identify areas where savings can be made or revenue increased.

A Member queried the over spend within Vehicle Maintenance and Fleet Management, which has arisen from a reduction of work which is impacting on productivity and revenue levels. Officers explained that this was an area that had been identified for future income generation, in that consideration was being given as to whether the MOT station located within the workshop could be used to offer a MOT service to Council staff.

Having given due consideration to the report, Members noted its contents, together with details of the budget monitoring position contained within the appendices.

**10. REQUESTS FOR REPORTS TO BE INCLUDED ON THE NEXT AVAILABLE AGENDA**

Councillor R.W. Gough requested a report providing detailing the vacant posts to be included in the Medium Term Financial Plan Savings for 2016/17. It was agreed that Officers would email this information to Members ahead of the Special Regeneration and Environment Scrutiny Committee meeting on 26th November 2015.

**11. INFORMATION ITEMS**

The Committee noted the following items for information, full details of which were included within the Officers reports. None of the items were brought forward for review.

- (1) Caerphilly Local Access Forum Minutes - 12th June 2015;
- (2) Voluntary Sector Liaison Committee Minutes - 16th September 2015.

The meeting closed at 7.25 pm.

Approved as a correct record and subject to any amendments or corrections agreed and recorded in the minutes of the meeting held on 8th December 2015, they were signed by the Chair.

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CHAIR

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## REGENERATION AND ENVIRONMENT SCRUTINY COMMITTEE – 8TH DECEMBER 2015

**SUBJECT: PLANNING GUIDANCE FOR SMALLER SCALE WIND TURBINE  
DEVELOPMENT /CAERPHILLY COUNTY BOROUGH LANDSCAPE  
SENSITIVITY AND CAPACITY STUDY**

**REPORT BY: CORPORATE DIRECTOR - COMMUNITIES**

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### **1. PURPOSE OF REPORT**

- 1.1 To update members on technical work undertaken in respect of supplementary planning guidance for wind turbines.
- 1.2 To inform members of the public consultation exercise undertaken in respect of the following:
  - 1 Supplementary Planning Guidance for Smaller Scale Wind Turbine Development;
  - 2 Caerphilly County Borough Landscape Sensitivity and Capacity Study.
- 1.3 To outline to members the representations made in respect of this Supplementary Planning Guidance during the six week public consultation exercise held in August /October 2015.
- 1.4 To consider the recommendations contained within this report in respect of the guidance and make any necessary recommendations to Cabinet and thereafter Council.
- 1.5 To recommend to Cabinet and thereafter Council that the guidance be approved as formal Supplementary Planning Guidance to the Caerphilly County Borough Local Development Plan up to 2021.

### **2. SUMMARY**

- 2.1 This study was commissioned by Blaenau Gwent Council on behalf of an informal group of Heads of the Valleys Local Planning Authorities, including Caerphilly County Borough Council. This was in response to concern over the significant number of applications for single or multiple wind turbines being received in the area. Landscape Officers felt that there was insufficient guidance for local authorities or developers to allow consistent assessment of the potential impacts of these smaller scale developments.
- 2.2 In response to this, Blaenau Gwent (the leading authority in this study) commissioned Gillespie's LLP to undertake work on behalf of the Heads of the Valleys Authorities. This informed the guidance which has been prepared in two parts as follows:
  - 1 Supplementary Planning Guidance for Smaller Scale Wind Turbine Development;  
and

- 2.3 Both parts have been subject to formal public consultation between November 2014 and October 2015. Representations received during these consultation periods are outlined in the consultation reports.

### 3. LINKS TO STRATEGY

- 3.1 The Single Integrated Plan **Caerphilly Delivers** has been prepared by the LSB and represents a determined commitment by all partners to accelerate change, strengthen partnership working, multi-agency collaboration, and accountability for delivery.
- 3.2 **Caerphilly Delivers** has been developed based on 4 key principles of:
- **Sustainable development** where we promote social justice and equality of opportunity and enhance the natural and cultural environment and respect its limits
  - **Equalities and Welsh language** where we all promote and mainstream equalities and the Welsh language in accordance with our legislative requirements and strategic equality objectives.
  - **Early intervention and prevention goals** with the aim of either preventing matters from getting worse or occurring in the first place, by identifying those in greatest need from their vulnerability, their risk of becoming vulnerable or from otherwise becoming disadvantaged.
  - **Community cohesion** where people from different backgrounds enjoy similar life opportunities, understand their rights and responsibilities and trust one another and are trusting of local institutions to act fairly.
- 3.3 The Caerphilly County Borough Local Development Plan up to 2021 (LDP) is the statutory framework for the development and use of land within the County Borough. It provides the policy framework for the development and conservation needs of the County Borough and is used by the Council to guide and control development.
- 3.4 Policy SP10 of the LDP seeks to *'protect, conserve, enhance and manage the natural heritage of the County Borough in the consideration of all proposals within both the rural and built environments'*. When approved this Supplementary Planning Guidance (SPG) will build upon this policy.

### 4. THE REPORT

#### Policy Context

- 4.1 Planning Guidance on Wind Turbines is contained in Planning Policy Wales and Technical Advice Note 8 (TAN 8) Planning for Renewable Energy (2005). TAN 8 states that *'Onshore wind power offers the greatest potential for increase in the generation of electricity from renewable energy in the short to medium term'* and that following extensive studies, large scale onshore wind turbines (over 25MW) should be concentrated into particular areas defined as 'Strategic Search Areas' (SSA's), and that *'most areas outside SSAs should remain free of large wind power schemes'*. There is no SSA's designated within Caerphilly County Borough.

#### Background

- 4.2 Caerphilly County Borough Council, along with neighbouring authorities in the Heads of the Valleys Area, have received a high number of applications for wind turbines in recent years. Concerns are raised over the cumulative impact that a high number of wind turbines could potentially have on the landscape and there is an identified need to provide consistent

guidance for local authorities and developers, to ensure that the potential impacts of these smaller scale developments on landscape is adequately controlled.

4.3 In response to this, Blaenau Gwent (the leading authority in this study) commissioned Gillespie's LLP to undertake work on behalf of the Heads of the Valleys Authorities. This informed the guidance which has been prepared in two parts as follows:

- 1 Supplementary Planning Guidance for Smaller Scale Wind Turbine Development; and
- 2 Caerphilly County Borough Landscape Sensitivity and Capacity Study

4.4 Part 1 of the Guidance was prepared in 2014 for the sub region and sets out the technical requirements for applicants as follows:

- Minimum requirements for submission of a request for an Environmental Impact Assessment (EIA) Screening Opinion;
- A methodology to be employed for EIA Screening; and
- Minimum requirements and standards of information to be submitted as part of a Landscape Visual Impact Assessment (LVIA) for both EIA and non-EIA applications.

4.5 Part 1 was subject to public consultation for a 6 week period between 7<sup>th</sup> of November and 19<sup>th</sup> of December 2014. Over a hundred different organisations were consulted including all Welsh Local Planning Authorities, Statutory Bodies, National organisations and Planning & Landscape Consultants. A copy of the consultation report is attached at Appendix 1.

4.6 There was a low response rate, with only ten responses received. There was however a good cross section of environmental organisations, industry representatives and local authorities that responded. Seven of the respondents that completed the questionnaire agreed that guidance is required to ensure that landscape and visual impacts of wind turbines are addressed in a consistent manner. Generally, most agreed with the typologies proposed, the size of the study area, the minimum requirements for submission of an EIA screening, the methodology, the approach to cumulative effects and search distances and the cumulative threshold for other infrastructure. All seven agreed with the minimum requirements of information to be provided for Landscape and Visual Impact Assessment. Most agreed with the use of LANDMAP as part of the Landscape and Visual Impact Assessment.

4.7 Part 2 of the Guidance, namely Caerphilly County Borough Landscape Sensitivity and Capacity Study is split into 6 sections:

Section 1: sets out the background and policy context for the study

Section 2: Identifies the methodology used in the study

Section 3: sets out the study area, landscape types and the units proposed

Section 4: includes the landscape sensitivity and capacity funding for each landscape unit (incorporating the landscape units from the HOV study and the rest of Caerphilly study)

Section 5: covers general locational guidance

Section 6: includes supporting maps and figures.

4.8 Part 2 of the Guidance separates the county borough into sixteen landscape units. For each unit there is:

- A map;

- An assessment of each LANDMAP criteria;
- An Assessment of the value of the landscape;
- A summary of the sensitivity to the wind turbine categories;
- Landscape capacity and guidance for siting of wind turbines.
- 

- 4.9 Part 2 of the Guidance has also been subject of public consultation. The Heads of the Valleys Area formed part of the original consultation in November 2014, whilst the remainder of Caerphilly was consulted on separately in August/October 2015. Over one hundred different organisations were consulted including all Welsh Local Planning Authorities, Statutory Bodies, National organisations and Planning & Landscape Consultants. A copy of the consultation report for Part 2 is attached at Appendix 2 and Appendix 3.
- 4.10 Although there was a low response rate in November 2014 (Appendix 2), with only 8 responses, there was a good cross section of environmental organisations, industry representatives and local authorities. All respondents agreed that a common methodology for undertaking Landscape Sensitivity and Capacity studies would be helpful. Not surprisingly there was disagreement on the proposed categories, definition of sensitivity, and the criteria for assessing landscape and visual susceptibility. All these comments have been taken into account and the document amended where appropriate.
- 4.11 A total of 4 responses were received during the consultation undertaken in August/October 2015 (Appendix 3). One representor raised an objection to the landscape units identified in Gelligaer and the information contained in LANDMAP. However, as individual wind turbine applications would still need to complete a Landscape Visual Impact Assessment (LVIA), and given that the LANDMAP data is set and managed by NRW, it is deemed that no changes to the study are required. The remaining responses were comments seeking greater clarification in respect of policy input.
- 4.12 Subject to consideration by elected members, the Guidance once approved will be adopted as Supplementary Planning Guidance to the Caerphilly County Borough Local Development Plan up to 2021.

## **5. EQUALITIES IMPLICATIONS**

- 5.1 Stakeholder engagement has been undertaken in line with the Agreed DA, which has full regard for the Citizens Engagement Strategy and the Equalities Strategy of the Council.

## **6. FINANCIAL IMPLICATIONS**

- 6.1 There are no new financial implications.

## **7. PERSONNEL IMPLICATIONS**

- 7.1 None

## **8. CONSULTATIONS**

- 8.1 All comments received have been incorporated in the report.

## **9. RECOMMENDATIONS**

- 9.1 To consider the representations received as part of the consultations undertaken in regards to and to recommend the minor amendments proposed in Appendix 3 with regards to:
- 1 Supplementary Planning Guidance for Smaller Scale Wind Turbine Development;
  - 2 Caerphilly County Borough Landscape Sensitivity and Capacity Study.
- 9.2 To recommend to Cabinet and thereafter Council that the guidance be approved as formal Supplementary Planning Guidance to the Caerphilly County Borough Local Development Plan up to 2021.

## **10. REASONS FOR THE RECOMMENDATIONS**

- 10.1 In order to provide consistency with adjoining local authorities on technical guidance to wind turbine development.
- 10.2 In order for the guidance note to be used in all planning applications and planning matters, where relevant.

## **11. STATUTORY POWER**

- 11.1 Part 6 Planning and Compulsory Purchase Act 2004.
- 11.2 Town and Country Planning (Local Development Plan)(Wales) Regulations 2005.

Author: Adeline Wilcox, Senior Planning Officer, Strategic and Development Plans  
Consultees: Cllr K James, Cabinet Member for Planning, Regeneration and Sustainability  
C HARRY, Corporate Director Communities  
P Elliott, Head of Regeneration & Planning  
R KYTE, Team Leader Strategic and Development Plans  
P Griffiths, Acting Manager of Countryside and Landscape Service  
T Stephens, Development Control Manager  
N Daniels, Landscape Architect  
G Williams, Acting Monitoring Officer

### Background Papers:

- 1 Supplementary Planning Guidance for Smaller Scale Wind Turbine Development;
- 2 Landscape Sensitivity and Capacity Study

### Appendices:

- Appendix 1: Consultation Report: Planning Guidance for Smaller Scale Wind Turbine Development: Landscape and Visual Impact Assessment
- Appendix 2: Consultation Report: Heads of the Valleys Landscape Sensitivity and Capacity Study'
- Appendix 3: Consultation Report: Caerphilly County Borough Landscape Sensitivity and Capacity Study'

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# **Planning Guidance for Smaller Scale Wind Turbine Development Landscape and Visual Impact Assessment Requirements Supplementary Planning Guidance Consultation Report**

Gillespies were commissioned by Blaenau Gwent County Borough Council on behalf of the Heads of the Valleys Local Authorities to prepare this study. The assessment approach was developed with the client group and with representatives from the South Wales Landscape Liaison Group.

This report sets out the consultation that was undertaken on the draft document, including a summary of the responses received and how they have been taken into account by the Council.

A 6 week consultation exercise was carried out between 7<sup>th</sup> November 2014 and 19<sup>th</sup> December 2014. The consultation included an email to over 100 organisations which included all Welsh Local Planning Authorities, Statutory Bodies, National organisations, local interest groups and Planning and Landscape Consultants. The email informed them of the consultation and provided a link to the document and comment form.

A consultation event was held on Tuesday 16<sup>th</sup> of December at the Norwegian Church, Cardiff. This was well attended by environmental groups, local authority planners and landscape architects and landscape consultants.

Ten responses to the consultation were received. These were from a range of Local Planning Authorities, Industry Representatives and environmental groups including NRW.

The following table contains the representations made during the consultation period and the response to them. Where appropriate, the document has been amended to take account of the views received.

## **Questionnaire Results**

- All 7 agreed that guidance is required to ensure landscape and visual impacts of wind turbines are addressed in a consistent manner.
- 4 agreed and no one disagreed with the typologies proposed in the guidance
- All agreed with the size of the study areas being proposed for each typology
- 3 agreed and 3 neither agreed or disagreed with the minimum requirements for the submission of and EIA screening
- 4 agreed and 3 disagreed with the methodology proposed for EIA screening
- 6 agreed and 1 disagreed with the proposed approach to cumulative effects and the proposed search distances
- 4 agreed and 2 disagreed with the proposed cumulative threshold for other infrastructure

- All 7 agreed with the general minimum requirements of information to be provided for Landscape and Visual Impact Assessment 6 agreed and 1 disagreed with the specific requirements for Landscape and Visual Impact Assessment
- 5 agreed and 1 disagreed with the use of LANDMAP as part of the Landscape and Visual Impact Assessment

Please note that not everyone answered the questionnaire and not everyone answered every question.



Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
<b>Q1: Do you agree that the use of a common methodology across Wales for undertaking Landscape Sensitivity and Capacity studies would be helpful?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	<p>It is agreed that a common methodology across Wales would be helpful nevertheless there are several important caveats and points that should be emphasised.</p> <p>Firstly that even more than the Heads of the Valleys Report such a nationwide study would be at a strategic level and would not be a substitute for a more detailed study for each proposed individual wind turbine development.</p> <p>Secondly that such approach and its implementation are rather belated given the level of proposed, consented and operational wind farm development across Wales in the past two decades. There is the issue of how such a study would relate to TAN8 which was based upon a similar type of exercise.</p> <p>Thirdly there is the issue of cost and logistics as well as how to assure that all the Welsh local authorities treat the results of the study in the same manner.</p>	<p>Noted</p> <p>Agree</p> <p>Agree</p> <p>Noted</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Agree	We agree with this in principle; however there are still significant inaccuracies which persist, e.g. as highlighted by the report authors in Unit 24 (presumably referring to LANDMAP Aspect Area (AA) 13); and AA1b which has recently changed its' name, which can result in confusion.	As LANDMAP is being constantly updated it is inevitable that there will be changes. All Guidance stresses that the most recent LANDMAP data should be used for an application
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree	<p>We agree that this type of study is very helpful for developers, local planning authorities and third parties, such as the local community, in providing clarity and identifying sensitive areas. We welcome this particular study, as the Heads of the Valleys area is complex and varied in terms of landscape, with areas that are highly vulnerable and areas that can accommodate some wind turbine development.</p> <p>However, applying this methodology across Wales will need to take regional variation, such as differing priorities into account. The obvious example will be that National Parks and AONBs will have stricter criteria than other areas, and the methodology must accommodate this. Similarly, there must be flexibility within the methodology to reflect the differing development priorities for different areas.</p>	Noted.

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sergio Zappulo Development Manager REG Windpower	Agree	<p>Providing that an appropriate and robust methodology is to be applied, it would be very welcome for a common methodology to be used across Wales, as this would offer certainty and comparability of all such assessments.</p> <p>In this regard, it is important to ensure that judgements made in this study are benchmarked in relation to the whole of the Welsh landscape, not just the study area. That is to say, those landscapes considered to be of 'high' sensitivity are truly the highest-sensitivity landscapes across Wales, not simply the most sensitive in the Heads of the Valleys.</p>	<p>Noted</p> <p>It was not within the scope of our study to do this. We do not know of any sensitivity studies in England or Wales that have attempted to assess sensitivity on a national basis.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
<p>Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC</p>	<p>Agree</p>	<p>Whilst agreeing that a common methodology across Wales would be helpful, the methodology itself causes specific concern for Rhondda Cynon Taf County Borough Council in relation to the TAN 8 SSAs. Rhondda Cynon Taf is the only LPA with land in a SSA in the HOV area (part of SSA F).</p> <p>Stage Three of the methodology adopts the implicit objective of TAN 8 to accept significant change in landscape character resulting from wind turbine development located within the SSA. This overlooks the intention in TAN 8 that local planning authorities will undertake local refinement of their SSAs (paragraph 2.4), and so applies the acceptance of significant change to the whole, broad-brush, unrefined SSA (in Rhondda Cynon Taf). The methodology thereby risks producing an outcome that overrides the intrinsic sensitivity of the SSA landscape derived from its underlying susceptibility and value. The refinement of SSA F in Rhondda Cynon Taf was carried out by multi-criteria analysis in accordance with the methodology in TAN 8 Annex D. The refined SSA F in Rhondda Cynon Taf (significantly smaller than the unrefined SSA) has been criticised as lacking weight in planning since it was “noted as a background paper” by the County Borough Council i.e. it was neither adopted nor rejected. Nevertheless, two important point emerge:</p>	<p>Noted</p> <p>References in the introduction have been strengthened to confirm that this study is intended for developments that considered suitable for areas outside SSA only. Wording used in the guidance has been repeated. Note added and reference made to the TAN 8 Annex D Study of Strategic Search Areas E and F: South Wales Valleys Final report (2006) both in the introduction and in the landscape objectives section to make explicit that the current study does not supersede there refinement study.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>1. The refined SSA has generally been successful in guiding where development should be carried out in SSA F (see attached map);</p> <p>2. Due to the density of built and approved development, SSA F is now nearing the maximum target set by the Welsh Government Minister for Environment and Sustainable Development in July 2011. This relieves development pressure in the undeveloped parts of the unrefined SSA (that is, outside the refined SSA).</p> <p>The methodology of accepting significant landscape change within the unrefined SSA F but outside the refined SSA F risks additional development on the high ground between the Cynon and Rhondda Fach valleys and between the Rhondda Fawr and Ogmoredale valleys, with significant cumulative landscape and visual effects on the residents of the densely-settled valley floors.</p> <p>There are two suggested options.</p> <ul style="list-style-type: none"> <li>· The TAN8 annex D study and the refined SSA boundary are noted and mapped respectively, with text to state that the study does not supersede these boundaries, or areas of high landscape sensitivity defined in the study.</li> <li>· The HOV study excludes areas 1, 3, 4 and 5.</li> </ul> <p>The SSAs present special issues of intensity of development and proximity to settlements. Therefore, it is suggested that more thought will need to be given to the methodology for assessing sensitivity not only in and around SSA F but also in other SSAs elsewhere in Wales. A strong vision is needed to prevent unacceptable effects on the landscapes and populations of these areas: the methodology does not adequately address these.</p>	

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Q2: Do you agree with the proposed wind farm typologies?			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	Please see the related response to Q2 of the landscape and visual impact assessment requirements questionnaire.	Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	<p>Whilst it is agreed that the adoption of a set of typologies is helpful (notwithstanding the constant overarching caveat that there will always be the need for detailed individual LVIAs for any proposed wind turbine development), we do not agree with the definition of the wind farm typologies that has been proposed. It is biased towards the generation of a definition that a proposed wind farm should be categorised as being 'large' or 'very large' with the commensurate greater restrictions upon its strategic acceptability.</p> <p>Under the proposed typology a proposed wind farm would be categorised as being 'very large' if it consists of more than five turbines of any height or a single turbine with a blade tip height in excess of 109m. This typology does not adequately reflect the recent development in turbine technology or the numbers of turbines contained in the wind farm developments that have been consented or become operational in the area that is covered by the Heads of the Valleys Study. It would appear inappropriate that the proposed Pen Bryn Oer Wind Farm which comprises three 110m blade tip turbines would be placed in the same 'very large' typology as the currently being constructed Pen-y-Cymoedd Wind Farm which consists of 76 turbines that will be 145m blade tip height.</p>	Because this study is concerned with smaller scale development only it is appropriate that both these schemes should fall into the very large category

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>The typology should be redefined so as to better reflect the range of wind turbine development that is operational, consented and proposed across the Heads of the Valleys study area. The corollary of adopting the present typology will be the sort of distribution of sensitivities for 'large' and 'very large' turbines as shown in Figures 14 and 15 in which the large majority or all of the study area is categorised as being of 'medium-high' or 'high' sensitivity. This outcome is not particularly helpful in differentiating varying sensitivity and capacity across different landscape units nor does it reflect the actual pattern of wind farm development that has arisen across the study area.</p>	<p>The aim of the study was not to reflect what has happened but to look at landscape sensitivity - this is only one possible aspect of the suitability of a site for WTD</p>
<p>Jeny Rawlings Senior Development Manager Airvolution Energy Ltd</p>	<p>Disagree</p>	<p>One very fundamental issue is that the Airvolution Energy (AvE) proposals for two turbines at Hafod-y-Dafal south east of Cwm do not fit into any of these proposed "Typologies". At two turbines in extent, it should fall under the "Small" typology. However at a maximum of 131m to tip, it could also fall under "Very Large".</p> <p>Another example might be a single turbine of 80m to tip which could be categorised as either "Micro" or "Medium" depending on whether the tip height or extent criteria were used.</p>	<p>We hope we have resolved this confusion by making the criteria clearer. Development must meet both criteria. The turbines at Hafod-y-dafal are greater than 109m to blade tip height and must therefore be in the very large typology.</p> <p>We have revised the typology tables to try and make this clearer. We have omitted the between ranges for the turbines - which we now realise</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Planning Guidance for Wind Turbine Development Landscape and Visual Impact Assessment Requirements (LVIAR) which is referred to as the source document for the Typologies, states under Table 1: “...to decide in which typology a development belongs <u>it must satisfy both the height and the turbine numbers criteria</u>. See the examples on page 0.5”. However if a development (such as Hafod) does <u>not</u> satisfy both criteria, there is no indication of how to resolve this incompatibility, and the illustrated examples in LVIAR (Figure 1) merely compound this conundrum.</p> <p>Since this underpins the determination of any and all conclusions arising from the Landscape Sensitivity and Capacity Study Final Report (LSCS), the report “falls at the first hurdle” and is therefore effectively not fit for purpose. Surely it is not being suggested that every development must comply with both criteria, or otherwise be automatically rejected?</p> <p>Interestingly, in LSCS it appears that the authors have “interpolated” between the two typology criteria as in Fig.07 and also Section 4 Hafod appears to be classified as “Medium” (and wrongly recorded as being two proposals) even though this approach is contrary to the aforementioned guidance as laid out in LVIAR. For this reason, we are unsure as to which typology the Hafod development should be classified under and hence the appropriate specifics which apply, both in terms of the standard and extent of information now considered acceptable for the typology in question (LVIAR) and the capacity and sensitivity of the landscape to the typology in question (LSCS).</p>	<p>confused the issue.</p> <p>Hafod was incorrectly shown on the plan and described previously.</p> <p>Plan amended to show Hafod-y-Dafal as Very Large and text changed</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Disagree	There needs to be greater clarity as to how to determine the typology of a wind turbine development. For example, should a single 109m turbine be classified as a micro, large, or something in between?	
Sergio Zappulo Development Manager REG Windpower	Neither Agree nor Disagree	The typologies include consideration of both turbine height and turbine numbers. We query the interaction between height and number. This can lead to inconsistencies such as, for example, a single turbine of 110m and a group of five turbines at 79m would both be considered a 'very large' development, despite having significant differences in terms of their likely interaction with the landscape. In our experience, turbine height is more critical in judging the principle of wind turbine development within an area (ie sensitivity). Turbine numbers may be more relevant to a consideration of 'capacity'. It is noted that, for operational and consented schemes, only height has been considered (page 11) and the reasons for this difference is not stated. If this is appropriate for operational and consented schemes, it may be appropriate to focus on height for all schemes.	We have addressed this emphasising the fact that this sensitivity study is for smaller scale development and by clarifying the typologies.
		It could be more clearly stated how the cut-off heights were arrived at. Reference is made to the <i>Planning Guidance for Wind Turbine Development: Landscape and Visual Impact Assessment Requirements</i> , although the consultation draft of this document does not provide this detail either. In defining these typologies, it is not clear if regard was had to the turbines currently operating and planned in the study area, or likely future trends. For example, there are a number of consented schemes in the study area with turbines of 145m, which is significantly greater than the 110m cut-off for the 'very large' category. The document could clarify that the 'very large'	Cut off heights were chose to align with other studies

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		category does indeed have no upper limit, and that the conclusions in relation to 110m turbines would remain valid for turbines of 150m+ which may be proposed in the future.	
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Neither Agree nor Disagree	The typologies are simple but seem to be quite restrictive. With most wind energy sensitivity studies, the size of turbine and the number of turbines are separated to allow flexibility in the future with changes in technologies and pattern of development. Single or double turbines over 109m to VBT are now coming forward so it is likely that the Very Large category will be challenged.	Developments in the <i>Very Large category will be assessed on a case by case basis.</i>
		It is apparent that the strategy is to concentrate any Large or Very Large developments in SSAs and Medium or smaller developments everywhere else. Whilst this might be true of the HOV study area, we are not sure that this will achieve government policy/targets if applied everywhere in Wales.	This study is only concerned with the landscape sensitivity of the HOV area and not with achieving government policy/targets across Wales.
		The only difficulty encountered with applying the typologies is where one development comprises turbines in more than one height category e.g. 3 at 100m plus 7 at 120m. Splitting the scheme into two typologies results in one Large typology adjacent to one Very Large typology, which should probably be treated as one Very Large typology. A note to cover this situation is needed.	Generally we think that schemes which incorporate different turbines should be discouraged. The scheme described would fall under the very large typology due to the number of turbines involved (10). I believe such situations, which are likely to be rare, can be left to the good sense of the planning officer. In addition the scheme described would be greater than 5MW and we have made it clearer that the study is aimed at under 5MW schemes.
<b>Q3: Do you agree with the proposed definition of sensitivity?</b>			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Disagree	<p>The inconsistent use of terminology between definitions of sensitivity makes comparisons between them more difficult. For instance, the definitions for “low and high sensitivity” explicitly address the vulnerability of the key landscape characteristics, while the term “vulnerable” is absent from the definition of “medium” sensitivity.</p> <p>It would also be beneficial if there was more consistency between the definitions when describing the impacts on the character of the landscape and the value placed on the landscape. The descriptions currently vary as follows: “significant adverse effects”, “result in change” and “significant effects”.</p>	We have reviewed these and consider that these are not inconsistencies in terminology but aim to describe the different kinds of effects that might be expected from landscapes that have low medium or high sensitivity
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	<p>The definitions are broadly correct but there are some amendments that would be helpful and reflect the reality of wind farm landscape assessments. Amongst these small-scale changes are:</p> <p>For Low Sensitivity given that for almost any wind turbine an LVIA would conclude that there would be some significant effects upon landscape character even if these are spatially restricted to the immediate vicinity of the proposed turbine, it is unrealistic to state that this definition only applies to areas (or landscape units) where no significant adverse effects would arise.</p>	This would be true in an English context but TAN 8 explicitly refers to no significant change outside SSAs
		<p>We consider that the use of the terms ‘area’ and ‘landscape’ appear to be used interchangeably. This definition is too vague in the context of this Study and should be replaced by ‘landscape unit’ as this is the scale at which the Study has been undertaken.</p>	The effect are not just limited to the landscape unit in which the development is proposed but may be on the surrounding or adjacent units - therefore to replace area and landscape with landscape unit would be inaccurate

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Table 2; Definition of Sensitivity; although the text correctly acknowledges that sensitivity is determined by consideration of both susceptibility and value, the sensitivity criteria in Table 2 are not specifically referred to in the text; make no mention of either susceptibility or value, and appear to “pre-judge” significance of effects; reading in fact more like effects criteria than sensitivity criteria.	The sensitivity definitions are a two sentence summary and cannot include everything. The detailed consideration of susceptibility and value and made clear in the methodology and in the actual study
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	The sensitivity definitions are appropriate and clearly stated. It is generally accepted by planners that all commercial-scale wind turbines are likely to give rise in a change in landscape character at a local scale. It would be helpful for the study to acknowledge this to ensure that these definitions are not read to imply that any change in character, no matter how small, is unacceptable.	TAN 8 explicitly refers to no significant change outside SSAs which is the wording used here for low sensitivity
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	There are 3 definitions (low, medium and high) but 5 different levels of sensitivity identified in the study area. This is confusing and could be contentious at public inquiries. There should be 5 definitions to explain low to medium and medium to high.	It is very common for intermediate assessments of medium/high to be given without a separate definition
Q4: Do you agree with the proposed criteria for assessing landscape and visual susceptibility to wind turbine development?			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Disagree	It is unclear whether cultural heritage features, such as scheduled ancient monuments (SAMs) and listed buildings, form part of the criteria for assessing landscape and visual susceptibility. These heritage features are known to be susceptible to wind turbine development, particularly in respect of harm to their settings. Whilst it is possible that SAMs and listed buildings are considered under the criteria relating to <i>Built Environment</i> and <i>Skylines and Settings</i> , it is not explicit in the explanatory text.	In this study heritage features are assessed in terms of their contribution to the landscape. A separate cultural heritage assessment of impacts on setting would need to be undertaken.
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	This response will provide brief comments on each criterion. Scale – agree that VS8 is the correct LANDMAP Survey Collector Response to use. Do not agree with the statement that “A large height differential ... by lessening the size of the turbines” as poorly sited turbines in an elevated location close to lower lying areas can increase the sense of the turbines being overbearing in these less elevated areas in the manner that has been identified in some LVIA reviews provided to local authorities in south Wales that have been prepared by White Associates, as is implied in the remainder of the commentary on this criterion in the Study. This sentence could be interpreted as contradicting the justification for the landform criterion.	We think this criterion is clear. They are inevitably very brief description of some quite complex ideas which are likely to be explored in depth for particular schemes.
		Landform – see comment above. Suggest altering so that ‘high hills/mountains’ is high susceptibility and ‘hills/valleys, rolling land undulating’ is medium susceptibility. Landcover pattern – broadly agree apart from the statement that the presence of a field pattern will	As above
		inherently result in high susceptibility: if the field pattern is regular and/or large scale and/or is formed by ditches; low trimmed hedgerows or post and wire fences.	A mosaic field pattern, not just any field pattern has high susceptibility

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Built environment – it is agreed that the presence of existing manmade features will generally reduce a Landscape Unit’s (LU’s) sensitivity to the presence of wind turbines. As is recognised in the supporting text the statement that the frequency of “built form and human intervention” is indicative of reduced sensitivity does appear to contradict the need for visual sensitivity to be considered (as it correctly is later on). The LANDMAP Survey Collector Responses VS20; use of construction materials and VS25: sense of place are weak proxies for considering effects upon built environment compared with the other three criteria listed under this heading.</p>	<p>Don't understand how this contradicts the need for visual sensitivity to be considered. It is well understood that different attribute of the landscape may result in differing susceptibility for example absences of residential properties makes it less likely that there will be residential issues but may indicate that it is a wild and remote landscape that will be susceptible for other reasons.</p> <p>The LANDMAP Survey Collector Responses VS20; use of construction materials and VS25: sense of place are additional information not proxies</p>
		<p>Skylines and setting – generally agree although if it is accepted that wind farms themselves form a distinctive skyline feature then this criterion would mitigate against extending existing wind farms or grouping together wind farm developments thereby reducing the potential for extending existing wind farms.</p>	<p>Whilst turbines are clearly skyline features they are not generally considered to be distinctive features requiring protection. We always have to believe that decision makers will apply common sense when they consider individual applications</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Movement – Generally agree but the criterion needs to be more subtle and specific about different types of movement within an LU and do not agree that the responses to Survey Collector Question VS18: Level of Human Access provides a good indication of the amount of movement in an LU. Had always assumed it was a reference to the density of the PRoW network or presence of Open Access Land. These are not good proxies for the effects that would be generated by the movement of turbine blades. Should rely upon observation during survey.</p>	<p>Question VS18: Level of Human Access provides additional information to observation during survey. The method for assessing VS18 refers to busy roads, motorways, town centres, small villages, rural roads, mountain footpaths etc. and in this respect supported observations during field survey.</p>
		<p>Visibility, key views and vistas – This criterion runs the risk of conflating landscape and visual sensitivity. With regard to landscape sensitivity it is not agreed that a high degree of enclosure and topographical variation and/or high levels of landcover are less susceptible. For VS9: enclosure, the equation of a sense of enclosure with low susceptibility to wind turbine development and exposure with high susceptibility are not in accordance with wind farm design guidance.</p>	<p>The difference here is that we are dealing with smaller scale development where enclosure in some instances may enable a smaller turbine to be accommodated.</p>
		<p>Intervisibility and Associations with Adjacent Landscapes. – This criterion is essentially a repeat of the previous criterion.</p>	<p>It depends on similar physical characteristics but focuses on different aspects</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Typical Receptors – Whilst the comments on the relative visual sensitivities of different broad categories of visual receptors is agreed as they accord with the general approach that has always been adopted in the different editions of the GLVIA, it could be interpreted as being contrary to the earlier built environment criteria. It also effectively requires an outline visual receptor baseline study to be undertaken.</p>	<p>It is well understood that different attribute of the landscape may result in differing susceptibility for example absences of residential properties makes it less like that there will be residential issues but may indicate that it is a wild and remote landscape that will be susceptible for other reasons.</p>
		<p>Views to and from important landscape and cultural heritage features. – Whilst it is agreed that these are important considerations, they are better considered at the more detailed stage when an LVIA and/or Cultural Heritage Impact Assessment is undertaken. As it is proposed that the response to this criterion is prepared solely upon the basis of site visit(s) it is not clear how this could be meaningfully considered at the scale of LUs and it is best considered under more detailed assessments for individual wind energy developers.</p>	<p>In the actual LU assessments this criteria is very useful as it indicates the features that are important to consider that this should be helpful to both developer and LPAs</p>
		<p>Scenic Quality and Character – at the strategic level at which this Study is concerned it is agreed that Survey Collector Responses VS46-VS48 are appropriate to use although as the supporting text strongly indicates there is a large degree of overlap with the criterion applied for landscape value. Also given that for many of the other criteria suggested the Study correctly advocates that LANDMAP data is supported by observation during study, the same approach should be adopted for this criterion. Simple reliance upon LANDMAP Collector Survey Responses seems to be a broad brush approach even at this ‘strategic level’.</p>	<p>Text added</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Remoteness Tranquillity – It is agreed that LANDMAP Survey Collector Response VS24 is useful for reviewing this criterion, it is not the case that inaccessible or remote LUs are inherently of high susceptibility to wind farm development nor are “accessible /frequented /busy” landscapes always of low susceptibility. There is some contradiction with the criteria suggested under the ‘movement’ and ‘built development’ headings. Also at the scale of LUs these attributes are likely to vary considerably within individual LUs.</p>	<p>It is well understood that different attribute of the landscape may result in differing susceptibility for example absences of residential properties makes it less like that there will be residential issues but may indicate that it is a wild and remote landscape that will be susceptible for other reasons.</p>
		<p>Landscape Value – compared with the 12 separate criteria that are advanced to assess landscape and visual susceptibility the use of just two criteria for landscape value; one of which is solely concerned with historic value could be considered to be unbalanced. Also the approach of using designations as a proxy could be criticised for ignoring earlier statements in the Study (as well as in other guidance) that even some nationally designated areas may have potential in some of their parts to accommodate certain types of landscape change. The statement that local landscape designations, namely SLAs, closely follow very sensitive national designations is disputed especially given that in some parts of the study area SLAs are very extensive covering nearly all the upland areas.</p>	<p>Wording has been amended</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Also it is not agreed that the outstanding or high values for LANDMAP Survey Collector Responses LH45; GL31; and GL33 should be interpreted as these LUs having a high landscape value with regard to wind turbine development. This is because these geological or ecological evaluations are often generated by the presence of one or two RIG sites or a small number of locally rare habitats; phenomena that would be avoided by any well-designed wind turbine proposal. The presence of a RIG site at the other side of an LU should have no influence upon suitability to host a wind turbine development.</p>	<p>This section is not identifying susceptibility to wind turbines. It is identifying indicators of landscape value as recommended by GLVIA3.</p>
		<p>Historic Value – Again even at a strategic scale this approach is simplistic; there should be a consideration of the reasons for the high or outstanding evaluations for the HL38-HL40 Survey Collector Responses to allow a review as to whether these could be affected by wind turbine development. Also from experience of undertaking LVIA's in this part of south Wales we are aware that a high proportion of HLAAs have been ascribed with high or outstanding evaluations thereby making it highly likely that a high proportion of LUs will be attributed with high landscape value in this study.</p>	<p>This criteria is measuring the value placed on the landscape and if a large number of aspect areas have been ascribed a high historic value that it a fact to be taken into consideration. The assessment for each LU has looked in more details at the reasons for the evaluation.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Table 3 and Stage 1“Landscape and Visual Sensitivity Criteria”. LSCS purports to be informed by GLVIA3. However GLVIA3 indicates that landscape and visual assessment should be carried out as two separate but related activities. In this report they appear to be combined. This could lead to some confusion. Whilst we agree with some perceptual attributes such as skylines and settings, key views and vistas and intervisibility can help to determine landscape susceptibility (even though it’s wrongly in our opinion listed under “visual criteria”) we do not agree with the specific “typical (visual) receptors” criteria. This is because visual assessment relates to point-based rather than generic receptors and its inclusion in the criteria could render the overall conclusions questionable (see below , Q12,for an example of this).	Effects of wind turbines on landscape character are predominantly as a result of visual changes - in this way they are not typical development. We are not aware of any wind turbine sensitivity studies that have assessed landscape and visual sensitivity separately although may have divided their criteria in to landscape and visual criteria whilst acknowledging the overlap. Typical (visual) receptors is one criteria and we do not consider that it could render the overall conclusions questionable.
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	The criteria are clearly described and their application is explained. There is some doubt as the specific applications of LANDMAP answers: for example under the Landcover Pattern criterion, the answers for VS16 include ‘formal’ under low sensitivity, although a formal landscape may be more sensitive to interruption. VS16 also includes the possible answer ‘organised’ which does not fall under any of the sensitivity levels. Other examples could be quoted but generally the approach is both clearly set out and properly grounded in established good practice.	The study does not remove the need for case by case analysis which should highlight a 'formal' landscape that would be harmed by interruption

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jill Kibble Planning Liaison CPRW Montgomeryshire Branch		We feel this is a very thorough appraisal and that similar work could usefully be done in other LPAs. We are not landscape experts and would not presume to comment on the detailed methodologies. We have considered the response made by CPRW Brecon and Radnorshire Branch and would fully endorse all the points they have cogently made particularly as regards Third Party Consultation requirement with interested stakeholders who have intimate understanding of the area under consideration. We would also emphasise that landscape has an economic component and that in some areas of Wales, for example Montgomeryshire, rural tourism and quiet outdoor pursuits are of considerable importance (12% of GDP) and that there is a considerable value to employers in the quality of the environment when recruiting senior staff. Landscape thus has more than an aesthetic value and planning officers must weigh economic value in the balance. Failure to do so has, of course, been the subject of recent applications for Judicial Review in Powys.	The impact on tourism is part of the planning balance but not part of the landscape sensitivity assessment although scenic value is often an indicator of value to tourism

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Our only additional comment over and above those provided by Brecon and Radnorshire would be on Landmap.</p> <p>Landmap can be a useful tool but has a tendency to encourage 'salami slicing' of the landscape into parcels that are not necessarily topographical entities and when considering massive, moving and vertical structures in the landscape the visibility over a considerable area, that probably encompasses a number of Landmap classifications, is essential. It is not the Landmap Visual / Sensory classification of the land on which the turbine itself stands that is of prime importance but the whole context of the landscapes in which it is seen. Landmap is irrelevant to the viewer who has a sensory perception of the quality of the landscape in its entirety.</p>	<p>Our Landscape Units are wider than the LANDMAP aspect areas but the assessment also requires a consideration of intervisibility between landscape units which should encompass the idea of seeing the landscape as a whole.</p>
<p>Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC</p>	<p>Disagree</p>	<p>The criteria are agreed except:</p> <p><b>Landcover pattern:</b> VS 16 –'formal' is defined in LANDMAP as elements/features with a formal designed relationship with each other. This is clearly sensitive. Suggest that: low susceptibility is regular, medium susceptibility is organised and high susceptibility is random and formal. Aesthetic/perceptual and experiential criteria:</p> <p>The use of scenic quality, character and integrity values may be seen as double counting with overall value.</p> <p>VS 24 – safe and settled are duplicated in medium and high</p>	<p>In fact the only time in the study area the answer for VS 16 is formal it is in relation to commercial forestry which clearly does not have high sensitivity</p> <p>We see it as confirmation rather than double counting as we do not use a scoring system</p> <p>Corrected</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		susceptibility	
Q5: Do you agree with the proposed Stage 1 Assessment Framework?			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	<p>Whilst we agree with the overarching approach and the need to draw upon LANDMAP Survey Collector Responses and strongly agree that these need to be supported and enhanced by site work there are a number of weaknesses in the approach suggested. In particular some of the criteria are contradictory with regard to attributes such as topography and landform; the relative isolation of the LU with regard the presence of settlements and level of public access; how to deal with relative isolation; and the use of Collector Survey Responses that are determined by the presence of location specific phenomena such as RIG sites.</p>	It is acknowledged in the study that some indicators of susceptibility <u>are</u> contradictory and this has to be considered in the overall assessment
		<p>Also it is important to understand that whilst LANDMAP is a very useful source of information and has the large advantage that it is a quality assured database that extends across all parts of Wales, the Survey Collector Responses were generally compiled on the basis of field work that was undertaken almost a decade ago i.e. before the majority of the present operational wind turbines were present. Although this is acknowledged later in the methodology, it is not clear how they incorporated into the final indicative landscape capacities</p>	They were incorporated into the final indicative landscape capacities through the use of the online WT database & site survey

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	See Above	Noted
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sergio Zappulo Development Manager REG Windpower	Neither Agree nor Disagree	<p>We broadly agree with the assessment framework as setting out an appropriate approach to landscape sensitivity and capacity evaluation. It is accepted that there is no published guidance on carrying out a landscape sensitivity study. Nevertheless, a widely accepted approach has been developed and implemented by landscape consultants, using a criteria-based analysis of landscape characteristics to determine relative sensitivity. We are content that, in outline, the Heads of the Valleys study follows this approach to arrive at a clear and robust methodology.</p> <p>However, we are less clear as to the way that cumulative effects have been incorporated. This remains the most problematic area of assessing landscape capacity for wind energy.</p> <p>The overview on page 8 states that sensitivity is based on landscape susceptibility, value and presence of wind turbines. This page goes on to state that capacity is based on sensitivity, unit size and presence of wind turbines. Since presence of wind turbines is considered in sensitivity, it is being double-counted in the assessment of capacity.</p>	We see it as confirmation rather than double counting as we do not use a scoring system

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>On page 12, the judgement of sensitivity is explained differently. Here it is stated that landscape susceptibility, visual susceptibility, landscape value, and visual receptors are the factors contributing to sensitivity. There is no mention of wind turbines. “Presence of modern structures such as wind farms” is referred to under the ‘Built Environment’ criterion as a factor which may reduce landscape susceptibility. But presence of wind turbines is not set out as a separate factor as indicated on page 8.</p> <p>Pages 19-20 detail the sensitivity evaluation process. This describes a desk-based assessment of sensitivity based on susceptibility and value, backed up by field work. In contrast to the overview on page 8 there is no mention of existing wind turbines. However, at Stage 3, the first paragraph on page 21 states that sensitivity was derived from susceptibility, value and ‘the potential for cumulative effects’. It is unclear how this ‘potential’ was assessed or how it has been incorporated into sensitivity, other than as one factor affecting the ‘Built Environment’ criterion.</p> <p>This lack of clarity continues into the actual assessments. For example, Landscape Unit 1 is assigned medium-high sensitivity in part because of the ‘presence of existing large scale wind farm’ (page 34). Mention is made of wind turbines in the susceptibility evaluation for this unit, but in the context of the evaluation criteria this would have the effect of reducing susceptibility.</p> <p>In summary, it is not clear how the study addresses existing development, and how this affects sensitivity in particular. Our view is that the presence of wind turbines, in common with other forms of development, may affect the susceptibility of the landscape, but should not be additionally considered as a separate ‘layer’ in the assessment of sensitivity. It is more appropriate to consider this aspect in the evaluation of (remaining) capacity (see our response to 00)</p>	<p>It is not possible to mention everything every time. The study must be read as a whole.</p> <p>Decisions on those circumstances where adding turbines to a landscape that already contains turbines is acceptable, possibly because the existing turbines mean that the degree of change is reduced, and where it results in cumulatively adverse effects is a judgement that still needs to be made on a case by case basis.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Agree	Generally agree. Suggest that it is important that all the main text paragraphs are numbered as this document is likely to be referred to frequently, especially at inquiries.	It would be quite a task to go back and number all the paragraphs now. This has not been raised before and many sensitivity studies do not have numbered paragraph but rely on page numbers.
<b>Q6: Do you agree with the proposed methodology for assessing Landscape and Visual Sensitivity?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
<p>Ian Gates Associate Director, Landscape AMEC E&amp;I UK Ltd</p>	<p>Disagree</p>	<p>As stated in the response to Q5 it is not clear how the key field survey component is taken into consideration in Stage Two. Whilst we agree with all the field survey bullet points that are listed on pages 19-20 with regard to the amalgamation of these with the results of the LANDMAP Desktop review under the 14 separate criteria the methodology merely states in the final paragraph on page 20 that “Based on the results of the field surveys, the draft evaluations of landscape unit sensitivity were refined ...”. This absence of methodological clarity is a major weakness. This is reflected in the key comment on page 19 (second text column, second paragraph) in which it is stated that “Sensitivity can vary locally within landscape units and the overall evaluation represents the general sensitivity across the landscape unit to reflect the strategic nature of the study.” The corollary of this statement must be that whilst the Study provides some broad landscape, visual and historic landscape context for wind turbines in the study area the acceptability of any proposed wind turbine development remains reliant upon it being subject to a detailed and thorough LVIA.</p>	<p>It is correct that whilst the Study provides broad landscape, visual and historic landscape context for wind turbines in the study area the acceptability of any particular wind turbine development remains reliant upon it being subject to a detailed and thorough LVIA. This is always the case with sensitivity studies which cannot assess individual sites or individual proposals.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	<p>See above; in our opinion visual receptors <i>per se</i> have no place in a <u>landscape</u> sensitivity and capacity study and may lead to misleading and inaccurate conclusions being drawn (see above qualified explanation under Q4 comments).</p> <p>A judgement on the sensitivity to change to each typology is made for each landscape unit. However Table 2 is not referred to and even if it were, we have reservations about the criteria used, and the way in which they may have been used, as aforementioned in Q3.</p> <p>Although it is stated that field survey was used to test and refine the findings of the report, it still comes across as a primarily GIS- based desk exercise with little evidence of this “refinement”.</p>	Effects of wind turbines on landscape character are predominantly as a result of visual changes - in this way they are not typical development. We are not aware of any wind turbine sensitivity studies that have assessed landscape and visual sensitivity separately although may have divided their criteria in to landscape and visual criteria whilst acknowledging the overlap.
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree	Although we support the overall methodology and the different data sources and criteria used, the weak point in this methodology is that the ultimate judgement on overall sensitivity is subjective. Obviously the judgement is informed by the available information, and made by experts, but this could potentially introduce inconsistency if the methodology is applied elsewhere.	There is no alternative to subjective judgement with regard to wind turbines and landscape impact
Sergio Zappulo Development Manager REG Windpower	Agree	We comment in Q5 in relation to the inclusion of cumulative effects in this section. Otherwise we accept that this section clearly sets out the process undertaken.	See answer above

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	The methodology omits consideration of the TAN 8 annex D SSA refinement studies, their refined boundaries, and the implications arising from these.	See answer above where consideration of wind farm scale development has been specifically excluded
<b>Q7: Do you agree with the use of professional judgement to determine the most appropriate landscape objectives?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	The use of professional judgement is in line with the overarching approach advocated within GLVIA3 and the manner in which the Landscape Objectives are tied into the TAN8 objectives provides a sense of consistency.	Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Agree	<p>Yes, in principle we agree with the use of professional judgement to determine landscape objectives, but this must be carried out with the help of stated criteria. With this in mind, we have the following query.</p> <p>Stage 3; Objective 2 states;</p> <p>“Landscape accommodation is applicable to landscapes where the conservation of landscape character and visual amenity has been assessed to be of moderate to high importance”.</p> <p>Presumably this is referring to LANDMAP but there is no cross-reference to this and begs the question, in the context of this report, exactly how is this “importance” assessed and using what criteria?</p>	How the importance is assessed and the criteria used are set out in the susceptibility and value criteria tables
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Disagree	It is unclear as to why professional judgement is needed as the objectives are very clearly allied to SSAs, Designated Landscapes, and land outside SSAs and Designated Landscapes. It would be simpler to apply the objectives accordingly. As for question 6, using subjective judgement could potentially introduce inconsistency if the methodology is applied elsewhere.	Professional judgement is always required
Sergio Zappulo Development Manager REG Windpower	Agree	The application of professional judgement is appropriate, and is an approach advocated by GLVIA3. However, the three objectives are simply applied to protected landscapes (protection), landscapes outside TAN8 search areas (accommodation), and landscapes within TAN8 search areas (change). The use of professional judgement was presumably quite limited.	Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC		Question not clear.	
Q8: Do you agree with the Landscape Objectives set for the Heads of the Valleys Area?			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Neither Agree nor Disagree	Although as stated above it is agreed that linking in the study to TAN8 is beneficial, the reliance upon TAN8 criteria in the determination of Objectives 2 & 3 does have the consequence that the landscape objectives for the landscape units has essentially been pre-determined by the TAN8 study which is nearly a decade old and whose underlying methodology has been subject to criticism and refinement.	We have now emphasised the fact that the study is not aimed at large scale wind farms i.e. those associated with SSAs
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Stage 3; Objective 2 states; “This objective aims to retain the overall character, quality and integrity of the landscape, whilst accepting that occasional small to medium scale developments may be allowed. Such development may have an effect on the local landscape <i>but should not bring about significant adverse changes in character.</i> ” Does this latter half of the sentence mean throughout the Landscape Unit? Or would localised significant effects be acceptable? This is not clear.	It would depend on the degree of harm

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>“Wind turbines should not become either the dominant or the key characteristic of a landscape”. Again is this referring to the whole landscape unit, or is, for example, a two turbine proposal at the extremities of the Unit within which a development is situated and with limited effects elsewhere, likely to be considered acceptable? Again, not clear.</p>	<p>The units have been defined for the purpose of the study so a development at the extremity of the unit could be dominating in an adjacent unit.</p>
<p>Sorrel Jones Conservation Officer Gwent Wildlife Trust</p>	<p>Agree</p>	<p>See Question 7.</p>	<p>Noted</p>
<p>Sergio Zappulo Development Manager REG Windpower</p>	<p>Neither Agree nor Disagree</p>	<p>The introduction of landscape objectives is to be welcomed and provides a clear means by which the study can be applied to planning decisions. The objectives for protection and change appear appropriate as the end points on a continuum of sensitivity, but accommodation must necessarily incorporate a broader spectrum including some sensitive areas and some less sensitive. The statement that only “occasional small to medium scale developments may be allowed” implies blanket restriction rather than recognising this variability. The statement that “wind turbines should not become either the dominant or the key characteristic” is a more appropriate test to apply, rather than a height-based restriction.</p>	<p>This has been changed as the small to medium did not refer to the typologies</p>
<p>Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC</p>	<p>Disagree</p>	<p><b>Objective 2</b> states that only up to occasional medium scale developments may be allowed. This effectively means no windfarms or turbines over 80m to VBT outside SSAs. Whilst desirable in many areas this seems highly restrictive overall.</p>	<p>This has been changed as the small to medium did not refer to the typologies</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p><b>Objective 3' s</b> definition indicate a 'notable amount of wind turbine developments'. This effectively covers the descriptive range of a landscape with windfarms, a windfarm landscape and a windfarm. All these will occur in an SSA and it is suggested that this should be explained. We also suggest that the definition should be changed to a 'notable amount of windfarms'. The reason is that in SSAs different rules apply as the areas are under particular pressure. Smaller developments are causing cumulative impact problems between the larger clusters of windfarms which are there to effectively meet the national targets.</p>	<p>We have added a note referring to the SSA studies and changed the definition to windfarms</p>
<p>Q9: Do you agree with the methodology for identifying the indicative landscape capacities?</p>			
<p>Judith Jones Head of Town Planning Merthyr Tydfil CBC</p>	<p>Agree</p>		<p>Noted</p>
<p>Ian Gates Associate Director, Landscape AMEC E&amp;I UK Ltd</p>	<p>Neither Agree nor Disagree</p>	<p>The four listed criteria are all important in establishing the indicative landscape capacity of each of the 33 LUs. However, once again it is not clear how the four criteria have been balanced in arriving at the final indicative capacity. It is noted that the individual LU sheets contained in Section 4 list the wind farm developments operational, consented or proposed for each LU but it is not apparent how the size of each LU has been taken into consideration. It would be useful if each LU's size in ha were given somewhere on the LU information sheet.</p> <p>It is assumed that the Study is relying upon "<i>professional judgement</i>" in interpreting the information set out on each LU's sheet to determine that LU's indicative landscape capacity but the structure of</p>	<p>The study cannot remove the need for a detailed LVIA and the detailed site survey work that should accompany it.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>the study and the LU sheets means that there is inevitably a strong emphasis upon the first bullet point i.e. the landscape and visual susceptibility and landscape value with the other three bullet points considerations being ‘bolted on’. Consequently contrary to the indication that the Study seeks to promote, it is heavily based upon the desktop study of the LANDMAP Survey Collector Responses under its 14 headings which as has been established earlier in this response contains a number of weaknesses, contradictions and double counting.</p> <p>This is tacitly acknowledged in another of the caveats that are occasionally inserted into the text; namely in the second paragraph of the second column on page 23 when it is stated that <i>“The indicative landscape capacity helps to identify the type of developments which could be potentially accommodated. However, this does not in itself suggest that all planning applications for the wind turbine development of the typology identified will be appropriate to these areas.”</i> It could also be argued that the corollary of this statement may be to suggest that no developments of a typology identified as being above the capacity of an LU will necessarily be inappropriate in that area.</p>	
		<p>With regard to the untitled and un-numbered figure on page 23 it is helpful to note that the Study concludes that landscapes (or LUs) with low sensitivity have the greatest capacity and that these are described as <i>“Typically a landscape with a number of wind turbine developments”</i>. However the Study does not make it clear whether the presence of the wind turbine developments contributes to a landscape’s low sensitivity.</p>	<p>We have reconsider this figure and omitted it</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	See above Comments in Q8.	See response above
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	We broadly agree with the approach taken here, which is adequately set out and accords with accepted good practice. The inclusion of existing and consented turbines is a key factor in determining the remaining	Noted
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Neither Agree nor Disagree	Suggest that the landscape sensitivity left-hand column should indicate <i>higher</i> sensitivity at the top and <i>lower</i> sensitivity at the bottom rather than just high and low which is too definite.  Also the threshold definitions should have the same wording as the objectives e.g. Typically a landscape with a notable amount of windfarms- on the bottom right column.	We have omitted this figure
Q10: Do you agree with the assessment of the Landscape Character Baseline?			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	Factual information with no errors identified	Noted
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Neither Agree nor Disagree		Noted
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Neither Agree nor Disagree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	This is useful background context which summarises the relevant sensitive landscapes of the study area.	Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	<p>Second paragraph, page 24- 'Millstone Grit' should be substituted with 'Pennant Sandstone'.</p> <p>We suggest that the TAN8 annex D study should be mentioned here if the study ultimately covers this area. The wording could read:</p> <p>TAN8 and Strategic Search Area (SSA) F</p> <p>An Annex D refinement study has been carried out for SSA F including an assessment of landscape sensitivity for technically feasible areas and the definition of a refined SSA boundary. This boundary is shown on figure X in conjunction with the overall SSA boundary. It should be noted that this study has not reviewed the Annex D study or come to a view on its findings. It does not supersede the definition of the refined boundary, or areas of high landscape sensitivity defined in the Annex D study.</p>	Changed  Note added to reflect this
<b>Q11: Do you agree with the proposed Landscape Types?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	It is agreed that the LANDMAP Visual & Sensory Aspect Level 3 Classification is appropriate.	Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Neither Agree nor Disagree		Noted
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Neither Agree nor Disagree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	We have not examined the proposed landscape types in detail, though they are clearly derived from application of LANDMAP and appear to be appropriate.	Noted
<b>Q12: Do you agree with the proposed Landscape Units?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Neither Agree nor Disagree	<p>It remains unclear as to how the LUs were defined. It is not explained in Section 3 or in Section 2 page 11 where they are introduced.</p> <p>These comments are only concerned with the LUs that are relevant to the proposed Pen Bryn Oer Wind Farm which would be located in Caerphilly Borough Council on elevated ground between Tredegar and Rhymney.</p> <p>The boundaries of the most relevant LUs (LU16; LU18; LU19 &amp; LU20) are logical and relate to the boundaries of the LANDMAP VSAs found in this area.</p>	The basis for defining the study units is set out on page 11

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Landscape Units embody a number of the individual LANDMAP aspect areas (AAs) which can produce potentially misleading and confusing results. For example, Unit 23 (encapsulating the Upland Grazing AA where the Hafod proposals would be located) includes extensive Urban and Amenity AAs which, because of the inclusion of visual criteria in the capacity assessment, results in a much higher sensitivity to turbine development than would be the case if just the Upland Grazing AA was assessed, despite Unit 23 generally being classed as a “medium to large scale landscape” and therefore less sensitive to development. The Unit 23 assessment concludes that it would have “...higher sensitivity to larger development due to the presence of visual receptors and the potential effects on the scale, landform and pattern of the valley”. Considering the proposed development is not within the valley itself and has very little intervisibility with it and that, in our opinion, visual receptivity should not feature in the assessment (see Q6), we would question the relevance and accuracy of this conclusion in respect of Hafod.	The definition of the landscape units has taken into account visual links between adjacent aspect areas. As explained above the key impact of wind turbines on landscape character is as a result of visual change
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Neither Agree nor Disagree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sergio Zappulo Development Manager REG Windpower	Neither Agree nor Disagree	We have not examined the proposed Landscape Units in detail, though they appear to be logical in their definition of discrete areas. We note that most of the units incorporate a selection of landscape types. Landscape sensitivity is generally driven by landscape type, with upland moorland types being generally less sensitive than enclosed valley types, for example. There is likely to be significant variation in landscape sensitivity within those landscape units which include a variety of types. It is important that this variation is recognised in the unit-based evaluations.	Noted. We believe it is addressed. The aspect areas which are discrete types were too small to be useful for a strategic study.
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Neither Agree nor Disagree	Note that the only ridge top which is not a character area, Cefn y Rhondda, lies between the Rhondda Fawr and Rhondda Fach valleys. This is of concern and even if it is physically omitted it must be properly addressed in the descriptions of the 2 adjoining areas. 1: description should include the scarp slopes to the north. 2: description should include the scarp slopes to the south. 3: mention narrow ridge top 4: mention narrow ridge top	Information added in relation to detailed comments below
		12: Merthyr East Valley Side – these are not the earthworks but a large scale coal recovery scheme (Ffos y Fran) which has about a 15 year life span and then will be completely restored. Does this affect any of your conclusions?	No. Still a man-made earthwork in the landscape

Respondent	Comment	Response
<b>Q13: If you have any other comments on the Heads of the Valleys assessments, please use this space to report them.</b>		
Judith Jones Head of Town Planning Merthyr Tydfil CBC	It is recommended that the assessments be tested against previous planning applications and appeals to ascertain whether they are broadly in line with previous decisions.	That is on going
	The assessments should also be updated at appropriate intervals in order to take account of landscape change.	Most sensitivity studies are only updated if major landscape change takes place
	Finally, it should be noted that Planning Policy Wales was revised in July 2014.	Change made
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	As a general comment on the LU sheets it is not clear what the percentage figures quoted in the tables refer to.	Appendix 4 added to explain this
	Comments are provided on the two LUs: LU18 – Mynydd Bedwellte and Associated Upland and LU19 – Heads of the Valleys Corridor. LU18 - Mynydd Bedwellte This would be the host LU for the three proposed 110m blade tip height turbines at Pen Bryn Oer Wind Farm.	Sentence reworded to say: a very large development comprising three turbines at the northern end of the unit currently in planning.
	Landform – disagree that a broad ridge should be assessed as having a high sensitivity to wind turbine development. If the topography at Bryn Oer Patch were to be reasonably considered to be a plateau as opposed to a broad ridge it would be considered to possess low landscape susceptibility.	This is a matter of professional judgement. VS4 Topographic states 65% hills and valleys which does not suggest plateau. The remainder is high hills/mountains or rolling/undulating. Also the contours do not suggest this is a plateau. The northern end of the unit is broader and it may be argued is more of a hill than a broad ridge but with regard to the unit overall broad ridge is more appropriate.

Respondent	Comment	Response
	<p>Built environment –it is acknowledged that LU18 contains only severely limited built development, although there are two properties in the northern part of the LU. In these circumstances little weight can be given to the response to VS20: use of construction materials. The main comment relates to the Study’s approach of relating low levels of built development with high susceptibility as the corollary is that wind turbines are better sited close to areas with a high level of built development which is likely to mean a large number of visual receptors, probably including a large number of high sensitivity visual receptors. The explanation of this criterion (Page 14) states that “it is concerned with the presence of built structures and human development present in the landscape.” Hence consideration should not be restricted to identifying built development but instead should be extended to fully include indications of human presence. In the case of the northern part of LU18 around the Pen Bryn Oer Wind Farm site the land-use history of the area which has included open cast mining and relatively recent restoration is apparent in landscape and visual terms through the readily discernible presence of restored rough grazing, access tracks and post and wire fencing.</p>	<p>As noted above. The criteria may result in differing susceptibility. The overall judgement is made taking all attributes into account. The detail given in this response is appropriate at detailed LVIA level but not at strategic sensitivity study level. The overriding reason for high susceptibility here is the fact there is little built development and a strong sense of place which could be affected by incongruous development.</p>
	<p>Skylines and setting – it is strongly disputed that the skyline formed by the elevated northern end of LU18 is “distinctive”. There are no cairns present in the northern part. The Cefn Golau Cemetery does not contribute to the skyline (being on the lower side of the Sirhowy Valley and in LU19) and the Cemetery cannot be seen from the Rhymney Valley to the west. Consequently the medium susceptibility assessed for this criterion should be revised to low susceptibility.</p>	<p>Not agreed. The uplands form very distinctive skylines for the valleys that are not dependent on the presence of cairns. Skyline is an important and valued element of the setting of surrounding settlement.  Reworded to make clear that the cairns are not necessarily on the skyline.  Distinctive open skyline. Cairns and the Cefn Golau cholera cemetery, seen from the valleys on either side. Upland setting for neighbourhood settled valleys.</p>

Respondent	Comment	Response
	<p>Movement – it is reiterated that the level of human access can be assumed to be an accurate proxy for the level of movement. It is disputed that the northern part of LU18 should be described as secluded given the relative proximity of Tredegar, Rhymney and the A465 corridor (with the recently upgraded A465) and if it is accepted that the presence of PRowS is a proxy for the level of movement it should be noted that there is a moderate density of PRowS in the northern part of LU18 as well as a carpark and an area of Open Access Land. Hence the high susceptibility assessed for this criterion should be reduced to medium susceptibility.</p>	<p>Currently movement may be visible from this LU but within the LU there is very little movement which give it high susceptibility to the introduction of movement.</p>
	<p>Visibility, key views and vistas – it is reiterated that the attribution of susceptibility for this criterion is counter intuitive: wind farms are overwhelmingly located in open upland locations and such locations are generally favoured by wind farm siting and design guidance. Consequently whilst it is agreed that the northern part of LU18 is open and therefore has extensive outward views, this attribute applies to all upland areas in the Study Area that aren't under forestry. Consequently the assessment that LU18 has a high susceptibility to this criterion is not accepted and should be reduced to medium.</p>	<p>Disagree with the premise. Wind turbines do tend to be located in upland areas but this does not mean that they will always impact on distinctive skylines. Where there is a possibility that they will impact on distinctive skylines there will be an increased susceptibility</p>
	<p>Intervisibility – this is a criterion where a general assessment is of limited value as it will be largely determined by the details of the individual wind farms that are operational, consented or proposed for any LU. As was demonstrated in the ZTV figures that accompanied the LVIA in the Pen Bryn Oer ES, the ZTVs that would be generated by the proposed wind farm would be relatively compact and would not extend as far south as Mynydd Bedwellte itself.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA.</p>
	<p>Views to/from landscape and cultural heritage features – the proposed Pen Bryn Oer Wind Farm would not impact upon views to the west or into the (Sirhowy) Valley from Cefn Golau. The aforementioned ZTVs also show that from the southern part of LU18 the proposed Pen Bryn Oer turbines would not be visible in northern views towards the Brecon Beacons national Park. Consequently the assessed medium landscape susceptibility should be reduced to low landscape susceptibility.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA</p>

Respondent	Comment	Response
	<p>Scenic quality and character – it is acknowledged that the values quoted are extracted from LANDMAP but with regard to the northern part of LU18 it is strongly disputed that scenic quality and integrity should be assessed as high given that a good proportion of the northern part of LU18 has only recently been restored. Consequently the high landscape susceptibility assessment should be downgraded to medium landscape susceptibility.</p>	<p>VS48 Character is 98% high for the area which demonstrates that although VS46 Scenic Quality is 50% high the unit as a whole has merit in terms of its strength of character and has an important role to play in separating development in the valleys east and west along its whole length.</p>
	<p>Remoteness and tranquillity – the description provided for LU18 is not applicable to its northern part around the proposed Pen Bryn Oer Wind Farm. It is disputed that this part of LU18 should be described as “attractive” although the assessment of medium landscape susceptibility for this criterion is accepted.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA</p>
	<p>Landscape value – given that a proportion of the northern part of LU18 is located in an SLA (local landscape designation) it is agreed that a medium landscape susceptibility for this criterion is justifiable. Historic value – given that the land-use history of the northern part of LU18 has been associated with open cast mining and restoration it is not agreed that it should be assessed as high for historic rarity and integrity. Reference to the LANDMAP HLAA database shows that most of the northern part of LU18 including the Pen Bryn Oer site itself is not within an HLAA with an overall evaluation that is high or outstanding. Consequently the high landscape susceptibility for this criterion should not be high but should be reduced to low.</p>	<p>The unit is assessed as a whole because of the role it plays in separating the two valleys and associated development. Impacting on part of this unit will affect the unit as a whole.</p>
	<p>Summary of sensitivity to wind turbine development– with regard to what the typology defines as large and very large wind turbine development the reasons stated for the high assessed landscape sensitivity are weak. They are primarily derived from the two value criteria (thereby supporting the criticism of the methodology that the number of variables used to derive the value component of the sensitivity is too small and therefore results in it being imbalanced and places too much importance upon the historic value which is a weakly assessed criterion) within which the historic criterion is inappropriately assessed. Aside from the disputed high assessment of LU18’s historic value the other stated reason for the LU’s high landscape sensitivity to large or very large wind turbines is that they would be seen from the Brecon Beacons National Park. This reason prompts two comments:</p>	<p>The sensitivity criteria explanations were brief for all units because the evaluation against each criteria provides more detailed explanation. The summary of sensitivity points out key reasons where appropriate.</p>

Respondent	Comment	Response
	<p>Once again the extent of the ZTV within the National Park will be heavily dependent upon the design and location of an individual wind turbine development. With regard to the proposed Pen Bryn Oer Wind Farm, despite its location in the northern part of LU18 i.e. the closest part to the National Park, the landscape assessment in the ES calculated that its blade tip ZTV only covered 5.2% of the total area of the National Park which does not equate to a high score on this criterion;</p>	<p>The sensitivity study does not remove the need for a detailed LVIA. The importance of the impacts on Nationally designated landscapes are not determined by the proportion of the nationally designated landscape affected.</p>
	<p>This is a good example of the problems in the adoption of an unbalanced typology. It remains unclear as to how a reduction in the blade tip height of the proposed wind turbine from 110m (as per Pen Bryn Oer and classified as very large) to 80m (classified as medium) could result in the assessed sensitivity of LU18 dropping from high to low. The reduction in the extent of the ZTV for the same number of turbines at 80m blade tip height within the National Park would be at most a couple of percent less than that for the proposed 110m blade tip height turbines. It is also not agreed that landscape effects upon the National Park would be the same were the proposed wind farm at Pen Bryn Oer to be for 30 turbines of the same height as it is for three turbines yet this is the conclusion that the adopted typology is forced to draw.</p>	<p>Only sensitivity to turbines less than 50m to Blade tip has been assessed as low. Medium turbines have been assessed as low/medium which on reconsidering has been revised to medium The typology has been misunderstood. 30 turbines would result in the same impact and for this reason any development of six turbines or more would be considered very large.</p>
	<p>Landscape Objective – the stated landscape objective is Objective 2: “to maintain the landscape character” which is defined in Table 5 as “accepting that occasional small to medium developments may be allowed.” Consequently the critical issue once again is the distorted typology under which the proposed Pen Bryn Oer Wind Farm is assessed on the basis of it being a “very large” development by virtue of it comprising turbines that are over 109m high. It would still be considered to be “very large” even if it were to be comprised of a single 110m high turbine. The adherence to the typology places too great a restriction on potential wind farm development in LU18. Given the detailed assessment that is provided for LU18 it is not clear why if Pen Bryn Oer were to consist of four 80m high turbines it would be acceptable but because it consists of three (or even one) 110m high turbine it is assessed as being unacceptable. A proposed wind farm consisting of four 80m high turbines in the same location would have similar intervisibility to the north and the National Park; would still be intervisible with other upland LUs and the Sirhowy and Rhymney Valleys; would still impact upon the purported distinctive skyline; would still be visible from the Cefn</p>	<p>The wording of the landscape objective has been revised to make it clear that it refers to wind turbine development that is potentially suitable outside SSAs rather than referring to the typologies</p>

Respondent	Comment	Response
	Golau Cemetery and would have the same, if not greater effect upon the moderate number of PRowS and the open access area.	
	Baseline wind turbine development (March 2014) – the veracity of the Study is brought into question by the fact that it does not mention the proposed Pen Bryn Oer Wind Farm despite the planning application being submitted in the Summer of 2013.	Reference added
	Indicative Overall Capacity – the Study accepts that there is “some capacity for medium scale development” which once again leads to the issue of the way in which the typology is distorting the results of the Study undermining its credibility.	Hopefully the revised typology descriptions will make this clearer

Respondent	Comment	Response
	<p>Guidance on siting – this states that effects upon views from the National Park from the north of LU18 must be considered. The Pen Bryn Oer landscape assessment did assess effects upon the National Park in depth and concluded that landscape effects upon the National Park would not be significant. It should be noted that the National Park did not object to the proposed Pen Bryn Oer wind Farm. Likewise the historic environment assessment concluded that there would be no significant effects upon designated and other cultural heritage features whilst it should be noted that despite extensive consultation on viewpoint selection no consultees considered it necessary for the selection of a viewpoint within or close to Cefn Golau Cemetery. <i>The</i> cumulative assessment considered the potential for sequential cumulative effects in detail (using a accurate cumulative baseline) and concluded that there would be no significant cumulative effects and that there would be visual separation with the other single and two turbine wind turbine developments within 10km. It again should be noted that no objection has been raised on cumulative issues. The visual assessment included all the various groups of residential and recreational visual receptors located in the settlements of Tredegar and Rhymney (as well as many other settlements) and broke these receptors down into much smaller groups and concluded that whilst some residential visual receptors located within 1.5km and a smaller number of recreational receptors within 3km would sustain significant visual effects their numbers were relatively low for a wind turbine development and should be considered to be acceptable. Once again no objections were raised in this regard. The only stated reason for refusal was the effect upon the SLA and this will form the basis of the forthcoming appeal. Given the land-use history and baseline characteristics of the northern part of LU18 it is difficult to accord with the statement that this part of the SLA provides a strong example of natural beauty.</p>	<p>As noted this scheme is going to appeal and these site specific issues will no doubt be considered in detail at the appeal.</p>

Respondent	Comment	Response
	<p>Hence it is concluded that even when assessed against LU18's siting guidance the proposed Pen Bryn Oer Wind Farm accords with at least four of the five criteria. This conclusion must serve to indicate that with regard to LU18 at least the Study is overly restrictive and does not result in a balanced assessment of landscape sensitivity and capacity.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA</p>
	<p>LU19 – Heads of the Valleys Corridor This is located to the immediate north and east of the proposed Pen Bryn Oer Wind Farm which is located in LU18. However a detailed review has been undertaken of the completed assessment sheet for LU19 in accordance with the Study's methodology regarding the inclusion of LUs as set out in the bottom paragraph in the left hand text column on page 11.</p>	
	<p>Landform – the landform is more accurately described as hills and valleys as opposed to undulating and rolling (as is demonstrated in the LU's title). Under the criteria set out for this criterion a hills and valleys type of landform would still be considered as being a landform of high susceptibility to wind turbine development but the veracity of this assertion has already been questioned. Based upon numerous site visits to LU19 it is concluded that a more reasonable assessment would be that LU19's landform possess medium susceptibility to this type of development.</p>	<p>LANDMAP VS4 Topographic - rolling undulating 95%</p>
	<p>Landcover pattern – it is agreed that LU19's landcover pattern is complex with broken patterns and the juxtaposition of different land-uses but overall it is more accurately assessed as having low as opposed to medium landscape susceptibility.</p>	<p>Our professional judgement concluded that the susceptibility was medium because of potential cumulative effects of further change (not wind turbine development) in this corridor.</p>
	<p>Built Environment – the large majority of the Clydach Gorge Registered Historic Landscape is sited outside LU19 and the western end that is within LU19 is outside the proposed Pen Bryn Oer Wind Farm's blade tip ZTV. It remains difficult to understand how the contributory components of this criterion relate to an LU's capacity to accept a wind turbine development e. g. the fact that 51% of the built development in LU19 is apparently considered to be constructed using inappropriate construction materials.</p>	<p>Information has been taken from LANDMAP and the evaluation follows the method agreed with the client group.</p>

Respondent	Comment	Response
	Skyline and setting – agree that LU19 does not possess a distinct skyline and that therefore landscape susceptibility under this criterion is low.	Noted
	Movement – agree that the key landscape role that is played by the recently upgraded A465 ensures that landscape susceptibility under this criterion is low.	Noted
	Visibility, key views and vistas – as LU19 consists primarily of urban development it is more likely that views are generally relatively restricted by nearby built development however on the basis of site visits it is acknowledged that views to the surrounding elevated areas are important hence the medium landscape susceptibility assessment is justified.	Noted
	Intervisibility – on the basis of detailed knowledge of LU19 gained through site visits it is difficult to understand how the LANDMAP derived comments utilised in this response can be helpful in determining landscape susceptibility nor how they can act as a proxy for actual on-site observation for this criterion. This is a good example of where less reliance on LANDMAP and greater emphasis upon the field survey component as set out in the bullet points on page 19 would be helpful. Indeed it is difficult to identify where information gathered during the field survey has been utilised in any of the responses in the LU19 survey sheet.	This sensitivity study does not remove the need for a detailed LVIA. It does highlight where and why there is higher susceptibility.

Respondent	Comment	Response
	<p>Types of Receptors – it is agreed that there are a large number of visual receptors within LU19 but as the response emphasises a good proportion of these are people at their place of work and using the ‘A’ roads, especially the A465. Under GLVIA3 (and early versions of GLVIA) these types of visual receptor are usually accorded lower visual sensitivity in comparison to residential and recreational receptors. It is also worth noting that just taking account of the overall number of potential visual receptors in an LU is an unsophisticated approach even at this strategic level; LVIA authors are aware that in settlements the availability of outward views is frequently restricted by nearby built development and/or vegetation and is influenced by the settlement’s morphology and aspect. Once again the veracity of the Study would be aided were the observations of the field survey component to be utilised in framing the response to this criterion. Consequently the high assessed susceptibility under this criterion is not accepted and should be reduced to medium susceptibility.</p>	<p>Due to the presence of a large number of residential receptors in this LU we feel the susceptibility remains as high. It is clearly within the scope of any individual application to demonstrate (via detailed LVIS) that due to the location chosen there are no significant residential issues.</p>
	<p>Views to/from landscape and cultural; heritage features – given that the main topographical feature of LU19 is a valley and based again on site visits there is only limited intervisibility with the National Park from within LU19, especially once the high level of built development is taken into account (for outward views). With specific regard to the proposed Pen Bryn Oer Wind Farm, its location to the south-west would ensure that its presence would have no effect upon the intervisibility between LU19 and the National Park. Consequently with specific reference to the proposed Pen Bryn Oer Wind Farm the assessed medium landscape susceptibility should be reduced to low landscape susceptibility.</p>	<p>This sensitivity study does not remove the need for a detailed LVIA.</p>
	<p>Scenic quality and character – agree with the assessed low landscape susceptibility.</p>	<p>Noted</p>
	<p>Remoteness and tranquillity - agree with the assessed low landscape susceptibility.</p>	<p>Noted</p>

Respondent	Comment	Response
	<p>Landscape value – given that this is a strategic level study there is little benefit in bringing in site specific sites and features such as Bedwellte Park unless it is in relation to actual field observations (Bedwellte Park is in the midst of Tredegar and contains a high level of mature trees so is unlikely to be affected by wind turbine development and certainly not by the proposed Pen Bryn Oer Wind Farm). The relatively low values quoted for VS50; VS49; LH45; GL31 &amp; GL33 are more indicative of low landscape susceptibility than medium landscape susceptibility.</p>	<p>Specific sites are referenced to ensure that proposals take into account their presence. Not all proposals within an LU are likely to have an impact on the sites identified</p>
	<p>Historic value – again would dispute that the quoted LANDMAP evaluations justify the high assessed landscape susceptibility for this criterion. The use of the Tredegar Conservation Area as a justification is an example of an overly deterministic approach and failure to use the field work to add a degree of realism to the Study to make it more accurate and therefore credible. The Tredegar Conservation Area is focused upon the town centre of an industrial settlement and rather than simply stating that its designation automatically results in high value it would be helpful if some consideration were to be given as to how the presence of wind turbine development elsewhere in LU19 could affect the attributes for which the Conservation Area has been designated.</p>	<p>This sensitivity study does not remove the need for a detailed LVIA.</p>
	<p>Summary of sensitivity to wind turbine development – the Study’s commentary text notes that “although a number of criteria suggest lower or medium sensitivity this area (LU) is densely settled and there will be residential amenity issues which will limit the potential size of wind energy development.” This is a sweeping statement which implies that a high settlement density outweighs not just all the other components included in the sensitivity study but also the other factors purportedly included in the Study as listed on pages 19 and 23. It could be argued that the Study is being wilfully naive in implying that a wind turbine development would ever be sited in close proximity to settlements of the size that are found in LU19. Issues such as residential visual amenity have to be assessed on a site by site basis. Even where a wind turbine development is located in moderate proximity to a number of residential properties as is the case with the proposed Pen Bryn Oer Wind Farm, effects upon residential amenity do not necessarily make the wind turbine unacceptable with regard to residential visual amenity.</p>	<p>This sensitivity study does not remove the need for a detailed LVIA.</p>

Respondent	Comment	Response
	<p>Finally it is again difficult to understand how LU19 would have low assessed sensitivity to a small wind turbine i.e. with a blade tip height of 50m but were the turbine's height to increase to 51m and therefore become a medium wind turbine under the typology, LU19's assessed sensitivity would increase to medium or high.</p>	<p>This sensitivity study does not remove the need for a detailed LVIA. Any development close to the boundary between typologies would be considered against both conclusions.</p>
	<p>Landscape Objective 2: Maintain the landscape character – it is not agreed that this is the correct landscape objective for LU19. In the context of the large amount of change that is taking place in parts of this LU, in particular the recent change associated with the A465 corridor itself, low levels of landscape management; the presence of restored landscapes that are only becoming established and the mosaic of sometimes competing land-uses, the objective should be to encourage suitable landscape change although the landscape objectives have been defined so that this landscape objective can only be applied in an SSA.</p>	<p>TAN 8 has been used to determine the objectives which related to wind turbine development - not other forms of development.</p>
	<p>Indicative Overall Capacity – same comments as provided for this subject for LU18.</p>	

Respondent	Comment	Response
	<p>Guidance on siting – with specific regard to how the proposed Pen Bryn Oer wind Farm would accord with the guidelines for LU19 the following brief comments apply:</p> <ul style="list-style-type: none"> <li>i) Views into and out of National Park – the location of the proposed Pen Bryn Oer Wind Farm to the immediate south-west of LU19 would ensure that its turbines could have no effect upon these views;</li> <li>ii) No development in Clydach Gorge and National Park - the proposed Pen Bryn Oer Wind Farm fully accords with this guidance</li> <li>iii) Maintain natural beauty of SLAs in the area and their special qualities – SLA in LU19 is restricted to its eastern parts therefore the proposed Pen Bryn Or Wind Farm would have minimal effects upon it;</li> <li>iv) Maintain the role of green wedges – as the only green wedge in LU19 is on the eastern side of Tredegar the limited presence of the proposed Pen Bryn Oer Wind Farm would not have an adverse impact upon its purpose and function;</li> <li>v) Bedwellty Park Registered Park and Garden - as noted earlier the Park’s setting and attributes would be unaffected by the proposed Pen Bryn Oer Wind Farm;</li> <li>vi) Tredegar Conservation Area – as noted earlier the Conservation Area’s valued characteristics and setting would not be significantly affected by the highly limited presence of the proposed Pen Bryn Oer Wind Farm in this part of LU19 (as demonstrated by the ZTVs in the LVIA in the June 2013 ES);</li> <li>vii) Protect the settings of designated and other important cultural heritage features and key views to and from these features – not enough information to comment;</li> <li>viii) Avoid cumulative effects with other large scale infrastructure – as set out in the assessment sheet for LU19 there are three other proposed single turbines in LU19 and these were all included in the cumulative assessment contained in the LVIA and ES. No significant cumulative effects were assessed and cumulative landscape and visual effects were not given as a reason for refusal;</li> <li>ix) avoid loss of trees and woodland – no trees or woodland would be lost in LU19 (or any other LU).</li> </ul>	<p>These responses are appropriate in terms of an individual application they are not relevant to the study itself. However, they do indicate how an individual application can be assessed against the criteria identified. We have not reviewed the statements made here with regard to the Pen Bryn Oer wind Farm and cannot say whether the scheme does or does not comply with the criteria.</p>

Respondent	Comment	Response
Sorrel Jones Conservation Officer Gwent Wildlife Trust	<p>We feel that this report performs well in assessing landscape sensitivity, but is less clear in terms of landscape capacity for turbine development. One of the most difficult issues faced by planners is assessing cumulative impacts of development, with turbines being a particularly difficult issue.</p> <p>The assessments generally give an indication of the type of wind turbine development that would be acceptable, <b>but fall short in indicating how much development can be accommodated</b>. It is clear that many individual, small scale turbines can be as damaging as a large scale development, and local authorities urgently need guidance as to where to draw the line. This is particularly important where turbine development have already been approved and built; some developers feel that once one turbine has been accepted, this provides a green light for more. It would be helpful for local authorities to have some guidance to support their decision, should they need to refuse development when landscape capacity has been reached.</p> <p>We strongly advocate an additional step in each assessment to determine an overall capacity for each landscape unit, whereby the acceptable number of developments as well as the typology is considered.</p>	This is not possible and has not been attempted in other sensitivity studies that have been undertaken outside SSA's. Within SSAs a different approach was adopted where the aim was that they should accommodate the maximum possible. This is not the approach outside the SSAs
Sergio Zappulo Development Manager REG Windpower	<p>We have looked in detail at the assessments for Unit 1 and Unit 4, as these are areas in which REG Windpower hold a specific interest. However, based on our review of the document we feel that similar observations may be made in relation to many of the unit assessments.</p> <p>We broadly agree with the assessments in relation to the separate criteria for Landscape Unit 1. However, the overall conclusion for sensitivity to 'Very Large' wind turbines states: "Medium - high sensitivity to very large development on account of historic value and presence of existing large scale wind farm". The assessment elsewhere (including in the assessments for built environment and movement) notes that the presence of wind turbines reduces susceptibility; this seems logical. It is therefore not clear why or how the presence of turbines increases overall sensitivity in this unit (see our comments on Q5).</p>	It is commonly accepted that whilst existing turbine development may reduce sensitivity it also has the potential to increase sensitivity due to the potential for cumulative impacts.

Respondent	Comment	Response
	<p>The section on Landscape Capacity is less clear. The 'Baseline wind turbine development' includes the Abergorki 3-turbine scheme (in planning), whereas the approach to the assessment only refers to operation and consented schemes being considered. It is not clear how this scheme influences overall capacity: i.e. does the assessment of capacity consider the capacity of the unit over and above Abergorki, or without Abergorki?</p>	<p>Abergorki is mentioned for information even though it is not yet consented. Any developer proposing development in this unit would have to be aware of the proposed scheme at Abergorki because if it is consented and built it will reduce the capacity for wind turbine development in this unit.</p>
	<p>It is not clear how the conclusions of 'Indicative overall capacity' have been reached. The conclusion explains that it is possible that there is little capacity in the northern extent due to developments which are consented but not yet built. However, it does not explain why this is the case for the remainder of the unit. It also states that there is limited capacity for large or very large scale development – this is despite the sensitivity assessment concluding different sensitivities for these two scales of development – a medium sensitivity to large turbines, and a medium-high sensitivity to very large turbines.</p>	<p>Sensitivity and capacity do not correspond directly and the limited capacity of the unit relates to the fact that there is already a large amount of development in the SSA in the unit.</p>
	<p>The indicative overall capacity does not make clear the influence of TAN8 SSA F which covers 78% of the area. The landscape objective is to accept landscape change within the SSA – but the overall capacity suggests there is limited capacity for large or very large scale development.</p>	<p>The SSA designation does not influence sensitivity but does indicate acceptance of landscape change within the SSA. This study is not concerned with development within the SSA. Outside the SSA the objective is to maintain landscape character.</p>
	<p>We note the final point within the guidance on siting - that proposals should appear separate from existing large scale wind farms. However, we consider this should be expanded to include, alternatively, siting proposed wind farms so that they form a logical and natural extension to existing wind farms.</p>	<p>Not appropriate as this study is not concerned with 'wind farms' that may be proposed for the SSA</p>
	<p>For Unit 4 the Summary of Sensitivity states that landform, built environment, sensitive receptors and historic value contribute to "high landscape sensitivity" to large and very large development. However, the adjacent coloured boxes seem to rate these as medium- high.</p>	<p>Wording changed to medium-high to reflect the assessment</p>

Respondent	Comment	Response
	The indicative overall capacity for Unit 4 could be written more clearly to distinguish between the area within the SSA and the area outside the SSA.	Wording has been changed to make this clearer
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	<b>Landscape Unit 1:</b> Landform- should note that plateau less sensitive but areas close to and on scarp slopes/dramatic landforms are very sensitive.	Wording amended
	Skylines and settings- as above.	Wording amended
	Visibility etc.- there are two scenic viewpoints, at Craig y Llyn and Bwlch y Clawdd, which should be mentioned.	Reference to viewpoints added
	Summary of sensitivity- this appears to suggest that medium or large turbines can be accommodated in the area just because very large development can be accommodated. Our experience with various planning applications have shown that these will appear awkward or incongruous in relation to the existing large scale windfarms in the area or visually link them together potentially resulting in complete visual coverage of the whole SSA and its surrounds. We suggest that this should be properly addressed and discouraged. We suggest that these should also be medium to high in sensitivity and text should address the issue in the additional comments and in the guidance on siting in the landscape capacity/guidance.	The issue with regard to potential cumulative impacts where large schemes are seen with smaller development is addressed elsewhere in the study
	Other susceptible landscape... Features- these should include dramatic glacial landforms	Wording amended
	Baseline turbine development- spellings incorrect	Spellings amended
	Indicative overall capacity- suggest that 2 <sup>nd</sup> sentence should read: <i>'Although the sensitivity to medium to very large scale development ranges from medium to high it is possible that due to the scale and extent of development consented and constructed that this unit has little capacity left for further development.'</i>	Wording amended as suggested
	Guidance on siting- suggest add: Large scale development should be located in the TAN 8 SSA F <b>refined areas</b> .	Wording amended

Respondent	Comment	Response
	<i>'Avoid siting single/double turbines where they can be seen in juxtaposition with large scale developments, or where they may visually link large scale developments.'</i>	Wording amended as suggested
	<b>Landscape Unit 2:</b> Scale is actually medium and large – LANDMAP is wrong	Percentage for medium – vast 21%, large 30% Medium 49%
	Landform – add to first sentence 'with dramatic glaciated landforms'.	Wording amended as suggested
	Landcover pattern – the fieldscapes east of Rhigos are actually reclaimed to very high standard- this should be acknowledged so that the medium susceptibility still takes this into account.	Reference to high standard of reclamation added
	Skylines and settings- the distinctive skyline of Hirwaun Common should be stated as being very sensitive.	Reference to the distinctive skyline of Hirwaun Common added
	Summary of sensitivity – medium and large and very large- should mention sensitivity in the relationship with the scarp slope as well.	Wording amended
	Indicative overall capacity- the proximity of medium, large and very large scale development to the scarp slope, and the juxtaposition with the larger scale development to the south are also issues.	Wording amended
	<b>Landscape unit 3:</b> Landform should mention narrow Cefn Rhondda ridge top.	Wording amended
	Intervisibility etc. – built form in the Valley bottom <i>sometimes</i> restricts views.... Also note views over the area from Bwlch y Clawdd viewpoint to the west .	Wording amended
	Summary sensitivity- large/very large turbines – add 'and association of the very large windfarm typology with the coalfield plateau, not the valley'.	Wording amended
	Guidance on siting- amend first sentence-' large scale development should be located in the TAN 8 SSA F <b>refined areas</b> .	Wording amended
	Add : Consider cumulative effects of development on both sides of the Valley to avoid 'surrounding' settlement with development.	Wording amended
	Avoid siting wind turbines on... add Graig Fach after Graig Fawr...	Wording amended
	Great care is needed on Cefn y Rhondda and associated ridgeline due to its sensitive narrow character and the existing prominent development.	Wording amended

Respondent	Comment	Response
	<i>Add-</i> Avoid siting single/double turbines where they can be seen in juxtaposition with existing large and very large developments, or where they may visually link those developments.'	Wording amended
	<b>Landscape unit 4:</b> Indicative overall capacity- first sentence should read: 'The focus within TAN 8 SSA F and its refined areas is on strategic scale windfarms. Second sentence should read 'the area in and around this area is already developed an overall remaining capacity is very limited'	Wording amended
	Guidance on siting – Great care is needed on Cefn y Rhondda and associated ridgeline due to its sensitive narrow character and the existing prominent development.	Wording amended
	<b>Landscape unit 5:</b> Summary of sensitivity – suggest that large should also be medium high. 'Proximity to, and intervisibility with, valleys' should also be mentioned in this and the very large turbine comments.	Sensitivity has not been changed but reference to valleys added
	Note that sensitivity to large turbines is low on the map- which is hopefully incorrect.	Plan amended
	Baseline wind turbine development- note that the area is outside the TAN8 annex D study refined area.	Reference to the refined area added
	Indicative overall capacity – suggest that just states that the capacity of the area is limited where there is intervisibility with the adjacent valleys.	Wording amended
	Guidance on siting – omit first sentence starting 'larger scale development...'	Wording amended
	<b>Landscape unit 8:</b> Guidance on siting – 5 <sup>th</sup> bullet – substitute significant adverse for overbearing.	Wording amended
<b>Q14: What status should Landscape Sensitivity and Capacity Assessments have? Should they be adopted as Supplementary Planning Guidance by Local Planning Authorities?</b>		

Respondent	Comment	Response
Judith Jones Head of Town Planning Merthyr Tydfil CBC	The Landscape Sensitivity and Capacity Assessments have the potential to be adopted as supplementary planning guidance within Merthyr Tydfil as they provide advice on landscape capacity and guidance on the siting of wind turbines which is linked to the landscape related criteria within LDP Policies BW5 and TB7. The Local Development Plan Manual does however state that an SPG should not be used to determine the appropriate type, scale and level of development for particular sites (paragraph 7.3.5). Can the <i>indicative overall capacity</i> findings be interpreted as doing this?	The indicative overall capacity findings do not relate to specific sites
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	<b>1. This is a highly specialised study of one part of Wales</b>	
	We are not professional landscape consultants and do not think we have sufficient expertise to comment in detail on the methodology used.	Noted
	Without detailed knowledge of the area, it is difficult to comment on whether the precise findings accord with the public understanding of landscape value and capacity. However we welcome the general advice and methodology, and the clear presentation of capacity in relation to different turbine sizes. We also endorse the emphasis on the role of unbiased professional judgement of experienced landscape architects.	Noted
	<b>2. Extension to other parts of Wales</b>	
	A stated aim is to achieve consistency across local authorities when considering applications for single or multiple applications which fall short of “wind farms”. If this is to be extended beyond the pilot area, it would obviously be desirable for the capacity studies to be performed by the same team, or at least by applying the same principles with the same care and similar balance of professional judgement. This is particularly important since the Heads of Valleys region is very different from other areas of Wales which may, for instance, rely more heavily on outdoor pursuits and rural tourism for regeneration.	Noted
In as much as the capacity study protects landscape from inappropriate development and sites development as sensitively as possible, it is right that all LPAs have similar protection. This is both because impacts will be experienced across LPA boundaries and because curbs on irresponsible development in one area of Wales will inevitably divert wind turbine development to anywhere regarded as more permissive.	Noted	

Respondent	Comment	Response
	<p>However, we fear that, in practice, motivation and cost could prevent extension to the detriment of poorer, less populated rural areas whose LPAs may remain without any such assessment. Perhaps worse, some LPAs may end up with less objective, sensitive and discriminating capacity studies incorporating vested interests of Developers.</p>	Noted
	<p><b>3. Reaching Capacity and Feed-back Effect of Turbine Development.</b></p>	
	<p>Although it is beyond the remit of this guidance, it is unclear whether “capacity” can be reached and, if so, how this will be decided. This will depend upon planning decisions about whether areas with wind turbines are regarded as having a changed “wind turbine” character and can thus “accept” more turbines or whether there is a threshold of cumulative impact of existing turbines which becomes a bar to any more. The capacity assessment assumes that industrialised, populated areas are more suitable for new construction and, if this principle is applied to wind-turbines, turbine construction will have a positive feedback on future development and capacity studies will only have a very limited impact in landscape protection. Similarly, we do not know whether capacity studies done at a future date would prove more restrictive or more permissive. Wind turbine siting is caught in this inherent ambiguity because developers tend to choose prominent skylines in tranquil, sparsely populated rural areas without any vertical buildings over 15m – precisely those areas deemed most vulnerable in the LANDMAP-based capacity assessment. It remains to be seen how the present capacity study will be applied and whether there is a planning will to protect any of these areas lying outside National Parks and AONBs from small and medium wind development.</p>	Noted
	<p>The Campaign for the Protection of Rural Wales (CPRW) established in 1928 is Wales’ foremost countryside Charity. Through its work as an environmental watchdog it aims to secure the protection and improvement of the rural landscape, environment and the well being of those living in the rural areas of Wales</p>	Noted

Respondent	Comment	Response
Sorrel Jones Conservation Officer Gwent Wildlife Trust	We believe that these assessments should be adopted as SPG to ensure that they are used as guidance by developers and Planning Authorities. Adoption will also help to raise overall awareness of landscape sensitivity. This guidance, together with the forthcoming <i>Planning Guidance for Wind Turbine Development: Landscape and Visual Impact Assessment Requirements</i> will help developers to select appropriate locations for turbines, and also help to protect sensitive and valued landscapes.	Noted
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Should not be as SPG in RCT until the SSA issues are resolved. It would be helpful to have this status elsewhere (outside SSAs).	Noted
	<b>Additional Comments</b>	
	<b>SECTION 5: GUIDANCE FOR WIND ENERGY DEVELOPMENT</b> 5 <sup>th</sup> para page 164- suggest for sentence should read 'No settlements should have the sense of being surrounded by wind turbines, such as developments on both sides of a valley'.	Amended
	Turbine size and scale- the '50% higher' rule would mean that most turbines near buildings should not be higher than 12m tall which seems rather restrictive.	Amended
Factors relating to location – landscape character- topography – suggest sentence is amended to read 'turbines can dominate the landform if not carefully sited'.	Amended	

Respondent	Comment	Response
	<p>Factors relating to siting – Filling in gaps between clusters of wind turbines- suggest entire text should read:</p> <p>Where there are large scale windfarms in an area, the introduction of single or double turbines between clusters can create visual links between developments. There is also potential for incongruous juxtapositions between the different scales of developments. Therefore, where site analysis indicates that maintaining visual separation between and around windfarm clusters is desirable, the gap between developments should be maintained.</p>	Amended
	<p><b>APPENDIX 2 REFERENCE DOCUMENTS</b></p> <p>SNH visual representation of windfarms guidance should be updated to 2014. Consequently the Highland Council standards should be deleted, as this has influenced the revised SNH guidance.</p>	SNH guidance updated but reference to Highlands Standards retained. Neither of these are proscriptive in Wales and the Highlands council standards are well suited to smaller scale development
	<p><b>APPENDIX 3 BASELINE INFORMATION</b></p> <p>Add:</p> <p>Consortium of South Wales Valleys Authorities (2006): TAN8 annex D refinement study for strategic search areas E and F: South Wales valleys. Prepared by Arup.</p>	Added to reference documents



Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
<p>Q1: Do you agree that guidance is required to ensure landscape and visual impacts of wind turbines are addressed in a consistent manner? If you agree please indicate below what status should the guidance have, should it be Supplementary Planning Guidance, a Planning Advisory Note or simply for information?</p>				
Phil Ratcliff, Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Planning Advisory Note status is more appropriate than SPG, since the material is procedural rather than policy. However, it will be a matter for individual Local Planning Authorities to decide.		
Sarah Chapple Landscape Architect Soltys Brewster Consulting	Agree			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	In terms of status, the guidance would most likely be adopted as a planning advisory note for the purposes of Merthyr Tydfil due to the procedural nature of the guidance and the non-direct link to the requirements of renewable energy and landscape related policies within the Local Development Plan.		
Oliver Buxton Project Manager Seren Energy Ltd	Agree	Supplementary Planning Guidance		

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree	<p>Guidance is very welcome in principle.</p> <p>Guidance encourages LPAs to go through a systematic process and demand a minimum of maps of proper scale, precise information about locations and details of turbines applied for and of other turbines (in planning, consented and operational), precise details of distances from dwellings, correct ZTVs, photomontages and wireframes, and other key features. We have witnessed the hasty determination of many wind turbine applications without the Developer being required to supply very basic essential information of the proper quality. Consistency in EIA screening is very welcome.</p> <p>EIA, where appropriate, tends to provide better quality environmental information and gives a better time-scale for third parties to respond to bring up important environmental information missed by Developers. We agree that there should be a transparent relation between threshold for EIA and both the scale of development and environmental sensitivity of the location.</p> <p>Guidance would carry most weight as SPG applied throughout Wales.</p>	Noted	
Mary O'Connor Associate Director WYG Group	Agree	For information only.	Noted	
Natural Resource Wales	Agree	Optional to each planning authority, they may use as guidance or adopt as SPG.	Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Q2: Do you agree with the typologies being proposed in the guidance (pages 0.3 and 0.5)? (Introduction)				
<p>Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council</p>	<p>Neither Agree nor Disagree</p>	<p>The typologies are simple but seem to be quite restrictive. With most wind energy sensitivity studies, the size of turbine and the number of turbines are separated to allow flexibility in the future with changes in technologies and pattern of development. Single or double turbines over 109m to VBT are now coming forward so it is likely that the Very Large category will be challenged.</p> <p>It is apparent that the strategy is to concentrate any Large or Very Large developments in SSAs and Medium or smaller developments everywhere else. Whilst this might be true of the HOV study area, we are not sure that this will achieve government policy/targets if applied everywhere in Wales.</p> <p>The only difficulty encountered with applying the typologies is where one development comprises turbines in more than one height category e.g. 3 at 100m plus 7 at 120m. Splitting the scheme into two typologies results in one Large typology adjacent to one Very Large typology, which should probably be treated as one Very Large typology. A note to cover this situation is needed.</p>	<p>Not entirely sure what is meant by <i>it is likely that the Very Large category will be challenged</i>. These would fall within the V large category.</p> <p>We are unable to comment on government policy/targets.</p> <p>Generally we think that schemes which incorporate different turbines should be discouraged. The scheme described would fall under the very large typology due to the number of turbines involved (10). I believe such situations, which are likely to be rare, can be left to the good sense of the planning officer. In addition the scheme described would be greater than 5MW and we are proposing to make it clearer that the guidance is aimed at under 5MW schemes.</p>	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	<p>The proposed typologies in Table 1 are generally considered to be appropriate. There are, however, inaccuracies in Figure 1 (Illustrative Example) and it is considered that this illustration could cause confusion.</p> <p>There is a minor concern that the typologies could encourage a high number of wind turbines within certain landscape units. For instance, certain landscape units are identified as having no capacity for large/very large scale wind turbines, but some capacity for medium scale wind turbines. In order to generate 2MW of energy within this landscape, a developer is likely to propose four, 0.5 MW, medium scale turbines rather than one, 2MW, large scale turbine. Would the former have a less detrimental impact on the landscape than the latter?</p>	<p>Noted</p> <p>If an area has been assessed as having no capacity for large /very large turbines that is a landscape judgment. A developer could put forward a scheme with 4 turbines up to 45m although there is not much evidence that this is the current pattern of development proposals. Such a proposal would fall to be judged on its merits and whether it was consistent with the siting criteria.</p>	Inaccuracies have been corrected
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Neither Agree nor Disagree	<p>A clear typology is useful in principle but: Incorporating the potentially independent variables of turbine tip-height and turbine number into a single typology of “development size” causes conceptual difficulties.</p> <p>The information could be clearer. Introduction Table 1 says <i>“To decide in which typology a development belongs it must satisfy both the height and the turbine numbers criteria. See the examples on page 0.5.”</i> This is misleading as you cannot necessarily satisfy both. Deciding on development size is a sequential process: you have to decide turbine height and, after this, apply the number to find the minimum development size.</p> <p>If the advantages of a single typology are accepted, is this typology the best possible for purpose?</p> <p>The results are often difficult to reconcile with ordinary experience: examples are: 1 x 80m turbine, 4 x 80m turbines and 4 x 50m turbines are all in same medium type which does not necessarily require EIA; 5 x 50m turbines do not necessarily require EIA; 3 x 50m turbines are three magnitudes of type different from 6 x 50m turbines. A “small” 50m turbine is</p>	<p>You must satisfy both criteria to be included in a typology. So, for example, more than five turbines of any size would constitute a very large scheme. This is not however a common development scenario and we considered that significant numbers of small turbines would be likely to have significant impacts and therefore justify being included in a typology for which the requirements are more onerous</p> <p>We looked at a number of typologies . Most are concerned with 'wind farms' rather than smaller scale development and have not come across a better example that addresses smaller scale development</p> <p>The guidance cannot state categorically that any development which is not Schedule 1 (EIA regs) must have an EIA, that is the role of the LPA. Any typology will have a range across a category where the top of the range is closer to the bottom of the range</p>	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		<p>already 3 times higher than most neighbouring buildings and towers over trees. In view of the devastating negative impact turbines can have on our landscape, visual receptors, and residential amenity, we think the “numbers” contribution to the final typology is too permissive (number in each typology too high) with respect to EIA being required..</p> <p>Suggest reducing the numbers to reflect impact: Small - 2 or fewer; Medium - 3 or fewer; Large - 4 or fewer</p> <p>The Typologies have not addressed the problem of same Developer adding to existing development.</p>	<p>above. Consequently our requirements have been considered in terms of being sufficient for the top of the range (not the middle) although sometimes this may make them appear quite demanding from the lowest point of the range.</p> <p>This change is minor and we do not feel it is justified</p> <p>This is addressed in the cumulative section</p>	
Mary O'Connor Associate Director WYG Group		<p>The category “very large” is confusing; surely even six wind turbines especially at over 100m height must constitute a “wind farm” scale development?</p> <p>Categories might be better expressed in a matrix</p>	<p>This is a good point. I think it has become clear that we need to explicitly exclude 'wind farms' (over 5MW) from the guidance. This will need a revision to the introductory sentence and to be made explicit on the matrix proposed in response to comment below.</p> <p>As the topologies have not been well</p>	<p>Revise introduction. <i>This guidance is aimed at smaller community based wind farm schemes (generally less than 5 MW) as described in Planning Policy Wales Technical Advice Note 8 Planning For Renewable Energy as suitable for areas outside Strategic Search Areas.</i></p> <p>Add matrix - use the</p>

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		<p>where the height of turbines and the number of turbines can be accounted for</p> <p>Other categories seem logical</p>	understood we will add a matrix	matrix to exclude schemes above 5MW
Natural Resource Wales	Neither Agree or Disagree	<p>We would prefer to have typologies that also refer to power output in addition to heights. An example of this multi faceted typology is evident in the recently adopted Conwy LDP, elements copied below*. There are many similarities to the typology of this guidance and combining some of the additional detail from this approach would be more informative and our preferred approach.</p> <ul style="list-style-type: none"> <li>• Align the terminology used in Table 1 to be consistent with the thresholds used for SSAs and NSIPs to provide clarity.</li> <li>• State the range in all typologies rather than 'or less'. For example, small to medium with range 50-79m</li> <li>• Identify the size of turbines and range of cluster sizes separately to give multiple contexts to the scale of development in the note at the bottom of the</li> </ul>	<p>The guidance is intended to help LPAs dealing with small scale development proposals. It is very hard for guidance that tries to cover everything to provide the nuanced guidance that we were asked to prepare for the range of small scale wind turbine applications that the LPAs are having to deal with. We will make the guidance more explicit that it is excluding schemes that would be considered as wind farms within an SSA. this will automatically also rule out NSIPs. The landscape and visual impact of WTD is not dependant on the power output and we therefore do not think it is useful to include it.</p> <p>We have removed the range from all the tables as 'less than' is more accurate.</p>	<p>Add note to intro that this guidance is not intended for either SSAs or NSIPs projects</p> <p>Range removed from all tables</p>

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		<p>table. There is a considerable difference between 6 or more small scale turbines and 6 or more very large turbines. For example, could a medium class be either 51-80 m OR comprising of 4 turbines?</p> <ul style="list-style-type: none"> <li>• Any modifications in the typologies may need to be reflected in updated study area distances and the document updated accordingly.</li> <li>• It would be important to link any changes to the typology &amp; study areas with any Natural Resources Wales Turbine and Vertical Structures guidance for consistency. Natural Resources Wales would welcome engaging in any discussion relating to any proposed amendments/additional information to be included in the typology.</li> </ul> <p>*We would prefer to have typologies that also refer to power output in addition to heights, example from Conwy.</p> <p>Micro Under 50kW</p> <ul style="list-style-type: none"> <li>• Single or twin turbine applications.</li> <li>• Turbine below 20m to blade tip.</li> </ul> <p>Small Under 5MW</p> <ul style="list-style-type: none"> <li>• Turbines up to 3 in number.</li> <li>• Turbines below 50m to blade tip.</li> <li>• Viewed as a small group.</li> </ul> <p>Medium Over 5MW but below 25MW</p> <ul style="list-style-type: none"> <li>• Turbines up to 9 in number.</li> <li>• Turbines below 80m to blade tip.</li> <li>• Viewed as a large group.</li> </ul> <p>Large Over 25MW</p> <ul style="list-style-type: none"> <li>• Turbines over 10 in number.</li> </ul>	<p>We would welcome discussions with NRW in achieving consistency with any forthcoming guidance on Wales Turbine and Vertical Structures.</p> <p>See comment above</p>	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		<ul style="list-style-type: none"> <li>• Turbines over 80m to blade tip.</li> <li>• Viewed as a large-scale wind farm.</li> <li>• Located within the SSA.</li> </ul> Very Large Over 25MW <ul style="list-style-type: none"> <li>• Turbines over 10 in number.</li> <li>• Turbines over 110m to blade tip.</li> <li>• Viewed as a very large-scale wind farm.</li> <li>• Located within the SSA.</li> </ul> Strategic Over 50MW <ul style="list-style-type: none"> <li>• Typically over 15 in number</li> <li>• Turbines typically over 100m to blade tip.</li> <li>• Viewed as nationally strategic</li> <li>• Located within the SSA</li> </ul> Applications for which are determined by National Infrastructure Planning delivered through PINS.		
Q3: Do you agree with the size of study areas being proposed for each typology				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Need to state in all the tables that the study area is a radius from the turbine site (i.e. not a diameter!).	Agreed	Will add
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree (given revision of numbers in Typologies)	A clear definition of “ <b>study area</b> ” would help non-professionals not to confuse this with the variable search areas for specific features in Q4	Will add however this guidance is aimed at professionals, both those submitting applications and those reviewing them and some level of knowledge has to be assumed. It is our experience that non-professional who are interested in wind turbine applications quickly become very knowledgeable.	Will add clearer definition of study area
Mary O’Connor Associate Director WYG Group	Agree	No evidence base is given for the study area extents; however, the range of “minimum” study areas is reasonable & possibility of flexibility in relation to presence of sensitive receptors beyond these	Noted	
Natural Resource Wales	Agree	NRW has provided comments previously on the size of the study areas proposed. The study area distances have been slightly increased following these discussions so we are happy with the current relationship of height to study area. If there are any changes to the height classes in the typology then	Noted	
Q4: Do you agree with the minimum requirements for submission of an EIA screening opinion for each typology				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Neither Agree nor Disagree	Page 1.1 states that Large and Very Large developments will require a detailed LVIA, which seems to be the explanation of why there is no Section D or E for Large and Very Large developments. Could this important point be made more clear and prominent? Should it say LVIA <i>and</i> CLVIA?		We will reiterate this point and include CLVIA as well as LVIA
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Neither Agree nor Disagree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree (given revision of numbers in Typologies)	Mention that Public Rights of Way must be clearly visible Each section mentions the on-line database: All parts of Wales need an online wind turbine data base. The database for S.Wales is an exceedingly impressive and powerful tool. The amount of development, reporting and data-input required may make it too costly and technically ambitious as a model for all other areas. However it would be very useful if a reduced version with more limited data and features were required for all areas of Wales. As an absolute minimum LPA's should be required to have an up-to-date map of all OCP turbines with location and height in order to verify application information and to inform developers and third parties. Maps could be backed up by clearly arranged tables of applications awaiting data entry.	It is not within the power of this guidance to require this.	Will add
Mary O'Connor Associate Director WYG Group	Neither Agree nor Disagree	Generally agree except requirements re "other large scale infrastructure" (c10, d10) for which the information may not be readily available; heights of mast and pylons are not likely to be available.	If they are unavailable that will be sufficient 'defence' for not providing them. It would be useful if the demand for such data promoted its more ready availability.	
Q5: Do you agree with the methodology for EIA Screening				



Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	<p>In general, the methodology for EIA Screening is considered to be acceptable. The recognition in the explanatory notes that professional judgement will still be required in certain circumstances is particularly welcome given that the distance thresholds are likely to indicate that more EIAs may be required.</p> <p>It is recommended that the methodology be tested against previous screening opinions and directions to ascertain whether it is broadly in line with previous decisions.</p> <p>Finally, Figure 2 indicates that both small and medium scale wind turbines include 50 m high turbines. This should be amended to avoid confusion.</p>	This would only confirm that the guidance is in line with current practice. It would not provide any information on whether current practice is based on sound and consistent principles. It is the principles set out in the guidance that we need to be agreeing.	Will amend
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree (given revision of numbers in Typologies)		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Mary O'Connor Associate Director WYG Group	Disagree	<p>The methodology provides a simplified approach to screening, and where “EIA may be required”, the focus should be on whether the proposal is <u>likely</u> to give rise to <u>significant effects</u></p> <p><u>In Note 1, p2.2, distinction should be made between landscape &amp; visual impact assessment (LVIA) forming part of an EIA and landscape and visual appraisal which is outside the EIA framework. The guidance in GLVIA3 and Landscape Institute’s Statement of Clarification in this regard should be followed. (<a href="http://landscapeinstitute.org/PDF/Contribute/GLVIA3StatementofClarification1-13.pdf">http://landscapeinstitute.org/PDF/Contribute/GLVIA3StatementofClarification1-13.pdf</a>)</u></p>	<p>The presence of sensitive receptors within certain distances <b>is an indicator</b> of whether the proposal is likely to give rise to significant effects. However professional judgements will still be required as their presence may not give rise to significant effects (due for example to screening) or receptors beyond the distance identified may have very heightened sensitivity. This can only be judged in the context of a particular application</p>	<p>Note added to the bottom of page 0.2. <i>There is a difference between a landscape and visual assessment that forms part of an EIA, a Landscape and Visual Impact Assessment (LVIA), and one that does not form part of an EIA which is described as a Landscape and Visual Appraisal (LVA). Throughout this guidance the term LVIA has been used to cover both kinds of assessment.</i></p>

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		Query whether the LANDMAP requirements are consistent with Guidance Note 3		<i>Guidelines for Landscape and Visual Impact Assessment Third Edition Statement of Clarification 1/13 published by the landscape Institute provides further clarification.</i>
Natural Resource Wales	Disagree	<ul style="list-style-type: none"> <li>The assessment for whether a project requires an Environmental Statement (ES) should be based on whether a project is a schedule 2 project and then meets the thresholds as set out in Circular 11/99. The criteria in figure 2 in assessing whether an ES is required are misleading and removes the judgement from the decision maker as to whether significant effects are likely.</li> </ul>	The presence of sensitive receptors within certain distances <b>is an indicator</b> of whether the proposal is likely to give rise to significant effects. Professional judgements will still be required as their presence may not give rise to significant effects (due for example to screening) or receptors beyond the distance identified may have very heightened sensitivity. This can only be judged in the context of a particular application	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
		<ul style="list-style-type: none"> <li>The figure 2 methodology should take on board the comments in question 2 on definitions of turbine class. The Environment Circular 11/99 Indicative Criteria/ Thresholds states 'the likelihood of significant effects will generally depend upon the scale of the development, and its visual impact, as well as potential noise impacts. EIA is more likely to be required for commercial developments of 5 or more turbines, or more than 5 MW of new generating capacity'.</li> <li>Figure 2 requires a reconsideration to take this point on board. As an example, if a scheme consists of 5 turbines or more it does not automatically mean an ES is required. All it means is that an ES is more likely to be required and this is where an assessment of the significance of effects is important.</li> </ul>	<p>Unclear what the point here is. the Environment Circular 11/99 Indicative Criteria/ Thresholds states that developments of more than 5 turbines are likely to require an EIA. However EIAs have been required of many smaller schemes and the brief for this work was to help LPAs decide when they should be asking for an EIA for schemes that are less than 5 turbines / 5MW but above the EIA regs schedule 2 criteria.</p> <p>Figure 2 is clear that it cannot say that an EIA is required this is a decision for the LPA it can only provide guidance on when it is likely.</p>	
Q6: Do you agree with the approach to cumulative effects and the proposed search area distances				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Disagree	<p>There is a slight confusion throughout page 2.3 and table 3 where turbines are said to have / belong to a typology. This is confusing because <i>turbines</i> have heights, whereas <i>turbine developments</i> have typologies. For example:</p> <ul style="list-style-type: none"> <li>• Where it says “Small turbines within 8km”, I believe it really means “Small developments within 8km”;</li> <li>• In table 3, instead of “Typology of Application Turbine(s)”, for clarity it needs to say “Typology of Application Development”</li> <li>• In table 3, I believe “the typology will be determined by the height to blade tip criteria only” is meant to say “the typology will be determined only by (a) the height to [vertical] blade tip and (b) the number of turbines” - unless the existing sentence is factually correct, in which case some more explanation would be helpful.</li> </ul> <p>For clarity, a definition is needed within the body of table 3, e.g. the CSA will be land within the stated distance of the application development.</p>	<p>The online database only categories turbines by height. It does not consider turbine numbers. We do not consider that this causes a problem with regard to CLVIA issues as turbine heights are the most determinative feature with regard to the distance at which there is potential for cumulative issues. Page 2.3 and Table 3 have been revised to make this clearer.</p>	<p>Page 2.3 and Table 3 revised to clarify the fact that the Online database only categorises turbines in terms of height</p>
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree	Make clear that this refers to EIA screening and LPAs have discretion to increase distances in scoping requirements for LVIA	This is the case for all the distances given in this section of the guidance .	
Mary O'Connor Associate Director WYG Group	Agree		Noted	
Natural Resource Wales	Agree	As with Q3, NRW has provided comments previously on the size of the study areas proposed. The study area distances have been slightly increased following these discussions so we are happy with the current relationship of height to study area. If there are any changes to the height classes in the typology then the study area distances would require appropriate amendment based on the agreed parameters to redefine the study and search areas.	Noted	
Q7: Do you agree with the proposed cumulative thresholds for Other Infrastructure				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
<p>Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council</p>	<p>Agree</p>	<p>Last paragraph above Table 4:</p> <ul style="list-style-type: none"> <li>• "... potential cumulative <i>landscape and visual</i> impacts ..."</li> <li>• There is some confusion here as the first sentence refers to EIA and the second to LVIA /CLVIA. This needs expanding to say what it really means, which isn't clear now. I suspect the first sentence should refer to LVIA/CLIA and not to EIA.</li> </ul> <p>Other Large Scale Infrastructure is defined elsewhere in the document, but the definition needs repeating in table 4. Need to clarify in Table 4 that occurrence of only <i>existing</i> OLSI is being taken into account.</p> <p>Important Note on page 2.4: Need to add another caveat to the effect of: "This guidance only considers landscape and visual effects. Even if the LPA concludes that EIA is not necessary on landscape and visual grounds, EIA may still be necessary on the grounds of likely significant effects other than landscape and visual effects."</p>	<p>Do not agree that there is any confusion here. This part of the guidance relates to EIA screening, the comment is making a separate point that even if an EIA is not required large and very large developments will always require a detailed assessment of landscape and visual effects and cumulative landscape and visual effects .</p> <p>Definition repeated. It would be reasonable to assess large scale infrastructure that was consented or in planning so we do not thing we should stress existing</p> <p>We don't think this is necessary as the Guidance says early on that it is only concerned with L&amp;V effects. The note here is to address an approach we have come across in applications that say because no EIA was required it means there can be no significant effects and no reasons for refusing it.</p>	<p>added</p> <p>Definition repeated.</p>

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Sarah Chapple Landscape Architect Soltys Brewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	Although examples of other infrastructure can be found within the document, it would be helpful if they were clearly defined within this section.		Definition repeated.
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Disagree	<b>Table 4.</b> Given the vast range of possibilities, it seems too ambitious (and provocative) to establish these cumulative thresholds. Table 4 is confusing because micro, small, and medium seem to apply to application typology but it is not clear to this reader to what turbine heights the numbers of turbines in the (horizontally colour-coded) second column apply and how anyone can establish a threshold when there is a mixture of turbine sizes and infrastructure of different height in any study area	The second column is derived from the cumulative search areas in Table 3. Professional judgement will be required. The thresholds are indicative	add within cumulative search areas to Table 4
Mary O'Connor Associate Director WYG Group	Disagree	"other large scale infrastructure" is not defined; Why only infrastructure and not other forms of development? Comment re distinction between LVIA and appraisals above applies here too.	Large scale infrastructure is the most likely to be an issue but professional judgment may bring in other forms of development	Definition repeated LVIA /LVA distinction referred to in introduction

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Natural Resource Wales	Neither Agree nor Disagree	<ul style="list-style-type: none"> <li>• P.2.3 Table 4 – do the distances in Table 3 apply? E.g. more than 15 medium (80m) turbines within 12km would be a threshold for EIA? 15 seems like quite a lot – significant effects could potentially result from less than this if they were close to a sensitive asset?</li> <li>• Table 4 sets out cumulative thresholds. Whilst this may be useful as a guide, it should always be based on a case by case assessment depending on the topography, landscape, setting and so on.</li> </ul>	Note added about case by case assessment. This stage in the screening process only comes into play if it has been concluded that there are <b>no other reasons</b> (such as the presence of sensitive assets) that might trigger an EIA	
Q8: Do you agree with the general minimum requirements of information to be provided for Landscape Visual Impact Assessments				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree	Non-EIA LVIAs are often called landscape and visual appraisals (LVAs). Need to specifically include this term to clarify that they are covered by the guidance.		Note added to introduction
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree	Suggest amendment to include: The details of any road construction/road improvement schemes required to provide access to the proposal site beyond the site boundary should be included in the minimum requirements. The preferred route or options for any new grid connections should be included even if there is no definitive decision.		Added  Added
Mary O'Connor Associate Director WYG Group	Agree	Make & model of turbine is unlikely to be known at this stage Details of grid connection is unlikely to be known at this stage Comment re distinction between LVIA and appraisals above applies here too.	It says where known  It says where known	Added to introduction
Natural Resource Wales	Agree		Noted	
Q9: Do you agree with the proposed specific requirements for Landscape Visual Impact Assessment				

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
<p>Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council</p>	<p>Agree</p>	<p>3.3</p> <ul style="list-style-type: none"> <li>The Typology column is confusing by including qualification of the listed typologies with overlapping height criteria (e.g. 50m is both Small and Medium), but the typologies are defined by height and number in the repeated Table 2 on page 3.2, so the typologies shouldn't need any qualification in Table 5.</li> <li>Need to state Study Area is radius. Suggest it should be called a Minimum Study Area.</li> </ul> <p>The requirement for a written assessment has been missed out for Large and Very Large – or is written assessment implicit in “Full CLVIA”?</p> <p><b>Application of LANDMAP data:</b> 2<sup>nd</sup> sentence is inaccurate. Should read: “Aspect areas outside the site should be considered in line with LANDMAP Guidance Note 3: using LANDMAP for landscape and visual impact assessment of onshore wind turbines” (see Part 3: Section C of this guidance).</p>	<p>We were asked to add heights as a quick reminder so people didn't need to keep referring back to the original table. Although Table 2 is opposite in the document here people often print out single pages. I think the document as a whole makes it clear that typologies also include number of turbines Table 2 says it is a minimum study area radius to be clarified elsewhere</p> <p>Yes implicit in full CLVIA</p>	<p>Adjusted to avoid overlap Will consider adding numbers as well</p> <p>Will consider adding to this table</p> <p>Revised in line with suggestion <i>All aspect areas affected by the footprint of the development should be considered in detail. Aspect areas outside the site should be considered in line with LANDMAP Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines. (See Part 3: Section C of this guidance)</i></p>

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree with reservatio ns	<p><b>Objective visualisation of the proposed scheme, easily understood by the public, is important for all schemes.</b></p> <p>A 25m Micro turbine is higher than surrounding residences and a visualisation of its relation to existing buildings is important in assessing impact. Wirelines alone should not be sufficient for Small and Medium Types as they do not give the LPA and the public a clear enough impression of the impact of the proposal on its site and surroundings .</p> <p><b>Residential Study Areas</b></p> <p>We agree that it is better to have Residential Study Area as a function of tip height rather than Development Type but query the smaller Residential Study Areas generated for Micro and Small Types and suggest a minimum RSA of 500m to allow impact on residential amenity to be properly assessed.</p> <p><b>Public Access</b></p> <p>Although National Trails are mentioned in the guidance, there is no mention of other rights of way or the impacts of any scheme when viewed from land designated as Open Access land under the CROW Act. There does not seem to be any discussion of key visual receptors which should be included in a LVIA.</p> <p>Any micro siting allowance should be included in the application information and all distances adjusted accordingly.</p> <p>Without this, the indicative distances in the guidance can be breached.</p>	<p>It is not considered proportionate to ask for wirelines or photomontages for micro turbines.It is not considered proportionate to insist on photomontages for small and medium turbines but LPAs may request them if they believe they are dealing with a particularly sensitive location.</p> <p>10 x blade tip height has been generally shown to include all properties where it is likely that unacceptable effects will occur. The note says that if there is clear visibility then properties just beyond this distance should also be included</p> <p>The Guidance says the assessment should be carried out in accordance with GLVIA3 which sets out how an assessment should be undertaken and, for example it identified that the users of PRowS and open access land have high sensitivity.</p> <p>Agreed that Micro-siting can be a significant issue with regard to the residential assessment so a note has been added to this effect</p>	<p>Residential study area note to be amended to include a reference to micro siting <i>The Residential Study Area is the area within which a residential visual amenity assessment should be</i></p>

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Mary O'Connor Associate Director WYG Group	Disagree	Computer generated ZTVs should not be <u>required</u> ; manually drawn zone of visual influence or visual envelopes may be acceptable – the emphasis should be on the purpose i.e. to identify where visual receptors may be found.  The LANDMAP requirements should be consistent with Guidance Note 3	Computer generated ZTVs are a commonly expected requirement for wind turbines  We have worked with NRW to agree requirements	
Natural Resource Wales	Agree		Noted	
Q10: Do you agree with the proposed use of LANDMAP as part of the Landscape Visual Impact Assessment				
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Agree		Noted	
Sarah Chapple Landscape Architect SoltysBrewster Consulting	Agree		Noted	
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted	
Oliver Buxton Project Manager Seren Energy Ltd	Agree		Noted	

Respondent	Agree Disagree Neither Agree or Disagree	Comment	Response	Change
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	Agree with reservatio ns	We appreciate the importance of LANDMAP for Wales and the advantages of the “layer/aspect” methodology but nevertheless we recognise that LANDMAP data is more robust in some instances than others and evaluations made in the past are themselves a matter of judgement and may not always reflect contemporary situations or value attributed by the public. We think it is important to allow flexibility to take this into account to avoid excessive wind energy development on aspect areas which are highly valued by the public but not classified as high or outstanding in Visual/Sensory Scenic quality or Character.	Agree that the quality of LANDMAP data can be variable and have added a note to this effect to the note at the bottom of page 3.6	It is essential that the LVIA analyses and interprets the LANDMAP data and does not merely quote from it. <i>The quality of LANDMAP data can be variable.</i>
Mary O’Connor Associate Director WYG Group	Neither Agree nor Disagree	Any LANDMAP requirements should be consistent with Guidance Note 3 It is not always straightforward to “interpret” the LANDMAP information and the interaction of the aspects	Agreed	
Natural Resource Wales	Agree	Under initial consideration <ul style="list-style-type: none"> <li>The first sentence ‘all aspect layers’ should be changed to ‘all aspect areas’</li> <li>Second paragraph, add ‘regardless of their overall evaluation’ at the end (so that it is clear that if the turbine is located within an aspect area it is considered fully even if it is not outstanding or high)</li> </ul> Under detailed consideration <ul style="list-style-type: none"> <li>The first sentence ‘all aspect layers’ should be changed to ‘all aspect areas’</li> </ul>	I think adding this note may be confusing here. It is stressed in Table 6 in the heading to column 4	Changed to all aspect areas  Changed to all aspect areas

Respondent	Comment	Response	Change
Phil Ratcliff Development Planning Officer Rhondda Cynon Taf County Borough Council	Part 3 section C photomontage guidance:  As stated above, the visual representation of windfarms good practice guidance, SNH 2014 should be referred to. Therefore the Highland Council guidance is not needed.	2014 SHN Guidance will be referenced. Highlands Council Standards have not been superseded. As we are in Wales photomontages are not required to be done to either of these standards but it is worth pointing developers to the Highlands Council Standards as we consider they are less onerous than the latest SNH guidance and as informative, especially when dealing with small scale developments.	
Kay Foster Senior Landscape Officer Conwy Council	I would like to say that I find the document very concise	THANK YOU - WE TRIED HARD	
Sarah Chapple Landscape Architect Soltys Brewster Consulting	I attended the consultation seminar at the Norwegian Church which was really helpful. One comment – Is there anyway a ‘How to Use’ guide could be produced for the ICLLOUD Mapping system It looks like a great resource but it would be helpful if there was some kind of tutorial available to make better use of the system	This may depend on if funding is available. There is some quite good guidance on the GIS cloud site	

Respondent	Comment	Response	Change
<p>Colette Bosley Principal Landscape and Countryside Officer Monmouthshire County Council</p>	<ul style="list-style-type: none"> <li>Introduction 0.7 – A statement on the need for suitably qualified Landscape Architect here would be helpful to ensure landscape consultants are at the table from the beginning. e.g. “Developers and agents considering the submission of a planning application for wind development are advised to engage a Landscape Consultant from an early stage to ensure professional judgement is applied in undertaking the Landscape and Visual Impact Assessment (LVIA). A LVIA will be required of all wind turbine applications. This document however clarifies that the scope of the LVIA study varies and is to be proportionate to the scale of proposed development and sensitivity of its landscape and visual context, and sets out the steps and considerations required in establishing whether or not the proposal requires an Environmental Impact Assessment.”</li> <li>Part one; minimum requirements for the EIA screening It came up in the seminar, but needs clarification in the document after section D the information to be provided for Large and Very large developments, otherwise it appears there are some missing pages.</li> <li>3.4 note 3. “The choice of viewpoints and which ones require photomontage visualisations will need to be agreed with the determining authority”.</li> <li>3.11 – the text loses the message. Suggest inserting at the top – The assessment of cumulative effects often needs to look beyond the Typology Study Area</li> </ul>	<p>We have added a note about a Landscape Consultant but we think the other part reiterates what is said elsewhere</p> <p>Note on page 1,1 given more emphasis and note added to Page 1.2 under turbine typologies</p>	<p>Added <i>Developers considering the submission of a planning application for wind development are advised to engage a Landscape Consultant from an early stage to ensure professional judgement is applied in undertaking the Landscape and Visual Impact Assessment (LVIA)</i></p> <p><i>The location of viewpoints and visualisations will need to be agreed with the planning authority.</i></p> <p>Text revised</p>

Respondent	Comment	Response	Change
<p>Barbara Morgan Network Rail</p>	<p>Network Rail has been consulted by Blaenau Gwent County Borough Council on the Wind Turbine Development. Thank you for providing us with this opportunity to comment on this Planning Policy document.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.</p> <p>Developers of turbines 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 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).</p> <p>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.</p> <p>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</p>	<p>I do not think that any of these comments are relevant to the landscape and visual aspects of wind turbine development</p>	

Respondent	Comment	Response	Change
	<p>to hold the tower in place put strain on the ground at the base of the structure.</p> <p>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 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.</p> <p>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 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.</p> <p>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.</p>		

Respondent	Comment	Response	Change
Oliver Buxton Project Manager Seren Energy Ltd	I welcome this more prescriptive advice for smaller scale wind development. However my only concern is the line <i>“it is likely that all wind turbine development where the turbine height to blade tip is greater than 80m or where there are more than five turbines will require an EIA.”</i> There is already clear guidance from a circular in regards to EIA thresholds and guidance. This additional threshold for 80m tip is unnecessary. A single turbine with a tip height of, for example 86.5m (Enercon E53 800kW) in an appropriate location away from sensitive landscapes should not be subject of an EIA. The screening process is already suitable and this addition is unnecessary.	Many authorities do not find the existing guidance clear enough hence commissioning this guidance. The guidance says 'it is likely an EIA will be required'. In the example given of a turbine towards the bottom end of its typology in a non-sensitive location it would be up to the developer to put forward a case as to why an EIA was not required.	
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	<p>CPRW welcomes a fairer, clearer and more consistent approach to EIA screening and LVIAs for wind energy applications which can be applied throughout Wales.</p> <p><b>Third Parties should be mentioned in the Guidance.</b> The guidance says it is written for Planning Officers and Developers to introduce clarity, consistency and avoid lengthy discussion of irrelevant issues. Third Party stakeholders are not mentioned. All those current and future generations who derive health and pleasure from the countryside, Welsh residents and independent organisations, including conservation charities, are also stakeholders – perhaps the most important ones. They have a right to public consultation processes and an interest in improved information and fair process resulting from good guidance.</p> <p><b>A plan for on-going assessment and timely review and updating of the guidance should be included.</b> The problems of applying out-dated guidance are amply illustrated by the plight of wind farm neighbours resulting from the retention of ETSU-R-97 guidance for noise assessment of wind turbines.</p>	<p>We agree that third parties should be involved. With regard to the process of deciding what should accompany an application for WTD this involvement will be via consultation with the LPA. It is beyond the remit of this guidance to prescribe what those consultation processes should be - that would need a separate piece of work.</p> <p>I don't know what provision there is for review of the document</p>	

Respondent	Comment	Response	Change
	<p>We can predict neither the future of onshore wind energy nor the unintended consequences of this guidance. We have all witnessed how rapidly the wind energy sector changes in response to energy and planning policy, economic incentives, technological development and the decrease in available sites. It is significant that we are calling the 79m single turbines so popular with Developers “medium developments” when these turbines are larger than those making up extensive windfarms a decade ago. 70m to 80m turbines are usually derated to 500kw in order to avoid the step-decrease in feed-in tariff over 500kw, demonstrating how quickly development adapts to economic incentives. The proposed guidance itself could have an analogous impact on patterns of application by making it clear how to bring a development in under the EIA threshold – like the impact of the recently abolished stamp-duty “slab-tax” on house prices. For instance, the guidance might encourage the peppering of the countryside with small groups of 3 turbines just under either 51m or 81m.</p> <p>It should be made even clearer at the outset that this is not guidance for making planning decisions.</p> <p>Perhaps the “Important notes” (2.4.) should be highlighted in the introduction.</p> <p>Ultimately an ES is a Developer’s business case targeted at LPA permission and it is only too easy for a demonstration of superficially correct <u>procedure</u> to be interpreted by Planning Officers and Statutory Consultees as a demonstration of correct information and correct <u>planning conclusions</u>. This very slippery slope should be avoided at all costs. ETSU-R-97 illustrates how</p>	<p>Whilst there is truth in this comment, taken to its logical conclusion it would mean that no guidance was ever produced and no thresholds set for fear of unintended consequences. A review of the effectiveness / consequences of the Guidance would be good practice.</p> <p>It is clear in the name - one of the reasons for sticking with a long winded name instead of something snappy</p> <p>We think that it is better where it is. the heading <b>Important Note</b> should make it hard to overlook.</p> <p>A well produced, clearly written assessment that includes all the correct information is always a help and never a hindrance in</p>	

Respondent	Comment	Response	Change
	<p><i>"guidance for assessment of wind turbine noise"</i> has made it virtually impossible for Planning Officers not to accept any Developer's noise assessment, whatever the scientific shortcomings.</p> <p><b>If the current approach is to be successful:</b></p> <ul style="list-style-type: none"> <li>· All EIA screening assessments and scoping exercises should be undertaken by accredited staff. Staff should be required to complete specific professional training in this approach and should only be accredited when they have demonstrated their competence in applying the methodology.</li> </ul> <p>A public register of all turbine schemes should be maintained and the outcome of any screening / scoping exercise of any such scheme should be included in the register.</p> <ul style="list-style-type: none"> <li>· An Authority should be required to publish their decisions, with reasons, why a scheme submitted to them does not require an EIA screening request or how a EIA screening decision is reached.</li> </ul> <p>We are also aware that the success of this approach relies heavily on the quality of the data and landscape information upon which any judgements are based. We therefore believe that any such assessment must be based upon professionally and independently accredited landscape capacity and sensitivity studies which themselves use the same methodology.</p> <p><b>An on-line Database is essential to this project</b></p> <p>As an absolute minimum LPA's should be required to have an up-to-date map of all OCP turbines with location and height in order</p>	<p>determining applications.</p> <p>We do not have a remit to impose this</p> <p>We do not have a remit to impose this but the online database is planned to include information of refused and withdrawn applications as well as approved ones</p> <p>It is unclear as to whether this is already required by the EIA regs with regard to Schedule 2 development</p> <p>Independently accredited landscape capacity and sensitivity studies are currently being undertaken for various areas within Wales</p> <p>We do not have a remit to impose this</p>	

Respondent	Comment	Response	Change
	to verify application information and to inform developers and third parties. Maps could be backed up by clearly arranged tables of applications awaiting data entry.		
Mary O'Connor Associate Director WYG Group	<p>Photomontages: the guidance referred to is now out of date: revised SNH guidance has been published in July 2014 and supersedes Highland Council guidance; the LI Advice Note is under revision in response to the new SNH guidance; NB: the SNH guidance on visualisations is for commercial scale wind farms in Scotland (see Introduction to the Guidance) not for smaller scale development and not for developments outside of Scotland; it should be reviewed critically before adopting it for less than commercial scale wind developments in Wales and only adopted so far as it is usefully applicable.</p> <p>p3.12: there is confusion here about location and visual receptor – see GLVIA3 which is clear that the visual receptor is the person viewing the landscape and not the location of the person e.g. the national trail as stated here.</p> <p>Consistency should be ensured between this and the Carmarthenshire &amp; Pembrokeshire Guidance.</p> <p>The Online WT Database is very welcome; support should be</p>	<p>To be updated</p> <p>Agreed</p> <p>Agreed</p> <p>This has been achieved as far as possible although one of the key purposes of this guidance was to establish study and search areas which more accurately reflected likely significant effects and this has meant a reduction in the minimum study areas from some existing guidance. If we keep consistency with everything that has gone before we can't bring in change.</p> <p>Agreed</p>	<p>We will revise this section in the light of the updated guidance and add a note on scale.</p> <p>Changed</p>

Respondent	Comment	Response	Change
	sought from Welsh Government to extend it to all Wales.		
Natural Resource Wales	<p>Natural Resources Wales welcomes this guidance and the collaborative approach that has been instrumental in developing it.</p> <p>We have engaged in providing feedback on this document on previous occasions whilst it was still in draft form, notably on 5<sup>th</sup> March, 6<sup>th</sup> March, 4 June, 9 June and 1 July 2014. Our comments have been considered and included at all stages and where they have not been included – satisfactory explanations have been given. Therefore only additional comments are included in this document.</p> <p>An officer has recently used this draft guidance in a live case as a test and found it to be a very logical process that will help in deciding on EIA requirements. Previously a ZTV would have been requested for the extent of visibility in order to inform their decision, but as the flow chart in figure 2 follows a logical process based on distances from more sensitive landscape areas, they felt it would make the screening process much simpler.</p> <p>Natural Resources Wales would be very pleased to work with you to arrange an event to launch and communicate the Guidance to Local Planning Authorities, Natural Resources Wales staff, consultants and developers.</p> <p>Additional comments on the draft document follow:</p> <p>0.1 Suggest replace ‘Environmental assessment is a procedure that ensures that the environmental implications of proposals are taken into account before decisions are made. An Environmental Impact Assessment (EIA) assesses the possible impact that a proposed project may have on the environment and this information is submitted to the Local Planning Authority (LPA) or the Welsh Government in the form of an Environmental Statement (ES)’.</p> <p>With:</p>	<p>This wording followed legal advice and we would like to keep it. It is more strictly factual with regard to EIA regulations than the suggested replacement.</p>	

Respondent	Comment	Response	Change
	<p>'Environmental Impact Assessment (EIA) is a process by which information about the likely environmental effects of certain projects is collected, assessed and taken into account both by the applicant, as part of project design, and by the decision making body (Local Planning Authority or if called in, by Welsh Government) in deciding whether permission should be granted. Thus EIA has two roles – improving decision making and project planning.'</p> <p>Introduction p.2 - CLVIA – should this say that other development as well as wind turbines should be considered (as referenced on p.4 Part 2)?</p> <p>P.1.2 a8 – it would be helpful if the site plan showed features such as mature trees/woodland/hedgerows as well as contour lines/spot heights.</p> <p>P1.3 b4 –Include sensitive seascapes?</p> <p>P.1.5 – the screening distances e.g. 3km from the National Park for medium, there could be significant effects within the 5km study area?</p>	<p>This would not be a usual requirement at a screening stage. If an applicant was relying on such screening as a reason for not requiring an EIA it would be up to them to add it to their plans and make their case.</p> <p>We are not aware of an agreed definition of a sensitive seascape</p> <p>Effects with 5km would be assessed even if an EIA was not required. The purpose of the screening is to identify likely triggers for an EIA not to cover all possible significant effects</p>	<p>Reference added</p>

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# **Heads of the Valleys Sensitivity and Capacity Study Supplementary Planning Guidance Consultation Report**

Gillespies were commissioned by Blaenau Gwent County Borough Council on behalf of the Heads of the Valleys Local Authorities to prepare this study. The assessment approach was developed with the client group and with representatives from the South Wales Landscape Liaison Group.

This report sets out the consultation that was undertaken on the draft document, including a summary of the responses received and how they have been taken into account by the Council.

A 6 week consultation exercise was carried out between 7<sup>th</sup> November 2014 and 19<sup>th</sup> December 2014. The consultation included an email to over 100 organisations which included all Welsh Local Planning Authorities, Statutory Bodies, National organisations, local interest groups and Planning and Landscape Consultants. The email informed them of the consultation and provided a link to the document and comment form.

A consultation event was held on Tuesday 16<sup>th</sup> of December at the Norwegian Church, Cardiff. This was well attended by environmental groups, local authority planners and landscape architects and landscape consultants.

Eight responses to the consultation were received. These were from a range of Local Planning Authorities, Industry Representatives and environmental groups.

The table on page 3 contains the representations made during the consultation period and the response to them. Where appropriate, the document has been amended to take account of the views received.

## **Questionnaire Results**

- All respondents agreed that there should be a common methodology for landscape sensitivity and capacity studies across Wales
- 3 out of 6 disagreed with the proposed wind farm typologies
- 4 out of 6 disagreed with the proposed definition of sensitivity
- 4 out of 6 disagreed with the criteria for assessing landscape and visual susceptibility
- 4 out of 6 disagreed with the Stage 1 Assessment Framework
- 3 agreed and 3 disagreed with the methodology for assessing Landscape and Visual Sensitivity
- 4 out of 5 agreed with the use of professional judgement to determine the most appropriate landscape objectives
- 2 agreed and 2 disagreed with the Landscape objectives set for the Heads of the Valleys Area

- 3 agreed and 1 disagreed with the methodology for identifying the indicative landscape capacities
- 3 agreed and 1 disagreed with the Landscape Character baseline
- 3 agreed and no one disagreed with the proposed Landscape Types
- 1 agreed and 1 disagreed with the Landscape units

Please note that not everyone answered the questionnaire and not everyone answered every question.

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
<b>Q1: Do you agree that the use of a common methodology across Wales for undertaking Landscape Sensitivity and Capacity studies would be helpful?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	<p>It is agreed that a common methodology across Wales would be helpful nevertheless there are several important caveats and points that should be emphasised.</p> <p>Firstly that even more than the Heads of the Valleys Report such a nationwide study would be at a strategic level and would not be a substitute for a more detailed study for each proposed individual wind turbine development.</p> <p>Secondly that such approach and its implementation are rather belated given the level of proposed, consented and operational wind farm development across Wales in the past two decades. There is the issue of how such a study would relate to TAN8 which was based upon a similar type of exercise.</p> <p>Thirdly there is the issue of cost and logistics as well as how to assure that all the Welsh local authorities treat the results of the study in the same manner.</p>	<p>Noted</p> <p>Agree</p> <p>Agree</p> <p>Noted</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Agree	We agree with this in principle; however there are still significant inaccuracies which persist, e.g. as highlighted by the report authors in Unit 24 (presumably referring to LANDMAP Aspect Area (AA) 13); and AA1b which has recently changed its' name, which can result in confusion.	As LANDMAP is being constantly updated it is inevitable that there will be changes. All Guidance stresses that the most recent LANDMAP data should be used for an application
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree	<p>We agree that this type of study is very helpful for developers, local planning authorities and third parties, such as the local community, in providing clarity and identifying sensitive areas. We welcome this particular study, as the Heads of the Valleys area is complex and varied in terms of landscape, with areas that are highly vulnerable and areas that can accommodate some wind turbine development.</p> <p>However, applying this methodology across Wales will need to take regional variation, such as differing priorities into account. The obvious example will be that National Parks and AONBs will have stricter criteria than other areas, and the methodology must accommodate this. Similarly, there must be flexibility within the methodology to reflect the differing development priorities for different areas.</p>	Noted.
Sergio Zappulo Development Manager REG Windpower	Agree	<p>Providing that an appropriate and robust methodology is to be applied, it would be very welcome for a common methodology to be used across Wales, as this would offer certainty and comparability of all such assessments.</p> <p>In this regard, it is important to ensure that judgements made in this study are benchmarked in relation to the whole of the Welsh landscape, not just the study area. That is to say, those landscapes considered to be of 'high' sensitivity are truly the highest-sensitivity landscapes across Wales, not simply the most sensitive in the Heads of the Valleys.</p>	<p>Noted</p> <p>It was not within the scope of our study to do this. We do not know of any sensitivity studies in England or Wales that have attempted to assess sensitivity on a national basis.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Agree	<p>Whilst agreeing that a common methodology across Wales would be helpful, the methodology itself causes specific concern for Rhondda Cynon Taf County Borough Council in relation to the TAN 8 SSAs. Rhondda Cynon Taf is the only LPA with land in a SSA in the HOV area (part of SSA F).</p> <p>Stage Three of the methodology adopts the implicit objective of TAN 8 to accept significant change in landscape character resulting from wind turbine development located within the SSA. This overlooks the intention in TAN 8 that local planning authorities will undertake local refinement of their SSAs (paragraph 2.4), and so applies the acceptance of significant change to the whole, broad-brush, unrefined SSA (in Rhondda Cynon Taf). The methodology thereby risks producing an outcome that overrides the intrinsic sensitivity of the SSA landscape derived from its underlying susceptibility and value. The refinement of SSA F in Rhondda Cynon Taf was carried out by multi-criteria analysis in accordance with the methodology in TAN 8 Annex D. The refined SSA F in Rhondda Cynon Taf (significantly smaller than the unrefined SSA) has been criticised as lacking weight in planning since it was “noted as a background paper” by the County Borough Council i.e. it was neither adopted nor rejected. Nevertheless, two important point emerge:</p>	<p>Noted</p> <p>References in the introduction have been strengthened to confirm that this study is intended for developments that considered suitable for areas outside SSA only. Wording used in the guidance has been repeated. Note added and reference made to the TAN 8 Annex D Study of Strategic Search Areas E and F: South Wales Valleys Final report (2006) both in the introduction and in the landscape objectives section to make explicit that the current study does not supersede there refinement study.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>1. The refined SSA has generally been successful in guiding where development should be carried out in SSA F (see attached map);</p> <p>2. Due to the density of built and approved development, SSA F is now nearing the maximum target set by the Welsh Government Minister for Environment and Sustainable Development in July 2011. This relieves development pressure in the undeveloped parts of the unrefined SSA (that is, outside the refined SSA).</p> <p>The methodology of accepting significant landscape change within the unrefined SSA F but outside the refined SSA F risks additional development on the high ground between the Cynon and Rhondda Fach valleys and between the Rhondda Fawr and Ogmere valleys, with significant cumulative landscape and visual effects on the residents of the densely-settled valley floors.</p> <p>There are two suggested options.</p> <ul style="list-style-type: none"> <li>· The TAN8 annex D study and the refined SSA boundary are noted and mapped respectively, with text to state that the study does not supersede these boundaries, or areas of high landscape sensitivity defined in the study.</li> <li>· The HOV study excludes areas 1, 3, 4 and 5.</li> </ul> <p>The SSAs present special issues of intensity of development and proximity to settlements. Therefore, it is suggested that more thought will need to be given to the methodology for assessing sensitivity not only in and around SSA F but also in other SSAs elsewhere in Wales. A strong vision is needed to prevent unacceptable effects on the landscapes and populations of these areas: the methodology does not adequately address these.</p>	

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Q2: Do you agree with the proposed wind farm typologies?			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree	Please see the related response to Q2 of the landscape and visual impact assessment requirements questionnaire.	Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	<p>Whilst it is agreed that the adoption of a set of typologies is helpful (notwithstanding the constant overarching caveat that there will always be the need for detailed individual LVIAs for any proposed wind turbine development), we do not agree with the definition of the wind farm typologies that has been proposed. It is biased towards the generation of a definition that a proposed wind farm should be categorised as being 'large' or 'very large' with the commensurate greater restrictions upon its strategic acceptability.</p> <p>Under the proposed typology a proposed wind farm would be categorised as being 'very large' if it consists of more than five turbines of any height or a single turbine with a blade tip height in excess of 109m. This typology does not adequately reflect the recent development in turbine technology or the numbers of turbines contained in the wind farm developments that have been consented or become operational in the area that is covered by the Heads of the Valleys Study. It would appear inappropriate that the proposed Pen Bryn Oer Wind Farm which comprises three 110m blade tip turbines would be placed in the same 'very large' typology as the currently being constructed Pen-y-Cymoedd Wind Farm which consists of 76 turbines that will be 145m blade tip height.</p>	Because this study is concerned with smaller scale development only it is appropriate that both these schemes should fall into the very large category

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>The typology should be redefined so as to better reflect the range of wind turbine development that is operational, consented and proposed across the Heads of the Valleys study area. The corollary of adopting the present typology will be the sort of distribution of sensitivities for 'large' and 'very large' turbines as shown in Figures 14 and 15 in which the large majority or all of the study area is categorised as being of 'medium-high' or 'high' sensitivity. This outcome is not particularly helpful in differentiating varying sensitivity and capacity across different landscape units nor does it reflect the actual pattern of wind farm development that has arisen across the study area.</p>	<p>The aim of the study was not to reflect what has happened but to look at landscape sensitivity - this is only one possible aspect of the suitability of a site for WTD</p>
<p>Jeny Rawlings Senior Development Manager Airvolution Energy Ltd</p>	<p>Disagree</p>	<p>One very fundamental issue is that the Airvolution Energy (AvE) proposals for two turbines at Hafod-y-Dafal south east of Cwm do not fit into any of these proposed "Typologies". At two turbines in extent, it should fall under the "Small" typology. However at a maximum of 131m to tip, it could also fall under "Very Large".</p> <p>Another example might be a single turbine of 80m to tip which could be categorised as either "Micro" or "Medium" depending on whether the tip height or extent criteria were used.</p> <p>Planning Guidance for Wind Turbine Development Landscape and Visual Impact Assessment Requirements (LVIAR) which is referred to as the source document for the Typologies, states under Table 1: "...to decide in which typology a development belongs <u>it must satisfy both the height and the turbine numbers criteria</u>. See the examples on page 0.5". However if a development (such as Hafod) does <u>not</u> satisfy</p>	<p>We hope we have resolved this confusion by making the criteria clearer. Development must meet both criteria. The turbines at Hafod-y-dafal are greater than 109m to blade tip height and must therefore be in the very large typology.</p> <p>We have revised the typology tables to try and make this clearer. We have omitted the between ranges for the turbines - which we now realise confused the issue.</p> <p>Hafod was incorrectly shown on the plan and described previously.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>both criteria, there is no indication of how to resolve this incompatibility, and the illustrated examples in LVIAR (Figure 1) merely compound this conundrum.</p> <p>Since this underpins the determination of any and all conclusions arising from the Landscape Sensitivity and Capacity Study Final Report (LSCS), the report “falls at the first hurdle” and is therefore effectively not fit for purpose. Surely it is not being suggested that every development must comply with both criteria, or otherwise be automatically rejected?</p> <p>Interestingly, in LSCS it appears that the authors have “interpolated” between the two typology criteria as in Fig.07 and also Section 4 Hafod appears to be classified as “Medium” (and wrongly recorded as being two proposals) even though this approach is contrary to the aforementioned guidance as laid out in LVIAR. For this reason, we are unsure as to which typology the Hafod development should be classified under and hence the appropriate specifics which apply, both in terms of the standard and extent of information now considered acceptable for the typology in question (LVIAR) and the capacity and sensitivity of the landscape to the typology in question (LSCS).</p>	Plan amended to show Hafod-y-Dafal as Very Large and text changed
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Disagree	There needs to be greater clarity as to how to determine the typology of a wind turbine development. For example, should a single 109m turbine be classified as a micro, large, or something in between?	

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sergio Zappulo Development Manager REG Windpower	Neither Agree nor Disagree	<p>The typologies include consideration of both turbine height and turbine numbers. We query the interaction between height and number. This can lead to inconsistencies such as, for example, a single turbine of 110m and a group of five turbines at 79m would both be considered a ‘very large’ development, despite having significant differences in terms of their likely interaction with the landscape. In our experience, turbine height is more critical in judging the principle of wind turbine development within an area (ie sensitivity). Turbine numbers may be more relevant to a consideration of ‘capacity’. It is noted that, for operational and consented schemes, only height has been considered (page 11) and the reasons for this difference is not stated. If this is appropriate for operational and consented schemes, it may be appropriate to focus on height for all schemes.</p>	<p>We have addressed this emphasising the fact that this sensitivity study is for smaller scale development and by clarifying the typologies.</p>
		<p>It could be more clearly stated how the cut-off heights were arrived at. Reference is made to the <i>Planning Guidance for Wind Turbine Development: Landscape and Visual Impact Assessment Requirements</i>, although the consultation draft of this document does not provide this detail either. In defining these typologies, it is not clear if regard was had to the turbines currently operating and planned in the study area, or likely future trends. For example, there are a number of consented schemes in the study area with turbines of 145m, which is significantly greater than the 110m cut-off for the ‘very large’ category. The document could clarify that the ‘very large’ category does indeed have no upper limit, and that the conclusions in relation to 110m turbines would remain valid for turbines of 150m+ which may be proposed in the future.</p>	<p>Cut off heights were chose to align with other studies</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Neither Agree nor Disagree	The typologies are simple but seem to be quite restrictive. With most wind energy sensitivity studies, the size of turbine and the number of turbines are separated to allow flexibility in the future with changes in technologies and pattern of development. Single or double turbines over 109m to VBT are now coming forward so it is likely that the Very Large category will be challenged.	Developments in the <i>Very Large category will be assessed on a case by case basis.</i>
		It is apparent that the strategy is to concentrate any Large or Very Large developments in SSAs and Medium or smaller developments everywhere else. Whilst this might be true of the HOV study area, we are not sure that this will achieve government policy/targets if applied everywhere in Wales.	This study is only concerned with the landscape sensitivity of the HOV area and not with achieving government policy/targets across Wales.
		The only difficulty encountered with applying the typologies is where one development comprises turbines in more than one height category e.g. 3 at 100m plus 7 at 120m. Splitting the scheme into two typologies results in one Large typology adjacent to one Very Large typology, which should probably be treated as one Very Large typology. A note to cover this situation is needed.	Generally we think that schemes which incorporate different turbines should be discouraged. The scheme described would fall under the very large typology due to the number of turbines involved (10). I believe such situations, which are likely to be rare, can be left to the good sense of the planning officer. In addition the scheme described would be greater than 5MW and we have made it clearer that the study is aimed at under 5MW schemes.
<b>Q3: Do you agree with the proposed definition of sensitivity?</b>			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Disagree	The inconsistent use of terminology between definitions of sensitivity makes comparisons between them more difficult. For instance, the definitions for “low and high sensitivity” explicitly address the vulnerability of the key landscape characteristics, while the term “vulnerable” is absent from the definition of “medium” sensitivity. It would also be beneficial if there was more consistency between the definitions when describing the impacts on the character of the landscape and the value placed on the landscape. The descriptions currently vary as follows: “significant adverse effects”, “result in change” and “significant effects”.	We have reviewed these and consider that these are not inconsistencies in terminology but aim to describe the different kinds of effects that might be expected from landscapes that have low medium or high sensitivity
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	The definitions are broadly correct but there are some amendments that would be helpful and reflect the reality of wind farm landscape assessments. Amongst these small-scale changes are: For Low Sensitivity given that for almost any wind turbine an LVIA would conclude that there would be some significant effects upon landscape character even if these are spatially restricted to the immediate vicinity of the proposed turbine, it is unrealistic to state that this definition only applies to areas (or landscape units) where no significant adverse effects would arise.	This would be true in an English context but TAN 8 explicitly refers to no significant change outside SSAs
		We consider that the use of the terms ‘area’ and ‘landscape’ appear to be used interchangeably. This definition is too vague in the context of this Study and should be replaced by ‘landscape unit’ as this is the scale at which the Study has been undertaken.	The effect are not just limited to the landscape unit in which the development is proposed but may be on the surrounding or adjacent units - therefore to replace area and landscape with landscape unit would be inaccurate

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Table 2; Definition of Sensitivity; although the text correctly acknowledges that sensitivity is determined by consideration of both susceptibility and value, the sensitivity criteria in Table 2 are not specifically referred to in the text; make no mention of either susceptibility or value, and appear to “pre-judge” significance of effects; reading in fact more like effects criteria than sensitivity criteria.	The sensitivity definitions are a two sentence summary and cannot include everything. The detailed consideration of susceptibility and value and made clear in the methodology and in the actual study
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	The sensitivity definitions are appropriate and clearly stated. It is generally accepted by planners that all commercial-scale wind turbines are likely to give rise in a change in landscape character at a local scale. It would be helpful for the study to acknowledge this to ensure that these definitions are not read to imply that any change in character, no matter how small, is unacceptable.	TAN 8 explicitly refers to no significant change outside SSAs which is the wording used her for low sensitivity
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	There are 3 definitions (low, medium and high) but 5 different levels of sensitivity identified in the study area. This is confusing and could be contentious at public inquiries. There should be 5 definitions to explain low to medium and medium to high.	It is very common for intermediate assessments of medium/high to be given without a separate definition

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Q4: Do you agree with the proposed criteria for assessing landscape and visual susceptibility to wind turbine development?			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Disagree	It is unclear whether cultural heritage features, such as scheduled ancient monuments (SAMs) and listed buildings, form part of the criteria for assessing landscape and visual susceptibility. These heritage features are known to be susceptible to wind turbine development, particularly in respect of harm to their settings. Whilst it is possible that SAMs and listed buildings are considered under the criteria relating to <i>Built Environment</i> and <i>Skylines and Settings</i> , it is not explicit in the explanatory text.	In this study heritage features are assessed in terms of their contribution to the landscape. A separate cultural heritage assessment of impacts on setting would need to be undertaken.
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	This response will provide brief comments on each criterion. Scale – agree that VS8 is the correct LANDMAP Survey Collector Response to use. Do not agree with the statement that “A large height differential ... by lessening the size of the turbines” as poorly sited turbines in an elevated location close to lower lying areas can increase the sense of the turbines being overbearing in these less elevated areas in the manner that has been identified in some LVIA reviews provided to local authorities in south Wales that have been prepared by White Associates, as is implied in the remainder of the commentary on this criterion in the Study. This sentence could be interpreted as contradicting the justification for the landform criterion.	We think this criterion is clear. They are inevitably very brief description of some quite complex ideas which are likely to be explore in depth for particular schemes.
		Landform – see comment above. Suggest altering so that ‘high hills/mountains’ is high susceptibility and ‘hills/valleys, rolling land undulating’ is medium susceptibility. Landcover pattern – broadly agree apart from the statement that the presence of a field pattern will inherently result in high susceptibility: if the field pattern is regular and/or large scale and/or is formed by ditches; low trimmed hedgerows or post and wire fences.	As above A mosaic field pattern, not just any field pattern has high susceptibility

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Built environment – it is agreed that the presence of existing manmade features will generally reduce a Landscape Unit’s (LU’s) sensitivity to the presence of wind turbines. As is recognised in the supporting text the statement that the frequency of “built form and human intervention” is indicative of reduced sensitivity does appear to contradict the need for visual sensitivity to be considered (as it correctly is later on). The LANDMAP Survey Collector Responses VS20; use of construction materials and VS25: sense of place are weak proxies for considering effects upon built environment compared with the other three criteria listed under this heading.</p>	<p>Don't understand how this contradicts the need for visual sensitivity to be considered. It is well understood that different attribute of the landscape may result in differing susceptibility for example absences of residential properties makes it less likely that there will be residential issues but may indicate that it is a wild and remote landscape that will be susceptible for other reasons.</p> <p>The LANDMAP Survey Collector Responses VS20; use of construction materials and VS25: sense of place are additional information not proxies</p>
		<p>Skylines and setting – generally agree although if it is accepted that wind farms themselves form a distinctive skyline feature then this criterion would mitigate against extending existing wind farms or grouping together wind farm developments thereby reducing the potential for extending existing wind farms.</p>	<p>Whilst turbines are clearly skyline features they are not generally considered to be distinctive features requiring protection. We always have to believe that decision makers will apply common sense when they consider individual applications</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Movement – Generally agree but the criterion needs to be more subtle and specific about different types of movement within an LU and do not agree that the responses to Survey Collector Question VS18: Level of Human Access provides a good indication of the amount of movement in an LU. Had always assumed it was a reference to the density of the PRoW network or presence of Open Access Land. These are not good proxies for the effects that would be generated by the movement of turbine blades. Should rely upon observation during survey.</p>	<p>Question VS18: Level of Human Access provides additional information to observation during survey. The method for assessing VS18 refers to busy roads, motorways, town centres, small villages, rural roads, mountain footpaths etc. and in this respect supported observations during field survey.</p>
		<p>Visibility, key views and vistas – This criterion runs the risk of conflating landscape and visual sensitivity. With regard to landscape sensitivity it is not agreed that a high degree of enclosure and topographical variation and/or high levels of landcover are less susceptible. For VS9: enclosure, the equation of a sense of enclosure with low susceptibility to wind turbine development and exposure with high susceptibility are not in accordance with wind farm design guidance.</p>	<p>The difference here is that we are dealing with smaller scale development where enclosure in some instances may enable a smaller turbine to be accommodated.</p>
		<p>Intervisibility and Associations with Adjacent Landscapes. – This criterion is essentially a repeat of the previous criterion.</p>	<p>It depends on similar physical characteristics but focuses on different aspects</p>
		<p>Typical Receptors – Whilst the comments on the relative visual sensitivities of different broad categories of visual receptors is agreed as they accord with the general approach that has always been adopted in the different editions of the GLVIA, it could be interpreted as being contrary to the earlier built environment criteria. It also effectively requires an outline visual receptor baseline study to be undertaken.</p>	<p>It is well understood that different attribute of the landscape may result in differing susceptibility for example absences of residential properties makes it less like that there will be residential issues but may indicate that it is a wild and remote landscape that will be susceptible for other reasons.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		Views to and from important landscape and cultural heritage features. – Whilst it is agreed that these are important considerations, they are better considered at the more detailed stage when an LVIA and/or Cultural Heritage Impact Assessment is undertaken. As it is proposed that the response to this criterion is prepared solely upon the basis of site visit(s) it is not clear how this could be meaningfully considered at the scale of LUs and it is best considered under more detailed assessments for individual wind energy developers.	In the actual LU assessments this criteria is very useful as it indicates the features that are important to consider that this should be helpful to both developer and LPAs
		Scenic Quality and Character – at the strategic level at which this Study is concerned it is agreed that Survey Collector Responses VS46-VS48 are appropriate to use although as the supporting text strongly indicates there is a large degree of overlap with the criterion applied for landscape value. Also given that for many of the other criteria suggested the Study correctly advocates that LANDMAP data is supported by observation during study, the same approach should be adopted for this criterion. Simple reliance upon LANDMAP Collector Survey Responses seems to be a broad brush approach even at this ‘strategic level’.	Text added
		Remoteness Tranquillity – It is agreed that LANDMAP Survey Collector Response VS24 is useful for reviewing this criterion, it is not the case that inaccessible or remote LUs are inherently of high susceptibility to wind farm development nor are “accessible /frequented /busy” landscapes always of low susceptibility. There is some contradiction with the criteria suggested under the ‘movement’ and ‘built development’ headings. Also at the scale of LUs these attributes are likely to vary considerably within individual LUs.	It is well understood that different attribute of the landscape may result in differing susceptibility for example absences of residential properties makes it less like that there will be residential issues but may indicate that it is a wild and remote landscape that will be susceptible for other reasons.

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>Landscape Value – compared with the 12 separate criteria that are advanced to assess landscape and visual susceptibility the use of just two criteria for landscape value; one of which is solely concerned with historic value could be considered to be unbalanced. Also the approach of using designations as a proxy could be criticised for ignoring earlier statements in the Study (as well as in other guidance) that even some nationally designated areas may have potential in some of their parts to accommodate certain types of landscape change. The statement that local landscape designations, namely SLAs, closely follow very sensitive national designations is disputed especially given that in some parts of the study area SLAs are very extensive covering nearly all the upland areas.</p>	<p>Wording has been amended</p>
		<p>Also it is not agreed that the outstanding or high values for LANDMAP Survey Collector Responses LH45; GL31; and GL33 should be interpreted as these LUs having a high landscape value with regard to wind turbine development. This is because these geological or ecological evaluations are often generated by the presence of one or two RIG sites or a small number of locally rare habitats; phenomena that would be avoided by any well-designed wind turbine proposal. The presence of a RIG site at the other side of an LU should have no influence upon suitability to host a wind turbine development.</p>	<p>This section is not identifying susceptibility to wind turbines. It is identifying indicators of landscape value as recommended by GLVIA3.</p>
		<p>Historic Value – Again even at a strategic scale this approach is simplistic; there should be a consideration of the reasons for the high or outstanding evaluations for the HL38-HL40 Survey Collector Responses to allow a review as to whether these could be affected by wind turbine development. Also from experience of undertaking LVIA's in this part of south Wales we are aware that a high proportion of HLAAs have been ascribed with high or outstanding evaluations thereby making it highly likely that a high proportion of LUs will be attributed with high landscape value in this study.</p>	<p>This criteria is measuring the value placed on the landscape and if a large number of aspect areas have been ascribed a high historic value that it a fact to be taken into consideration. The assessment for each LU has looked in more details at the reasons for the evaluation.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Table 3 and Stage 1“Landscape and Visual Sensitivity Criteria”. LSCS purports to be informed by GLVIA3. However GLVIA3 indicates that landscape and visual assessment should be carried out as two separate but related activities. In this report they appear to be combined. This could lead to some confusion. Whilst we agree with some perceptual attributes such as skylines and settings, key views and vistas and intervisibility can help to determine landscape susceptibility (even though it’s wrongly in our opinion listed under “visual criteria”) we do not agree with the specific “typical (visual) receptors” criteria. This is because visual assessment relates to point-based rather than generic receptors and its inclusion in the criteria could render the overall conclusions questionable (see below , Q12,for an example of this).	Effects of wind turbines on landscape character are predominantly as a result of visual changes - in this way they are not typical development. We are not aware of any wind turbine sensitivity studies that have assessed landscape and visual sensitivity separately although may have divided their criteria in to landscape and visual criteria whilst acknowledging the overlap. Typical (visual) receptors is one criteria and we do not consider that it could render the overall conclusions questionable.
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	The criteria are clearly described and their application is explained. There is some doubt as the specific applications of LANDMAP answers: for example under the Landcover Pattern criterion, the answers for VS16 include ‘formal’ under low sensitivity, although a formal landscape may be more sensitive to interruption. VS16 also includes the possible answer ‘organised’ which does not fall under any of the sensitivity levels. Other examples could be quoted but generally the approach is both clearly set out and properly grounded in established good practice.	The study does not remove the need for case by case analysis which should highlight a 'formal' landscape that would be harmed by interruption

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jill Kibble Planning Liaison CPRW Montgomeryshire Branch		<p>We feel this is a very thorough appraisal and that similar work could usefully be done in other LPAs. We are not landscape experts and would not presume to comment on the detailed methodologies. We have considered the response made by CPRW Brecon and Radnorshire Branch and would fully endorse all the points they have cogently made particularly as regards Third Party Consultation requirement with interested stakeholders who have intimate understanding of the area under consideration. We would also emphasise that landscape has an economic component and that in some areas of wales, for example Montgomeryshire, rural tourism and quiet outdoor pursuits are of considerable importance (12% of GDP) and that there is a considerable value to employers in the quality of the environment when recruiting senior staff. Landscape thus has more than an aesthetic value and planning officers must weigh economic value in the balance. Failure to do so has, of course, been the subject of recent applications for Judicial Review in Powys.</p>	<p>The impact on tourism is part of the planning balance but not part of the landscape sensitivity assessment although scenic value is often an indicator of value to tourism</p>
		<p>Our only additional comment over and above those provided by Brecon and Radnorshire would be on Landmap. Landmap can be a useful tool but has a tendency to encourage 'salami slicing' of the landscape into parcels that are not necessarily topographical entities and when considering massive, moving and vertical structures in the landscape the visibility over a considerable area, that probably encompasses a number of Landmap classifications, is essential. It is not the Landmap Visual / Sensory classification of the land on which the turbine itself stands that is of prime importance but the whole context of the landscapes in which it is seen. Landmap is irrelevant to the viewer who has a sensory perception of the quality of the landscape in its entirety.</p>	<p>Our Landscape Units are wider than the LANDMAP aspect areas but the assessment also requires a consideration of intervisibility between landscape units which should encompass the idea of seeing the landscape as a whole.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	The criteria are agreed except: <b>Landcover pattern:</b> VS 16 –‘formal’ is defined in LANDMAP as elements/features with a formal designed relationship with each other. This is clearly sensitive. Suggest that: low susceptibility is regular, medium susceptibility is organised and high susceptibility is random and formal. Aesthetic/perceptual and experiential criteria:	In fact the only time in the study area the answer for VS 16 is formal it is in relation to commercial forestry which clearly does not have high sensitivity
		The use of scenic quality, character and integrity values may be seen as double counting with overall value.	We see it as confirmation rather than double counting as we do not use a scoring system
		VS 24 – safe and settled are duplicated in medium and high susceptibility	Corrected
Q5: Do you agree with the proposed Stage 1 Assessment Framework?			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	<p>Whilst we agree with the overarching approach and the need to draw upon LANDMAP Survey Collector Responses and strongly agree that these need to be supported and enhanced by site work there are a number of weaknesses in the approach suggested. In particular some of the criteria are contradictory with regard to attributes such as topography and landform; the relative isolation of the LU with regard the presence of settlements and level of public access; how to deal with relative isolation; and the use of Collector Survey Responses that are determined by the presence of location specific phenomena such as RIG sites.</p>	<p>It is acknowledged in the study that some indicators of susceptibility <u>are</u> contradictory and this has to be considered in the overall assessment</p>
		<p>Also it is important to understand that whilst LANDMAP is a very useful source of information and has the large advantage that it is a quality assured database that extends across all parts of Wales, the Survey Collector Responses were generally compiled on the basis of field work that was undertaken almost a decade ago i.e. before the majority of the present operational wind turbines were present. Although this is acknowledged later in the methodology, it is not clear how they incorporated into the final indicative landscape capacities</p>	<p>They were incorporated into the final indicative landscape capacities through the use of the online WT database &amp; site survey</p>
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	See Above	Noted
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
<p>Sergio Zappulo Development Manager REG Windpower</p>	<p>Neither Agree nor Disagree</p>	<p>We broadly agree with the assessment framework as setting out an appropriate approach to landscape sensitivity and capacity evaluation. It is accepted that there is no published guidance on carrying out a landscape sensitivity study. Nevertheless, a widely accepted approach has been developed and implemented by landscape consultants, using a criteria-based analysis of landscape characteristics to determine relative sensitivity. We are content that, in outline, the Heads of the Valleys study follows this approach to arrive at a clear and robust methodology.</p> <p>However, we are less clear as to the way that cumulative effects have been incorporated. This remains the most problematic area of assessing landscape capacity for wind energy.</p> <p>The overview on page 8 states that sensitivity is based on landscape susceptibility, value and presence of wind turbines. This page goes on to state that capacity is based on sensitivity, unit size and presence of wind turbines. Since presence of wind turbines is considered in sensitivity, it is being double-counted in the assessment of capacity.</p> <p>On page 12, the judgement of sensitivity is explained differently. Here it is stated that landscape susceptibility, visual susceptibility, landscape value, and visual receptors are the factors contributing to sensitivity. There is no mention of wind turbines. “Presence of modern structures such as wind farms” is referred to under the ‘Built Environment’ criterion as a factor which may reduce landscape susceptibility. But presence of wind turbines is not set out as a separate factor as indicated on page 8.</p> <p>Pages 19-20 detail the sensitivity evaluation process. This describes a desk-based assessment of sensitivity based on susceptibility and value, backed up by field work. In contrast to the overview on page 8 there is no mention of existing wind turbines. However, at Stage 3,</p>	<p>We see it as confirmation rather than double counting as we do not use a scoring system</p> <p>It is not possible to mention everything every time. The study must be read as a whole.</p> <p>Decisions on those circumstances where adding turbines to a landscape that already contains turbines is acceptable, possibly because the</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p>the first paragraph on page 21 states that sensitivity was derived from susceptibility, value and 'the potential for cumulative effects'. It is unclear how this 'potential' was assessed or how it has been incorporated into sensitivity, other than as one factor affecting the 'Built Environment' criterion.</p> <p>This lack of clarity continues into the actual assessments. For example, Landscape Unit 1 is assigned medium-high sensitivity in part because of the 'presence of existing large scale wind farm' (page 34). Mention is made of wind turbines in the susceptibility evaluation for this unit, but in the context of the evaluation criteria this would have the effect of reducing susceptibility.</p> <p>In summary, it is not clear how the study addresses existing development, and how this affects sensitivity in particular. Our view is that the presence of wind turbines, in common with other forms of development, may affect the susceptibility of the landscape, but should not be additionally considered as a separate 'layer' in the assessment of sensitivity. It is more appropriate to consider this aspect in the evaluation of (remaining) capacity (see our response to Q9).</p>	<p>existing turbines mean that the degree of change is reduced, and where it results in cumulatively adverse effects is a judgement that still needs to be made on a case by case basis.</p>
<p>Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC</p>	<p>Agree</p>	<p>Generally agree. Suggest that it is important that all the main text paragraphs are numbered as this document is likely to be referred to frequently, especially at inquiries.</p>	<p>It would be quite a task to go back and number all the paragraphs now. This has not been raised before and many sensitivity studies do not have numbered paragraph but rely on page numbers.</p>
<p>Q6: Do you agree with the proposed methodology for assessing Landscape and Visual Sensitivity?</p>			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Disagree	<p>As stated in the response to Q5 it is not clear how the key field survey component is taken into consideration in Stage Two. Whilst we agree with all the field survey bullet points that are listed on pages 19-20 with regard to the amalgamation of these with the results of the LANDMAP Desktop review under the 14 separate criteria the methodology merely states in the final paragraph on page 20 that “Based on the results of the field surveys, the draft evaluations of landscape unit sensitivity were refined ...”. This absence of methodological clarity is a major weakness. This is reflected in the key comment on page 19 (second text column, second paragraph) in which it is stated that “Sensitivity can vary locally within landscape units and the overall evaluation represents the general sensitivity across the landscape unit to reflect the strategic nature of the study.” The corollary of this statement must be that whilst the Study provides some broad landscape, visual and historic landscape context for wind turbines in the study area the acceptability of any proposed wind turbine development remains reliant upon it being subject to a detailed and thorough LVIA.</p>	<p>It is correct that whilst the Study provides broad landscape, visual and historic landscape context for wind turbines in the study area the acceptability of any particular wind turbine development remains reliant upon it being subject to a detailed and thorough LVIA. This is always the case with sensitivity studies which cannot assess individual sites or individual proposals.</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	<p>See above; in our opinion visual receptors <i>per se</i> have no place in a <u>landscape</u> sensitivity and capacity study and may lead to misleading and inaccurate conclusions being drawn (see above qualified explanation under Q4 comments).</p> <p>A judgement on the sensitivity to change to each typology is made for each landscape unit. However Table 2 is not referred to and even if it were, we have reservations about the criteria used, and the way in which they may have been used, as aforementioned in Q3.</p> <p>Although it is stated that field survey was used to test and refine the findings of the report, it still comes across as a primarily GIS- based desk exercise with little evidence of this “refinement”.</p>	Effects of wind turbines on landscape character are predominantly as a result of visual changes - in this way they are not typical development. We are not aware of any wind turbine sensitivity studies that have assessed landscape and visual sensitivity separately although may have divided their criteria in to landscape and visual criteria whilst acknowledging the overlap.
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree	Although we support the overall methodology and the different data sources and criteria used, the weak point in this methodology is that the ultimate judgement on overall sensitivity is subjective. Obviously the judgement is informed by the available information, and made by experts, but this could potentially introduce inconsistency if the methodology is applied elsewhere.	There is no alternative to subjective judgement with regard to wind turbines and landscape impact
Sergio Zappulo Development Manager REG Windpower	Agree	We comment in Q5 in relation to the inclusion of cumulative effects in this section. Otherwise we accept that this section clearly sets out the process undertaken.	See answer above
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	The methodology omits consideration of the TAN 8 annex D SSA refinement studies, their refined boundaries, and the implications arising from these.	See answer above where consideration of wind farm scale development has been specifically excluded
Q7: Do you agree with the use of professional judgement to determine the most appropriate landscape objectives?			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	The use of professional judgement is in line with the overarching approach advocated within GLVIA3 and the manner in which the Landscape Objectives are tied into the TAN8 objectives provides a sense of consistency.	Noted
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Agree	<p>Yes, in principle we agree with the use of professional judgement to determine landscape objectives, but this must be carried out with the help of stated criteria. With this in mind, we have the following query.</p> <p>Stage 3; Objective 2 states;</p> <p>“Landscape accommodation is applicable to landscapes where the conservation of landscape character and visual amenity has been assessed to be of moderate to high importance”.</p> <p>Presumably this is referring to LANDMAP but there is no cross-reference to this and begs the question, in the context of this report, exactly how is this “importance” assessed and using what criteria?</p>	How the importance is assessed and the criteria used are set out in the susceptibility and value criteria tables

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Disagree	It is unclear as to why professional judgement is needed as the objectives are very clearly allied to SSAs, Designated Landscapes, and land outside SSAs and Designated Landscapes. It would be simpler to apply the objectives accordingly. As for question 6, using subjective judgement could potentially introduce inconsistency if the methodology is applied elsewhere.	Professional judgement is always required
Sergio Zappulo Development Manager REG Windpower	Agree	The application of professional judgement is appropriate, and is an approach advocated by GLVIA3. However, the three objectives are simply applied to protected landscapes (protection), landscapes outside TAN8 search areas (accommodation), and landscapes within TAN8 search areas (change). The use of professional judgement was presumably quite limited.	Noted
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC		Question not clear.	
<b>Q8: Do you agree with the Landscape Objectives set for the Heads of the Valleys Area?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Neither Agree nor Disagree	Although as stated above it is agreed that linking in the study to TAN8 is beneficial, the reliance upon TAN8 criteria in the determination of Objectives 2 & 3 does have the consequence that the landscape objectives for the landscape units has essentially been pre-determined by the TAN8 study which is nearly a decade old and whose underlying methodology has been subject to criticism and refinement.	We have now emphasised the fact that the study is not aimed at large scale wind farms i.e. those associated with SSAs
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Disagree	Stage 3; Objective 2 states; “This objective aims to retain the overall character, quality and integrity of the landscape, whilst accepting that occasional small to medium scale developments may be allowed. Such development may have an effect on the local landscape <i>but should not bring about significant adverse changes in character.</i> ” Does this latter half of the sentence mean throughout the Landscape Unit? Or would localised significant effects be acceptable? This is not clear.	It would depend on the degree of harm
		“Wind turbines should not become either the dominant or the key characteristic of a landscape”. Again is this referring to the whole landscape unit, or is, for example, a two turbine proposal at the extremities of the Unit within which a development is situated and with limited effects elsewhere, likely to be considered acceptable? Again, not clear.	The units have been defined for the purpose of the study so a development at the extremity of the unit could be dominating in an adjacent unit.
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Agree	See Question 7.	Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sergio Zappulo Development Manager REG Windpower	Neither Agree nor Disagree	The introduction of landscape objectives is to be welcomed and provides a clear means by which the study can be applied to planning decisions. The objectives for protection and change appear appropriate as the end points on a continuum of sensitivity, but accommodation must necessarily incorporate a broader spectrum including some sensitive areas and some less sensitive. The statement that only “occasional small to medium scale developments may be allowed” implies blanket restriction rather than recognising this variability. The statement that “wind turbines should not become either the dominant or the key characteristic” is a more appropriate test to apply, rather than a height-based restriction.	This has been changed as the small to medium did not refer to the typologies
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	<b>Objective 2</b> states that only up to occasional medium scale developments may be allowed. This effectively means no windfarms or turbines over 80m to VBT outside SSAs. Whilst desirable in many areas this seems highly restrictive overall.	This has been changed as the small to medium did not refer to the typologies
		<b>Objective 3’ s</b> definition indicate a ‘notable amount of wind turbine developments’. This effectively covers the descriptive range of a landscape with windfarms, a windfarm landscape and a windfarm. All these will occur in an SSA and it is suggested that this should be explained. We also suggest that the definition should be changed to a ‘notable amount of windfarms’. The reason is that in SSAs different rules apply as the areas are under particular pressure. Smaller developments are causing cumulative impact problems between the larger clusters of windfarms which are there to effectively meet the national targets.	We have added a note referring to the SSA studies and changed the definition to windfarms
Q9: Do you agree with the methodology for identifying the indicative landscape capacities?			

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Neither Agree nor Disagree	<p>The four listed criteria are all important in establishing the indicative landscape capacity of each of the 33 LUs. However, once again it is not clear how the four criteria have been balanced in arriving at the final indicative capacity. It is noted that the individual LU sheets contained in Section 4 list the wind farm developments operational, consented or proposed for each LU but it is not apparent how the size of each LU has been taken into consideration. It would be useful if each LU's size in ha were given somewhere on the LU information sheet.</p> <p>It is assumed that the Study is relying upon "<i>professional judgement</i>" in interpreting the information set out on each LU's sheet to determine that LU's indicative landscape capacity but the structure of the study and the LU sheets means that there is inevitably a strong emphasis upon the first bullet point i.e. the landscape and visual susceptibility and landscape value with the other three bullet points considerations being 'bolted on'. Consequently contrary to the indication that the Study seeks to promote, it is heavily based upon the desktop study of the LANDMAP Survey Collector Responses under its 14 headings which as has been established earlier in this response contains a number of weaknesses, contradictions and double counting.</p> <p>This is tacitly acknowledged in another of the caveats that are occasionally inserted into the text; namely in the second paragraph of the second column on page 23 when it is stated that "<i>The indicative landscape capacity helps to identify the type of developments which</i></p>	The study cannot remove the need for a detailed LVIA and the detailed site survey work that should accompany it.

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
		<p><i>could be potentially accommodated. However, this does not in itself suggest that all planning applications for the wind turbine development of the typology identified will be appropriate to these areas.</i> It could also be argued that the corollary of this statement may be to suggest that no developments of a typology identified as being above the capacity of an LU will necessarily be inappropriate in that area.</p>	
		<p>With regard to the untitled and un-numbered figure on page 23 it is helpful to note that the Study concludes that landscapes (or LUs) with low sensitivity have the greatest capacity and that these are described as <i>“Typically a landscape with a number of wind turbine developments”</i>. However the Study does not make it clear whether the presence of the wind turbine developments contributes to a landscape’s low sensitivity.</p>	<p>We have reconsider this figure and omitted it</p>
<p>Jeny Rawlings Senior Development Manager Airvolution Energy Ltd</p>	<p>Disagree</p>	<p>See above Comments in Q8.</p>	<p>See response above</p>
<p>Sorrel Jones Conservation Officer Gwent Wildlife Trust</p>	<p>Agree</p>		<p>Noted</p>
<p>Sergio Zappulo Development Manager REG Windpower</p>	<p>Agree</p>	<p>We broadly agree with the approach taken here, which is adequately set out and accords with accepted good practice. The inclusion of existing and consented turbines is a key factor in determining the remaining</p>	<p>Noted</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Neither Agree nor Disagree	Suggest that the landscape sensitivity left-hand column should indicate <i>higher</i> sensitivity at the top and <i>lower</i> sensitivity at the bottom rather than just high and low which is too definite.  Also the threshold definitions should have the same wording as the objectives e.g. Typically a landscape with a notable amount of windfarms- on the bottom right column.	We have omitted this figure
<b>Q10: Do you agree with the assessment of the Landscape Character Baseline?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	Factual information with no errors identified	Noted
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Neither Agree nor Disagree		Noted
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Neither Agree nor Disagree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sergio Zappulo Development Manager REG Windpower	Agree	This is useful background context which summarises the relevant sensitive landscapes of the study area.	Noted
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Disagree	<p>Second paragraph, page 24- 'Millstone Grit' should be substituted with 'Pennant Sandstone'.</p> <p>We suggest that the TAN8 annex D study should be mentioned here if the study ultimately covers this area. The wording could read:</p> <p>TAN8 and Strategic Search Area (SSA) F</p> <p>An Annex D refinement study has been carried out for SSA F including an assessment of landscape sensitivity for technically feasible areas and the definition of a refined SSA boundary. This boundary is shown on figure X in conjunction with the overall SSA boundary. It should be noted that this study has not reviewed the Annex D study or come to a view on its findings. It does not supersede the definition of the refined boundary, or areas of high landscape sensitivity defined in the Annex D study.</p>	<p>Changed</p> <p>Note added to reflect this</p>
<b>Q11: Do you agree with the proposed Landscape Types?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	Agree	It is agreed that the LANDMAP Visual & Sensory Aspect Level 3 Classification is appropriate.	Noted
Jeny Rawlings Senior Development Manager Airvolution Energy Ltd	Neither Agree nor Disagree		Noted
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Neither Agree nor Disagree		Noted
Sergio Zappulo Development Manager REG Windpower	Agree	We have not examined the proposed landscape types in detail, though they are clearly derived from application of LANDMAP and appear to be appropriate.	Noted
<b>Q12: Do you agree with the proposed Landscape Units?</b>			
Judith Jones Head of Town Planning Merthyr Tydfil CBC	Agree		Noted

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
<p>Ian Gates Associate Director, Landscape AMEC E&amp;I UK Ltd</p>	<p>Neither Agree nor Disagree</p>	<p>It remains unclear as to how the LUs were defined. It is not explained in Section 3 or in Section 2 page 11 where they are introduced.</p> <p>These comments are only concerned with the LUs that are relevant to the proposed Pen Bryn Oer Wind Farm which would be located in Caerphilly Borough Council on elevated ground between Tredegar and Rhymney.</p> <p>The boundaries of the most relevant LUs (LU16; LU18; LU19 &amp; LU20) are logical and relate to the boundaries of the LANDMAP VSAs found in this area.</p>	<p>The basis for defining the study units is set out on page 11</p>
<p>Jeny Rawlings Senior Development Manager Airvolution Energy Ltd</p>	<p>Disagree</p>	<p>Landscape Units embody a number of the individual LANDMAP aspect areas (AAs) which can produce potentially misleading and confusing results. For example, Unit 23 (encapsulating the Upland Grazing AA where the Hafod proposals would be located) includes extensive Urban and Amenity AAs which, because of the inclusion of visual criteria in the capacity assessment, results in a much higher sensitivity to turbine development than would be the case if just the Upland Grazing AA was assessed, despite Unit 23 generally being classed as a “medium to large scale landscape” and therefore less sensitive to development. The Unit 23 assessment concludes that it would have “...higher sensitivity to larger development due to the presence of visual receptors and the potential effects on the scale, landform and pattern of the valley”. Considering the proposed development is not within the valley itself and has very little intervisibility with it and that, in our opinion, visual receptivity should not feature in the assessment (see Q6), we would question the relevance and accuracy of this conclusion in respect of Hafod.</p>	<p>The definition of the landscape units has taken into account visual links between adjacent aspect areas. As explained above the key impact of wind turbines on landscape character is as a result of visual change</p>

Respondent	Agree / Disagree / Neither Agree or Disagree	Comment	Response / Proposed Change
Sorrel Jones Conservation Officer Gwent Wildlife Trust	Neither Agree nor Disagree		Noted
Sergio Zappulo Development Manager REG Windpower	Neither Agree nor Disagree	We have not examined the proposed Landscape Units in detail, though they appear to be logical in their definition of discrete areas. We note that most of the units incorporate a selection of landscape types. Landscape sensitivity is generally driven by landscape type, with upland moorland types being generally less sensitive than enclosed valley types, for example. There is likely to be significant variation in landscape sensitivity within those landscape units which include a variety of types. It is important that this variation is recognised in the unit-based evaluations.	Noted. We believe it is addressed. The aspect areas which are discrete types were too small to be useful for a strategic study.
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Neither Agree nor Disagree	Note that the only ridge top which is not a character area, Cefn y Rhondda, lies between the Rhondda Fawr and Rhondda Fach valleys. This is of concern and even if it is physically omitted it must be properly addressed in the descriptions of the 2 adjoining areas. 1: description should include the scarp slopes to the north. 2: description should include the scarp slopes to the south. 3: mention narrow ridge top 4: mention narrow ridge top	Information added in relation to detailed comments below
		12: Merthyr East Valley Side – these are not the earthworks but a large scale coal recovery scheme (Ffos y Fran) which has about a 15 year life span and then will be completely restored. Does this affect any of your conclusions?	No. Still a man-made earthwork in the landscape

Respondent	Comment	Response
<b>Q13: If you have any other comments on the Heads of the Valleys assessments, please use this space to report them.</b>		
Judith Jones Head of Town Planning Merthyr Tydfil CBC	It is recommended that the assessments be tested against previous planning applications and appeals to ascertain whether they are broadly in line with previous decisions.	That is on going
	The assessments should also be updated at appropriate intervals in order to take account of landscape change.	Most sensitivity studies are only updated if major landscape change takes place
	Finally, it should be noted that Planning Policy Wales was revised in July 2014.	Change made
Ian Gates Associate Director, Landscape AMEC E&I UK Ltd	As a general comment on the LU sheets it is not clear what the percentage figures quoted in the tables refer to.	Appendix 4 added to explain this
	Comments are provided on the two LUs: LU18 – Mynydd Bedwellte and Associated Upland and LU19 – Heads of the Valleys Corridor. LU18 - Mynydd Bedwellte This would be the host LU for the three proposed 110m blade tip height turbines at Pen Bryn Oer Wind Farm.	Sentence reworded to say: a very large development comprising three turbines at the northern end of the unit currently in planning.
	Landform – disagree that a broad ridge should be assessed as having a high sensitivity to wind turbine development. If the topography at Bryn Oer Patch were to be reasonably considered to be a plateau as opposed to a broad ridge it would be considered to possess low landscape susceptibility.	This is a matter of professional judgement. VS4 Topographic states 65% hills and valleys which does not suggest plateau. The remainder is high hills/mountains or rolling/undulating. Also the contours do not suggest this is a plateau. The northern end of the unit is broader and it may be argued is more of a hill than a broad ridge but with regard to the unit overall broad ridge is more appropriate.

Respondent	Comment	Response
	<p>Built environment –it is acknowledged that LU18 contains only severely limited built development, although there are two properties in the northern part of the LU. In these circumstances little weight can be given to the response to VS20: use of construction materials. The main comment relates to the Study’s approach of relating low levels of built development with high susceptibility as the corollary is that wind turbines are better sited close to areas with a high level of built development which is likely to mean a large number of visual receptors, probably including a large number of high sensitivity visual receptors. The explanation of this criterion (Page 14) states that “it is concerned with the presence of built structures and human development present in the landscape.” Hence consideration should not be restricted to identifying built development but instead should be extended to fully include indications of human presence. In the case of the northern part of LU18 around the Pen Bryn Oer Wind Farm site the land-use history of the area which has included open cast mining and relatively recent restoration is apparent in landscape and visual terms through the readily discernible presence of restored rough grazing, access tracks and post and wire fencing.</p>	<p>As noted above. The criteria may result in differing susceptibility. The overall judgement is made taking all attributes into account. The detail given in this response is appropriate at detailed LVIA level but not at strategic sensitivity study level. The overriding reason for high susceptibility here is the fact there is little built development and a strong sense of place which could be affected by incongruous development.</p>
	<p>Skylines and setting – it is strongly disputed that the skyline formed by the elevated northern end of LU18 is “distinctive”. There are no cairns present in the northern part. The Cefn Golau Cemetery does not contribute to the skyline (being on the lower side of the Sirhowy Valley and in LU19) and the Cemetery cannot be seen from the Rhymney Valley to the west. Consequently the medium susceptibility assessed for this criterion should be revised to low susceptibility.</p>	<p>Not agreed. The uplands form very distinctive skylines for the valleys that are not dependent on the presence of cairns. Skyline is an important and valued element of the setting of surrounding settlement.  Reworded to make clear that the cairns are not necessarily on the skyline.  Distinctive open skyline. Cairns and the Cefn Golau cholera cemetery, seen from the valleys on either side. Upland setting for neighbourhood settled valleys.</p>

Respondent	Comment	Response
	<p>Movement – it is reiterated that the level of human access can be assumed to be an accurate proxy for the level of movement. It is disputed that the northern part of LU18 should be described as secluded given the relative proximity of Tredegar, Rhymney and the A465 corridor (with the recently upgraded A465) and if it is accepted that the presence of PRowS is a proxy for the level of movement it should be noted that there is a moderate density of PRowS in the northern part of LU18 as well as a car park and an area of Open Access Land. Hence the high susceptibility assessed for this criterion should be reduced to medium susceptibility.</p>	<p>Currently movement may be visible from this LU but within the LU there is very little movement which give it high susceptibility to the introduction of movement.</p>
	<p>Visibility, key views and vistas – it is reiterated that the attribution of susceptibility for this criterion is counter intuitive: wind farms are overwhelmingly located in open upland locations and such locations are generally favoured by wind farm siting and design guidance. Consequently whilst it is agreed that the northern part of LU18 is open and therefore has extensive outward views, this attribute applies to all upland areas in the Study Area that aren't under forestry. Consequently the assessment that LU18 has a high susceptibility to this criterion is not accepted and should be reduced to medium.</p>	<p>Disagree with the premise. Wind turbines do tend to be located in upland areas but this does not mean that they will always impact on distinctive skylines. Where there is a possibility that they will impact on distinctive skylines there will be an increased susceptibility</p>
	<p>Intervisibility – this is a criterion where a general assessment is of limited value as it will be largely determined by the details of the individual wind farms that are operational, consented or proposed for any LU. As was demonstrated in the ZTV figures that accompanied the LVIA in the Pen Bryn Oer ES, the ZTVs that would be generated by the proposed wind farm would be relatively compact and would not extend as far south as Mynydd Bedwellte itself.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA.</p>
	<p>Views to/from landscape and cultural heritage features – the proposed Pen Bryn Oer Wind Farm would not impact upon views to the west or into the (Sirhowy) Valley from Cefn Golau. The aforementioned ZTVs also show that from the southern part of LU18 the proposed Pen Bryn Oer turbines would not be visible in northern views towards the Brecon Beacons national Park. Consequently the assessed medium landscape susceptibility should be reduced to low landscape susceptibility.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA</p>

Respondent	Comment	Response
	<p>Scenic quality and character – it is acknowledged that the values quoted are extracted from LANDMAP but with regard to the northern part of LU18 it is strongly disputed that scenic quality and integrity should be assessed as high given that a good proportion of the northern part of LU18 has only recently been restored. Consequently the high landscape susceptibility assessment should be downgraded to medium landscape susceptibility.</p>	<p>VS48 Character is 98% high for the area which demonstrates that although VS46 Scenic Quality is 50% high the unit as a whole has merit in terms of its strength of character and has an important role to play in separating development in the valleys east and west along its whole length.</p>
	<p>Remoteness and tranquillity – the description provided for LU18 is not applicable to its northern part around the proposed Pen Bryn Oer Wind Farm. It is disputed that this part of LU18 should be described as “attractive” although the assessment of medium landscape susceptibility for this criterion is accepted.</p>	<p>The sensitivity study does not remove the need for a detailed LVIA</p>
	<p>Landscape value – given that a proportion of the northern part of LU18 is located in an SLA (local landscape designation) it is agreed that a medium landscape susceptibility for this criterion is justifiable. Historic value – given that the land-use history of the northern part of LU18 has been associated with open cast mining and restoration it is not agreed that it should be assessed as high for historic rarity and integrity. Reference to the LANDMAP HLAA database shows that most of the northern part of LU18 including the Pen Bryn Oer site itself is not within an HLAA with an overall evaluation that is high or outstanding. Consequently the high landscape susceptibility for this criterion should not be high but should be reduced to low.</p>	<p>The unit is assessed as a whole because of the role it plays in separating the two valleys and associated development. Impacting on part of this unit will affect the unit as a whole.</p>
	<p>Summary of sensitivity to wind turbine development– with regard to what the typology defines as large and very large wind turbine development the reasons stated for the high assessed landscape sensitivity are weak. They are primarily derived from the two value criteria (thereby supporting the criticism of the methodology that the number of variables used to derive the value component of the sensitivity is too small and therefore results in it being imbalanced and places too much importance upon the historic value which is a weakly assessed criterion) within which the historic criterion is inappropriately assessed. Aside from the disputed high assessment of LU18’s historic value the other stated reason for the LU’s high landscape sensitivity to large or very large wind turbines is that they would be seen from the Brecon Beacons National Park. This reason prompts two comments:</p>	<p>The sensitivity criteria explanations were brief for all units because the evaluation against each criteria provides more detailed explanation. The summary of sensitivity points out key reasons where appropriate.</p>

Respondent	Comment	Response
	<p>Once again the extent of the ZTV within the National Park will be heavily dependent upon the design and location of an individual wind turbine development. With regard to the proposed Pen Bryn Oer Wind Farm, despite its location in the northern part of LU18 i.e. the closest part to the National Park, the landscape assessment in the ES calculated that its blade tip ZTV only covered 5.2% of the total area of the National Park which does not equate to a high score on this criterion;</p>	<p>The sensitivity study does not remove the need for a detailed LVIA. The importance of the impacts on Nationally designated landscapes are not determined by the proportion of the nationally designated landscape affected.</p>
	<p>This is a good example of the problems in the adoption of an unbalanced typology. It remains unclear as to how a reduction in the blade tip height of the proposed wind turbine from 110m (as per Pen Bryn Oer and classified as very large) to 80m (classified as medium) could result in the assessed sensitivity of LU18 dropping from high to low. The reduction in the extent of the ZTV for the same number of turbines at 80m blade tip height within the National Park would be at most a couple of percent less than that for the proposed 110m blade tip height turbines. It is also not agreed that landscape effects upon the National Park would be the same were the proposed wind farm at Pen Bryn Oer to be for 30 turbines of the same height as it is for three turbines yet this is the conclusion that the adopted typology is forced to draw.</p>	<p>Only sensitivity to turbines less than 50m to Blade tip has been assessed as low. Medium turbines have been assessed as low/medium which on reconsidering has been revised to medium The typology has been misunderstood. 30 turbines would result in the same impact and for this reason any development of six turbines or more would be considered very large.</p>
	<p>Landscape Objective – the stated landscape objective is Objective 2: “to maintain the landscape character” which is defined in Table 5 as “accepting that occasional small to medium developments may be allowed.” Consequently the critical issue once again is the distorted typology under which the proposed Pen Bryn Oer Wind Farm is assessed on the basis of it being a “very large” development by virtue of it comprising turbines that are over 109m high. It would still be considered to be “very large” even if it were to be comprised of a single 110m high turbine. The adherence to the typology places too great a restriction on potential wind farm development in LU18. Given the detailed assessment that is provided for LU18 it is not clear why if Pen Bryn Oer were to consist of four 80m high turbines it would be acceptable but because it consists of three (or even one) 110m high turbine it is assessed as being unacceptable. A proposed wind farm consisting of four 80m high turbines in the same location would have similar intervisibility to the north and the National Park; would still be intervisible with other upland LUs and the Sirhowy and Rhymney Valleys; would still impact upon the purported distinctive skyline; would still be visible from the Cefn Golau Cemetery and would have the same, if not greater effect upon the moderate number of PRowS and the open access area.</p>	<p>The wording of the landscape objective has been revised to make it clear that it refers to wind turbine development that is potentially suitable outside SSAs rather than referring to the typologies</p>

Respondent	Comment	Response
	Baseline wind turbine development (March 2014) – the veracity of the Study is bought into question by the fact that it does not mention the proposed Pen Bryn Oer Wind Farm despite the planning application being submitted in the Summer of 2013.	Reference added
	Indicative Overall Capacity – the Study accepts that there is “some capacity for medium scale development” which once again leads to the issue of the way in which the typology is distorting the results of the Study undermining its credibility.	Hopefully the revised typology descriptions will make this clearer
	Guidance on siting – this states that effects upon views from the National Park from the north of LU18 must be considered. The Pen Bryn Oer landscape assessment did assess effects upon the National Park in depth and concluded that landscape effects upon the National Park would not be significant. It should be noted that the National Park did not object to the proposed Pen Bryn Oer wind Farm. Likewise the historic environment assessment concluded that there would be no significant effects upon designated and other cultural heritage features whilst it should be noted that despite extensive consultation on viewpoint selection no consultees considered it necessary for the selection of a viewpoint within or close to Cefn Golau Cemetery. <i>The</i> cumulative assessment considered the potential for sequential cumulative effects in detail (using a accurate cumulative baseline) and concluded that there would be no significant cumulative effects and that there would be visual separation with the other single and two turbine wind turbine developments within 10km. It again should be noted that no objection has been raised on cumulative issues. The visual assessment included all the various groups of residential and recreational visual receptors located in the settlements of Tredegar and Rhymney (as well as many other settlements) and broke these receptors down into much smaller groups and concluded that whilst some residential visual receptors located within 1.5km and a smaller number of recreational receptors within 3km would sustain significant visual effects their numbers were relatively low for a wind turbine development and should be considered to be acceptable. Once again no objections were raised in this regard. The only stated reason for refusal was the effect upon the SLA and this will form the basis of the forthcoming appeal. Given the land-use history and baseline characteristics of the northern part of LU18 it is difficult to accord with the statement that this part of the SLA provides a strong example of natural beauty.	As noted this scheme is going to appeal and these site specific issues will no doubt be considered in detail at the appeal.

Respondent	Comment	Response
	Hence it is concluded that even when assessed against LU18's siting guidance the proposed Pen Bryn Oer Wind Farm accords with at least four of the five criteria. This conclusion must serve to indicate that with regard to LU18 at least the Study is overly restrictive and does not result in a balanced assessment of landscape sensitivity and capacity.	The sensitivity study does not remove the need for a detailed LVIA
	<p>LU19 – Heads of the Valleys Corridor</p> <p>This is located to the immediate north and east of the proposed Pen Bryn Oer Wind Farm which is located in LU18. However a detailed review has been undertaken of the completed assessment sheet for LU19 in accordance with the Study's methodology regarding the inclusion of LUs as set out in the bottom paragraph in the left hand text column on page 11.</p>	
	Landform – the landform is more accurately described as hills and valleys as opposed to undulating and rolling (as is demonstrated in the LU's title). Under the criteria set out for this criterion a hills and valleys type of landform would still be considered as being a landform of high susceptibility to wind turbine development but the veracity of this assertion has already been questioned. Based upon numerous site visits to LU19 it is concluded that a more reasonable assessment would be that LU19's landform possess medium susceptibility to this type of development.	LANDMAP VS4 Topographic - rolling undulating 95%
	Landcover pattern – it is agreed that LU19's landcover pattern is complex with broken patterns and the juxtaposition of different land-uses but overall it is more accurately assessed as having low as opposed to medium landscape susceptibility.	Our professional judgement concluded that the susceptibility was medium because of potential cumulative effects of further change (not wind turbine development) in this corridor.
	Built Environment – the large majority of the Clydach Gorge Registered Historic Landscape is sited outside LU19 and the western end that is within LU19 is outside the proposed Pen Bryn Oer Wind Farm's blade tip ZTV. It remains difficult to understand how the contributory components of this criterion relate to an LU's capacity to accept a wind turbine development e. g. the fact that 51% of the built development in LU19 is apparently considered to be constructed using inappropriate construction materials.	Information has been taken from LANDMAP and the evaluation follows the method agreed with the client group.
	Skyline and setting – agree that LU19 does not possess a distinct skyline and that therefore landscape susceptibility under this criterion is low.	Noted

Respondent	Comment	Response
	Movement – agree that the key landscape role that is played by the recently upgraded A465 ensures that landscape susceptibility under this criterion is low.	Noted
	Visibility, key views and vistas – as LU19 consists primarily of urban development it is more likely that views are generally relatively restricted by nearby built development however on the basis of site visits it is acknowledged that views to the surrounding elevated areas are important hence the medium landscape susceptibility assessment is justified.	Noted
	Intervisibility – on the basis of detailed knowledge of LU19 gained through site visits it is difficult to understand how the LANDMAP derived comments utilised in this response can be helpful in determining landscape susceptibility nor how they can act as a proxy for actual on-site observation for this criterion. This is a good example of where less reliance on LANDMAP and greater emphasis upon the field survey component as set out in the bullet points on page 19 would be helpful. Indeed it is difficult to identify where information gathered during the field survey has been utilised in any of the responses in the LU19 survey sheet.	This sensitivity study does not remove the need for a detailed LVIA. It does highlight where and why there is higher susceptibility.
	Types of Receptors – it is agreed that there are a large number of visual receptors within LU19 but as the response emphasises a good proportion of these are people at their place of work and using the ‘A’ roads, especially the A465. Under GLVIA3 (and early versions of GLVIA) these types of visual receptor are usually accorded lower visual sensitivity in comparison to residential and recreational receptors. It is also worth noting that just taking account of the overall number of potential visual receptors in an LU is an unsophisticated approach even at this strategic level; LVIA authors are aware that in settlements the availability of outward views is frequently restricted by nearby built development and/or vegetation and is influenced by the settlement’s morphology and aspect. Once again the veracity of the Study would be aided were the observations of the field survey component to be utilised in framing the response to this criterion. Consequently the high assessed susceptibility under this criterion is not accepted and should be reduced to medium susceptibility.	Due to the presence of a large number of residential receptors in this LU we feel the susceptibility remains as high. It is clearly within the scope of any individual application to demonstrate (via detailed LVIS) that due to the location chosen there are no significant residential issues.

Respondent	Comment	Response
	Views to/from landscape and cultural; heritage features – given that the main topographical feature of LU19 is a valley and based again on site visits there is only limited intervisibility with the National Park from within LU19, especially once the high level of built development is taken into account (for outward views). With specific regard to the proposed Pen Bryn Oer Wind Farm, its location to the south-west would ensure that its presence would have no effect upon the intervisibility between LU19 and the National Park. Consequently with specific reference to the proposed Pen Bryn Oer Wind Farm the assessed medium landscape susceptibility should be reduced to low landscape susceptibility.	This sensitivity study does not remove the need for a detailed LVIA.
	Scenic quality and character – agree with the assessed low landscape susceptibility.	Noted
	Remoteness and tranquillity - agree with the assessed low landscape susceptibility.	Noted
	Landscape value – given that this is a strategic level study there is little benefit in bringing in site specific sites and features such as Bedwellte Park unless it is in relation to actual field observations (Bedwellte Park is in the midst of Tredegar and contains a high level of mature trees so is unlikely to be affected by wind turbine development and certainly not by the proposed Pen Bryn Oer Wind Farm). The relatively low values quoted for VS50; VS49; LH45; GL31 & GL33 are more indicative of low landscape susceptibility than medium landscape susceptibility.	Specific sites are referenced to ensure that proposals take into account their presence. Not all proposals within an LU are likely to have an impact on the sites identified
	Historic value – again would dispute that the quoted LANDMAP evaluations justify the high assessed landscape susceptibility for this criterion. The use of the Tredegar Conservation Area as a justification is an example of an overly deterministic approach and failure to use the field work to add a degree of realism to the Study to make it more accurate and therefore credible. The Tredegar Conservation Area is focused upon the town centre of an industrial settlement and rather than simply stating that its designation automatically results in high value it would be helpful if some consideration were to be given as to how the presence of wind turbine development elsewhere in LU19 could affect the attributes for which the Conservation Area has been designated.	This sensitivity study does not remove the need for a detailed LVIA.
	Summary of sensitivity to wind turbine development – the Study’s commentary text notes that “although a number of criteria suggest lower or medium sensitivity this area (LU) is densely settled and there will be residential amenity issues which will limit the potential size of wind energy development.” This is a sweeping statement which implies that a high	This sensitivity study does not remove the need for a detailed LVIA.

Respondent	Comment	Response
	<p>settlement density outweighs not just all the other components included in the sensitivity study but also the other factors purportedly included in the Study as listed on pages 19 and 23. It could be argued that the Study is being wilfully naive in implying that a wind turbine development would ever be sited in close proximity to settlements of the size that are found in LU19. Issues such as residential visual amenity have to be assessed on a site by site basis. Even where a wind turbine development is located in moderate proximity to a number of residential properties as is the case with the proposed Pen Bryn Oer Wind Farm, effects upon residential amenity do not necessarily make the wind turbine unacceptable with regard to residential visual amenity.</p>	
	<p>Finally it is again difficult to understand how LU19 would have low assessed sensitivity to a small wind turbine i.e. with a blade tip height of 50m but were the turbine's height to increase to 51m and therefore become a medium wind turbine under the typology, LU19's assessed sensitivity would increase to medium or high.</p>	<p>This sensitivity study does not remove the need for a detailed LVIA. Any development close to the boundary between typologies would be considered against both conclusions.</p>
	<p>Landscape Objective 2: Maintain the landscape character – it is not agreed that this is the correct landscape objective for LU19. In the context of the large amount of change that is taking place in parts of this LU, in particular the recent change associated with the A465 corridor itself, low levels of landscape management; the presence of restored landscapes that are only becoming established and the mosaic of sometimes competing land-uses, the objective should be to encourage suitable landscape change although the landscape objectives have been defined so that this landscape objective can only be applied in an SSA.</p>	<p>TAN 8 has been used to determine the objectives which related to wind turbine development - not other forms of development.</p>
	<p>Indicative Overall Capacity – same comments as provided for this subject for LU18.</p>	

Respondent	Comment	Response
	<p>Guidance on siting – with specific regard to how the proposed Pen Bryn Oer wind Farm would accord with the guidelines for LU19 the following brief comments apply:</p> <ul style="list-style-type: none"> <li>i) Views into and out of National Park – the location of the proposed Pen Bryn Oer Wind Farm to the immediate south-west of LU19 would ensure that its turbines could have no effect upon these views;</li> <li>ii) No development in Clydach Gorge and National Park - the proposed Pen Bryn Oer Wind Farm fully accords with this guidance</li> <li>iii) Maintain natural beauty of SLAs in the area and their special qualities – SLA in LU19 is restricted to its eastern parts therefore the proposed Pen Bryn Or Wind Farm would have minimal effects upon it;</li> <li>iv) Maintain the role of green wedges – as the only green wedge in LU19 is on the eastern side of Tredegar the limited presence of the proposed Pen Bryn Oer Wind Farm would not have an adverse impact upon its purpose and function;</li> <li>v) Bedwellty Park Registered Park and Garden - as noted earlier the Park’s setting and attributes would be unaffected by the proposed Pen Bryn Oer Wind Farm;</li> <li>vi) Tredegar Conservation Area – as noted earlier the Conservation Area’s valued characteristics and setting would not be significantly affected by the highly limited presence of the proposed Pen Bryn Oer Wind Farm in this part of LU19 (as demonstrated by the ZTVs in the LVIA in the June 2013 ES);</li> <li>vii) Protect the settings of designated and other important cultural heritage features and key views to and from these features – not enough information to comment;</li> <li>viii) Avoid cumulative effects with other large scale infrastructure – as set out in the assessment sheet for LU19 there are three other proposed single turbines in LU19 and these were all included in the cumulative assessment contained in the LVIA and ES. No significant cumulative effects were assessed and cumulative landscape and visual effects were not given as a reason for refusal;</li> <li>ix) avoid loss of trees and woodland – no trees or woodland would be lost in LU19 (or any other LU).</li> </ul>	<p>These responses are appropriate in terms of an individual application they are not relevant to the study itself. However, they do indicate how an individual application can be assessed against the criteria identified. We have not reviewed the statements made here with regard to the Pen Bryn Oer wind Farm and cannot say whether the scheme does or does not comply with the criteria.</p>

Respondent	Comment	Response
Sorrel Jones Conservation Officer Gwent Wildlife Trust	<p>We feel that this report performs well in assessing landscape sensitivity, but is less clear in terms of landscape capacity for turbine development. One of the most difficult issues faced by planners is assessing cumulative impacts of development, with turbines being a particularly difficult issue.</p> <p>The assessments generally give an indication of the type of wind turbine development that would be acceptable, <b>but fall short in indicating how much development can be accommodated</b>. It is clear that many individual, small scale turbines can be as damaging as a large scale development, and local authorities urgently need guidance as to where to draw the line. This is particularly important where turbine development have already been approved and built; some developers feel that once one turbine has been accepted, this provides a green light for more. It would be helpful for local authorities to have some guidance to support their decision, should they need to refuse development when landscape capacity has been reached.</p> <p>We strongly advocate an additional step in each assessment to determine an overall capacity for each landscape unit, whereby the acceptable number of developments as well as the typology is considered.</p>	This is not possible and has not been attempted in other sensitivity studies that have been undertaken outside SSA's. Within SSAs a different approach was adopted where the aim was that they should accommodate the maximum possible. This is not the approach outside the SSAs
Sergio Zappulo Development Manager REG Windpower	<p>We have looked in detail at the assessments for Unit 1 and Unit 4, as these are areas in which REG Windpower hold a specific interest. However, based on our review of the document we feel that similar observations may be made in relation to many of the unit assessments.</p> <p>We broadly agree with the assessments in relation to the separate criteria for Landscape Unit 1. However, the overall conclusion for sensitivity to 'Very Large' wind turbines states: "Medium - high sensitivity to very large development on account of historic value and presence of existing large scale wind farm". The assessment elsewhere (including in the assessments for built environment and movement) notes that the presence of wind turbines reduces susceptibility; this seems logical. It is therefore not clear why or how the presence of turbines increases overall sensitivity in this unit (see our comments on Q5).</p>	It is commonly accepted that whilst existing turbine development may reduce sensitivity it also has the potential to increase sensitivity due to the potential for cumulative impacts.

Respondent	Comment	Response
	<p>The section on Landscape Capacity is less clear. The ‘Baseline wind turbine development’ includes the Abergorki 3-turbine scheme (in planning), whereas the approach to the assessment only refers to operation and consented schemes being considered. It is not clear how this scheme influences overall capacity: i.e. does the assessment of capacity consider the capacity of the unit over and above Abergorki, or without Abergorki?</p>	<p>Abergorki is mentioned for information even though it is not yet consented. Any developer proposing development in this unit would have to be aware of the proposed scheme at Abergorki because if it is consented and built it will reduce the capacity for wind turbine development in this unit.</p>
	<p>It is not clear how the conclusions of ‘Indicative overall capacity’ have been reached. The conclusion explains that it is possible that there is little capacity in the northern extent due to developments which are consented but not yet built. However, it does not explain why this is the case for the remainder of the unit. It also states that there is limited capacity for large or very large scale development – this is despite the sensitivity assessment concluding different sensitivities for these two scales of development – a medium sensitivity to large turbines, and a medium-high sensitivity to very large turbines.</p>	<p>Sensitivity and capacity do not correspond directly and the limited capacity of the unit relates to the fact that there is already a large amount of development in the SSA in the unit.</p>
	<p>The indicative overall capacity does not make clear the influence of TAN8 SSA F which covers 78% of the area. The landscape objective is to accept landscape change within the SSA – but the overall capacity suggests there is limited capacity for large or very large scale development.</p>	<p>The SSA designation does not influence sensitivity but does indicate acceptance of landscape change within the SSA. This study is not concerned with development within the SSA. Outside the SSA the objective is to maintain landscape character.</p>
	<p>We note the final point within the guidance on siting - that proposals should appear separate from existing large scale wind farms. However, we consider this should be expanded to include, alternatively, siting proposed wind farms so that they form a logical and natural extension to existing wind farms.</p>	<p>Not appropriate as this study is not concerned with 'wind farms' that may be proposed for the SSA</p>
	<p>For Unit 4 the Summary of Sensitivity states that landform, built environment, sensitive receptors and historic value contribute to “high landscape sensitivity” to large and very large development. However, the adjacent coloured boxes seem to rate these as medium- high.</p>	<p>Wording changed to medium-high to reflect the assessment</p>

Respondent	Comment	Response
	The indicative overall capacity for Unit 4 could be written more clearly to distinguish between the area within the SSA and the area outside the SSA.	Wording has been changed to make this clearer
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	<b>Landscape Unit 1:</b> Landform- should note that plateau less sensitive but areas close to and on scarp slopes/dramatic landforms are very sensitive.	Wording amended
	Skylines and settings- as above.	Wording amended
	Visibility etc.- there are two scenic viewpoints, at Craig y Llyn and Bwlch y Clawdd, which should be mentioned.	Reference to viewpoints added
	Summary of sensitivity- this appears to suggest that medium or large turbines can be accommodated in the area just because very large development can be accommodated. Our experience with various planning applications have shown that these will appear awkward or incongruous in relation to the existing large scale windfarms in the area or visually link them together potentially resulting in complete visual coverage of the whole SSA and its surrounds. We suggest that this should be properly addressed and discouraged. We suggest that these should also be medium to high in sensitivity and text should address the issue in the additional comments and in the guidance on siting in the landscape capacity/guidance.	The issue with regard to potential cumulative impacts where large schemes are seen with smaller development is addressed elsewhere in the study
	Other susceptible landscape... Features- these should include dramatic glacial landforms	Wording amended
	Baseline turbine development- spellings incorrect	Spellings amended
	Indicative overall capacity- suggest that 2 <sup>nd</sup> sentence should read: <i>'Although the sensitivity to medium to very large scale development ranges from medium to high it is possible that due to the scale and extent of development consented and constructed that this unit has little capacity left for further development.'</i>	Wording amended as suggested
	Guidance on siting- suggest add: Large scale development should be located in the TAN 8 SSA F <b>refined areas</b> .	Wording amended
<i>'Avoid siting single/double turbines where they can be seen in juxtaposition with large scale developments, or where they may visually link large scale developments.'</i>	Wording amended as suggested	

Respondent	Comment	Response
	<b>Landscape Unit 2:</b> Scale is actually medium and large – LANDMAP is wrong	Percentage for medium – vast 21%, large 30% Medium 49%
	Landform – add to first sentence ‘with dramatic glaciated landforms’.	Wording amended as suggested
	Landcover pattern – the fieldscapes east of Rhigos are actually reclaimed to very high standard- this should be acknowledged so that the medium susceptibility still takes this into account.	Reference to high standard of reclamation added
	Skylines and settings- the distinctive skyline of Hirwaun Common should be stated as being very sensitive.	Reference to the distinctive skyline of Hirwaun Common added
	Summary of sensitivity – medium and large and very large- should mention sensitivity in the relationship with the scarp slope as well.	Wording amended
	Indicative overall capacity- the proximity of medium, large and very large scale development to the scarp slope, and the juxtaposition with the larger scale development to the south are also issues.	Wording amended
	<b>Landscape unit 3:</b> Landform should mention narrow Cefn Rhondda ridge top.	Wording amended
	Intervisibility etc. – built form in the Valley bottom <i>sometimes</i> restricts views.... Also note views over the area from Bwlch y Clawdd viewpoint to the west .	Wording amended
	Summary sensitivity- large/very large turbines – add ‘and association of the very large windfarm typology with the coalfield plateau, not the valley’.	Wording amended
	Guidance on siting- amend first sentence-‘ large scale development should be located in the TAN 8 SSA F <b>refined areas</b> .	Wording amended
	Add : Consider cumulative effects of development on both sides of the Valley to avoid ‘surrounding’ settlement with development.	Wording amended
	Avoid siting wind turbines on... add Graig Fach after Graig Fawr...	Wording amended
	Great care is needed on Cefn y Rhondda and associated ridgeline due to its sensitive narrow character and the existing prominent development.	Wording amended
	<i>Add-</i> Avoid siting single/double turbines where they can be seen in juxtaposition with existing large and very large developments, or where they may visually link those developments.’	Wording amended

Respondent	Comment	Response
	<p><b>Landscape unit 4:</b> Indicative overall capacity- first sentence should read: 'The focus within TAN 8 SSA F and its refined areas is on strategic scale windfarms. Second sentence should read 'the area in and around this area is already developed an overall remaining capacity is very limited'</p>	Wording amended
	Guidance on siting – Great care is needed on Cefn y Rhondda and associated ridgeline due to its sensitive narrow character and the existing prominent development.	Wording amended
	<p><b>Landscape unit 5:</b> Summary of sensitivity – suggest that large should also be medium high. 'Proximity to, and intervisibility with, valleys' should also be mentioned in this and the very large turbine comments.</p>	Sensitivity has not been changed but reference to valleys added
	Note that sensitivity to large turbines is low on the map- which is hopefully incorrect.	Plan amended
	Baseline wind turbine development- note that the area is outside the TAN8 annex D study refined area.	Reference to the refined area added
	Indicative overall capacity – suggest that just states that the capacity of the area is limited where there is intervisibility with the adjacent valleys.	Wording amended
	Guidance on siting – omit first sentence starting 'larger scale development...'	Wording amended
	<p><b>Landscape unit 8:</b> Guidance on siting – 5<sup>th</sup> bullet – substitute significant adverse for overbearing.</p>	Wording amended
<p><b>Q14: What status should Landscape Sensitivity and Capacity Assessments have? Should they be adopted as Supplementary Planning Guidance by Local Planning Authorities?</b></p>		
Judith Jones Head of Town Planning Merthyr Tydfil CBC	The Landscape Sensitivity and Capacity Assessments have the potential to be adopted as supplementary planning guidance within Merthyr Tydfil as they provide advice on landscape capacity and guidance on the siting of wind turbines which is linked to the landscape related criteria within LDP Policies BW5 and TB7. The Local Development Plan Manual does however state that an SPG should not be used to determine the appropriate type, scale and level of development for particular sites (paragraph 7.3.5). Can the <i>indicative overall capacity</i> findings be interpreted as doing this?	The indicative overall capacity findings do not relate to specific sites

Respondent	Comment	Response
Peter Seaman Chairman Campaign for the Protection of Rural Wales (CPRW)	<b>1. This is a highly specialised study of one part of Wales</b>	
	We are not professional landscape consultants and do not think we have sufficient expertise to comment in detail on the methodology used.	Noted
	Without detailed knowledge of the area, it is difficult to comment on whether the precise findings accord with the public understanding of landscape value and capacity. However we welcome the general advice and methodology, and the clear presentation of capacity in relation to different turbine sizes. We also endorse the emphasis on the role of unbiased professional judgement of experienced landscape architects.	Noted
	<b>2. Extension to other parts of Wales</b>	
	A stated aim is to achieve consistency across local authorities when considering applications for single or multiple applications which fall short of “wind farms”. If this is to be extended beyond the pilot area, it would obviously be desirable for the capacity studies to be performed by the same team, or at least by applying the same principles with the same care and similar balance of professional judgement. This is particularly important since the Heads of Valleys region is very different from other areas of Wales which may, for instance, rely more heavily on outdoor pursuits and rural tourism for regeneration.	Noted
	In as much as the capacity study protects landscape from inappropriate development and sites development as sensitively as possible, it is right that all LPAs have similar protection. This is both because impacts will be experienced across LPA boundaries and because curbs on irresponsible development in one area of Wales will inevitably divert wind turbine development to anywhere regarded as more permissive.	Noted
	However, we fear that, in practice, motivation and cost could prevent extension to the detriment of poorer, less populated rural areas whose LPAs may remain without any such assessment. Perhaps worse, some LPAs may end up with less objective, sensitive and discriminating capacity studies incorporating vested interests of Developers.	Noted
	<b>3. Reaching Capacity and Feed-back Effect of Turbine Development.</b>	

Respondent	Comment	Response
	<p>Although it is beyond the remit of this guidance, it is unclear whether “capacity” can be reached and, if so, how this will be decided. This will depend upon planning decisions about whether areas with wind turbines are regarded as having a changed “wind turbine” character and can thus “accept” more turbines or whether there is a threshold of cumulative impact of existing turbines which becomes a bar to any more. The capacity assessment assumes that industrialised, populated areas are more suitable for new construction and, if this principle is applied to wind-turbines, turbine construction will have a positive feedback on future development and capacity studies will only have a very limited impact in landscape protection. Similarly, we do not know whether capacity studies done at a future date would prove more restrictive or more permissive. Wind turbine siting is caught in this inherent ambiguity because developers tend to choose prominent skylines in tranquil, sparsely populated rural areas without any vertical buildings over 15m – precisely those areas deemed most vulnerable in the LANDMAP-based capacity assessment. It remains to be seen how the present capacity study will be applied and whether there is a planning will to protect any of these areas lying outside National Parks and AONBs from small and medium wind development.</p>	Noted
	<p>The Campaign for the Protection of Rural Wales (CPRW) established in 1928 is Wales’ foremost countryside Charity. Through its work as an environmental watchdog it aims to secure the protection and improvement of the rural landscape, environment and the well being of those living in the rural areas of Wales</p>	Noted
<p>Sorrel Jones Conservation Officer Gwent Wildlife Trust</p>	<p>We believe that these assessments should be adopted as SPG to ensure that they are used as guidance by developers and Planning Authorities. Adoption will also help to raise overall awareness of landscape sensitivity. This guidance, together with the forthcoming <i>Planning Guidance for Wind Turbine Development: Landscape and Visual Impact Assessment Requirements</i> will help developers to select appropriate locations for turbines, and also help to protect sensitive and valued landscapes.</p>	Noted

Respondent	Comment	Response
Phil Ratcliffe Development Planning Officer Rhonda Cynon Taff CBC	Should not be as SPG in RCT until the SSA issues are resolved. It would be helpful to have this status elsewhere (outside SSAs).	Noted
	<b>Additional Comments</b>	
	<b>SECTION 5: GUIDANCE FOR WIND ENERGY DEVELOPMENT</b> 5 <sup>th</sup> para page 164- suggest for sentence should read 'No settlements should have the sense of being surrounded by wind turbines, such as developments on both sides of a valley'.	Amended
	Turbine size and scale- the '50% higher' rule would mean that most turbines near buildings should not be higher than 12m tall which seems rather restrictive.	Amended
	Factors relating to location – landscape character- topography – suggest sentence is amended to read 'turbines can dominate the landform if not carefully sited'.	Amended
	Factors relating to siting – Filling in gaps between clusters of wind turbines- suggest entire text should read: Where there are large scale windfarms in an area, the introduction of single or double turbines between clusters can create visual links between developments. There is also potential for incongruous juxtapositions between the different scales of developments. Therefore, where site analysis indicates that maintaining visual separation between and around windfarm clusters is desirable, the gap between developments should be maintained.	Amended
<b>APPENDIX 2 REFERENCE DOCUMENTS</b> SNH visual representation of windfarms guidance should be updated to 2014. Consequently the Highland Council standards should be deleted, as this has influenced the revised SNH guidance.	SNH guidance updated but reference to Highlands Standards retained. Neither of these are proscriptive in Wales and the Highlands council standards are well suited to smaller scale development	

Respondent	Comment	Response
	<p><b>APPENDIX 3 BASELINE INFORMATION</b></p> <p>Add:  Consortium of South Wales Valleys Authorities (2006): TAN8 annex D refinement study for strategic search areas E and F: South Wales valleys. Prepared by Arup.</p>	<p>Added to reference documents</p>

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**CAERPHELLY COUNTY BOROUGH SMALLER SCALE WIND TURBINE  
DEVELOPMENT: LANDSCAPE SENSITIVITY AND CAPACITY STUDY**

**Report of Consultation**

**1 Introduction**

- 1.1 In line with the Council's agreed procedure for the preparation of Supplementary Planning Guidance (SPG), Smaller Scale Wind Turbine Development: Landscape Sensitivity and Capacity Study was subject to a 6-week public consultation between 26 August 2015 and 6 October 2015.
- 1.2 The consultation was undertaken using the following methods:
- Emails sent to key stakeholders including those that had been consulted as part of the wider 'Heads of the Valleys Smaller Wind Turbine Development' document;
  - Letters sent to Community Councils;
  - Letters sent to all neighbouring authorities and Elected Members;
  - Statutory notice placed in the Caerphilly Observer on 20 August 2015;
  - CD copies of the document made available for public inspection at all local libraries and Customer Service Centres in the County Borough and at the Council Offices at Pontllanfraith House;
  - The document was available to view electronically on the Council website.
- 1.3 A total of 4 responses were received from the following external consultees:
- Natural Resources Wales (NRW);
  - AJA Associates;
  - LDA Design; and
  - NATS Ltd; and

Letters were also received from the Coal Authority, stating that they had no comments to make on the SPG document.

## Appendix 1: Summary of Responses

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	AJ Associated	Disagree	SLA Boundary
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### Summary Of Representation

Previously made representations on behalf of Bryn Quarry Ltd relating to the SLA designation in the Adopted LDP. Believe the SLA boundary should be drawn 1.5km north as the land between the two roads (A472 and B4254) are areas of a LANDMAP values.

### Officer Response

All SLA boundaries are to be reviewed as part of the Replacement LDP. In addition, each application and LVIA will be judged on a case by case basis.

### Recommendation

No change

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	AJ Associated	Disagree	Inconsistencies in LU1 designation
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**Summary Of Representation**

The boundaries of LU1 reflect many of the SLA boundaries, and like the SLA's it is far from being a homogenous area in terms of landscape character or sensitivity. These Landscape Units are strongly based upon the underlying LANDMAP Visual and Sensory [V&S] data. We observe that there are 5 different V&S aspect areas within LU1, the largest being CYNONVS143 classified as Hillside and Scarp Slope Mosaic [that Bryn Quarry itself lies within]. However, the remaining area [approximately 15%] includes V&S areas classified as upland grazing, urban and village, each with different sets of landscape and visual susceptibility criteria – they also differ greatly in overall evaluation, from Low to High. This is mirrored in other LANDMAP Aspects. Concern is expressed that these smaller aspect areas potentially skew the data, which results in a higher overall assessment of sensitivity to wind energy development.

**Officer Response**

The boundaries for LU1 have been established along the same lines as those units defined for the Heads of the Valleys study. The Landscape units are not landscape characters or types, but were determined taking account of place, landform, topography, indivisibility and receptors and were refined using local knowledge. In addition, the study cannot remove the need for a detailed LVIA and the detailed site survey work that should accompany it. Any variations in the landscape will be addressed as part of the specific LVIA.

**Recommendation**

No change

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	AJ Associated	Disagree	Disagrees with sensitivity area in LU1
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**Summary Of Representation**

There are indications that there are also areas of lower sensitivity. Believe criteria has been assessed too highly and the land at Bryn quarry should quantify as a 'Low' sensitivity area.

**Officer Response**

The assessment criteria for all of the landscape units has already been established in the Heads of the Valleys study.

**Recommendation**

No change

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	AJ Associated	Disagree	Disagrees with capacity assessment of LU1
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**Summary Of Representation**

Under 'Indicative overall capacity', draft document indicates that there is some capacity for medium scale development and limited capacity for large scale development. However, believe that there is potential land in the vicinity of Bryn Quarry which may well meet the criteria and would be suitable for medium and large scale wind energy developments.

**Officer Response**

The study cannot remove the need for a detailed LVIA and the detailed site survey work that should accompany it. Should it be deemed suitable for the applicants to wish to place large scale wind turbines in the area, the detailed LVIA will take this into account. Each application will be judged on a case by case basis.

**Recommendation**

No change

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	Coal authority		Comment
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**Summary Of Representation**

No specific comments to make.

**Officer Response**

Noted

**Recommendation**

Noted

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	LDA Design	Disagree	Larger set of criteria used in this landscape sensitivity
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**Summary Of Representation**

Compared to most sensitivity and capacity studies, this uses a larger set of criteria. This could be an advantage except that there is perhaps not enough attention paid to how the criteria interact, and whether the combination and scoring of criteria has unduly affected the results. For instance – a small scale landscape with more complex landform (both rated as higher susceptibility) will nearly always have a high degree of enclosure (rated as low susceptibility). A landscape with more movement because it hosts a major road corridor (lower susceptibility), will nearly always have more visual receptors (higher susceptibility) and lack remoteness and tranquillity (lower susceptibility). The study also appears to place equal weighting on each criterion. In particular this is questionable in respect of the weighting of the three value criteria. LANDMAP has a bias in reporting most areas (nationwide) as being of High or Outstanding historic value; and a similar, though less pronounced, bias in terms of cultural value. This combination of using some ‘competing’ criteria, and other criteria with an inherent bias towards higher values will tend to produce results in which values tend to medium (as a result of the competing criteria), and perhaps higher (as a result of the criteria with a higher bias).

**Officer Response**

LANDMAP Data was used to provide a consistent, independently verified description of the characteristics of the landscape. The study recognises that there are different receptors, and that different susceptibilities will apply. Whilst it may be perceived that some areas fair better than others, it needs to be remembered that a detailed LVIA will need to take place before a formal planning decision is made on each site.

**Recommendation**

No change

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	LDA Design	Disagree	Requirement of development sizes needed.
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**Summary Of Representation**

There is a wealth of detail in terms of the analysis of the various susceptibility criteria, but very little in the consideration of suitable development sizes – both in terms of the explanation of the methodology, and in terms of the analysis for each landscape unit. There seems to be a default assumption that all landscapes must have at least Medium-High sensitivity to the Large and Very Large scale of development. It is clear that this is a policy-based assumption (page 6 table 1) – i.e. that such developments are only appropriate within SSAs. Using this as a guiding assumption colours the entire study – instead of being a landscape-led study to which policy is applied, it is a policy-led study. The contrast between the clear, traceable, and analytical approach to the susceptibility and value criteria; and the ‘present the answer’ approach of the capacity and sizing guidance undermines the capacity and sizing recommendations and suggests an inherent assumption that larger developments are intrinsically unacceptable.

**Officer Response**

Development sizes will be taken account of in a case by case basis. The purpose of the report was to provide guidance on the landscapes, not on the exact scale, form and location of the wind turbines to be placed in the locality.

**Recommendation**

No change

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	NRW	Comment	Clarification
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**Summary Of Representation**

Understand the title of the Heads of the Valleys study to be 'Wind Turbine Development' rather than 'Smaller Scale Wind Turbine Development' and suggest the titles reflect each other, for consistency.

**Officer Response**

The title of the Heads of the Valleys document is 'Smaller Scale Wind Turbine Development: Landscape Sensitivity and Capacity study'. The decision was taken to add 'smaller scale' to differentiate the SSA wind turbines defined under TAN8.

**Recommendation**

No change

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	NRW	Comment	Clarification
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**Summary Of Representation**

Section 6 Fig. 03. It is not very easy to distinguish between the colours of Historic Parks & Gardens Essential Setting and Special Landscape Areas.

**Officer Response**

Noted. This follows the designations in the Local Development Plan.

**Recommendation**

Colours to be amended in final document.

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	NRW	Comment	Clarification
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**Summary Of Representation**

Fig. 04. Is there a definition of Open Country?

**Officer Response**

As a result of the 2000 CROW Act, all authorities in England and Wales needed to map areas of Open Country. As this document is intended to be read and implemented by professionals, there is an assumed knowledge to the CROW. Part 1(2) of the CROW stipulates Open Country to mean land which—

(a) appears to the appropriate countryside body to consist wholly or predominantly of mountain, moor, heath or down, and (b) is not registered common land. As this definition is enshrined in law, there is no need to repeat it within the maps.

**Recommendation**

No change.

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	NRW	Comment	Clarification
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**Summary Of Representation**

Fig. 05. It would be useful to have a plan showing related units to ones adjacent in the Heads of the Valleys study.

**Officer Response**

Yes. This will all be pulled into one document for consideration to Full Council.

**Recommendation**

Noted.

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	NRW	Comment	Clarification
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**Summary Of Representation**

Fig. 06 & 07. The picture with regards to operational, consented, in planning has changed since Nov 14. The study may need to refer to the base line of Nov 14 in its findings, but should acknowledge the changing baseline in the publication, with perhaps a map at a fixed date or link to the Blaenau Gwent cumulative mapping website.

**Officer Response**

Noted. This will be included and updated in the final document.

**Recommendation**

Noted.

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	NRW	Comment	Clarification
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**Summary Of Representation**

Fig. 11. shows a high sensitivity to large turbines for Unit 9 and Fig.12 shows a medium-high sensitivity to very large turbines for Unit 9, whereas the text indicates no capacity for very large and some capacity for large and medium turbines. Is this correct?

**Officer Response**

This is an error. Figure 11 should show medium-high sensitivity to large turbines for Unit 9 and Figure 12 should show high sensitivity to very large turbines for Unit 9

**Recommendation**

Amend Figures accordingly.

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	NRW	Comment	Clarification
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**Summary Of Representation**

Is there a case for dividing Unit 1? It includes part of the Gelligaer Common Registered Historic Landscape, an area significant historically and different to other parts of the unit, which is quite large.

**Officer Response**

The boundaries for LU1 have been established along the same lines as those units defined for the Heads of the Valleys study. The Landscape units are not landscape characters or types, but were determined taking account of place, landform, topography, intervisibility and receptors and were refined using local knowledge. No change required as any anomalies within landscape units will be picked up through individual LVIA's.

**Recommendation**

No change.

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	NRW	Comment	Clarification
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**Summary Of Representation**

Is there an LDP relevant policy regarding cultural heritage (including Registered Landscapes) that would be worth referring to?

**Officer Response**

Noted. This will be included and updated in the final document.

**Recommendation**

Noted. Document will be amended.

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	NRW	Comment	
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**Summary Of Representation**

Unit 1. There are views across Gelligaer Common and from Gelligaer Common across the area. Question whether this should be high susceptibility, due to the Registered Landscape and presence of SAMs. The adjoining Unit 13 in the Heads of the Valleys study has this as high susceptibility. Should the sensitivity to large scale turbines be high, the text comment says they would be out of scale with the unit and visually prominent?

**Officer Response**

This is an error in the document. The sensitivity for Unit 1 to large scale turbines should be increased to high.

**Recommendation**

Amend the sensitivity for Unit 1 to large scale turbines to High.

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## REGENERATION AND ENVIRONMENT SCRUTINY COMMITTEE – 8TH DECEMBER 2015

**SUBJECT: PART NIGHT LIGHTING AND FUTURE LIGHTING ENERGY SAVING PROPOSALS**

**REPORT BY: HIGHWAYS OPERATIONS GROUP MANAGER**

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### **1. PURPOSE OF REPORT**

- 1.1 This report explains the stages required to attain the projected street lighting energy savings agreed at Cabinet (February 2015) as part of Medium Term Financial Plan (MTFP) 2015-16 & 2016-17 and what steps could be taken to make further savings in this field (beyond 2016-17). Subsequently it will then be presented to Cabinet for review and approval.
- 1.2 For Scrutiny members to note the progress made so far and to consider options for finding the savings from part-night lighting proposal 2016-17.
- 1.3 For Scrutiny members to review the future lighting energy savings proposals 2017/18 onwards and consider how this should be taken forward.

### **2. SUMMARY**

- 2.1 Caerphilly County Borough Council (CCBC) has a current lighting stock of approximately 27,500 units, which have been subject to a number of energy saving measures (inter-urban part-night lighting, replacement of conventional bulbs with low-energy alternatives, dimming etc.).
- 2.2 The MTFP 2015-16 EN5 saving looks for an energy saving of £450k over 2015-16, 2016-17 with the combination of an investment of £980k in LED replacement technology and the equipment required to part-night light enough urban lighting units to achieve all of this saving.
- 2.3 The LED technology element of this investment is currently being installed with between 8-9,000 lighting units converted to lower energy ratings by the planned end date of March 2016, realising £100k of the total £450k saving.
- 2.4 The target saving for the Part-night lighting element of the MTFP 2015-16 EN5 (£450k) is £160k, this proposal has undergone an assessment process summarised in Section 4.4 of this report and detailed in Appendix B. The outcome being that it is achievable, but may have implementation issues as most are situated in urban areas.
- 2.5 An alternative option to the £160k part-night lighting saving is to reduce the Lighting Maintenance budget by this amount.
- 2.6 This report also covers further energy saving proposals for 2017/18 MTFP consisting of £1,000k investment (Proposal 2/ 2a) in low-energy replacements to life expired and high energy usage lighting units.

- 2.7 There is an additional proposal (3/ 3a) consisting of an investment of £2,000k for the replacement of all lighting in 'conflicted zones' (at junctions, roundabouts etc.) with the possibility of further replacement of remaining lighting stock.

### 3. LINKS TO STRATEGY

- 3.1 The report links directly to the Council's priority to ensure that communities are safe, green and clean places to live and to improve residents' quality of life by reviewing, renewing and installing lighting energy saving technologies.
- 3.2 The proposal also links to the Council's Strategic Equality Objectives – **Safer Caerphilly** namely SEO1 - Tackling Identity Based hate Crime and SEO3 Physical Access, as detailed further in Section 5 of this report.
- 3.3 This proposal has a contribution to make in improving sustainability with more effective lighting and the reduction in energy usage for these lighting replacements. As noted in the Single Integrated Plan - A **Greener Caerphilly** which aims to: improve local environmental quality (G01) and reduce the causes of and adapt to the effects of climate change (G02).

### 4. THE REPORT

#### 4.1 Background to Street Lighting

- 4.1.1 No statutory requirement on local authorities in the United Kingdom exists to provide public lighting, the Highways Act 1980 (Sections 97 & 98 - summarised in Appendix A), empowers local authorities to light roads (Highway Authorities may provide lighting for the purposes of any Highway or proposed Highway for which they are or will be the Highway Authority), it does not place a duty to do so. Although Highway Authorities do have a duty of care to the road user, and an obligation to light obstructions on the highway, this does not imply a duty on the Highway Authority to keep all lighting operational. The Council has a statutory duty under the Highways Act to ensure the safe passage of the highway (as far as reasonably practicable) and this includes any lighting equipment placed on the highway.
- 4.1.2 The profile of street lighting has changed in recent years, with trial areas for low-energy lanterns and part-night lighting regimes taking place from 2010 onwards. As a quick energy cost comparison:

Financial Year	Number of Lighting Units	Annual Energy (KWh)	Annual Cost	Average Energy Usage per unit (Cost)
2008-09	26,872	13,866,208	£1,336,270	516kWh (£50)
2011-12	27,053	13,287,567	£1,390,438	491kWh (£51)
2014-15	27,522	13,375,432	£1,541,478	486 kWh (£56)

*Table 1: CCBC lighting energy usage and costs from 2008 to 2015*

The stock can be seen to increase 2.5% (650 units) over the 6 years (mainly due to new developments), giving an average of 0.4% increase per annum, increasing the energy demand and Council liability. Despite this stock increase, the decrease in the average energy usage (per unit) can clearly be seen. The rise in cost (per unit) is mainly due to the increasing cost of energy; this would have been much higher if energy saving measures (inter-urban part-night lighting, dimming etc.) had not taken place.

- 4.1.3 The first half of this report will set out the options available for part-night lighting, the second half will set out the possible deployment of lower energy lighting alternatives to conventional lighting units (high pressure sodium lighting – SON and low pressure sodium lighting – SOX). By way of explanation there are currently two leading low-energy alternatives available, these being:

- CPO (Metal Halide) Cosmopolis units – produces light through the use of metal halides, it is approximately four times brighter than halogen equivalents and uses approximately half the power of a conventional unit
- LED (light emitting diode) units – emits light when electrical currents pass through its semiconductor elements, commonly used in multiples, its power usage is approximately a fifth of a conventional unit.

These will be referred to throughout the rest of this report as CPO (Halide) and LED respectively.

- 4.1.4 To date a number of measures have taken place to reduce energy consumption in CCBC.
- 4.1.5 In 2009-10 CCBC implemented part-night lighting (switched off between mid-night and 5.30 am GMT – as agreed by the Council in 2009 for implementation in 2010 onwards) for the majority of the inter-urban roads (between towns and villages); approximately 5,000 units in total.
- 4.1.6 In 2012-14 areas were nominated for low energy lighting (CPO Halide), trialled in selected areas around the county borough; approximately 2,000 units in total.
- 4.1.7 In 2012-14, Central Management System (CMS)/ Dimming schemes were installed in trial areas, with its installation into approximately 3,000 units in total. This works by dimming the lights (via the CMS) by around 20% from 9pm (CPO Halide units) and from midnight (SON units) to 5am to realise energy savings. This is achieved by reducing the power to the light source, i.e. a 10% reduction in lamp wattage, **not** a 10% reduction in light output. The threshold for this reduction is 50%, a visible difference being perceived by the naked eye after this point; this being the case, increasing the dimming will have a limited effect. Better efficient energy savings can be attained through more recent and effective ranges of lighting technologies, such as LED replacements.
- 4.1.8 In 2015-16 a capital investment of £980k was made for replacement of approximately 9,000 lights with LED gear trays (Proposal 1). These are now being installed with a projected completion date of March 2016, realising £100k (2015-16) and an additional £190k (2016-17) of the total £450k MTFP financial savings.
- 4.1.9 There are also ancillary apparatus that include lit signs and bollards. These are of marginal cost to the annual energy budget, amounting up to £10k each; with traffic lights having a figure of £50k per annum. Though these are not seen as a priority (as more significant savings can be realised with street lighting replacements), the older/ life expired ancillary units are gradually being replaced by modern energy efficient LED versions, as finances allow.
- 4.1.10 the current lighting budget for 2015-16 is £2,028k of which £1,398k is on energy; leaving £630k for all the Routine and Non-routine Maintenance. Therefore, any savings in energy will have the largest impact on the budget for street lighting requirements.
- 4.1.11 Part of the Asset Management function of Highways Operations includes a maintenance role for all highway assets. Since the existing street lighting assets have been installed by the Council; they are recorded, monitored and maintained with a dedicated Street Lighting Budget.
- 4.1.12 An energy saving was agreed in the Medium Term Financial Plan 2015-16, EN5 - Street Lighting Energy Reduction measure, in February 2015; in summary this proposed that:

*‘A combination of options will generate £450k saving in full year, including energy reduction initiatives and some part-night lighting in residential areas. An upfront investment of £980k will be required. Present indications are that £290k can be achieved via new technologies with £160k achieved via part-night lighting’*

The £980k refers to the LED gear-tray replacements (Proposal 1, reference 2.8), the £290k refers to the projected annual energy savings from this investment and the £160k refers to the expected savings from a Part-night lighting exercise, which is outlined in Section 4.2.

## **4.2. Energy Costs and Part-Night / Switch-off Options**

- 4.2.1 Energy costs are calculated by the energy provider using the updated asset register (provided on a monthly basis by CCBC Highways Operations) and the photo-cell array (currently sited on the Civic Centre) as references. The register will give the quantum and type of lighting assets CCBC currently hold and the array will give the estimated burn hours per night.
- 4.2.2 A variant in energy savings are that they subject to the market rates (11.2665 Pence/ kWh unit, as of August 2015), presently lower than the MTFP proposed rate, set October 2014 (11.5247 Pence/ kWh unit), so in 2014, £200k = 1,735,403 kWh and in 2015 £200k = 1,775,174 kWh. Market fluctuations will therefore have a bearing on the revenue savings level attributed to the LED/ CPO Halide replacement units, i.e. lower energy prices giving lower energy cost savings, even though the cost of energising the asset (from conventional Low/ High Pressure Sodium to LED/ CPO Halide) will still be lower.
- 4.2.3 The future energy prices are unlikely to stay at their current low levels, so any reduction in energy usage made now will probably appreciate as the energy costs rise, giving the Council a method of cost avoidance.
- 4.2.4 The vagaries of energy pricing to one side, in achieving the remaining energy saving (estimated at £160k), part night light or switch off options will need to be reviewed and may be required to attain the £450k target.
- 4.2.5 The switch off option is always open to the authority for an absolute energy saving, but has its own costs, due to the fact that disconnected lighting apparatus rapidly deteriorate and will need to be removed for safety. This can happen within 12 months of switching off. Due to the disproportionate cost of removal and possible replacement, this particular option has been discounted from this report; however as the financial climate dictates this may have to be revisited.

## **4.3 Energy Savings Status**

- 4.3.1 The LED gear-tray replacements should bring an annual saving of ©£290k to CBCC's energy bill; in the MTFP Plan 2015-16, EN5 (referred to in section 2.12), this was to be split between a predicted £100k in 2015-16 with an additional £190k saving in 2016-17.

- 4.3.2 Proposal 1 - LED gear-tray replacement installation started in August 2015 with a planned completion by the close of March 2016.

- 4.3.3 To date the energy figures from this year can be compared to last year's are as follows:

April to September - £584,500 (2014), £564,000 (2015) – a saving of £20,500  
September to March - £958,000 (2014), £875,000 (2015) – saving of £83,000 (projected)

Annual projected saving of .....£103,500 (for 2015/16)

The actual and projected figures are showing that they are currently on track to achieve the target saving of £100k for 2015-16, with the additional £190k being sourced from the annual savings from the LED gear-tray replacements over the 12 month period 2016-17.

- 4.3.4 The remaining energy saving required for 2016-17 is £160k was to be achieved through Part-night Lighting (reference 4.1.12); for this to take place an exercise must be completed to assess how this can be implemented. The summary of which is outlined below in Section 4.2.

#### **4.4 Part-night Lighting Assessment in Urban Areas**

- 4.4.1 As mentioned earlier, the existing street lighting stock in CCBC has already been subject to a Part-night lighting exercise with the majority of the inter-urban routes now being switched to part night lighting. In combination with this, there are trial areas for low energy lighting (installed 2012-14 in selected areas around the county borough to assess the effectiveness of energy savings) and the replacement of existing residential (high energy use) sodium bulb units with LED gear trays (installation 2015-16). All of the above have been excluded from consideration in this Part-night lighting review.
- 4.4.2 The remaining eligible stock for street lighting (i.e. not subject to LED/ CPO Metal Halide replacement or part-night lighting regime) numbers around 7,500 units and are located in a mixture of all of the Council's rural and urban areas. These form the basis for the assessment process, which is detailed in Appendix B.
- 4.4.3 The steps taken in this assessment further eliminate 'conflicted areas' (containing junctions, roundabouts, traffic calming etc.), as these units cannot, for safety concerns, be part-night lit.
- 4.4.4 As can be seen from this process (detailed in Appendix B) the savings of £160k can be realised from part-night lighting all the lighting outside 'conflicted' areas, though there may be issues with public appeals and subsequent local re-assessment exercises (which would need to be instigated by CCBC before this proposal was enacted – a model of which is outlined in background paper Torfaen Cabinet Item 8 – Street Lighting – Our Strategy for the Future – July 2011. There are alternates to this approach, as outlined in Section 4.5.
- 4.4.5 Part Night Lighting is estimated to cost £160k, to install the required hard-ware for all the lighting units outside the 'conflicted zones', the cost of which can be recovered (through the energy savings outlined in 4.4.4) within 12 months.
- 4.4.6 A possible part-night lighting objection from the Public could be about the detrimental effect on safety; this seems to be more of a perception rather than a reality. A recent study, led by the London School of Hygiene & Tropical Medicine in partnership with University College London (published in the Journal of Epidemiology and Community Health - July 2015) showing no increase in crime rate (from 2010 to 2013) or decrease in road safety (from 2000 to 2013) in locations where a part night lighting regime had been in place. (Briefing note for this in Appendix D). These findings can be further supported from the experience of Street Lighting Strategy in Torfaen (reference to Torfaen Cabinet Item 8 – Street Lighting – Our Strategy for the Future – July 2011).

#### **4.5 Alternatives to Part Night Lighting in Urban Areas**

- 4.5.1 The switch off option is always an alternative, though this has its own significant costs and consequences.
- 4.5.2 Another alternative is a reduction in the maintenance budget, currently totalling approximately £630,000, split into Routine Maintenance (replacement of lighting elements) and approximately £275k Non-routine Maintenance (replacing/ repairing other components such as the column, lantern, cabling etc.) approximately £355k.
- 4.5.3 The current street lighting stock amounts to approximately 27,500, with approximately 9,000 LED gear-tray conversions being in place by April 2016. The design life of conventional lamps is around 4-6 years. It is compared to around 10 to 15 years for the LED alternates and LED gear-trays replacements. Consequently this means that approximately a third of the stock is estimated to have a design life over double that of conventional lamps. With this being the case the Routine Maintenance budget could be reduced by a third giving, a saving of £100k; the remaining £60k would need to be found either by partial part-night lighting or from the Non-routine lighting maintenance budget.

- 4.5.4 Any reduction in the Lighting Maintenance budget will have an effect on the service quality and responsiveness, with the possibility of broken/unserviceable lights remaining broken /unlit for longer durations than is currently the case.
- 4.5.5 The proposed decrease in budget (£160k out of £630k) will result in a reduction in service leading to a relaxation of response times of approximately 20%, so increasing turn-around times from the existing 3 to 9 days to a response time of 5 to 12 days. This will have an effect on our performance as an Authority, for example the most recent nation-wide APSE (Association of Public Service Excellence) survey of 2013-14 scores Caerphilly with a 95% rate for restoration for working lights within 7 days of reporting (ranked 6th out of 20 peer Councils) – our average response/ repair times being 4 days, with this relaxation a fall to a 5-6 day average would see this position fall to 12-15th place. This is with the proviso that peer councils are not seeking to reduce their own service quality level, if they do make reductions then the fall may not be as great.
- 4.5.6 This proposed reduction in lighting maintenance revenue budget will lead to the need for periodic injections of capital into the existing asset stock as they deteriorate. Since historic investment(s) were usually installed over short time periods (such as the investment in residential lighting columns in the early 1970's and early 2000's) any re-investment will probably be needed in pulses, to accommodate the end of design life for a particular asset batch. Essentially this will introduce a capital funding driven approach rather than the current revenue derived mechanism.

#### **4.6 Summary of Part-Night Lighting and Alternative Options**

4.6.1 There are four main options to realise the 160k energy saving for 2016-17:

- A. switch off all non-conflict area lights
- B. Part-night Light all the lighting units in non-conflict areas
- C. Part-night Light a proportion of lighting units in non-conflict areas, and then make up the difference from the Lighting Maintenance Budget
- D. Secure the £160k from the Lighting Maintenance Budget
- E. Combine the savings from the reduced Lighting Maintenance Budget and Part-night Lighting of non-conflicted areas

Considering the sensitivity of the residential areas concerned and the lack of time to fully implement part-night lighting for all non-conflicted zones, it is suggested that Option D is selected, as this represents a saving from a defined source; leaving the remaining options for future consideration.

#### **4.7 Future Savings**

- 4.7.1 There are opportunities to look further into low-energy replacements for conventional units, to replace life-expired units and significantly reduce energy usage for units in 'conflicted' areas of the highway (i.e. containing junctions, roundabouts, traffic calming etc.).
- 4.7.2 The part-night lighting proposal for non-conflicted zones can form part of the MTFP 2017-18, if agreed this should give sufficient time for the implementation of a site specific assessments and an appeals process.
- 4.7.2 An initial proposal (Proposal 2) has been tabled as part of the MTFP 2017-18, this being an investment of £1,000k to replace life-expired low-pressure sodium residential lighting units (approx. 1,700 in number) and a number of large High-pressure sodium units on the main roads (approx. 650 in number) in 'conflicted' zones; with an annual saving of approximately £100k (prices correct to August 2015).

- 4.7.3 A follow on proposal is then to take the remaining lighting units in the 'conflicted' zones of the highway and convert them into low-energy technology alternatives; thus forming a third proposal (Proposal 3) for 2018-19.
- 4.7.4 Both the above proposals are detailed in Appendix C.
- 4.7.5 The salient results in Appendix C and E can be summarised as follows:
- Proposal 2a – demonstrates that the optimised CPO (Halide)/ LED option can lead to the most economical solution with the £1,000k fund, having an additional 25% of units (600) converted to low energy alternatives, when compared to a wholly LED replacement option (Proposal 2). The risk with this is that the cheaper CPO (Halide) units (about a third of the total replacement number) will require ongoing maintenance and could become obsolete in the medium term (approximately 4-7 years), subsequently leading to them being replaced with LED technology (a technology that is undergoing a fall in market pricing).
  - Proposal 3 – the £2,000k for this proposal will either replace the remaining 'Conflicted area' lighting, if the wholly LED option is taken under Proposal 2, or replace the remaining 'Conflicted area' lighting and invest a further £1,000k in converting the remaining stock (see Table 3 - below) if Proposal 2a (mixed CPO(Halide)/ LED) option is approved.
- 4.7.6 The projected payback period also forms part of Appendix C and can be summarised as follows:

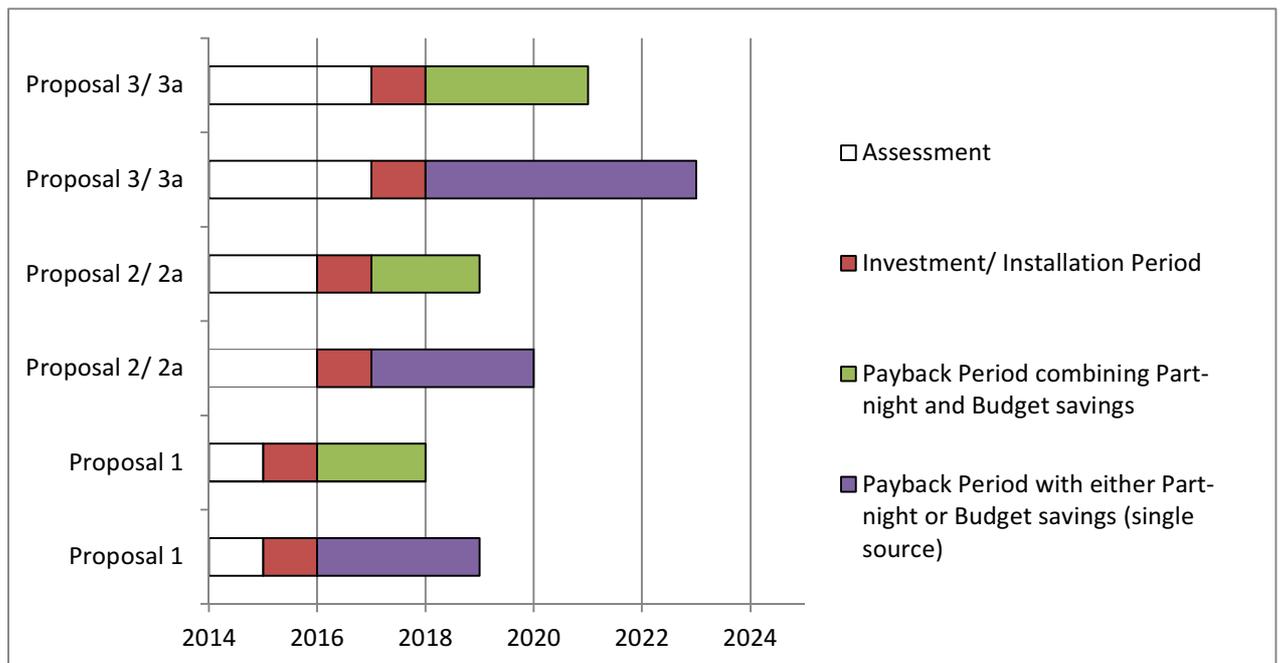


Table 2: Simplified bar-chart to demonstrate the relative durations of Pay-back periods for Proposals 1, 2, 2a, 3 & 3a (3a follows on from Proposal 2a)

In this table the results can be summarised as follows:

- Proposal 1 (LED Gear-tray replacements) due to conclude in March 2016, projected payback period is by 2018 (combined) or 2019 (single source)
- Proposal 2 & 2a (LED & CPO (Halide)/ LED combination replacements in 2017-18), projected payback period is by 2019 (combined) or 2020 (single source)
- Proposal 3 & 3a (LED replacements 2019-20), projected payback period is by 2021 (combined) or 2023 (single source)

- 4.7.7 The proviso to these recommendations is that LED technology will become more effective and, so their costs should reduce and the energy prices will increase from their current low position; savings should increase with each energy rate price rise.

4.7.8 At this point (April 2019) the remaining stock should read as follows:

Lighting Regimes	Stock Numbers	2017-18 Proposal 2/ 2a	2018-19 Proposal 3/ 3a	Remaining stock requiring Low Energy Replacement	LED Replacements for CPO (Halide) - post 2023
Lights currently being Part Night Lit	5,000	400		4,700	
Lights with lower energy lights (CPO Metal Halide etc.)	4,000				4,000
Lights being replaced by LED Gear Trays	9,000				
Eligible stock for Part Night Lighting	7,500	1,950	2,194	3,356*	1,000
Energy Efficient Lanterns installed during Routine Maintenance	2,000				
<b>Total Stock</b>	<b>27,500</b>			<b>8,056</b>	<b>5,000</b>

*Table 3: Lighting unit numbers in lighting regime categories with remaining numbers post Proposals*

\* - this is a priority energy reduction area, as these units burn through the night; they have a replacement cost of approx. £2,500k (as of August 2015) – reduced to £1,500k, if Proposals 2a & 3a are approved

## 5. EQUALITIES IMPLICATIONS

- 5.1 Dimming or switching off of street lights could have a significantly greater negative impact on people with certain types of visual impairment compared with the majority of the population. It will also significantly affect older people for both reasons of eyesight, and potentially a number of groups such as older people, the LGBT community, lone women etc. in terms of feelings of vulnerability and an increased fear of crime.
- 5.2 Lower energy alternatives to conventional lighting can also have a greater luminance and as a result would have a significantly greater positive impact on those groups mentioned above.

## 6. FINANCIAL IMPLICATIONS

- 6.1 There will be a reduction in street lighting energy and street lighting maintenance expenditure and a reduction in budget provision to assist with the Council's Medium Term Financial Plan (MTFP).
- 6.2 The preferred option for Proposal 2 is 2a, this will represent an investment of £1.0 million, to replace approximately 3,000 life expired and conventional lighting in conflicted areas, giving an annual energy saving of approximately 1,000,000 kWh at an annual cost saving of £100k; projected payback period (with the energy and maintenance savings) should be completed by 2019 (combining Part-night lighting and maintenance budget savings) or 2020 (using either the part night lighting or maintenance budget saving).
- 6.3 The preferred option for Proposal 3 is 3a, this will represent an investment of £2.0 million, to replace approximately 2,500 for lighting in conflicted areas and remaining convention stock, giving an annual energy saving of approximately 1,000,000 kWh at an annual cost saving of £100k; projected payback period (with the energy and maintenance savings) should be completed by is 2021 (combining part-night lighting and maintenance budget savings) or 2023 (using either the part night lighting or the maintenance budget saving).

## **7. PERSONNEL IMPLICATIONS**

- 7.1 These proposals will not have any direct impact on CCBC personnel.

## **8. CONSULTATIONS**

- 8.1 All comments received have been taken into consideration and are included in the report.
- 8.2 A consultation process may need to be considered before the implementation of the part-night lighting proposal in 2017-18.

## **9. RECOMMENDATIONS**

- 9.1 The preferred Part-night lighting proposal, as outlined in Section 4.6, is Option D - sourcing the whole saving from the Lighting Maintenance Budget.
- 9.2 It is proposed that part-night lighting be part of the MTFP 2017-18 savings, giving an opportunity for site-specific assessments and the setting up of an appeals process.
- 9.3 The preferred proposal for 2017-18 is Proposal 2a (optimised selection combining CPO (Halide) with LED replacements) for the 2017-18 MTFP, with the proviso that there will be on-going maintenance costs for the cheaper CPO (Halide) units and their possible replacement with LED technology in 5-7 years' time, should they become obsolete.
- 9.4 The preferred future option for 2018-19 is dependent on the decision made at Proposal 2/ 2a stage. If the preferred Proposal 2a is approved, then Proposal 3a can use £1,000k to finish LED replacement of lighting units in 'conflicted' areas with the additional £1,000k replacing up to 40% of the remaining lighting stock (in Table 3 above).
- 9.5 It is recommended that the above preferred Options/ Proposals are accepted, so they can then be presented to Cabinet for review and approval.

## **10. REASONS FOR RECOMMENDATIONS**

- 10.1 The reason for recommending Option D for the £160k saving is due to the possible implementation issues (such as formulating and introducing assessments and appeals procedures), with the majority of the nominated part-night lighting units being located within urban areas. This will allow the agreed £160k saving to be made in 2016-17, whilst the part-night lighting process is formulated, reviewed, agreed and implemented.
- 10.2 The savings to be made from Part-night lighting in non-conflicted zones can amount to approximately £160k in energy savings per annum; if it is agreed that this proposal forms part of the MTFP 2017-18, it should provide sufficient time for the required processes to be reviewed, agreed and implemented.
- 10.2 Recommending Option 2a will mean that more lighting units can be replaced under this proposal, with the possibility of replacing the CPO Halide stock in 5-7 years' time when the cost of LED replacements should have decreased (given current market trends).
- 10.3 Option 3a is recommended as it will follow on from Proposal 2a and give an opportunity to replace up to 40% of the remaining lighting stock (i.e. not part of the 'conflicted areas').

## **11. STATUTORY POWER**

- 11.1 Highway Act 1980.

**Author:** Graham Parry, Highway Operations Group Manager  
**Consultees:** Cllr T Williams – Cabinet Member for Highways, Transportation & Engineering  
Cllr D T Davies – Chair of Regeneration and Environmental Scrutiny Committee  
Cllr E Aldworth – Vice Chair of Regeneration and Environmental Scrutiny Committee  
Chris Burns – Interim Chief Executive  
Christina Harray - Corporate Director – Communities  
Nicole Scammell, Acting Director of Corporate Services and S.151  
Terry Shaw – Head of Engineering Services  
Gail Williams – Interim Head of Legal Services/Monitoring Officer  
Stephen Harris – Interim Head of Corporate Finance  
Rob Hartshorn – Head of Public Protection  
Mike Eedy – Finance Manager  
Trish Reardon – HR Manager  
David Thomas – Senior Policy Officer (Equalities and Welsh Language)  
Steve Hodges – Network Management Manager  
Thomas Llewellyn – Senior Assistant Engineer

**Background Papers:**

Highways Act 1980  
London School of Hygiene & Tropical Medicine in partnership with University College London  
(published in the Journal of Epidemiology and Community Health - July 2015)  
Torfaen Cabinet Item 8 – Street Lighting – Our Strategy for the Future – July 2011

**Appendices:**

Appendix A – An extract summary of Highways Act 1980 (Sections 97 & 98)  
Appendix B – Method of assessing the Part-Night Lighting Savings  
Appendix C – Future Energy Savings Proposals  
Appendix D – APSE Briefing Note 15-43 – Street Lighting Switch-off Outcomes  
Appendix E – Energy-Cost Comparator  
Appendix F – Lighting Options Summary

## Appendix A

### Sections 97 and 98 of the Highways Act 1980

The 1966 Act has now been repealed by section 343(3) of the Highways Act 1980, and replaced with section 97 and 98 of the Highways Act 1980, which clearly states the following.

Highway Authorities may provide lighting for the purposes of any Highway or proposed Highway for which they are or will be the Highway Authority.

Highway Authorities may agree with a Lighting Authority for delegation to the Lighting Authority of any function of the Highway Authority with respect to the lighting of any highway or part of a highway within their parish.

The Lighting Authority shall in the discharge of any function delegated to them act as agents to the Highway Authority and it shall be condition of the delegation that: -

- a) The works to be executed or expenditure incurred by the Lighting Authority in the discharge of the delegated function are to be subject to the approval of the Highway Authority.
- b) The Lighting Authority are to comply with any requirement of the Highway Authority as to the manner in which any such works are to be carried out, and with any directions of the Highway Authority as to the terms of contract to be entered into for the purposes of the discharge of the delegated functions; and
- c) Any such works are to be completed to the satisfaction of the Highway Authority.

If at any time the Highway Authority are satisfied that a system in respect of which functions of that authority are delegated under this section is not in proper repair or condition, they may give notice to the Lighting Authority requiring them to place it in proper repair or condition. And if the notice is not complied with within a reasonable time may themselves do anything which seems to them necessary to place the system in proper repair or condition.

It should also be noted that such delegation of function can be terminated upon the Highway Authority giving notice. The ability to do so is subject to certain limitations concerning when such notice can be given.

**Note:** *CCBC are the Highway Authority and take the function of the Lighting Authority within its remit*

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### Method of assessing the Part-Night Lighting Savings

The existing street lighting stock in CCBC has already been subject to a part-night lighting exercise with the majority of the inter-urban (roads between towns and villages) now being switched to part night lighting (switched off between mid-night and 5.30 am GMT – as agreed by the Council in 2009 for implementation in 2010 onwards). In combination with this, there are nominated areas for low energy lighting (installed 2012-14 in selected areas around the borough to assess the effectiveness of energy savings) and the replacement of existing residential (high energy use) sodium bulb units with LED gear trays (installation 2015-16), which are excluded from consideration in this Part-night lighting exercise.

The remaining eligible stock for street lighting (i.e. not subject to LED/ low energy replacement or part-night lighting regime) numbers around 7,500 units and are located in a mixture of all of the Council's rural and urban areas, these can be summarised in Table 2 as follows:

(A) Lamp Type	(B) Main use Locations	(C) Number	(D) Annual Energy (kWh)	(E) Annual Cost (as of 2015)	(F) Average Cost per Unit (p.a.)
250 High Pressure Sodium	Main Roads	864	1,085,184	£123,711	£143.18
150 High Pressure Sodium	Main & Minor Roads	3,533	2,653,283	£302,474	£85.61
100 High Pressure Sodium	Main & Minor Roads	1,187	563,825	£64,276	£54.15
135 Low Pressure Sodium	Residential	286	212,212	£24,192	£84.59
90 Low Pressure Sodium	Residential	327	166,443	£18,975	£58.03
55 Low Pressure Sodium	Residential	1,300	417,717	£47,620	£36.63
<b>Totals</b>		<b>7,497</b>	<b>5,098,664</b>	<b>£581,248</b>	

Table 2: Existing energy usage/ costs of the eligible Street Lighting stock for proposed part-night lighting regime

Part-night lighting the entire remaining eligible stock results in that shown in Table 3:

(A) Lamp Type	(C) Number	(G) Annual Energy (kWh)	(H) Part-Night Lighting Annual Cost	(I) Savings - Column E (Table 2) minus Column H
250 High Pressure Sodium	864	546,048	£62,250	£61,461
150 High Pressure Sodium	3,533	1,335,474	£152,244	£150,230
100 High Pressure Sodium	1,187	283,693	£32,341	£31,935
135 Low Pressure Sodium	286	106,678	£12,161	£12,031
90 Low Pressure Sodium	327	83,712	£9,543	£9,432
55 Low Pressure Sodium	1,300	217,517	£24,797	£22,823
<b>Totals</b>	<b>7,497</b>	<b>2,573,122</b>	<b>£293,336</b>	<b>£287,912</b>

Table 3: Costs & savings for proposed part-night lighting regime on the eligible Street Lighting stock

Though this exceeds the target of £190k, the majority of these proposed part-night lighting units are in urban areas. In these areas conflict locations have been identified prohibiting part night lighting, due to safety considerations, such as:

- Junctions
- Roundabouts
- CCTV
- Traffic calming measures

These change the potential saving profile as follows:

(A) Lamp Type	(C) Number	(J) Number <u>minus</u> conflict locations	(K) Amended Part-Night Lighting Annual Cost	(L) Amended Annual Savings (Column K minus J x F)	(M) Part Night Light Conversion Cost
250 High Pressure Sodium	864	166	£11,960	£11,808	£8,300
150 High Pressure Sodium	3,533	1,897	£81,745	£80,664	£94,850
100 High Pressure Sodium	1,187	935	£25,475	£25,155	£46,750
135 Low Pressure Sodium	286	134	£5,698	£5,637	£6,700
90 Low Pressure Sodium	327	221	£6,450	£6,374	£11,050
55 Low Pressure Sodium	1,300	1,300	£24,797	£22,823	£65,000
<b>Totals</b>	<b>7,497</b>	<b>4,653</b>	<b>£156,125</b>	<b>£152,461</b>	<b>£232,650</b>

Table 4: Energy savings costs of part-night lighting in non-conflict areas

As a worked example, 250KW High Pressure Sodium units in non-conflict areas number 166, their Part-night Light energy cost is £11,960; the cost of full night lighting equates to the figure shown in 'Average energy cost per 250W High Pressure Sodium' (top line - Column F - Table 1) £143.18 multiplied by 166 (number of units in non-conflict areas) giving £23,768. Subtract the first figure £11,960 from the second £23,768 gives -£11,808 in cost savings.

The desk-top study above reveals the savings that can be made from urban part-night lighting will achieve a saving of £152,461 (from Amended Annual Savings total figure in Column L), this falls short by approximately £8,000 from the proposed target of £160k; these figures to being subject to change due to local challenges and energy pricing.

Where part night lighting is introduced, line painting and cats eyes may need to be extended on roads (particularly on those with speeds of 50mph and above), though this should not be a significant amount.

There is also the experience from peer-Councils that complaints and queries about part-night lighting will increase, therefore the costs of resourcing this extra work into the call-centres and officers' time will need to be factored in to this proposal.

A possible part-night lighting objection from the Public could be about the detrimental effect on safety; this seems to be more of a perception rather than a reality. A recent study, led by the London School of Hygiene & Tropical Medicine in partnership with University College London (published in the Journal of Epidemiology and Community Health - July 2015) showing no increase in crime rate (from 2010 to 2013) or decrease in road safety (from 2000 to 2013) in locations where a part night lighting regime had been in place (briefing note for this in Appendix D). These conclusions being echoed in the findings of the Torfaen Street Lighting Cabinet Report – 2011 (copy in Appendix G).

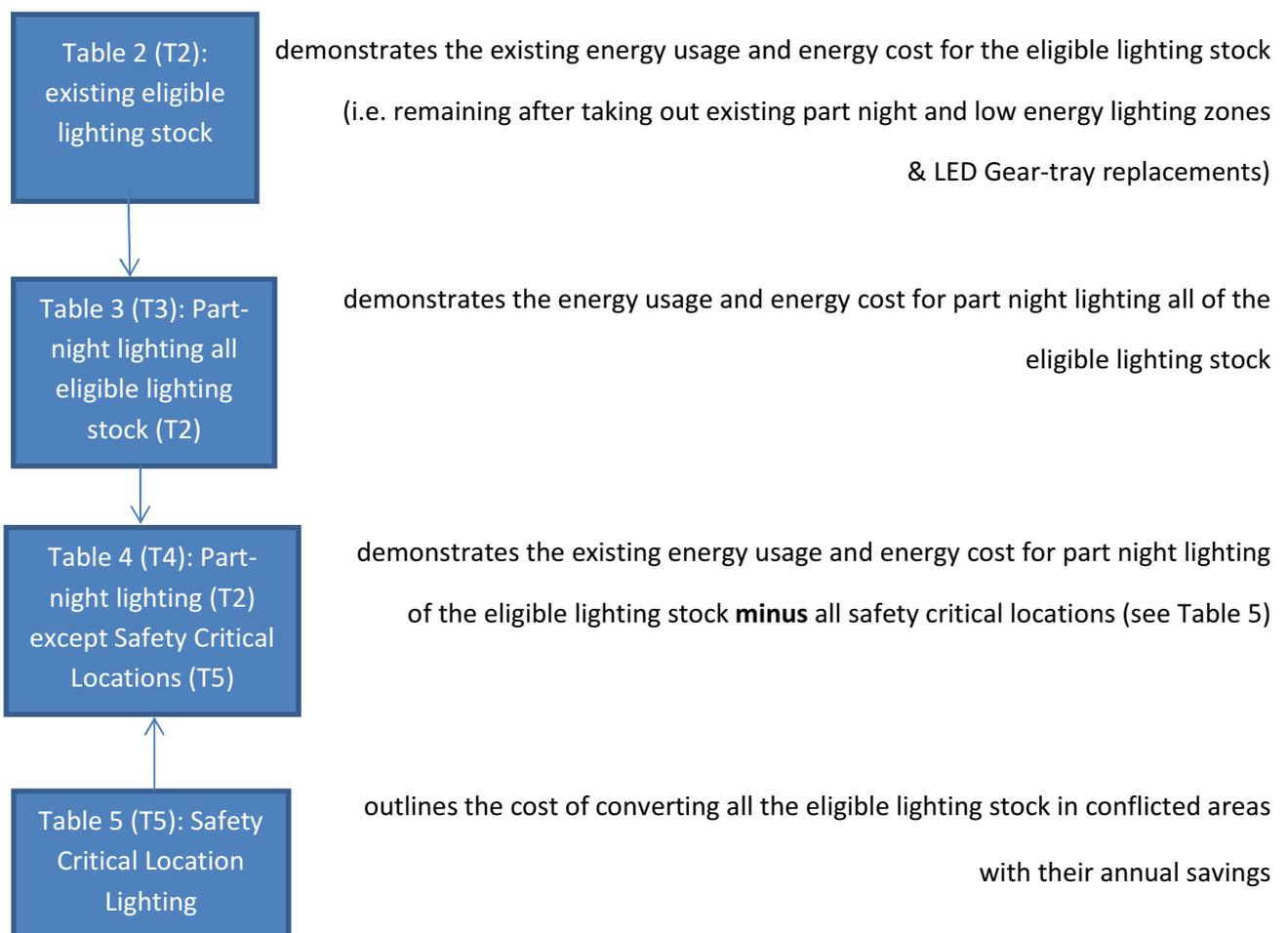
The units in conflict areas identified in this exercise could be replaced with LED alternative, so mitigating the energy costs, this can be summarised as follows:

(A) Lamp Type	(N) Total Number	(O) Number of units in Conflicted Areas – Column N minus Column J (Table 3)	(P) Total Cost for LED Conversion (approx. £800/unit)	(Q) Annual Energy Saving for LED conversion – (Column E x Column O minus LED Rating x Column O)
250 High Pressure Sodium	864	698	£558,400	£60,096
150 High Pressure Sodium	3,533	1,636	£1,308,800	£72,354
100 High Pressure Sodium	1,187	252	£201,600	£10,768
135 Low Pressure Sodium	286	152	£121,600	£4,180
90 Low Pressure Sodium	327	106	£84,800	£1,764
<b>Totals</b>	<b>6,131</b>	<b>2,844</b>	<b>£2,275,200</b>	<b>£149,162</b>

Table 5: Categorized table of units in conflicted areas with associated costs and savings (as of August 2015)

The units exempt from Part Light Lighting - identified in Column O (Table 5), are to be given prioritisation for LED replacement, with outline investment costs given in Column P (Table 5) and projected yearly savings in Column Q.

In summary the process for assessing the cost savings from this Part-Night Lighting exercise is followed in the schematic below:



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## Future Energy Savings Proposals

The basis for this next stage is to take forward, using technological improvements, the reduction of levels in:

- Energy Costs
- Maintenance Costs
- Carbon emission
- Light pollution

The approach required is multi-phased, with a proposed outline programme as follows:

Proposal 1 - 2015-16 – Capital investment of £980k\*\* for replacement of © 8-9,000 lights with LED gear trays (saving £190k p.a.\*\* – in progress

Proposal 2 - 2017/18 - Capital investment of ©£1,000k\*\* for replacement of ©2,350 lights (1,700 life-expired small residential units and 650 larger Highway units) with LED complete assemblies (saving £100k p.a.\*\* – proposal stage of MTFP

Proposal 3 - 2018/19 – Capital investment of ©£2,000k\*\* for replacement of ©2,200 lights (in conflict areas) with LED complete lantern assemblies for the larger highways units (saving £100k p.a.\*\* – possible future proposal for MTFP

\*\* - Costs current to August 2015

### Proposal 1

Proposal 1 is currently underway and due to be completed by March 2016.

### Initial MTFP Proposal 2

The opportunity exists to use this data to guide further investments into low-energy lighting technology for more effective savings as suggested in the MTFP Options meeting for 2017/18. A £1,000,000 investment could be split into two distinct lots (\*prices correct to April 2015):

Lot a - There are currently © 1,700 life expired (55 watt low pressure sodium) lanterns in the Borough (1,300 of which are referred to in this exercise, the remaining 400 are already subject to Part-night lighting), these are the oldest and most inefficient units within the asset register for street lighting. As the whole lantern unit is life-expired, replacement of just the light source with an LED gear tray (as per 2015-16 investment) would not be effective. Therefore the entire unit needs to be replaced at a cost of ©£300k\* (for 1,700 lantern units – design life 20 years) plus ©£200k for the installation & rewiring of the complete units; making a total of ©£500k\*, with a saving of £43k\* per annum it gives a pay-back period for this is estimated at 12 years (isolated from other savings in the street lighting budget – see below). This investment will mean that these exhausted assets can be replaced in a coordinated manner rather than having to be replaced in an ad-hoc approach (only replacing them when they fail), that will probably prove less efficient and so more expensive.

Lot b - With the remaining amount Highway (Class A & B roads) lantern units can now be replaced; as Lot A will have completed the replacement of the remaining residential lighting in the Borough. These Highways units will be a mix of low and high pressure sodium units (rated between 90 and 250 watts), priority will be given to conflict areas such as roundabouts, junctions etc. For the remaining amount of money (£500k\*) approximately 650 complete Highway lantern units (design life 25 years) can be replaced at a cost of ©£400k\* with installation cost of ©£100k\*, with a saving of ©£56k\* per annum, gives a pay-

back period for this is estimated at 9 years (isolated from other savings in the street lighting budget – see below).

Both Lots a and b (1,700 residential + 650 highway units) equate to an energy saving of ©£100k\* (overall payback period estimated at 10 years, isolated from other savings in the street lighting budget – see below)

### **Assessment of Alternate Replacement Strategies**

Looking at future options there is a need for this initial Proposal 2 (2017-18) to be challenged by any viable alternates that are in the market, this requires a comparative exercise to take place. For the purposes of this report the following options have been looked at with comparative costs (per 100 units over 20 years – top table in Appendix E) used for the following options:

- Like for like replacement (conventional units)
- Replacement with CPO (Halide) in place of conventional
- LED replacements for conventional
- Optimal option combining the options that indicate best value

To develop this process, an exercise was carried out on the remaining units in conflict area (after the 2015-16 LED gear-tray replacements), the first table shows Proposal 2 (2017-18) based on the replacement of 650 55W HP Lamps and 1,700 55W LP Lamps, the results are as follows:

- Like-for-Like Replacement - a comparative initial low cost (approx. £334k) with high energy and high maintenance costs (totalling £7,200k over 20 years).
- CPO (Halide) Replacement – comparatively median initial cost (approx. £688k) with relatively high energy and maintenance cost (totalling £3,305k over 20 years).
- LED Replacement - a comparative initial high cost (approx. £810k) with low energy and maintenance costs (totalling £1,940k over 20 years) CPO (Halide) approach - a comparative low cost (approx. £482k) with low energy and maintenance costs (totalling £1,966k over 20 years).

Although the combined approach initially appears to be the best solution, there are some technical/practical implications to the combined approach:

- The 250W HP lamps are located along highway routes, so will require traffic management (with its associated costs) for the changing of lamps, this would need to happen 5 times over a 20 year period for CPO and nil for LED option.
- Energy costs are likely to rise in the near and medium term future, so (over a 20 year period) the higher energy used in CPO units will be at a cost disadvantage to the lower energy LED alternatives.
- The demand for CPO units is declining, so reducing the availability of replacement parts, whilst LED demand is on the rise, so challenging (and subsequently reducing) existing prices – especially with bulk orders. Most LED lanterns supplied are future proofed.
- The LED lantern also includes for CMS (Central Management System – for dimming), where the CPO units do not.
- The LED wattages required to replace 250W HP lamps may be less than assumed (after undertaking the necessary street lighting designs), which would reduce the LED whole life costs.
- If the initial unit cost is put to one side, the 250W HP whole life costs for both LED and CPO are comparable over the 20 year period.

So there is a clear choice with this proposal (2017-18):

- A. To use LED technology for both 250W HP and 55W LP lamps, so mitigating the implications above.

- B. To use CPO technology (with its uncertainties as outlined above) for the 250W HP lamps and the LED option for the 55W LP units.

Option A should mean that the £1M investment will (for the most part) go on replacing the 250W HP and 55W LP stocks (totalling ©2,400 units); with Option B the £1M investment can follow Proposal 2a (Appendix E) – where the combined CPO/ LED approach is outlined in the bottom table (with green headers) with the replacement of the 250W HP, 100W HP, 135W LP, 90W LP and 55W LP stocks (totalling ©3,200 units).

If Option B is chosen the remaining stock in Conflict areas will be ©1,350 150W HP units with a total initial cost of ©£1,070k - see the 'remaining Units in Conflicted Area' column of the CPO/ LED Replacement Table (green headings) under the Proposal 2a heading in Appendix E.

If Option A is chosen then the remaining stock (in Conflict areas) will follow Proposal 3 (2018-19) – in Appendix E, with each option and a best combination option showing the following results:

Like-for-Like Replacement - a comparative initial low cost (approx. £350k) with high energy and median maintenance costs (approx. £3,850k and £300k).

CPO (Halide) Replacement – comparatively low initial cost (approx. £657k) with relatively high energy and maintenance cost (approx. 3,080k and 444k).

LED Replacement - a comparative initial high cost (approx. £1,755k) with low energy and maintenance costs (approx. £1,728k and £0k).

The combination LED/ CPO (Halide) approach - a comparative initial high cost (approx. £1,600k) with low energy and maintenance costs (approx. £1,810k and £66k).

## **Conclusion**

Option A (LED only replacement) represents a higher cost (total unit replacement total 2,400) choice compared to Option B (Combined CPO/ LED) – total replacement total of 3,200 units. This then leads to the £2,000k possible investment for Proposal 3 being spent as follows:

Proposal 3 (Option A) – replacing the remaining 'Conflicted area' stock (approx. 2,200 units).

Proposal 3a (Option B) – replacing the remaining 'Conflicted area' stock (approx. 1,300 units) and investing a further £1,000k in converting © 40% of the remaining lighting stock (see Table 3 below).

Therefore the preferred options are 2a and 3a (Option B) with the proviso that around 1,000 CPO Halide units will probably need replacing with LED alternates post 2023.

The next step is to consider pay-back durations

## Annual Savings and Pay-back Periods

Taking the replacement strategies above (2015-16, 2017-18, 2018-19), these are anticipated to translate into the following reductions in yearly maintenance and energy costs:

PROPOSALS	ANNUAL STAND-ALONE SAVINGS FROM EXISTING MAINTENANCE & ENERGY BUDGETS										Savings Totals (£k)
	2016/17		2017/18		2018/19		2019/20		2020/21		
	Mtce <sup>4</sup>	Energy	Mtce <sup>4</sup>	Energy	Mtce <sup>4</sup>	Energy	Mtce <sup>4</sup>	Energy	Mtce <sup>4</sup>	Energy	
1 (2015-16 <sup>1</sup> )	£100k	£290k	£100k	£290k	£100k	£290k	£100k	£290k	£100k	£290k	£500/1,450k
1 (2015-16 <sup>2</sup> )	£160k	£290k	£160k	£290k	£160k	£290k	£160k	£290k	£160k	£290k	£800/1,450k
1 (2015-16 <sup>3</sup> )	£320k	£290k	£320k	£290k	£320k	£290k	£320k	£290k	£320k	£290k	£1,600/1,450k
2 (2017-18 <sup>1</sup> )#	£100k	£290k	£121k	£390k	£121k	£390k	£121k	£390k	£121k	£390k	£584/1,850k
2 (2017-18 <sup>2</sup> )#	£160k	£290k	£181k	£390k	£181k	£390k	£181k	£390k	£181k	£390k	£884/1,850k
2 (2017-18 <sup>3</sup> )#	£320k	£290k	£341k	£390k	£341k	£390k	£341k	£390k	£341k	£390k	£1,684/1,850k
3 (2018-19 <sup>1</sup> )!	£100k	£290k	£121k	£390k	£142k	£490k	£142k	£490k	£142k	£490k	£647/2,150k
3 (2018-19 <sup>2</sup> )!	£160k	£290k	£181k	£390k	£202k	£490k	£202k	£490k	£202k	£490k	£947/2,150k
3 (2018-19 <sup>3</sup> )!	£320k	£290k	£341k	£390k	£362k	£490k	£362k	£490k	£362k	£490k	£1,747/2,150k

Table 1: Annual savings from existing maintenance and energy costs for Proposals 1, 2 & 3 (Proposal 2a equates to Proposal 2, Proposal 3a equated to Proposal 3)

**Note:** all costs are current to August 2015

### Key:

- <sup>1</sup> – Reducing the Routine Maintenance budget only (£100k) with partial Part-night lighting (£60k)
- <sup>2</sup> - Reducing the Routine & Non-routine Maintenance budgets (£160k)
- <sup>3</sup> – Combining maintenance savings and part-night lighting saving £320k (£160k plus up to £160k)
- <sup>4</sup> – Represents maintenance and/ or part-night lighting saving combinations
- <sup>5</sup> – Summation of maintenance and energy savings by March 2021

### TABLE NOTE:

# - Proposal 2/2a - 2017-18 - ©2,300 – 3,200 LED/ LED & CPO Halide replacement lights taken out of conventional lamp replacement regime of the remaining stock of 18,500 (27,500 minus 9,000 LED gear-trays) – equates to ©12% saving of remaining routine Maintenance budget (£175k) translating to an additional ©£21,000 saving p.a.

! - Proposal 3/3a - 2018-19 - ©1,300 - 2,200 LED replacement lights taken out of conventional lamp replacement regime of the remaining stock of 16,150 (27,500 minus 9,000 LED gear-trays, minus 2,350 LED replacement 2017-18) – equates to ©14% saving of remaining routine Maintenance budget, £154k (£175k minus £21k), translating to an additional ©£21,000 saving p.a.

## Pay-Back Summary

These strategies could lead to the following investment recoveries:

Proposal 1 - 2015-16 – Capital investment of approx. £980k<sup>®</sup> for replacement of ©9,000 lights with LED gear trays (saving £290k p.a.<sup>®</sup>) – combined savings will be have recovered the cost in the end of 2017/18 with combined reduced Maintenance Budget & Part-night Lighting or 2018/19 with either the reduced Maintenance Budget or Part-night Lighting.

Proposal 2/ 2a - 2017/18 - Capital investment of approx. £1,000k<sup>®</sup> for replacement of ©2,350 – 3,200 lights with LED complete assemblies or CPO (Halide) / Led combination (saving £100k p.a.<sup>®</sup>) - combined savings will be have recovered the cost by the end of 2019/20 with combined reduced Maintenance Budget & Part-night Lighting or 2020-21 with either the reduced Maintenance Budget or Part-night Lighting.

Proposal 3/ 3a - 2018/19 – Capital investment of approx. £2,000k<sup>@</sup> for replacement of ©2,200 – 2,800 lights (in conflict areas & remaining stock) with LED or CPO (Halide) / LED combination complete assemblies for the larger highways units (saving £100k p.a.<sup>@</sup>) - combined savings will be have recovered by the end of 2020/21 with combined reduced Maintenance Budget & Part-night Lighting or 2022-23 with just reduced Maintenance Budget or Part-night Lighting.

<sup>@</sup> - Costs current to August 2015

Below is a simplified bar chart showing the relative durations of the pay-back period for each of the three Proposals; Payback Combined is the combination savings of Maintenance and Part-night Lighting, Payback Separate is the savings from just the Maintenance or the Part-night Lighting.

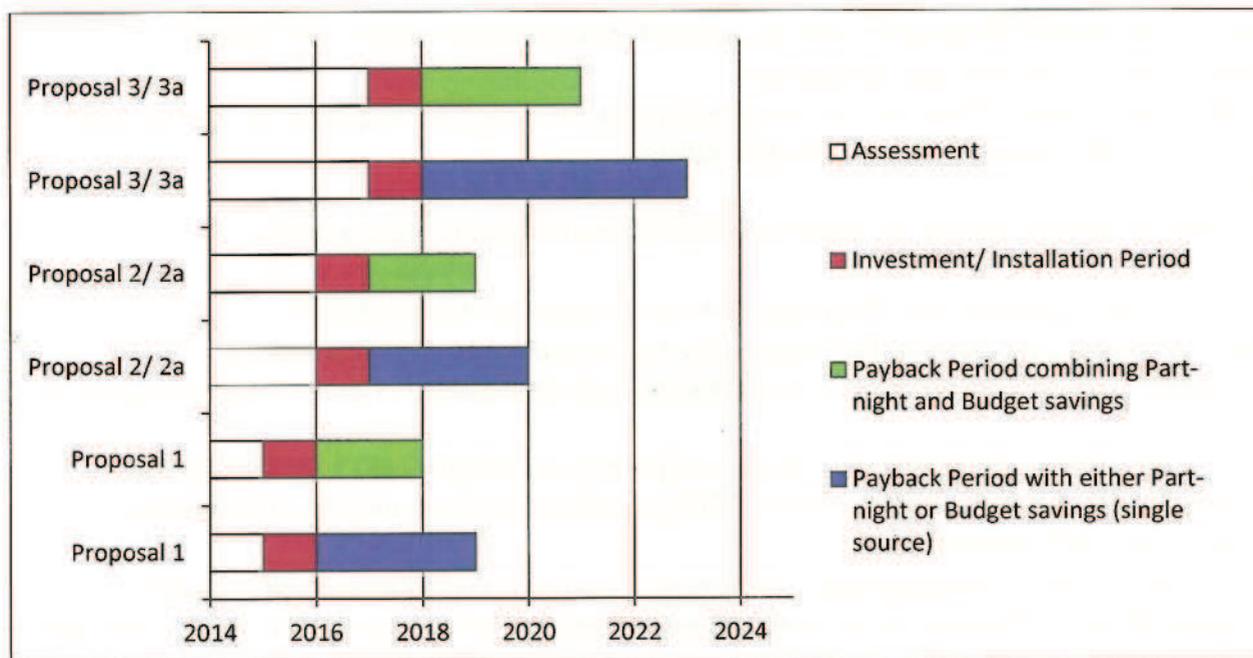


Table 2: Simplified bar-chart to demonstrate the relative durations of Pay-back periods for Proposals 1, 2, 2a, 3 & 3a (3 follows on from Proposal 2 , 3a follows on from Proposal 2a)

As can be seen, the maintenance and energy savings made from the preceding schemes can be used to support the application for Capital Funding required by the succeeding schemes.

By April 2019 the remaining lighting stock (which have not had a low-energy replacement) should number around 8,000, which will form part of the next stage of lower energy replacement scheme (See Table 3 below). This will be the proviso that all newly adopted street lighting assets (new developments etc.) are to a contemporary low energy/ LED standard or equivalent.

As can also be seen in Table 3 the lower energy replacement units (CPO Halide, LED etc.), will need to be replaced around 2025 due to their respective design life spans. Since these total approximately 20,000, there will need to be provision made for capital investment to replace these in a tight programme window (2-3 years).

## Conclusion

To give a clearer summary to this report a high-level table has been included in Appendix F, which gives the Proposal options as:

In Table 1 – Proposals and savings for LED replacements:

- LED Gear-tray Replacements (Proposal 1) which is currently being installed
- Part-night Lighting for Non-conflict Areas – the proposal detailed in Appendix B
- Reduction in Maintenance Budget – the proposal outlined in Section 4.3 of the Scrutiny Lighting Report
- 2017-18 Investment (Proposal 2) – to exchange 650 x 250W(HP) and 1,700 x 55W(LP) conventional lamps with LED alternatives
- 2018-19 Investments (Proposal 3) – to exchange the remaining lighting stock in Conflict Areas (junctions, traffic calming etc.) to LED alternatives

In Table 2 - Proposals and savings for combined CPO (Halide) and LED replacements:

- LED Gear-tray Replacements (Proposal 1) which is currently being installed
- Part-night Lighting for Non-conflict Areas – the proposal detailed in in Appendix B
- Reduction in Maintenance Budget – the proposal outlined in Section 4.5 of the Scrutiny Lighting Report
- 2017-18 Investment (Proposal 2a) – to exchange 650 x 250W(HP), 300 x 150W(HP), 250 x 100W(HP), 150 x 135W(LP) and 1,700 x 55W(LP) conventional lamps with a combination of CPO (Halide) and LED alternatives
- 2018-19 Investments (Proposal 3a) – to exchange the remaining lighting stock (after the implementation of Proposal 2a) in Conflict Areas (junctions, traffic calming etc.) to LED alternative; with the remaining sum being invested in the remaining eligible stock (reference Table 3 below)

The tables have assumed that these proposals/ measures have been introduced at their earliest dates and the projected annual savings (correct to August 2015) are calculated to March 2021, where the sum of all the options are predicted to have broken even.

So what's left to do? Below is a table of the status and numbers of units (as from spring 2019), with proposed investment and further priority stock in conflict areas:

Lighting Regimes	Numbers <sup>1</sup>	2017-18 Proposal 2/ 2a <sup>2</sup>	2018-19 Proposal 3/ 3a	Remaining stock requiring Low Energy Replacement	Remaining stock requiring Low Energy Replacement
Lights currently being Part Night Lit	5,000	400 <sup>3</sup>		4,700	
Lights that have replacement lower energy lights (CPO (Halide) etc.)	4,000				4,000 (to be replaced ©2025)
Lights being replaced by LED Gear Trays	9,000				9,000 (to be replaced ©2025)
Eligible stock for Part Night Lighting	7,500	1,950 (1,300+650) <sup>4</sup>	2,194 (2,844-650) <sup>5</sup>	3,356*	
Energy Efficient Lanterns installed during Routine Maintenance	2,000				2,000 (to be replaced 2025)
Total Stock	27,500				23,506

*Table 3: Lighting unit numbers in lighting regime categories with the remaining stock to be converted to LED technology*

\* - this is a priority energy reduction area as these units burn through the night have a replacement cost of approx. £2,500k (as of August 2015) – reduced to £1,500k, if Proposals 2a & 3a are approved

Key:

<sup>1</sup> – numbers as from Spring 2016

<sup>2</sup> – MTFP Option suggested for 2017/18 with capital investment of £1,000,000

<sup>3</sup> – 55W Low-pressure sodium life expired units already under part-night lighting regime

<sup>4</sup> – total equals 1,400 55W Low-pressure sodium life expired units plus 650 Low & High Pressure Sodium units in conflict areas

<sup>5</sup> - total of remaining Low & High Pressure Sodium units in conflict areas (not subject to part night lighting)

If Proposals 2a and 3a are agreed to the latter investment will be able to convert up to 40% of the remaining conventional lighting stock (1,000 to 1,500 units).





Briefing 15/43 August 2015

# Findings from a report into the impacts of reduced street lighting.

To: contacts in England, Scotland, Wales and Northern Ireland.

## Key issues

Long term study of impacts of reducing street lighting.

No convincing evidence of association between lighting adaptations and road traffic collisions.

Slight suggestion of an association between dimming and reductions in crime, particularly violent crime.

## 1. Introduction

In March 2014, Dr Phil Edwards from the Department of Population Health, London School of Hygiene and Tropical Medicine attended the APSE Highways and Street Lighting seminar to talk about the LANTERNS project as a study into the effects of changes to street lighting on traffic crashes and crime. The final report from the project has been published in the *Journal of Epidemiology and Community Health*.

The full report can be found [here](#).

## 2. Background

The budget pressures all local authorities are facing alongside the need to reduce carbon emissions has prompted many local authorities to reduce street lighting. It is an obvious target for potential savings as the service is a big user of electricity, there is new technology available for deployment and investment in the lighting stock has been inadequate in many local authorities over recent years. However, there had previously been no evidence collected about the possible impacts on public health of the reduction of lighting which has been undertaken.

The project considered the effect of 4 street lighting adaptation strategies (switch off, part-night lighting, dimming and white light) on casualties and crime in England and Wales. The methodology included observational study based on analysis of geographically coded police data on road traffic collisions and crime in 62 local authorities. Conditional Poisson models were used to analyse longitudinal changes in the counts of night-time collisions occurring on affected roads during 2000–2013, and crime within census Output Areas during 2010–2013. Effect estimates were adjusted for regional temporal trends in casualties and crime.

62 of 174 local authorities approached in England and Wales responded with usable data and were included in the analysis.

### **3. Lighting strategies**

Of the 62 local authorities, 5 (8%) had introduced switch off, 30 (48%) had introduced part-night lighting, 40 (65%) had introduced dimming, and 52 (84%) had introduced white light. The introduction of these street lighting adaptation strategies increased steadily from 2009 so that by December 2013, the local authorities participating in this study had implemented white light on a total of 7% of the total road km in the 62 participating local authorities; part-night lighting on 5%; dimming on 4%; and switch off on 0.4%.

### **4. Results**

14 years of data on road traffic collisions in 62 local authorities was used without any convincing evidence for associations between street lighting adaptations and road traffic collisions being found.

The study did, however, suggest an association between some street lighting adaptations and crime with results overall suggestive of an association between dimming and reductions in crime, particularly for violent crime. These results may be interpreted as lending support to the hypothesis linking lower levels of visibility to difficulties in identifying 'suitable' targets from those on the street at night.

Results also suggested an association between white light and reductions in crime, particularly burglary, which may provide support for the credibility of mechanisms linking increased visibility or increased investment in local communities to reductions in crime. If reduced street lighting displaces pedestrian activity to better-lit streets, this might reduce the risks of victimisation and interpersonal crime on those streets, and increase guardianship on the better-lit streets.

The study claims that there is no evidence that reduced street lighting is associated with increases in road traffic collisions or crime nor that dimming the amount of light or switching to white light/LEDs may reduce crime in an area. As such it notes that when risks are carefully considered, local authorities can safely reduce street lighting, saving energy costs and reducing carbon emissions, without impacting negatively on traffic collisions and crime.

The study was unable to identify any evidence that any street lighting adaptation strategy was associated with a change in collisions at night. There was significant statistical heterogeneity in the effects on crime estimated at police force level. Overall, there was no evidence for an association between the aggregate count of crime and switch off or part-night lighting. There was weak evidence for a reduction in the aggregate count of crime and dimming and white light. Results suggested that in the aggregate, dimming and white light regimes were associated with reductions in crime, though estimates were imprecise.

As such the study concluded that there was little evidence of harmful effects of switch off, part-night lighting, dimming, or changes to white light/LEDs on road collisions or crime in England and Wales.

### **5. APSE comment**

APSE was happy to support this study and help widen the number of local authorities involved. Studies to identify the impacts of strategies undertaken (whether street lighting related or otherwise) are a necessary, but not always provided, step in the process of justifying decisions about how public funds are spent and as such this study is welcome.

There are a number of factors which might impact on the analysis and the study did take account of these such as, changes in CCTV and speed camera provision, changes in modes of transport and changes in levels of walking and cycling. Equally the data relies on reported records of collisions and crime rather than the actual level, although this is a perennial problem when using this type of data.

Media coverage about the perceived negative effects of reduced lighting has been focused on specific incidents which are of course regrettable in themselves. However, it is an approach which means the fear of a possible crime or accident is based on an incident in another location which has been reported in the media. This report draws a virtual blank when looking for evidence of a link which the media often claims exists. Officers undertake appropriate risk assessments as a matter of course when making the changes to lighting services noted in this report and will do so on a case by case basis. Nonetheless these findings will be a vital addition to their sources of information.

Clearly many factors need to be taken into consideration when applying a new approach to street lighting and the report notes some of them. The health and wellbeing benefits of reduced lighting such as improved sleep and being able to see the night sky are examples. The introduction of LEDs can change the quality and colour of lighting and improve visual acuity, and improve closed circuit television (CCTV) images so making criminals feel more conspicuous and so potentially deterring certain types of crime. Furthermore the movement of people from well-lit to unlit streets might reduce road casualties by reducing the potential for collisions as well as reducing the amount of 'natural surveillance' in an area, leading to an increase in crime.

Street lighting remains a fundamental public good and local authority provided front line service. The service needs to be reviewed regularly, as all public services do, and this is certainly happening. Evidence of the kind noted in this report is important as an input to the decision making process for investment and changes service delivery.

APSE fully supports this kind of study into the impacts of services and the outcomes of changes to them.

**Phil Brennan**  
**Principal Advisor**

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**APPENDIX E: ENERGY/ COST COMPARATOR PER 100 LAMPS**

**Energy Ratings and Costs for Conventional (Sodium), CPO (Halide/ Cosmopolis), LED (Light Emitting Diode) for a sample of 100 Lamps**

Lamp Type	Like -for Like Replacement (Sodium)					CPO (Cosmopolis) Replacement					LED Replacement				Comments
	Energy (kWh)	Cost (£)	Lamp Cost (£) -4 years	Lantern Cost (£)	Design Life	Energy (kWh)	Cost (£)	Lamp Cost (£) - 4 years	Lantern Cost (£)	Design Life	Energy (kWh)	Cost (£)	Lantern Cost (£)	Design Life	
250 High Pressure Sodium	125,607	14,319	3,600	13,700	20	65,516	7,469	4,800	24,900	20	50,076	5,709	80,000	20	
150 High Pressure Sodium	75,114	8,563	3,400	13,100	20	65,516	7,469	4,800	24,900	20	36,305	4,139	80,000	20	
100 High Pressure Sodium	47,572	5,423	3,100	10,200	20	41,313	4,710	6,400	24,800	20	10,015	1,142	80,000	20	
135 Low Pressure Sodium	74,279	8,468	3,700	13,100	20	65,516	7,469	4,800	24,900	20	50,076	5,709	80,000	20	
90 Low Pressure Sodium	50,911	5,804	3,300	10,200	20	41,313	4,710	6,400	24,800	20	36,305	4,139	80,000	20	
55 Low Pressure Sodium	30,880	3,520	3,000	10,000	20	28,376	3,235	6,200	22,900	20	10,015	1,142	17,000	20	

Lamp & Lantern Cost over 20 years (A)		
£ 31,700	£ 48,900	£ 80,000
£ 30,100	£ 48,900	£ 80,000
£ 25,700	£ 56,800	£ 80,000
£ 31,600	£ 48,900	£ 80,000
£ 26,700	£ 56,800	£ 80,000
£ 25,000	£ 53,900	£ 17,000

20 Year Energy Costs (B)		
£286,380	£149,377	£114,173
£171,260	£149,377	£82,776
£108,460	£94,193	£22,835
£169,360	£149,377	£114,173
£116,080	£94,193	£82,776
£70,400	£64,698	£22,840

Whole life costs over 20 years (A+B)	
£ 318,080	£ 198,277
£ 201,360	£ 198,277
£ 134,160	£ 150,993
£ 200,960	£ 198,277
£ 142,780	£ 150,993
£ 95,400	£ 118,598

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PROPOSAL 2 - £1M FOR INVESTMENT 2017-18 (based on Replacement of 250HP and 55LP Lamps)

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	Like-for-Like Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£112,450	816,446	£93,074	£206,050	£1,861,470	£2,067,520
150 High Pressure Sodium	3,533	1,636	0	1,636	£0	0	£0	£0	£0	£0
100 High Pressure Sodium	1,187	252	0	252	£0	0	£0	£0	£0	£0
135 Low Pressure Sodium	286	152	0	152	£0	0	£0	£0	£0	£0
90 Low Pressure Sodium	327	106	0	106	£0	0	£0	£0	£0	£0
55 Low Pressure Sodium	1,700	0	1,700	0	£221,000	524,960	£59,840	£425,000	£1,196,800	£1,621,800
<b>Totals</b>	<b>7,897</b>		<b>2,350</b>		<b>£333,450</b>	<b>1,341,406</b>	<b>£152,914</b>			<b>£3,689,320</b>

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	CPO (Cosmopolis) Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£193,050	425,855	£48,547	£317,850	£970,949	£1,288,799
150 High Pressure Sodium	3,533	1,636	0	1,636	£0	0	£0	£0	£0	£0
100 High Pressure Sodium	1,187	252	0	252	£0	0	£0	£0	£0	£0
135 Low Pressure Sodium	286	152	0	152	£0	0	£0	£0	£0	£0
90 Low Pressure Sodium	327	106	0	106	£0	0	£0	£0	£0	£0
55 Low Pressure Sodium	1,700	0	1,700	0	£494,700	482,399	£54,993	£916,300	£1,099,869	£2,016,169
<b>Totals</b>	<b>7,897</b>		<b>2,350</b>		<b>£687,750</b>	<b>908,253</b>	<b>£103,541</b>			<b>£3,304,968</b>

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	LED Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£520,000	325,494	£37,106	£520,000	£742,126	£1,262,126
150 High Pressure Sodium	3,533	1,636	0	1,636	£0	0	£0	£0	£0	£0
100 High Pressure Sodium	1,187	252	0	252	£0	0	£0	£0	£0	£0
135 Low Pressure Sodium	286	152	0	152	£0	0	£0	£0	£0	£0
90 Low Pressure Sodium	327	106	0	106	£0	0	£0	£0	£0	£0
55 Low Pressure Sodium	1,700	0	1,700	0	£289,000	170,255	£19,414	£289,000	£388,280	£677,280
<b>Totals</b>	<b>7,897</b>		<b>2,350</b>		<b>£809,000</b>	<b>495,749</b>	<b>£56,520</b>			<b>£1,939,406</b>

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	CPO (Cosmopolis)/ LED Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£193,050	425,855	£48,547	£317,850	£970,949	£1,288,799
150 High Pressure Sodium	3,533	1,636	0	1,636	£0	0	£0	£0	£0	£0
100 High Pressure Sodium	1,187	252	0	252	£0	0	£0	£0	£0	£0
135 Low Pressure Sodium	286	152	0	152	£0	0	£0	£0	£0	£0
90 Low Pressure Sodium	327	106	0	106	£0	0	£0	£0	£0	£0
55 Low Pressure Sodium	1,700	0	1,700	0	£289,000	170,255	£19,414	£289,000	£388,280	£677,280
<b>Totals</b>	<b>7,897</b>		<b>2,350</b>		<b>£482,050</b>	<b>596,110</b>	<b>£67,961</b>			<b>£1,966,079</b>

**NOTES:**

The selection for the combined table (CPO (Cosmopolis)/ LED Replacement) was assessed on the total Initial Unit Costs and the total 20 year Whole Life Costs, so for Proposal 2 (2017-18):

The **250W High Pressure Sodium Units** (650 to be replaced); for Cosmopolis had an initial cost of ©£200k with a 20 year Whole Life cost of ©£1,300k, for LED replacements the initial costs are ©500k with a 20 year Whole Life cost of ©£1,250k - so preferred option is Cosmopolis replacement

The **55W Low Pressure Sodium Units** (1,700 to be replaced); for Cosmopolis had an initial cost of ©£500k with a 20 year Whole Life cost of ©£2,000k, for LED replacements the initial costs are ©300k with a 20 year Whole Life cost of ©£700k - so preferred option is LED replacement

**PROPOSAL 2a - £1M FOR INVESTMENT 2017-18 (£1M budget figure in Red)**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	Like-for-Like Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	698	0	£120,754	876,737	£99,947	£221,266	£1,998,932	£2,220,198
150 High Pressure Sodium	3,533	1,636	1,636	0	£269,940	1,228,865	£140,091	£492,436	£2,801,814	£3,294,250
100 High Pressure Sodium	1,187	252	252	0	£33,516	119,881	£13,666	£64,764	£273,319	£338,083
135 Low Pressure Sodium	286	152	152	0	£25,536	112,904	£12,871	£48,032	£257,427	£305,459
90 Low Pressure Sodium	327	106	106	0	£14,310	53,966	£6,152	£28,302	£123,045	£151,347
55 Low Pressure Sodium	1,700	0	1,700	0	£221,000	524,960	£59,840	£425,000	£1,196,800	£1,621,800
<b>Totals</b>	<b>7,897</b>		<b>4544</b>	<b>0</b>	<b>£ 685,056</b>	<b>2,917,313</b>	<b>£332,567</b>	<b>£1,279,800</b>	<b>£6,651,337</b>	<b>£7,931,137</b>
							<b>Mtce Cost</b>	<b>£ 594,744</b>		

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Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	CPO (Cosmopolis) Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	698	0	£207,306	457,302	£52,132	£341,322	£1,042,649	£1,383,971
150 High Pressure Sodium	3,533	1,636	500	1136	£148,500	327,581	£37,344	£244,500	£746,884	£991,384
100 High Pressure Sodium	1,187	252	252	0	£78,624	104,108	£11,868	£143,136	£237,366	£380,502
135 Low Pressure Sodium	286	152	152	0	£45,144	99,584	£11,353	£74,328	£227,053	£301,381
90 Low Pressure Sodium	327	106	106	0	£33,072	43,791	£4,992	£60,208	£99,845	£160,053
55 Low Pressure Sodium	1,700	0	1,700	0	£494,700	482,399	£54,993	£916,300	£1,099,869	£2,016,169
<b>Totals</b>	<b>7,897</b>		<b>3,408</b>	<b>1,136</b>	<b>£1,007,346</b>	<b>1,514,766</b>	<b>£172,683</b>	<b>£1,779,794</b>	<b>£3,453,666</b>	<b>£5,233,460</b>
							<b>Mtce Cost</b>	<b>£772,448</b>		

**Reference Figures for Comparison with Conventional Units with Proposal 2a**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2a: 2018-19	Remaining units in April 2019	Like-for-Like Replacement		
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)
250 High Pressure Sodium	864	698	698	166	£120,754	876,737	£99,947
150 High Pressure Sodium	3,533	1,636	300	3233	£49,500	225,342	£25,689
100 High Pressure Sodium	1,187	252	252	935	£33,516	119,881	£13,666
135 Low Pressure Sodium	286	152	152	134	£25,536	112,904	£12,871
90 Low Pressure Sodium	327	106	106	221	£14,310	53,966	£6,152
55 Low Pressure Sodium	1,700	0	1,700	0	£221,000	524,960	£59,840
<b>Totals</b>	<b>7,897</b>		<b>3,208</b>	<b>4,689</b>	<b>£ 464,616</b>	<b>1,913,790</b>	<b>£218,165</b>

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2a: 2017-18	Remaining units in Conflicted Area	LED Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	0	698	£0	0	£0	£0	£0	£0
150 High Pressure Sodium	3,533	1,636	400	1236	£320,000	145,220	£16,555	£320,000	£331,103	£651,103
100 High Pressure Sodium	1,187	252	252	0	£201,600	25,238	£2,877	£201,600	£57,543	£259,143
135 Low Pressure Sodium	286	152	152	0	£121,600	76,116	£8,677	£121,600	£173,543	£295,143
90 Low Pressure Sodium	327	106	106	0	£84,800	38,483	£4,387	£84,800	£87,742	£172,542
55 Low Pressure Sodium	1,700	0	1,700	0	£289,000	170,255	£19,414	£289,000	£388,280	£677,280
<b>Totals</b>	<b>7,897</b>		<b>2,610</b>	<b>1,934</b>	<b>£1,017,000</b>	<b>455,313</b>	<b>£51,911</b>	<b>£1,017,000</b>	<b>£1,038,211</b>	<b>£2,055,211</b>
							<b>Mtce Cost</b>	<b>£0</b>		

Lamp Type	Number	Number of units in Conflicted Area	Proposal 3a: 2018-19	Remaining units in April 2019	Like-for-Like Replacement		
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)
250 High Pressure Sodium	864	698	166	0	£28,718	208,508	£23,770
150 High Pressure Sodium	3,533	1,636	1366	1,867	£225,390	1,026,057	£116,971
100 High Pressure Sodium	1,187	252	935	0	£124,355	444,798	£50,705
135 Low Pressure Sodium	286	152	134	0	£22,512	99,534	£11,347
90 Low Pressure Sodium	327	106	221	0	£29,835	112,513	£12,827
55 Low Pressure Sodium	1,700	0	0	0	£0	0	£0
<b>Totals</b>	<b>7,897</b>		<b>2822</b>	<b>1,867</b>	<b>£ 430,810</b>	<b>1,891,410</b>	<b>£215,619</b>

**PROPOSAL 3a - £2M FOR INVESTMENT 2018-19 (follow on from Proposal 2a)**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2a: 2017-18	CPO (Cosmopolis)/ LED Replacement						Remaining units in Conflicted Area	Proposal 3a First Tranche	Remaining Residual Stock	Proposal 3a - Remaining Investment	Proposal 3a - Remaining Stock	CPO (Cosmopolis)/ LED Replacement			Remaining Stock April 2019	Remaining investment required
				Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost						Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)		
250 High Pressure Sodium	864	698	698	£207,306	457,302	£52,132	£341,322	£1,042,649	£1,383,971	0	£0	166		166	£49,302	108,757	£12,398	0	£ -
150 High Pressure Sodium	3,533	1,636	300	£240,000	108,915	£12,416	£240,000	£248,327	£488,327	1336	£1,068,800	1,897	<b>£931,200</b>	30	£24,000	495,928	£56,536	1867	£ 1,493,600
100 High Pressure Sodium	1,187	252	252	£201,600	25,238	£2,877	£201,600	£57,543	£259,143	0	£0	935		935	£748,000	93,642	£10,675	0	£ -
135 Low Pressure Sodium	286	152	152	£45,144	99,584	£11,353	£74,328	£227,053	£301,381	0	£0	134		134	£39,798	87,792	£10,008	0	£ -
90 Low Pressure Sodium	327	106	106	£33,072	43,791	£4,992	£60,208	£99,845	£160,053	0	£0	221		221	£68,952	91,301	£10,408	0	£ -
55 Low Pressure Sodium	1,700	0	1,700	£289,000	170,255	£19,414	£289,000	£388,280	£677,280	0	£0	0		0	£0	0	£0	0	£ -
<b>Totals</b>	<b>7,897</b>		<b>3,208</b>	<b>£1,016,122</b>	<b>905,087</b>	<b>£103,185</b>	<b>£1,206,458</b>	<b>£2,063,697</b>	<b>£3,270,155</b>		<b>£1,068,800</b>	<b>3,353</b>		<b>1,486</b>	<b>£930,052</b>	<b>877,419</b>	<b>£100,026</b>		<b>£ 1,493,600</b>
					SAVING	SAVING	Mtce Cost								SAVINGS	SAVINGS			
					1,008,703	£114,980	<b>£190,336</b>								1,013,991	£115,593			

**PROPOSAL 3 - £2M FOR INVESTMENT 2018-19 (follow on from Proposal 2)**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	Like-for-Like Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£8,304	60,291	£6,873	£15,216	£137,462	£152,678
150 High Pressure Sodium	3,533	1,636		1,636	£269,940	1,228,865	£140,091	£492,436	£2,801,814	£3,294,250
100 High Pressure Sodium	1,187	252		252	£33,516	119,881	£13,666	£64,764	£273,319	£338,083
135 Low Pressure Sodium	286	152		152	£25,536	112,904	£12,871	£48,032	£257,427	£305,459
90 Low Pressure Sodium	327	106		106	£14,310	53,966	£6,152	£28,302	£123,045	£151,347
55 Low Pressure Sodium	1,700	0	1,700	0	£0	0	£0	£0	£0	£0
<b>Totals</b>	<b>7,897</b>			<b>2,194</b>	<b>£351,606</b>			<b>£648,750</b>	<b>£3,593,067</b>	<b>£4,241,817</b>

**Mtce Cost  
£ 297,144**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	CPO (Cosmopolis) Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£14,256	31,448	£3,585	£23,472	£71,701	£95,173
150 High Pressure Sodium	3,533	1,636		1,636	£485,892	1,071,843	£122,190	£800,004	£2,443,803	£3,243,807
100 High Pressure Sodium	1,187	252		252	£78,624	104,108	£11,868	£143,136	£237,366	£380,502
135 Low Pressure Sodium	286	152		152	£45,144	99,584	£11,353	£74,328	£227,053	£301,381
90 Low Pressure Sodium	327	106		106	£33,072	43,791	£4,992	£60,208	£99,845	£160,053
55 Low Pressure Sodium	1,700	0	1,700	0	£0	0	£0	£0	£0	£0
<b>Totals</b>	<b>7,897</b>			<b>2,194</b>	<b>£656,988</b>			<b>£1,101,148</b>	<b>£3,079,767</b>	<b>£4,180,915</b>

**Mtce Cost  
£444,160**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	LED Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£38,400	24,036	£2,740	£38,400	£54,803	£93,203
150 High Pressure Sodium	3,533	1,636		1,636	£1,308,800	593,951	£67,710	£1,308,800	£1,354,209	£2,663,009
100 High Pressure Sodium	1,187	252		252	£201,600	25,238	£2,877	£201,600	£57,543	£259,143
135 Low Pressure Sodium	286	152		152	£121,600	76,116	£8,677	£121,600	£173,543	£295,143
90 Low Pressure Sodium	327	106		106	£84,800	38,483	£4,387	£84,800	£87,742	£172,542
55 Low Pressure Sodium	1,700	0	1,700	0	£0	0	£0	£0	£0	£0
<b>Totals</b>	<b>7,897</b>			<b>2,194</b>	<b>£1,755,200</b>			<b>£1,755,200</b>	<b>£1,727,841</b>	<b>£3,483,041</b>

**Mtce Cost  
£0**

Lamp Type	Number	Number of units in Conflicted Area	Proposal 2: 2017-18	Remaining units in Conflicted Area	CPO (Cosmopolis)/ LED Replacement					
					Initial Unit Cost	Annual Energy (kWh)	Annual Energy Cost (£)	Unit Cost for 20 Years	Energy Cost for 20 Years	20 year Whole Life Cost
250 High Pressure Sodium	864	698	650	48	£14,256	31,448	£3,585	£23,472	£71,701	£95,173
150 High Pressure Sodium	3,533	1,636		1,636	£1,308,800	593,951	£67,710	£1,308,800	£1,354,209	£2,663,009
100 High Pressure Sodium	1,187	252		252	£201,600	25,238	£2,877	£201,600	£57,543	£259,143
135 Low Pressure Sodium	286	152		152	£45,144	99,584	£11,353	£74,328	£227,053	£301,381
90 Low Pressure Sodium	327	106		106	£33,072	43,791	£4,992	£60,208	£99,845	£160,053
55 Low Pressure Sodium	1,700	0	1,700	0						
<b>Totals</b>	<b>7,897</b>			<b>2,194</b>	<b>£1,602,872</b>			<b>£1,668,408</b>	<b>£1,810,351</b>	<b>£3,478,759</b>
								<b>Mtce Cost</b>		
								<b>£65,536</b>		

**NOTES:**

The selection for the combined table (CPO (Cosmopolis)/ LED Replacement) was assessed on the total Initial Unit Costs and the total 20 year Whole Life Costs, so for Proposal 2 (2017-18):

The **250W High Pressure Sodium Units** (650 to be replaced); for Cosmopolis had an initial cost of ©£200k with a 20 year Whole Life cost of ©£1,300k, for LED replacements the initial costs are ©£500k with a 20 year Whole Life cost of ©£1,250k - so preferred option is Cosmopolis replacement

The **55W Low Pressure Sodium Units** (1,700 to be replaced); for Cosmopolis had an initial cost of ©£500k with a 20 year Whole Life cost of ©£2,000k, cost of ©£700k for LED replacements the initial costs are ©£300k with a 20 year Whole Life - so preferred option is LED replacement

**APPENDIX F: LIGHTING OPTIONS SUMMARY**

**TABLE 1: SHOWING PROPOSALS AND SAVINGS FOR LED REPLACEMENTS**

Proposals	2015/16			2016-17			2017-18			2018-19			2019-20			2020-21			April 2021	
	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Costs	Savings
LED Geartrays (Proposal 1 - AGREED)	Install	-£980,000	100,000	Monitor/ maintain	£0	£290,000 (100+190k)	Monitor/ maintain	£0	£290,000	Monitor/ maintain	£0	£290,000	Monitor/ maintain	£0	£290,000	Monitor/ maintain	£0	£290,000	-£980,000	£1,260,000
Part Night Lighting - in non-conflict areas	Agree	-£235,000	£150,000	Monitor (reactive)	£20,000	£150,000	Monitor (reactive)	£10,000	£150,000	Monitor (reactive)	£10,000	£150,000	Monitor (reactive)	£5,000	£150,000	Monitor (reactive)	£5,000	£150,000	-£190,000	£750,000
Reduction in Maintenance Budget	Reduce Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	£0	£750,000
2017-18 Investment (Proposal 2)				Agree/ Install	-£1,000,000	£0	Monitor/ maintain	£0	£100,000	Monitor/ maintain	£0	£100,000	Monitor/ maintain	£0	£100,000	Monitor/ maintain	£0	£100,000	-£1,000,000	£300,000
2018-19 Investment (Proposal 3)							Agree/ Install	-£2,000,000	£0	Monitor/ maintain	£0	£100,000	Monitor/ maintain	£0	£100,000	Monitor/ maintain	£0	£100,000	-£2,000,000	£200,000
<b>Totals</b>		<b>-£1,215,000</b>	<b>£400,000</b>		<b>-£980,000</b>	<b>£590,000</b>		<b>-£1,990,000</b>	<b>£690,000</b>		<b>£10,000</b>	<b>£790,000</b>		<b>£5,000</b>	<b>£790,000</b>		<b>£5,000</b>	<b>£790,000</b>	<b>-£4,170,000</b>	<b>£4,050,000</b>

**TABLE 2: SHOWING PROPOSALS AND SAVINGS FOR COMBINED HALOGEN AND LED REPLACEMENTS**

Proposals	2015/16			2016-17			2017-18			2018-19			2019-20			2020-21			April 2021	
	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Action	Costs	Savings	Costs	Savings
LED Geartrays (Proposal 1 - AGREED)	Install	-£980,000	100,000	Monitor/ maintain	£0	£290,000 (100+190k)	Monitor/ maintain	£0	£290,000	Monitor/ maintain	£0	£290,000	Monitor/ maintain	£0	£290,000	Monitor/ maintain	£0	£290,000	-£980,000	£1,260,000
Part Night Lighting - in non-conflict areas	Agree	-£235,000	£150,000	Monitor (reactive)	£20,000	£150,000	Monitor (reactive)	£10,000	£150,000	Monitor (reactive)	£10,000	£150,000	Monitor (reactive)	£5,000	£150,000	Monitor (reactive)	£5,000	£150,000	-£190,000	£750,000
Reduction in Maintenance Budget	Reduce Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	Reduced Budget	£0	£150,000	£0	£750,000
2017-18 Investment (Proposal 2a)				Agree/ Install	-£1,000,000	£0	Monitor/ maintain	£0	£80,000	Monitor/ maintain	£0	£80,000	Monitor/ maintain	£0	£80,000	Monitor/ maintain	£0	£80,000	-£1,000,000	£240,000
2018-19 Investment (Proposal 3a)							Agree/ Install	-£1,000,000	£0	Monitor/ maintain	£0	£80,000	Monitor/ maintain	£0	£80,000	Monitor/ maintain	£0	£80,000	-£1,000,000	£160,000
<b>Totals</b>		<b>-£1,215,000</b>	<b>£400,000</b>		<b>-£980,000</b>	<b>£590,000</b>		<b>-£990,000</b>	<b>£670,000</b>		<b>£10,000</b>	<b>£750,000</b>		<b>£5,000</b>	<b>£750,000</b>		<b>£5,000</b>	<b>£750,000</b>	<b>-£3,170,000</b>	<b>£3,910,000</b>

**Note:**

All costs are current to August 2015

Costs for proposals are shown at the earliest dates that they can be accepted

     Call centre costs for response to the Public highlighted in yellow

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## **REGENERATION AND ENVIRONMENT SCRUTINY COMMITTEE – 8TH DECEMBER 2015**

**SUBJECT: ACTIVE TRAVEL CONSULTATION ON EXISTING ROUTES MAP**

**REPORT BY: CORPORATE DIRECTOR - COMMUNITIES**

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### **1. PURPOSE OF REPORT**

- 1.1 To seek Members views on the draft Active Travel Existing Routes Maps and to report the responses from the statutory and public consultation, prior to its presentation to Cabinet and for approval.

### **2. SUMMARY**

- 2.1 The Active Travel (Wales) Act 2013 places new duties on local authorities in Wales to produce and publish Active Travel maps. The first stage of the Act requires local authorities to produce an 'Existing Routes Map' that has to be submitted to the Welsh Government for approval by 22 January 2016. The Maps prepared were widely consulted upon and of the 35 responses received, 80% agreed with the routes as proposed.

### **3. LINKS TO STRATEGY**

- 3.1 To work towards the Council's corporate objective of improving peoples' living environment through targeted actions, regulation, information and advice.
- 3.2 Contributes to the Single Integrated Plan priority to 'improve local employment opportunities including access to opportunities across a wider geographical area'.
- 3.3 Contribute to the Caerphilly County Borough Local Development Plan aim to 'provide a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and protects the environment; where public transport, walking and cycling provide real travel alternatives.'
- 3.4 Contribute to the South East Wales Valleys Local Transport Plan (LTP) objective to develop innovative walking, cycling and Smarter Choices programmes.

### **4. THE REPORT**

- 4.1 The Active Travel (Wales) Act 2013 came in to force in September 2014 and places new duties on local authorities in Wales to produce and publish Active Travel maps. The first stage of the Act requires local authorities to produce an 'Existing Routes Map' that has to be

submitted to the Welsh Government for approval by 22 January 2016. The Existing Routes Map relates to specific areas in Wales that are determined by population as specified in the Act.

- 4.2 The Act aims to make Active Travel the most attractive option for shorter journeys. It requires highways authorities in Wales to make year on year improvements in Active Travel routes through enhancements to routes and facilities for pedestrians and cyclists in all new road schemes and to have regard to the needs of walkers and cyclists in a range of other highway authority functions.
- 4.3 Caerphilly County Borough benefits from a fairly extensive network of walking and cycling infrastructure across the borough. However it is not the intention that the Active Travel Existing Routes Map will show all walking and cycling routes in the county borough. The maps only include existing routes that meet the definition of an Active Travel route as set down in the Act. The 4 points below summarise the definition of an existing active travel route:
1. Routes suitable for walking and cycling (including the use of mobility scooters).
  2. Routes that are within or link to those communities/ areas that are included within the Act. For the County Borough these are:  
  
Aberbargoed, Abercarn, Abertridwr, Bargoed, Blackwood, Caerphilly, Cwmfelinfach, Llanbradach, Machen, Nelson, New Tredegar, Newbridge, Penmaenmawr, Pontllanfraith, Pontlottyn, Rhymney, Risca, Wattsville, Ynysddu, Ystrad Mynach.
  3. Routes that fit with the active travel journeys definition i.e. 'a journey made to or from a workplace or educational establishment or in order to access health, leisure or other services or facilities'. This covers short-distance commuting, travel to school, travel to shops, travel to leisure facilities etc. The route has to connect to facilities and services and be suitable for utility, everyday journeys. It does not cover routes or sections of routes that are just used for leisure or recreational purposes.
  4. Routes that the Local Authority considers fit for purpose in line with the requirements of the Welsh Government's 'Design Guidance Active Travel (Wales) Act 2013 (December 2013)'.
- 4.4 The Existing Routes Maps prepared and consulted upon only include Active Travel routes in the County Borough that satisfy the 4 points detailed above, see Appendix 1. As such some routes indicated on the map form part of a longer distance network used for all journey purposes, including leisure or recreational journeys.
- 4.5 The engagement and consultation process was carried out over a 12 week period. All contacts and the public were directed to the consultation via email or co-ordinators or through press release and through the Caerphilly Newline free paper. The respondents were asked to complete an online questionnaire that was made available in English and Welsh and in other formats. Paper copies were also made available at all libraries. Two responses were received in paper form and these were entered by hand into the snap survey used to analyse the responses received. Of the 35 responses received, 80% agreed with the routes as proposed.
- 4.6 Further interactive engagement with young people has been promoted in schools and the first event was held at Bedwas High School on 13<sup>th</sup> October 2015. The event has collected useful information from young people, which will help develop local routes for Active Travel.

## **5. EQUALITIES IMPLICATIONS**

- 5.1 The South East Wales Valleys Local Transport Plan has undergone Caerphilly CBC's Equalities Impact Assessment (EIA) process. The information within the Active Travel Existing Routes Consultation Maps is a development of this Plan.
- 5.2 Stakeholders in affected minority groups were consulted during the consultation process in accordance with the Council's Equalities Consultation and Monitoring Guidance document.
- 5.3 A full equalities impact assessment is not needed because extensive consultation has been carried out and Active Travel was included in the assessment carried out for the Authorities South East Valleys Local Transport Plan.

## **6. FINANCIAL IMPLICATIONS**

- 6.1 No direct financial implications in producing the Active Travel Maps. Developing a programme of improvements for Active Travel routes will form the basis of bids to the Welsh Government for transport funding.

## **7. PERSONNEL IMPLICATIONS**

- 7.1 None.

## **8. CONSULTATIONS**

- 8.1 The Active Travel Existing Routes consultation was extensive and all relevant responses have been incorporated into the final document presented here. The full list of consultees is shown in Appendix 3.
- 8.2 The consultation included statutory consultees, key external stakeholders, Caerphilly CBC Members and relevant officers, Town and Community Councils and equalities groups and neighbouring local authorities (See Appendix 3). There is also a WG requirement to consult with youth groups. Staff in the Transportation section have contacted schools to encourage participation. Bedwas High School hosted a successful morning event with pupils considering the local Active Travel Routes and requirements in their community. This activity will help promoted sustainable travel to young people and assist officers understand the needs of the community.
- 8.3 A total of 35 consultation responses were received, which have been reviewed and summarised in Appendix 2. The consultation report provides an overview of common themes or issues that were raised during the consultation. It also provides detail of any specific comments received that required consideration of whether changes to the Maps were needed. An overwhelming 80% agreed with the proposed active travel routes shown. One change is required to the proposed map to Link 13 (St. Cenydd Comprehensive school to Caerphilly town centre), which amends the origin of the Active Travel route to remove the road bridge. If the bridge becomes DDA compliant then the map can be reviewed in the future.
- 8.4 A general response was also received from a national body regarding good practice when designing infrastructure to accommodate those with particular disabilities. This information will be considered in the development and design of Active Travel infrastructure.
- 8.5 The comments received on this report from the list of consultees have been incorporated within the report.

## **9. RECOMMENDATIONS**

- 9.1 To seek Members' views on the Active Travel consultation on existing routes maps prior to reporting to Cabinet for approval.

## **10. REASONS FOR THE RECOMMENDATIONS**

- 10.1 To provide the required submission to the Welsh Government by the 22<sup>nd</sup> January 2015 and meet the Council's statutory obligations.

## **11. STATUTORY POWER**

- 11.1 Active Travel (Wales) Act 2013.

Authors: Clive Campbell – Transportation Engineering Manager  
Liz Gibby – Senior Assistant Engineer (Transport Strategy & Road Safety)

### Consultees:

Cllr T Williams – Cabinet Member for Highways, Transportation & Engineering  
Cllr D T Davies – Chair of Regeneration and Environmental Scrutiny Committee  
Cllr E Aldworth – Vice Chair of Regeneration and Environmental Scrutiny Committee  
Chris Burns – Interim Chief Executive  
Christina HARRY - Corporate Director – Communities  
Terry Shaw – Head of Engineering Services  
Pauline Elliott – Head of Regeneration and Planning  
Gail Williams – Interim Head of Legal Services/Monitoring Officer  
Mike Eedy – Finance Manager  
Trish Reardon – HR Manager  
David Thomas – Senior Policy Officer (Equalities and Welsh Language)

### Appendices:

Appendix 1 – Active Travel Existing Routes Consultation Maps  
Appendix 2 – Summary of responses to the Active Travel Existing Routes Maps Consultation  
Appendix 3 – Active Travel Consultation Distribution List

### Background Paper:

Adoption of South East Wales Valleys Local Transport Plan – report to Regeneration and Environment Scrutiny Committee 09-12-14

# Caerphilly County Borough Council Active Travel Existing Routes Consultation Maps



A greener place to live, work and visit  
Man gwyrddach i fyw, gweithio ac ymweld

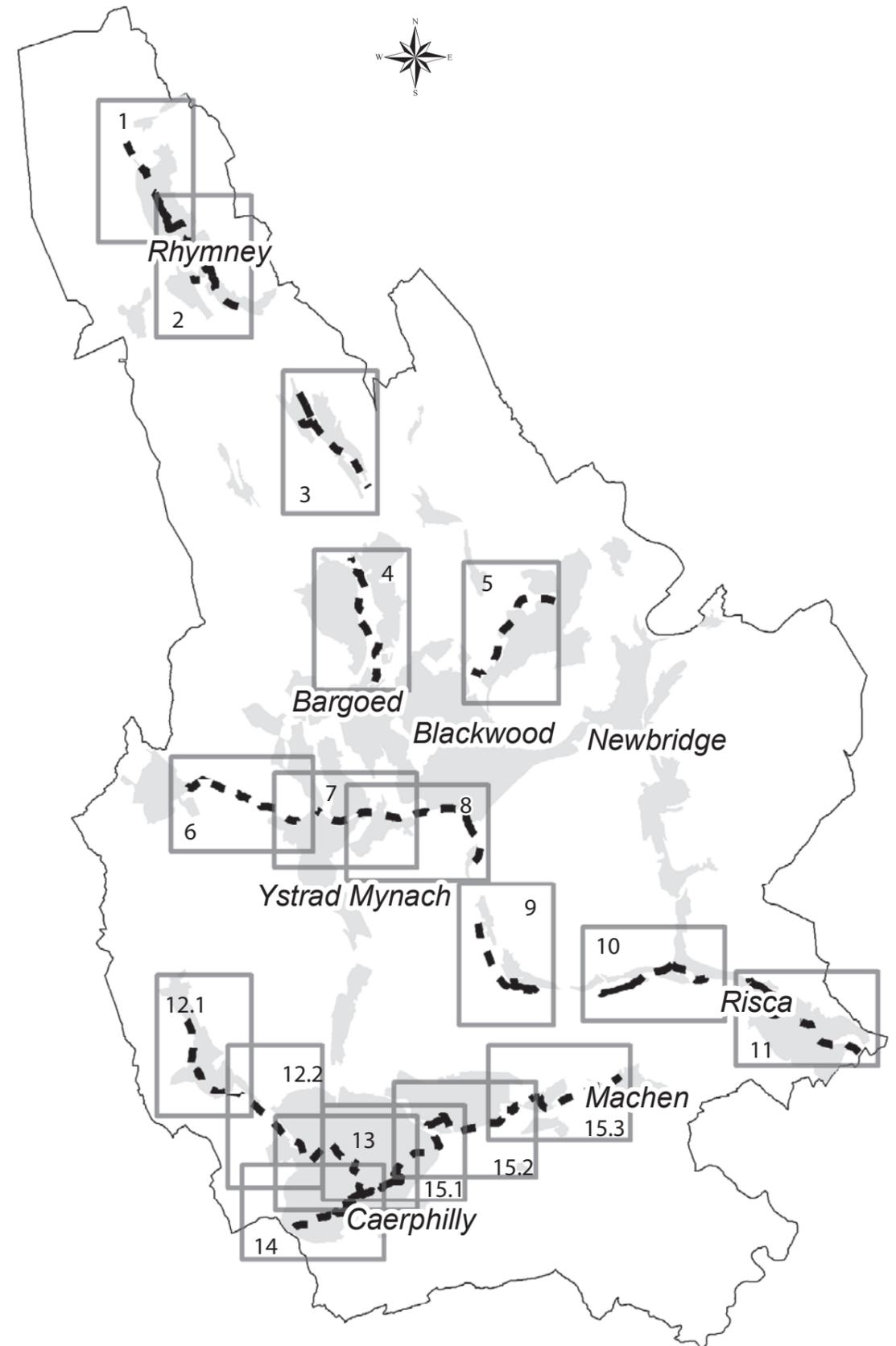


# Caerphilly County Borough Council

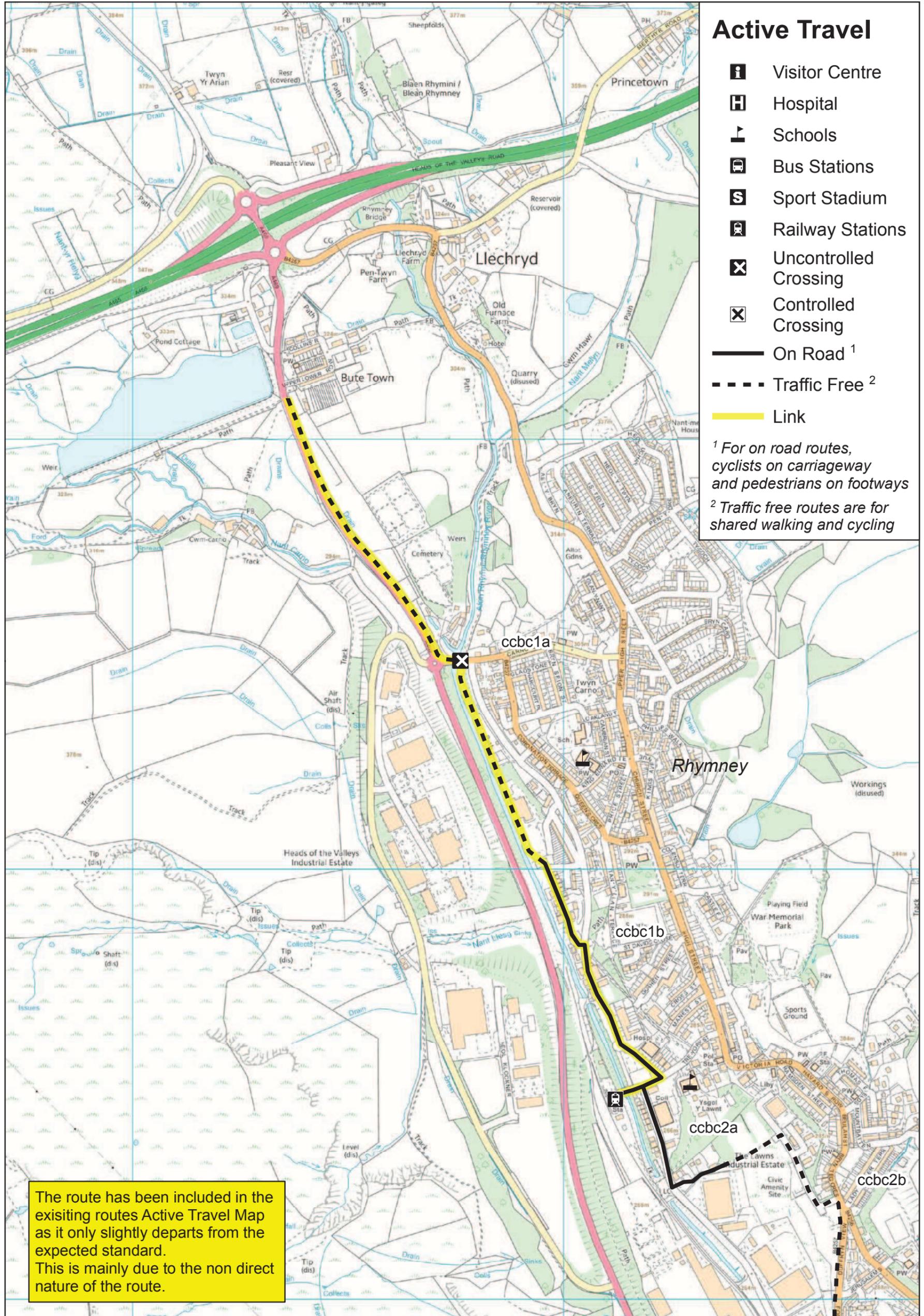
## Active Travel

### Existing Routes Consultation Maps

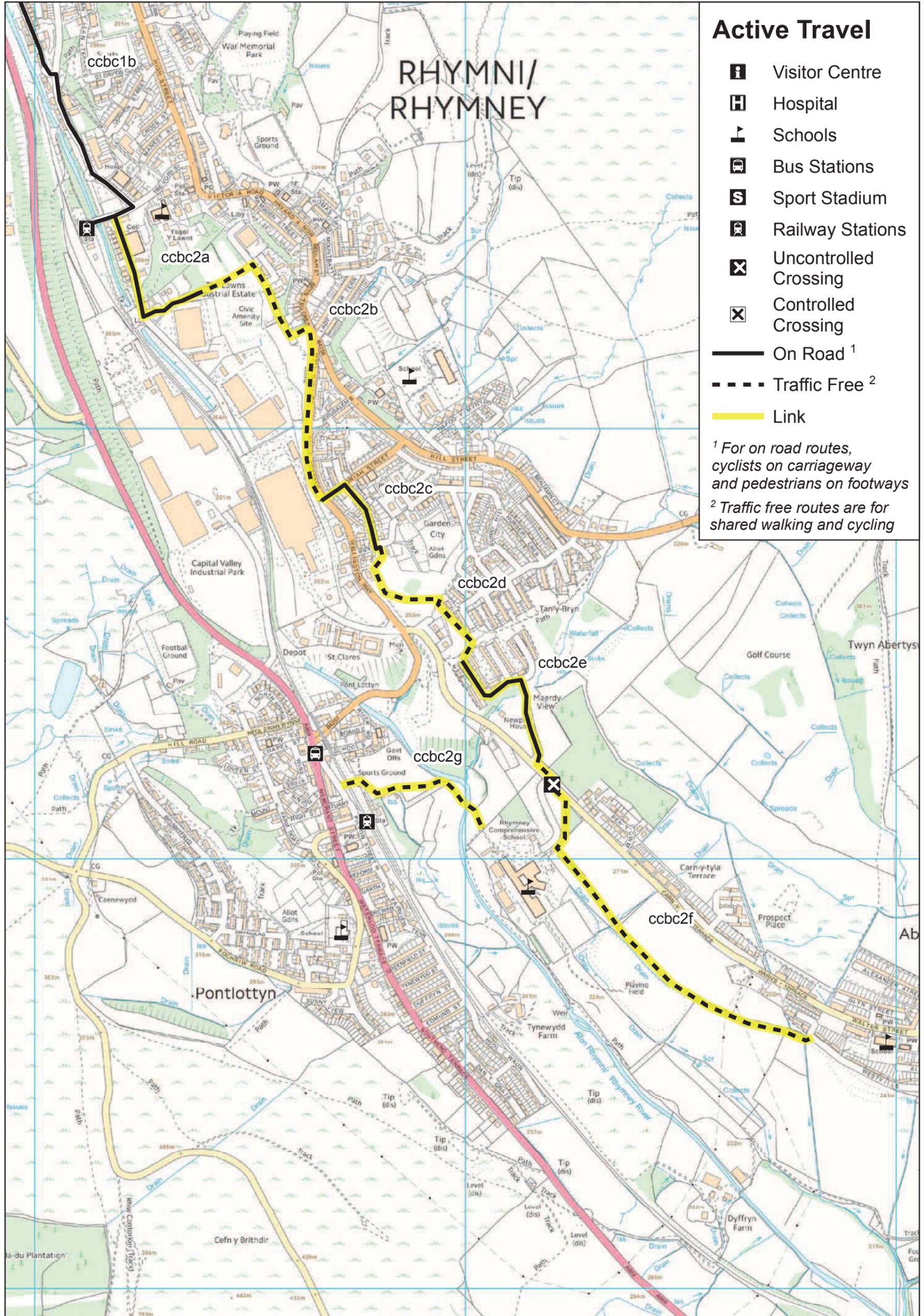
CCBC ID	LINK	Route Name
ccbc1	1	Bute Town to Rhymney Rail Station
ccbc2	2	Rhymney Rail Station to Abertysswg via Rhymney Comprehensive School
ccbc2g	2g	Pontlottyn to Rhymney Comprehensive School (Safe Routes in Communities)
ccbc3	3	New Tredegar North and South to Tirphil Rail Station and Village Centre
ccbc4a	4a	Aberbargoed to Bargoed Rail Station/ Bargoed Town Centre
ccbc4a	4b	Bargoed Rail Station / Town Centre to Pengam
ccbc5	5	Oakdale Business Park to North of Blackwood Town Centre
ccbc6	6	Nelson to Penallta Industrial Park/ Tredomen Business Park
ccbc7	7	Ystrad Mynach Town Centre to Hengoed Rail Station
ccbc8	8	Hengoed Rail Station to Wyllie
ccbc9	9	Ynysddu to Cwmfelinfach
ccbc10	10	Wattsville to Crosskeys
ccbc11	11	Crosskeys via Risca to Pontymister
ccbc12	12	Senghenydd to St Cenydd Comprehensive School
ccbc13	13	St Cenydd Comprehensive School to Caerphilly Town Centre
ccbc14	14	Boundary of Caerphilly along NCN route 4 to Caerphilly Town Centre
ccbc15	15	Caerphilly Town Centre to Machen via Bedwas and Trethomas



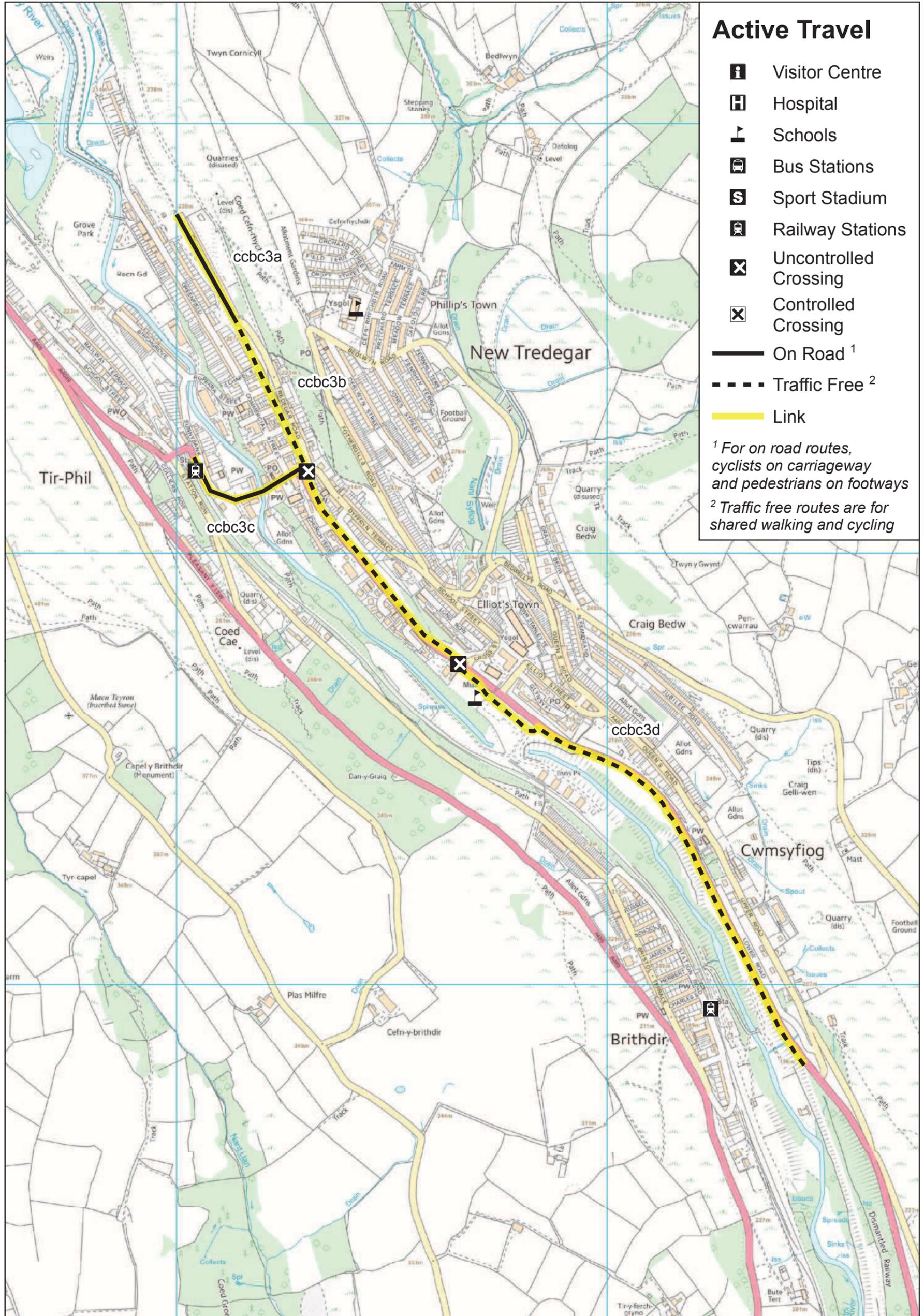
# Link 1. Bute Town to Rhymney Rail Station. Section a and Section b



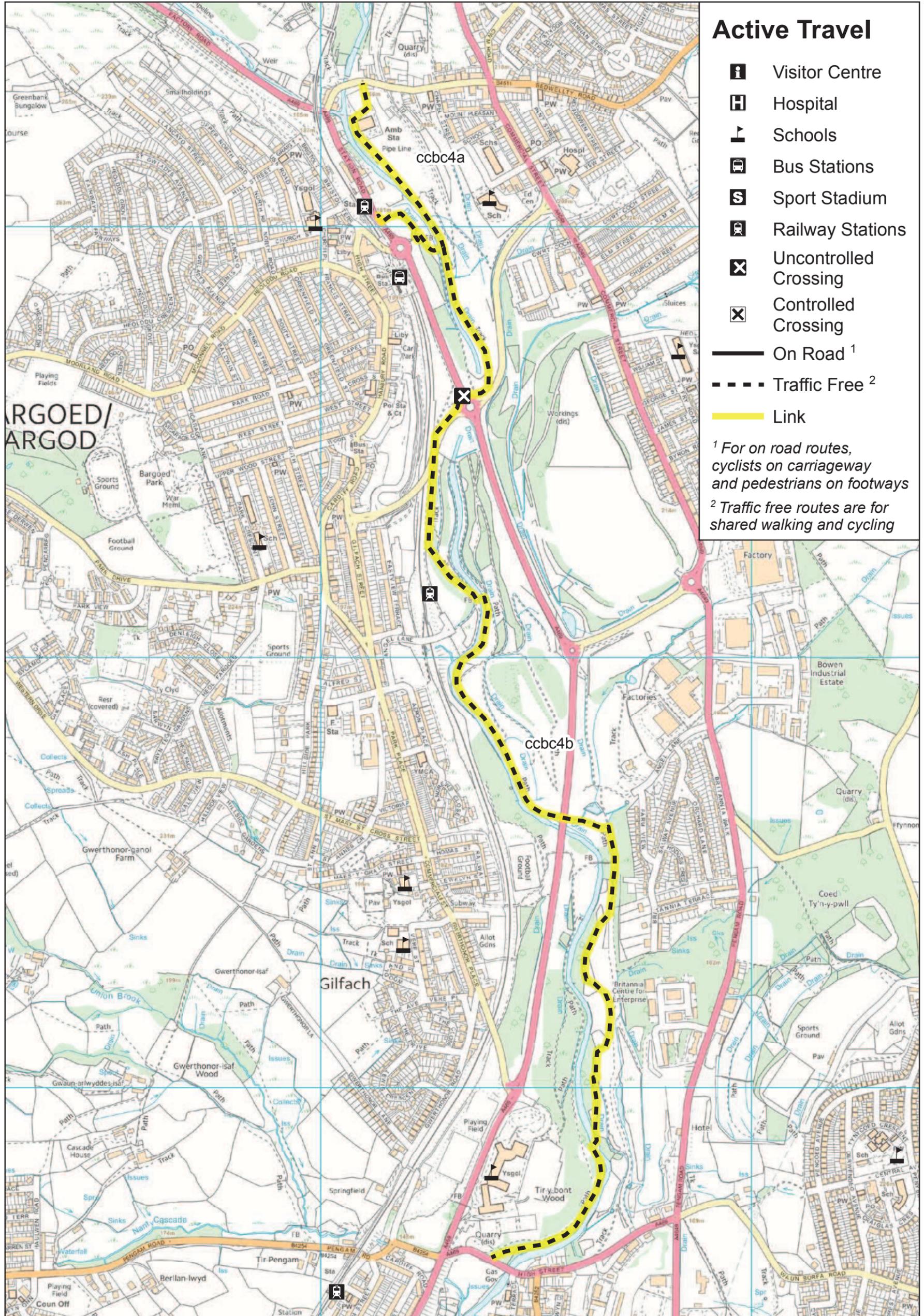
Link 2. Rhymney Rail Station to Abertysswg via Rhymney Comprehensive.  
 Link 2g. Pontlottyn to Rhymney Comprehensive School (SRIC).  
 Sections a to f and Section g



# Link 3. New Tredegar North and South to Tirphil Rail Station and Village Centre. Sections a to d



Link 4. Aberbargoed to Bargoed Rail Station/Bargoed Town Centre .  
 Link 4b. Bargoed Town Centre to Pengam  
 Sections a and Section b

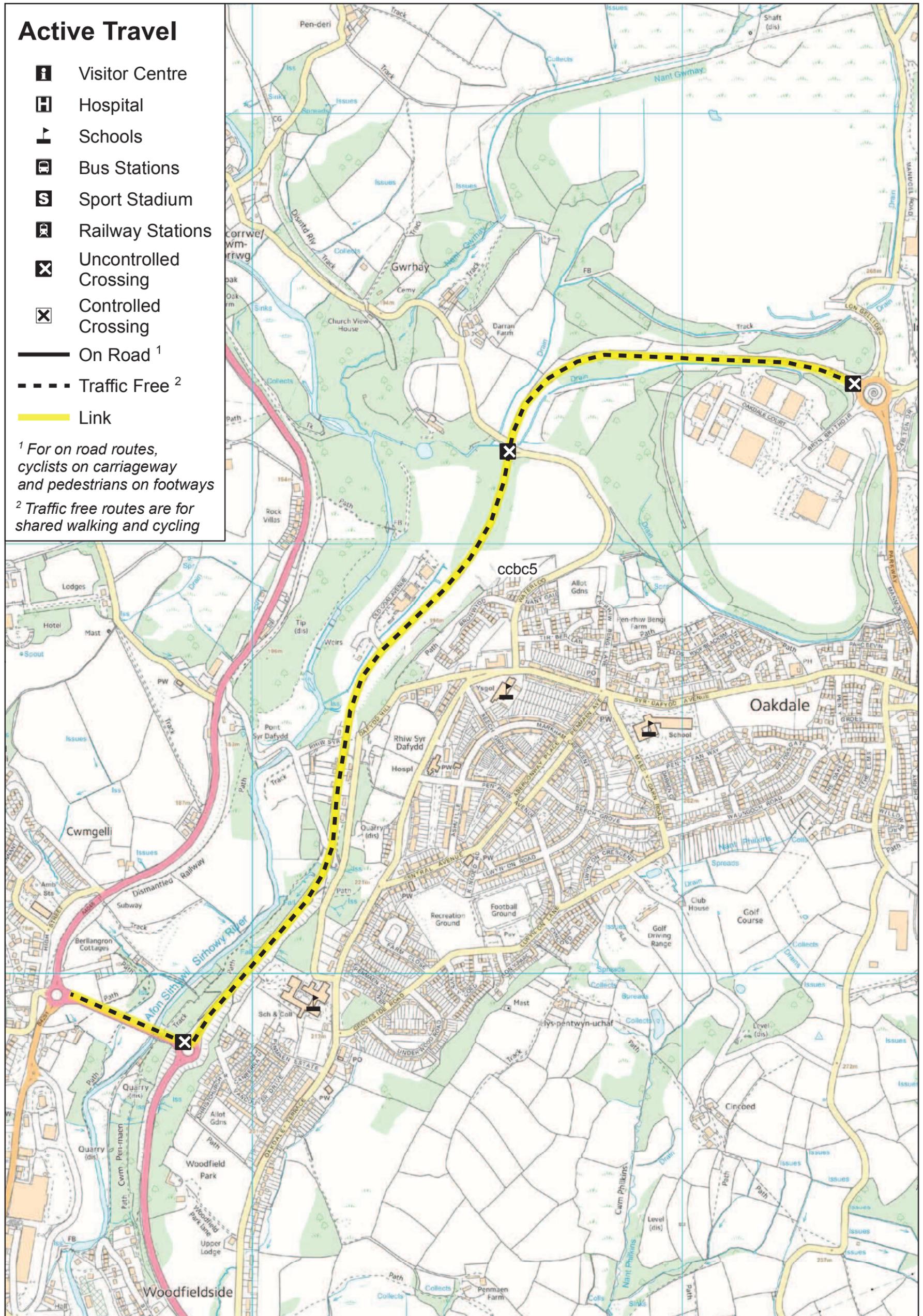


### Active Travel

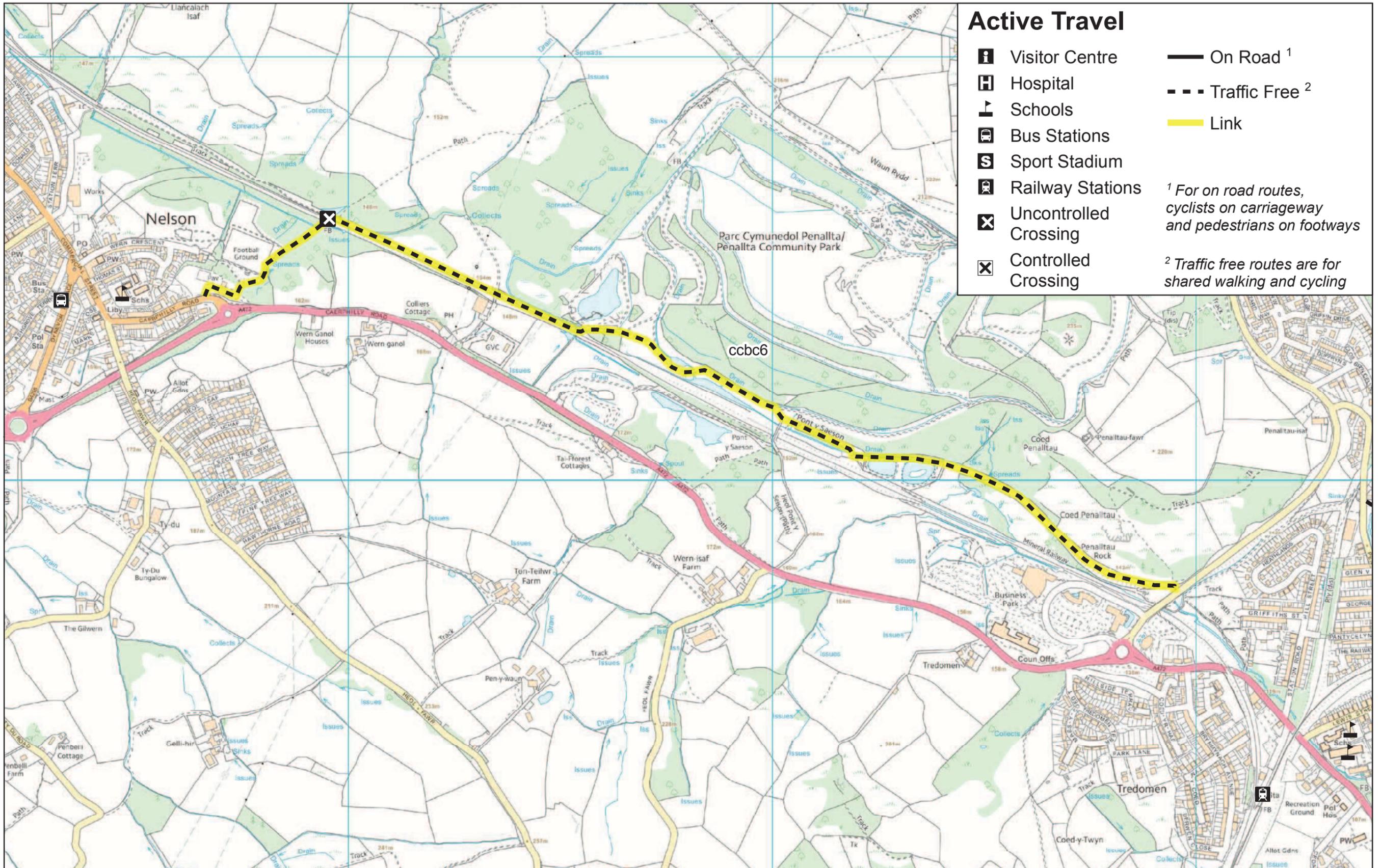
- Visitor Centre
- Hospital
- Schools
- Bus Stations
- Sport Stadium
- Railway Stations
- Uncontrolled Crossing
- Controlled Crossing
- On Road <sup>1</sup>
- Traffic Free <sup>2</sup>
- Link

<sup>1</sup> For on road routes, cyclists on carriageway and pedestrians on footways

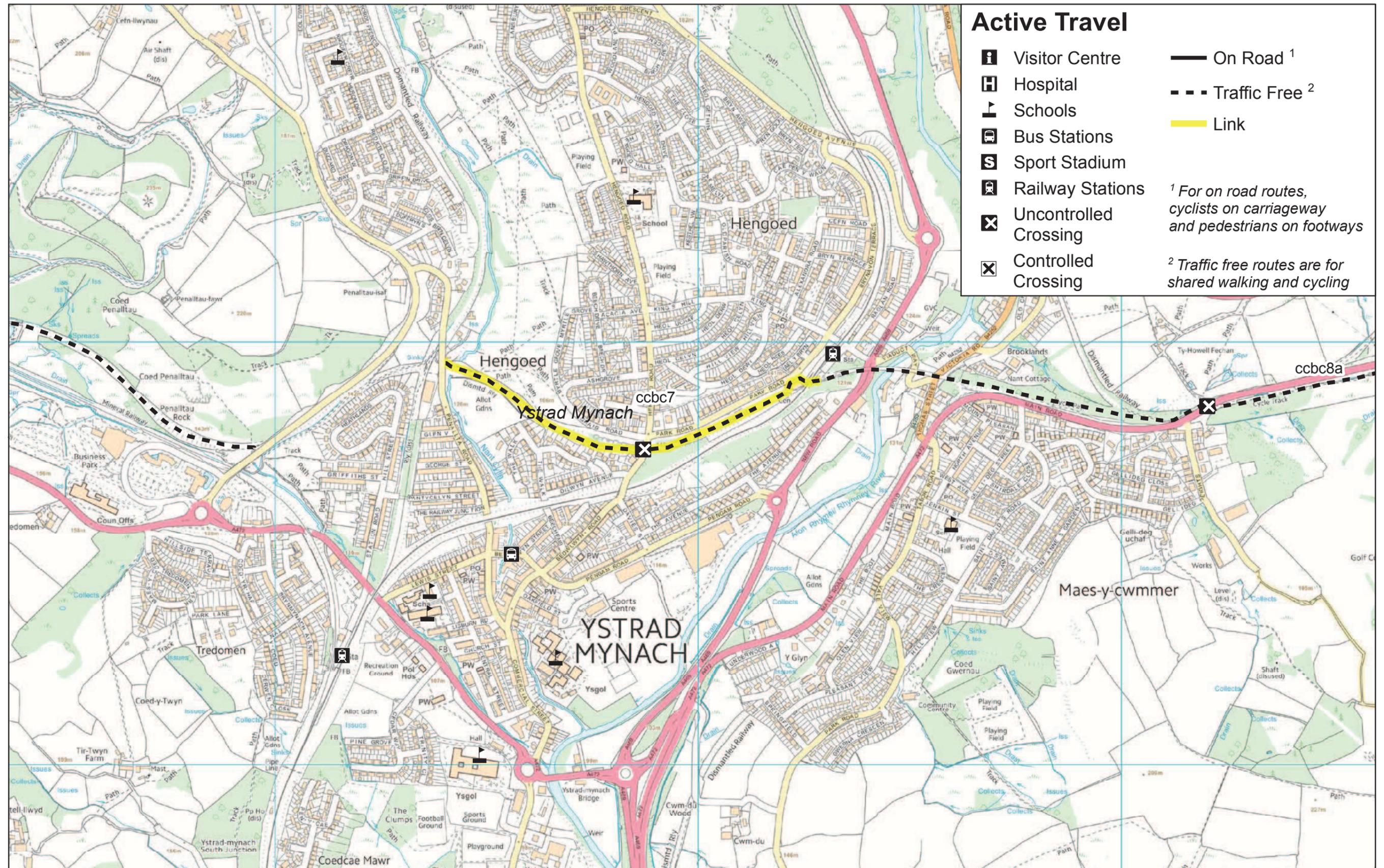
<sup>2</sup> Traffic free routes are for shared walking and cycling



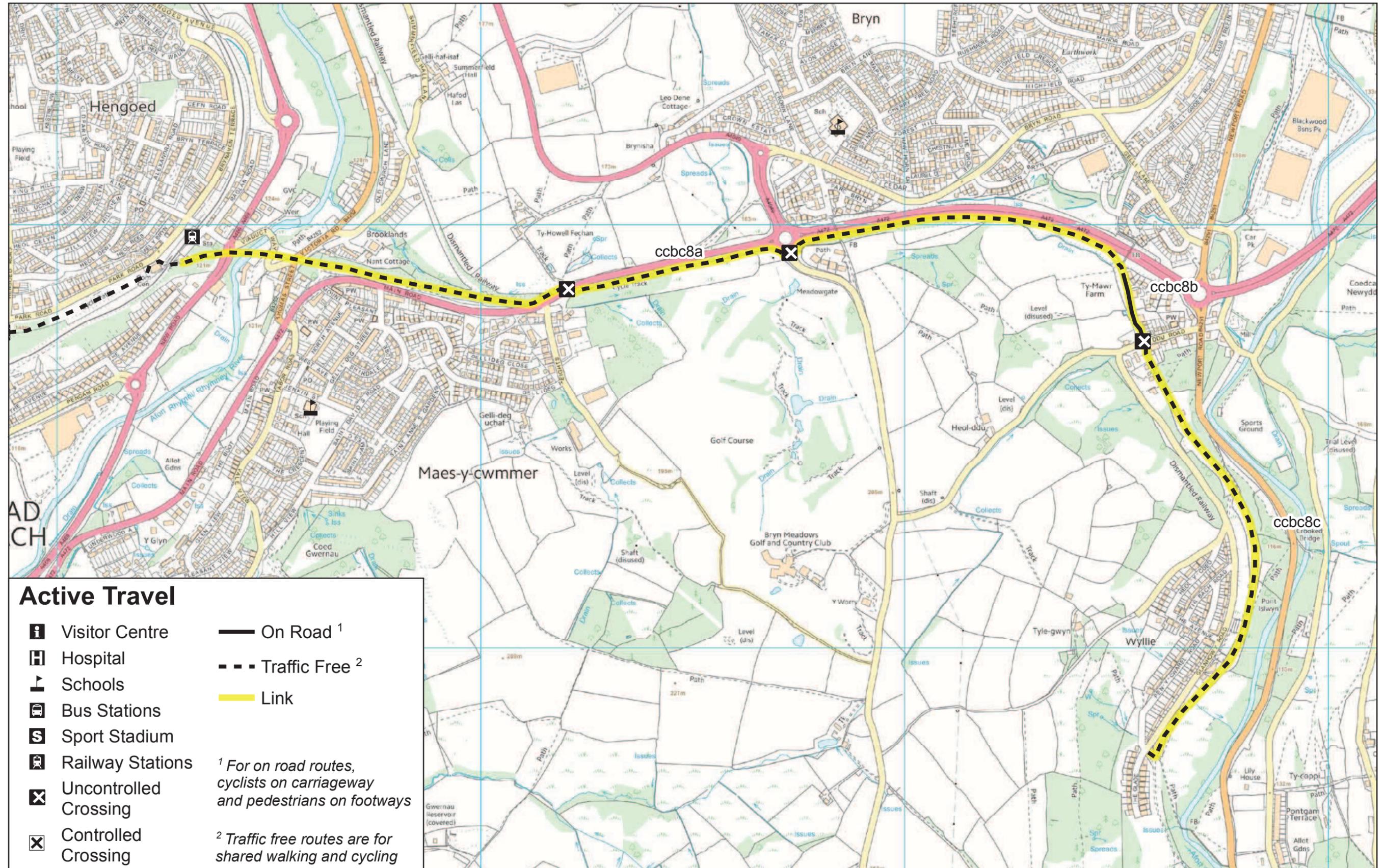
Link 6.  
Nelson to Penallta Industrial Park/Tredomen Business Park.



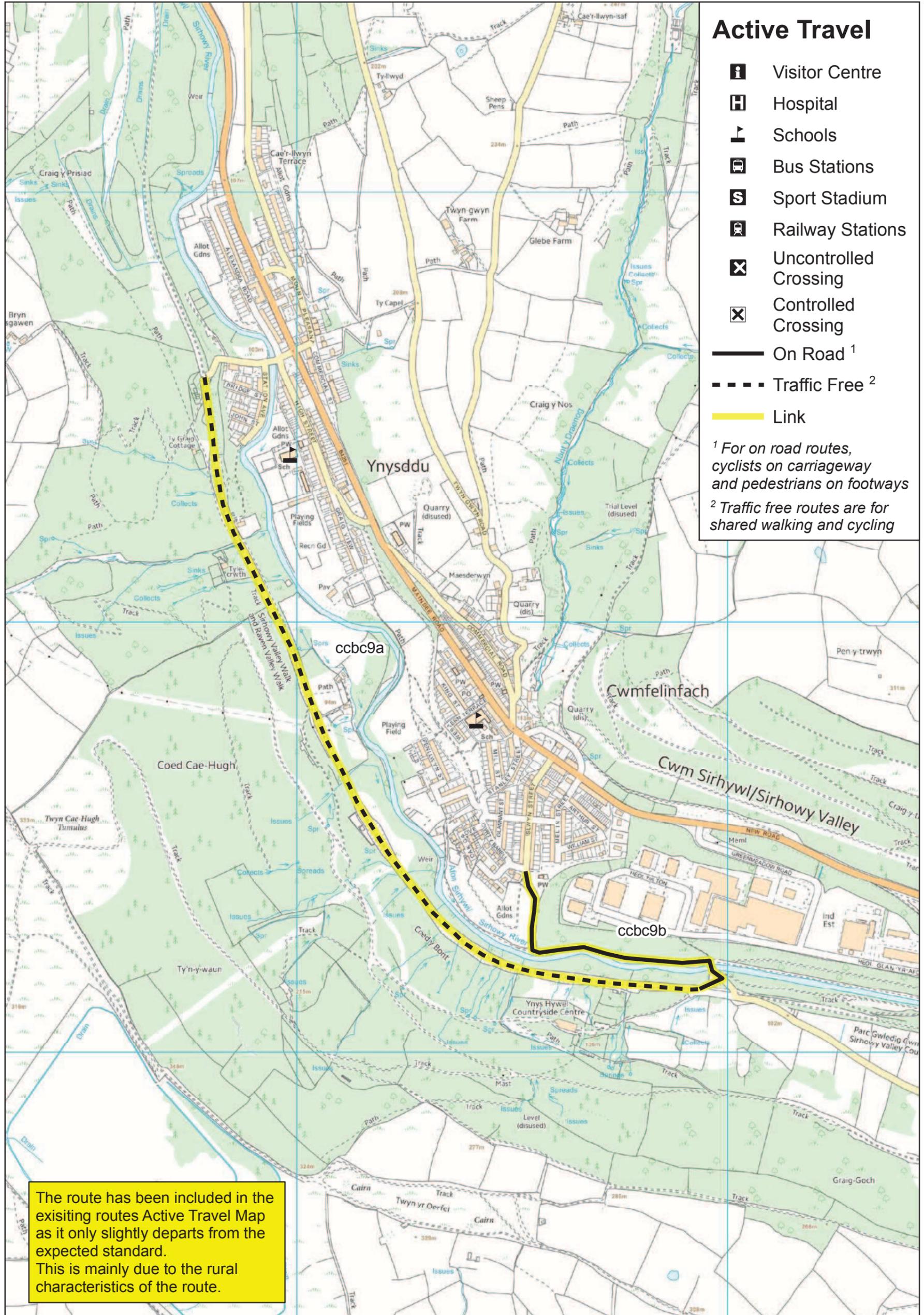
Link 7.  
Ystrad Mynach Town Centre to Hengoed Rail Station.



Link 8. Hengoed Rail Station to Wyllye.  
Section a to Section c



Link 9. Ynysddu to Cwmfelinfach.  
Sections a to Section b

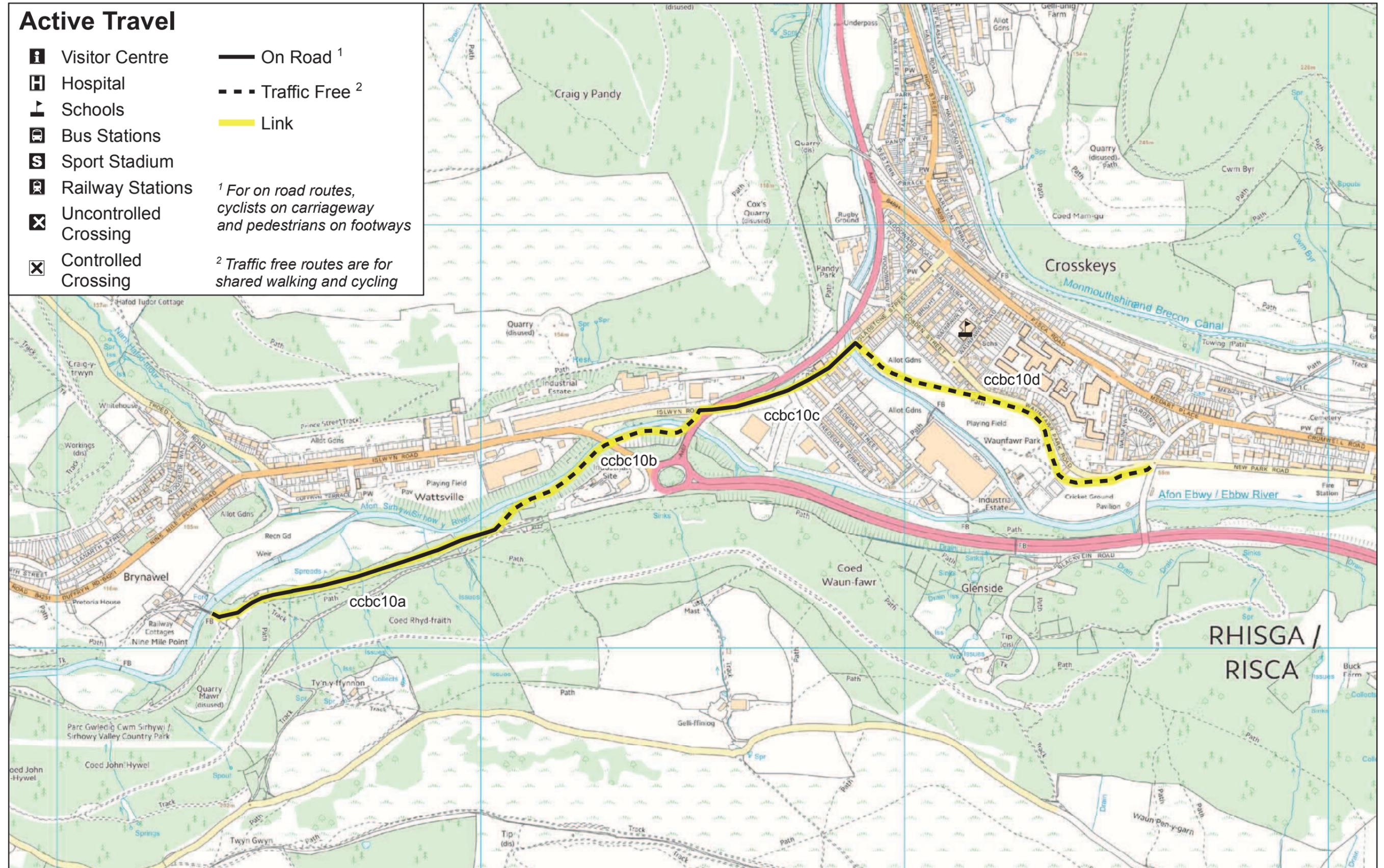


Link 10. Wattsville to Crosskeys.  
Section a to Section d

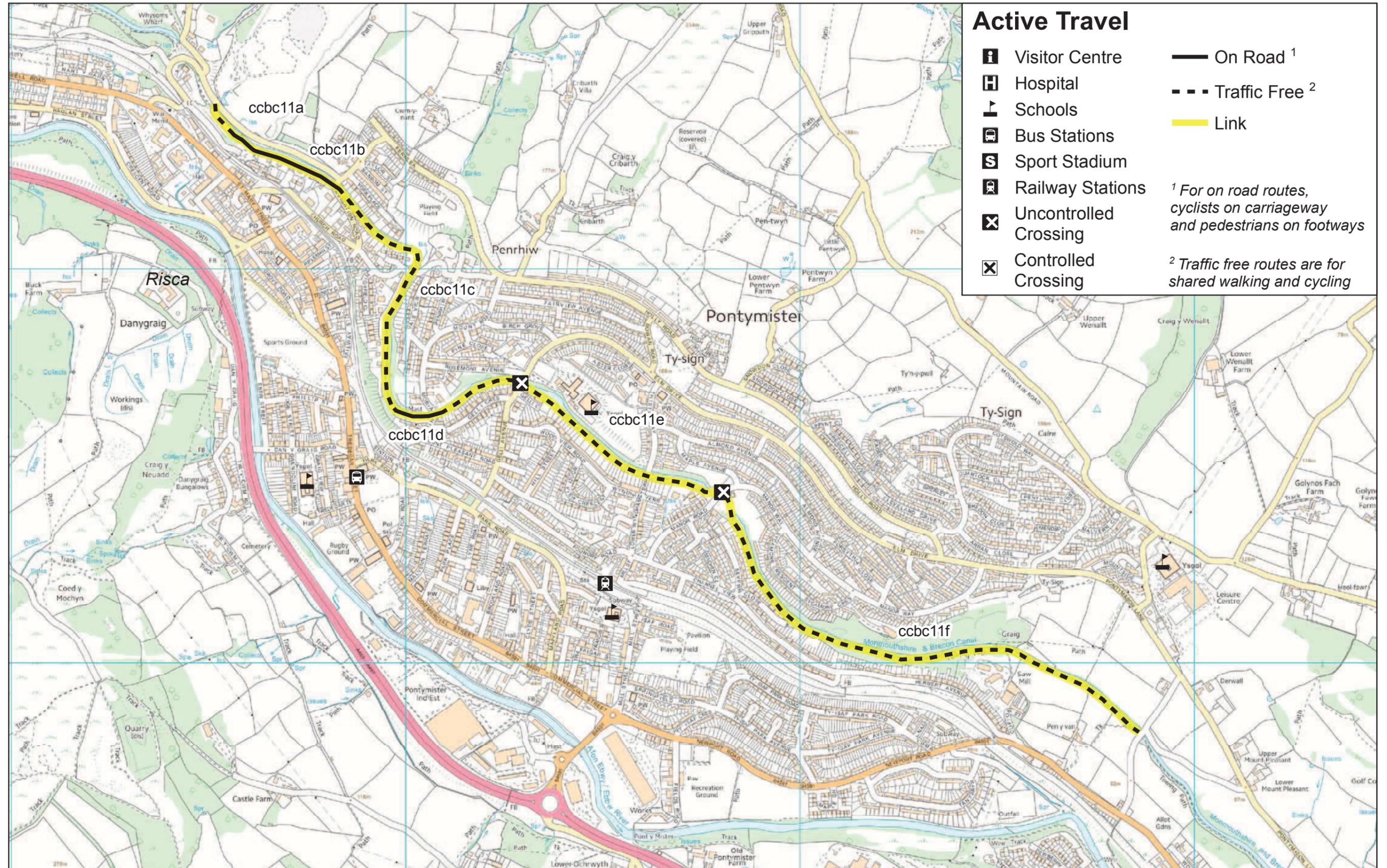


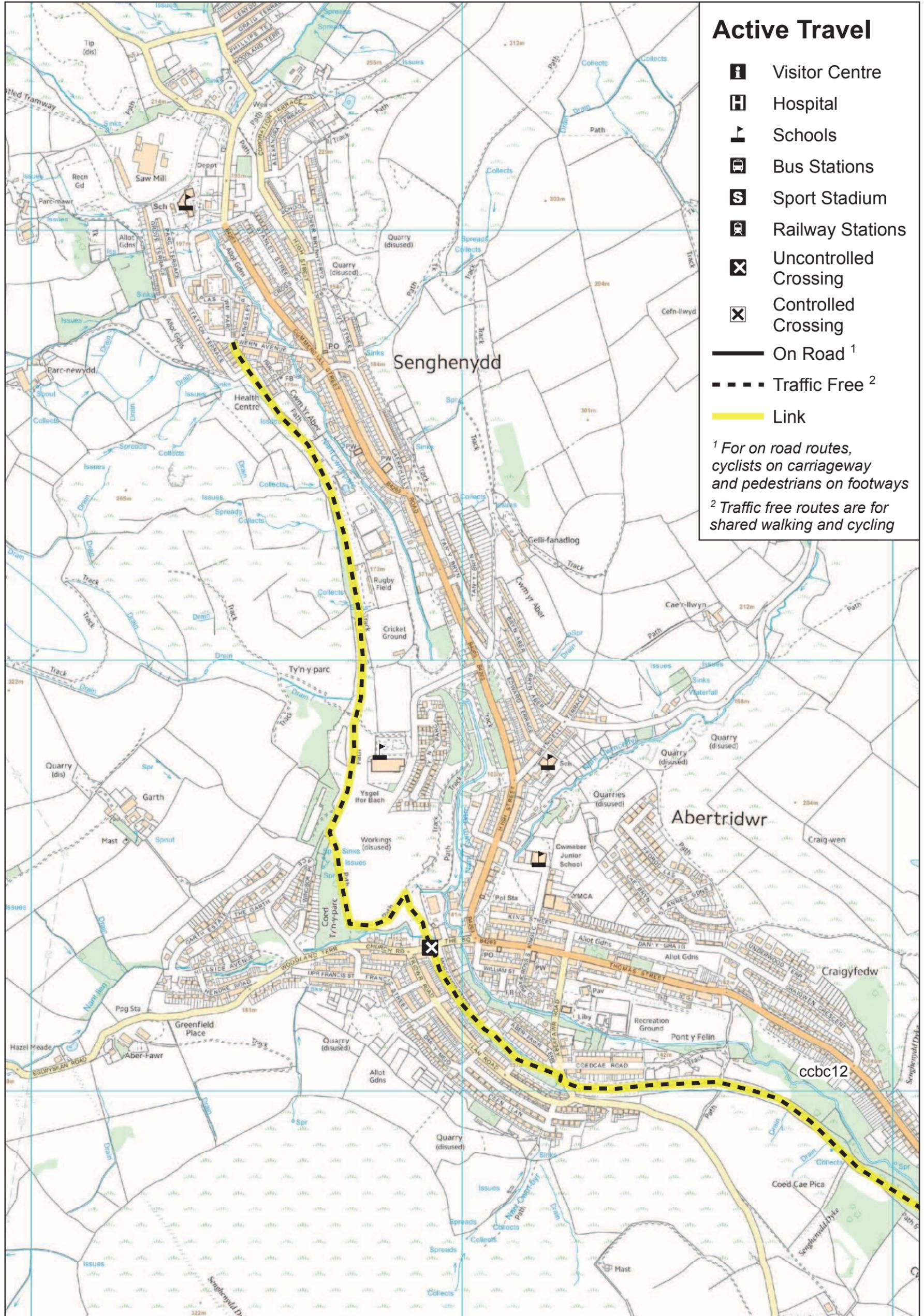
**Active Travel**

- |  |                       |  |  |
|--|-----------------------|--|--|
|  | Visitor Centre        |  | On Road <sup>1</sup>   |
|  | Hospital              |  | Traffic Free <sup>2</sup>  |
|  | Schools               |  | Link   |
|  | Bus Stations          |  |  |
|  | Sport Stadium         |  |  |
|  | Railway Stations      |  |  |
|  | Uncontrolled Crossing |  | <sup>1</sup> For on road routes, cyclists on carriageway and pedestrians on footways |
|  | Controlled Crossing   |  | <sup>2</sup> Traffic free routes are for shared walking and cycling                  |



Link 11. Crosskeys via Risca to Pontymister.  
Section a to Section f



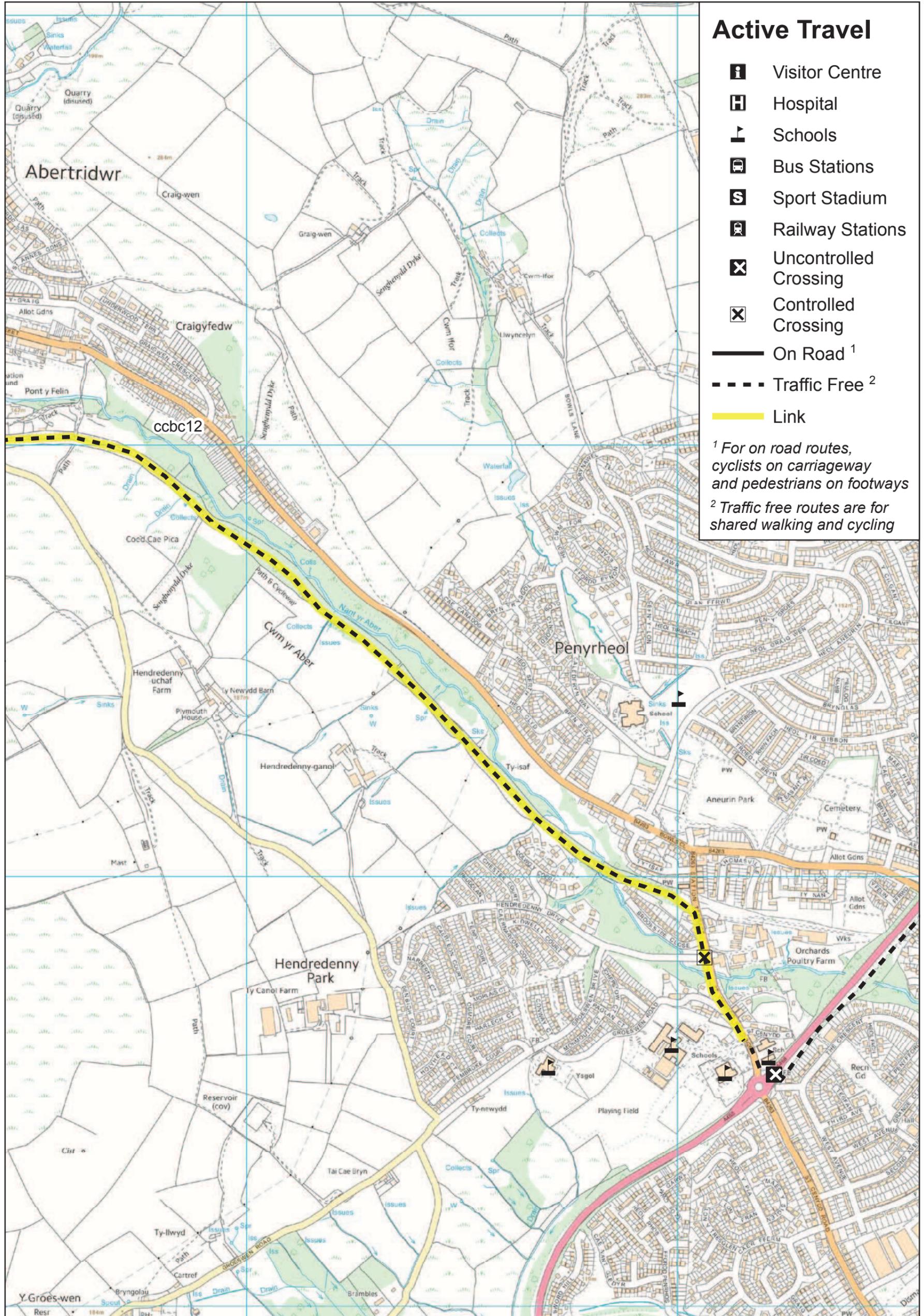


### Active Travel

- Visitor Centre
- Hospital
- Schools
- Bus Stations
- Sport Stadium
- Railway Stations
- Uncontrolled Crossing
- Controlled Crossing
- On Road <sup>1</sup>
- Traffic Free <sup>2</sup>
- Link

<sup>1</sup> For on road routes, cyclists on carriageway and pedestrians on footways

<sup>2</sup> Traffic free routes are for shared walking and cycling



### Active Travel

- Visitor Centre
- Hospital
- Schools
- Bus Stations
- Sport Stadium
- Railway Stations
- Uncontrolled Crossing
- Controlled Crossing
- On Road <sup>1</sup>
- Traffic Free <sup>2</sup>
- Link

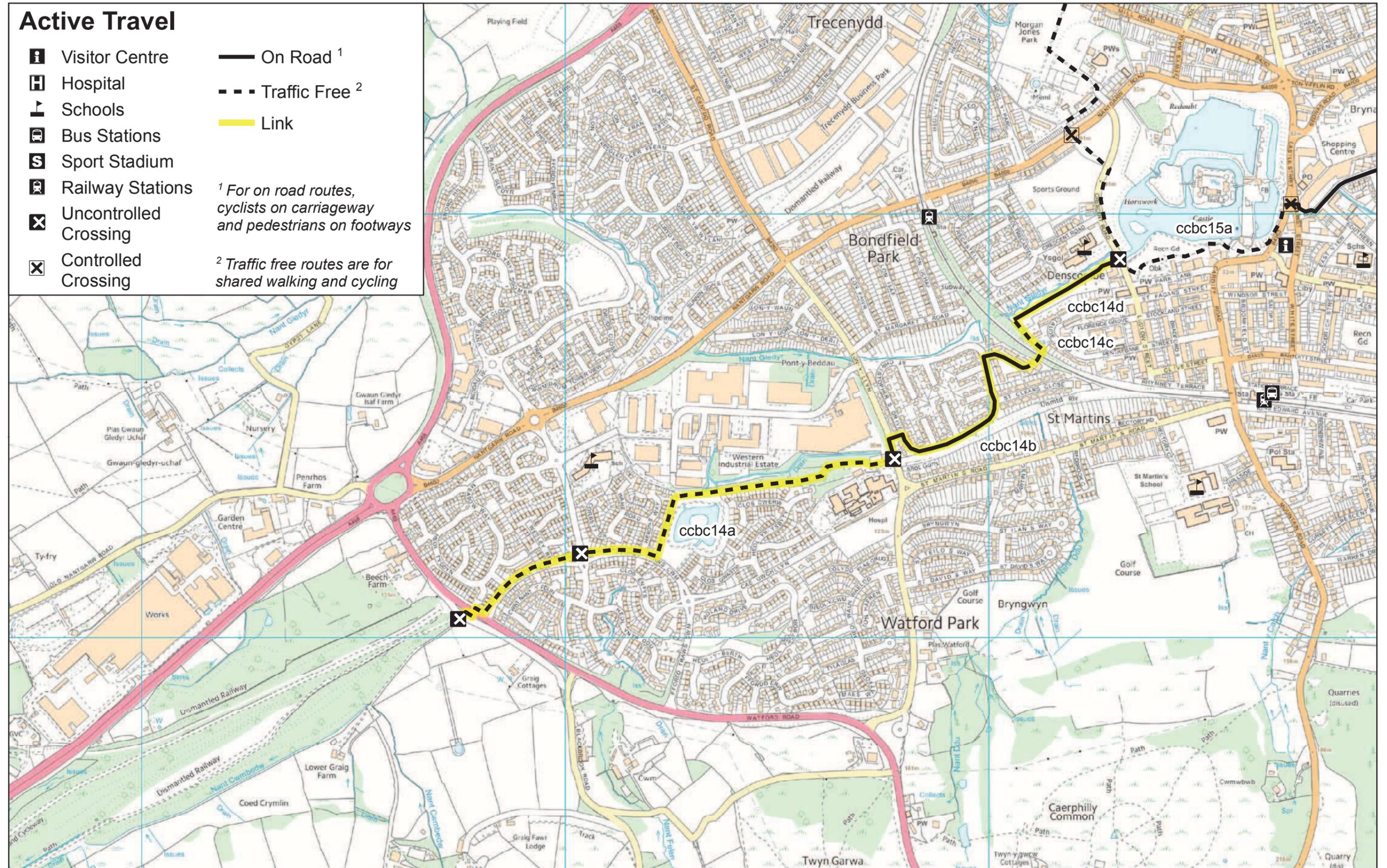
<sup>1</sup> For on road routes, cyclists on carriageway and pedestrians on footways

<sup>2</sup> Traffic free routes are for shared walking and cycling

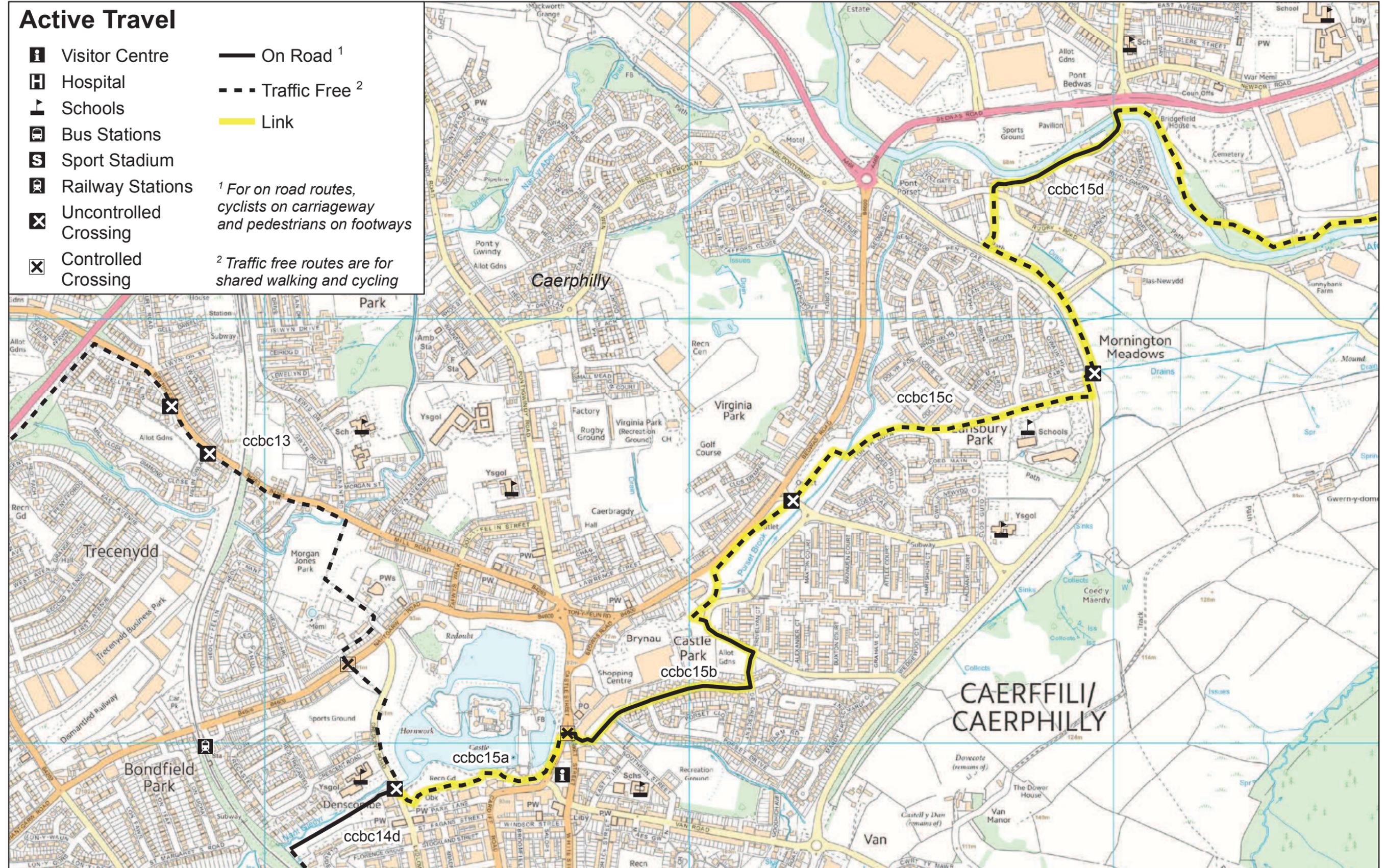
Link 13.  
St Cenydd Comprehensive School to Caerphilly Town Centre.



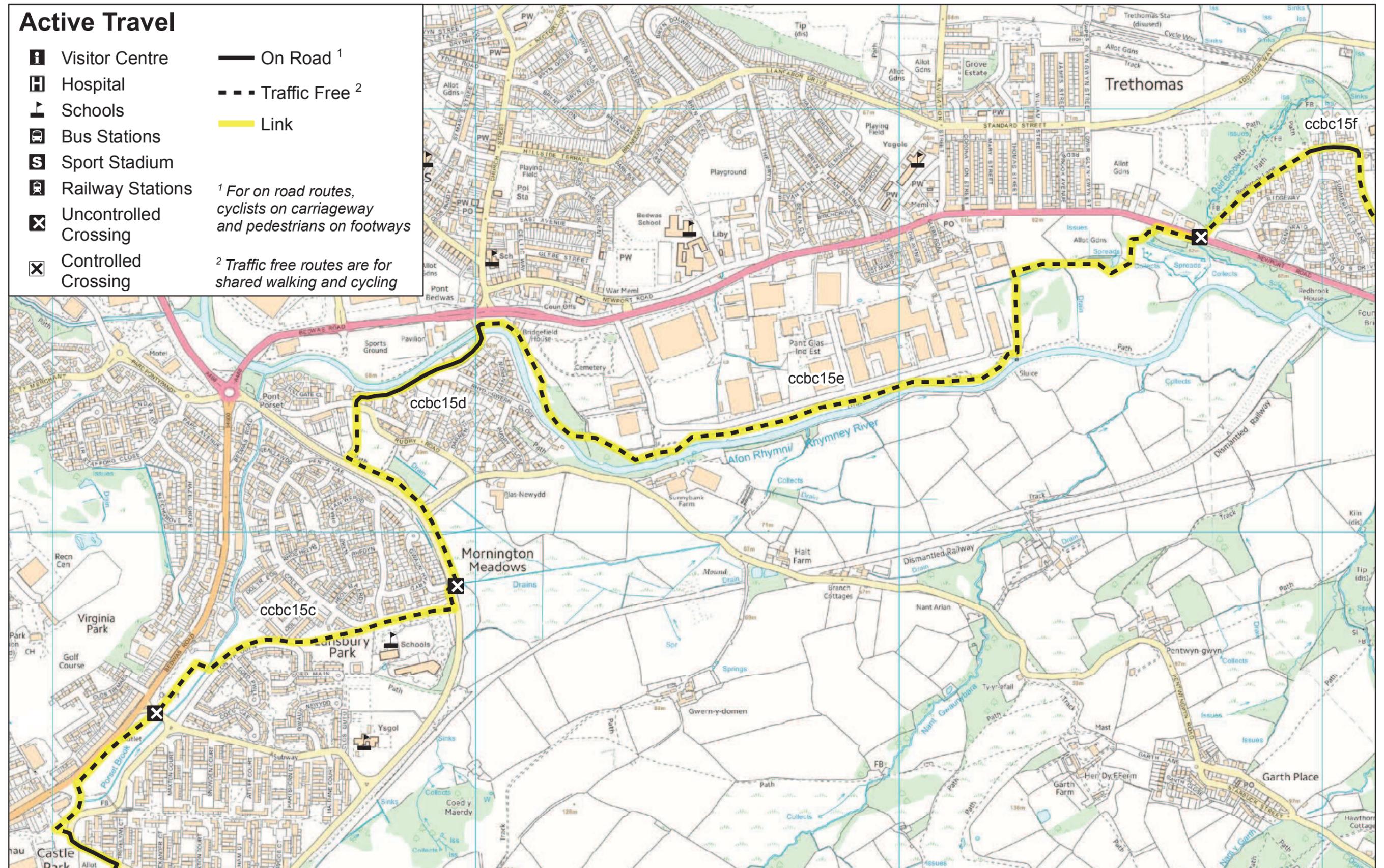
Link 14. Boundary of Caerphilly County Borough along NCN route 4 to Caerphilly Town Centre.  
Section a to Section d



Link 15 (Map 1 of 3). Caerphilly Town Centre to Machen via Bedwas and Trethomas.  
Section a to Section g



Link 15 (Map 2 of 3). Caerphilly Town Centre to Machen via Bedwas and Trethomas.  
Section a to Section g

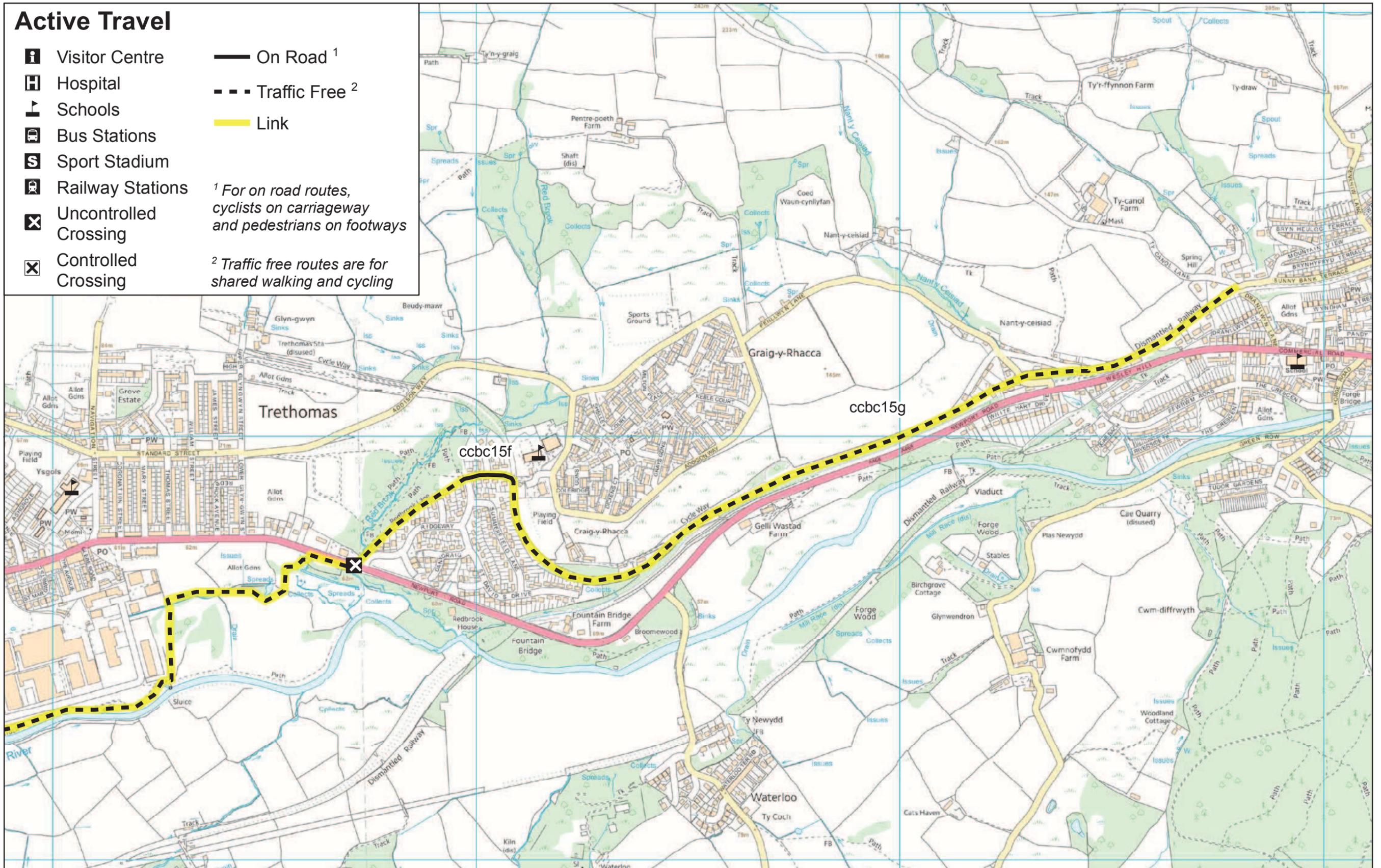


Link 15 (Map 3 of 3). Caerphilly Town Centre to Machen via Bedwas and Trethomas.  
Section a to Section g



**Active Travel**

- |  |                       |  |                           |
|--|-----------------------|--|---------------------------|
|  | Visitor Centre        |  | On Road <sup>1</sup>      |
|  | Hospital              |  | Traffic Free <sup>2</sup> |
|  | Schools               |  | Link                      |
|  | Bus Stations          |  |                           |
|  | Sport Stadium         |  |                           |
|  | Railway Stations      |  |                           |
|  | Uncontrolled Crossing |  |                           |
|  | Controlled Crossing   |  |                           |
- <sup>1</sup> For on road routes, cyclists on carriageway and pedestrians on footways
- <sup>2</sup> Traffic free routes are for shared walking and cycling



## APPENDIX 2

### SUMMARY OF RESPONSES TO THE ACTIVE TRAVEL EXISTING ROUTES CONSULTATION

- 1 The public consultation was live for 12 weeks and included Welsh and English questionnaires being made available to the general public, officers, stakeholders, equalities groups and partners. The location based comments received from the public consultation about the 'Proposed Active Travel Existing Routes Map' refer to 7 of the shared walking and cycling links. Most of the specific comments refer to links numbered 10 to 15.
- 2 Overall 35 respondents completed this questionnaire, of which 80% agreed with the proposed Active Travel existing route maps.
- 3 The main observations made relate to the following:-
  - Restrictions along routes
  - Concerns about journey time delay for cyclists whilst using off-road routes for utility journeys;
  - Use of shared routes in terms of cyclist/pedestrian conflicts (Crosskeys, Risca, and Pontywaun area).
  - One respondent suggested an embellishment to include measured distances/journey times to specific facilities/destinations. This useful suggestion will be considered and taken forward if practicable in the next stage of the route development and the production of the 'Active Travel Integrated Network Map'.
  - Accessibility to cycle paths for wheel chair users and non-standard bicycles: these matters were not specifically identified and respondents are encouraged to contact the Authority to see if their needs can be accommodated.
  - Some general maintenance matters were highlighted which require further investigation.
  - All useful suggestions will inform the next stage, which is production of the 'Active Travel Integrated Network Plan' for Caerphilly County Borough'.

4 Responses received to questions:

4.1 Question 1: 'Do you agree or disagree that the routes we have included are suitable for 'Active Travel'?'

Agree (28)

Disagree (7)

4.2 Question: 2 Please indicate which routes you feel are not suitable for 'Active Travel' and provide your reasons why in the space provided.

COMMENT	RESPONSE
<p>(1) Links from East to West are currently good, but more links are required north to south - especially from Ystrad Mynach to Caerphilly as there is a major gap in this vicinity.</p> <p>(2) Link12: Poor quality surface over some of the route for cycling. Narrow barrier to enter the path at Abertridwr on both sides of the road. Difficult to cross here as dropped kerbs aren't directly opposite cycle route. Glass usually on this route to the north. Route also finishes with no off road route to the centre of Senghenydd. At the south of the route- another barrier prevents disabled access. Shared pavement towards the schools useless- too narrow &amp; have to give way 2 times in a very short period.</p> <p>(3) Link 10 ccbc10d through Waunfawr Park. An Active Travel route is a route that is suitable for commuting by bike. The route through Waunfawr Park is about 3 metres wide. This is not wide enough to allow walkers, cyclists and users of mobility vehicles going in both directions. A cyclist will want to overtake and that will mean diverting onto a grassy area, which over time will ruin the grass. Only a few weeks ago, a cyclist shouted at me for walking on the wrong side of</p>	<p>(1) Noted to be considered in the next phase.</p> <p>(2) A number of maintenance issues have been raised relating to surface quality and glass on the route, these will be passed to the appropriate Officer for consideration/action. The comment on the end of the route is noted and development of the integrated network will permit consideration of improvements to the walking and cycling Active Travel Network. Barriers have been put in place to discourage use by off road motorcyclists. The standard(width) of the route for shared use near St Cenydd School was achieved and doesn't prohibit the route been included as part of the existing routes map.</p> <p>(3) The standard of the shared walking and cycling path through Waunfawr Park met national design standards when constructed and does not prohibit</p>

<p>the path. Signs have been up for months indicating that this is a shared path and all users can use either side in both directions. This cyclist had not read the signs and he was cycling far too fast through a park. If it were ever to be adopted for commuting there would be far more speeding. The path is used a great deal by walkers, cyclists, people using mobility vehicles, parents or grandparents pushing babies and toddlers in prams or push along trikes. It is not suitable for use by someone who wants to get to and from work fast.</p> <p>(4) No routes from Caerphilly Town to Ystrad Mynach / Blackwood etc</p> <p>(5) In the current economical world the money could be spent on better causes.</p> <p>(6) Nearly all of the routes are unlit - this makes them unsuitable for use as a route to and from work for at least 4 months of the year. You cannot expect persons to use a route that may be deemed unsafe point that has been proved in the past.</p> <p>(7) The gradient on many of them also makes them unsuitable for the majority of the population over the age of 35.</p>	<p>the route from being included as part of the existing active travel routes map. The authority will seek to build new infrastructure to the standards contained in the Design Guidance Active Travel (Wales) Act 2013. It is pleasing that the route is well used.</p> <p>(4) Noted - The Authority is looking to develop routes connecting these communities. There are a number of constraints to provision of a safe cycling link that is traffic free.</p> <p>(5) Noted – This is a decision for Welsh Government who fund this initiative.</p> <p>(6) Some of the routes are unlit however the use of a particular route and its safety is a matter of personal choice. Many of the routes are overlooked by the community and a balanced approach is needed in terms of protecting the ecology of an area and providing sustainable infrastructure whilst reducing the carbon footprint where appropriate.</p> <p>(7) Noted.</p>
<p>(8) Link 13 ccbc 13: Poor quality surface, bridge has 20+ steps, again no disabled access using this route.</p> <p>(9) Link 15 ccbc 15a- very narrow shared path, which has signage to indicate that this cannot be cycled &amp; needs to be walked.</p> <p>(10) Link 14 ccbc 14d, poor quality route through car park- not marked, dangerous when car park is busy. Has barrier at exit to car park up a narrow path- impossible to use for inexperienced users without getting off and walking.</p> <p>(11) Link 14 ccbc 14c route then goes under railway bridge- incredibly narrow due to metal barrier that splits walking and cycling routes. Cyclists again advised to walk this route. This then continues on the</p>	<p>(8) Comment on the bridge is noted. The length of route 13 will be reduced to remove the bridge section and will now provide a walking/cycling link from Trecenydd to Caerphilly Town Centre.</p> <p><b>Change to Map</b> - The bridge is not DDA compliant at present.</p> <p>(9) The standard of the route does not prohibit the section being included in the Active Travel Existing Routes Map. However, it should be noted that the traffic free route runs through the Castle grounds and there is little scope to enhance the path.</p>

<p>road through estate- numerous parked cars- dangerous for any inexperienced cyclists.</p> <p>(12) Link 15 ccbc 15b is all on road, unsuitable to be used as an active travel route.</p> <p>(13) Route along the canal towpath in Risca I oppose this route for the same reason that I oppose the route through Waunfawr Park. Additionally it is dangerous because of the canal. When commuting people want to get to and from work fast. Even before this designation there have been huge problems because cyclists speed along the towpath.</p>	<p>(10)The comments are noted. However the section is a small part of the route and the constraints are partially due to the need to negotiate the rail network.</p> <p>(11)The comments are noted (See 10 above).</p> <p>(12)There is a footway for pedestrians and the cyclists are on road. The comments are noted.</p> <p>(13) The standard of the route does not prohibit the section being included in the Active Travel Existing Routes Map.</p>
<p>(14)Link14: ccbc 14a- poor quality route, shared pavement which gives way more than 6 times to minor roads- including a roundabout of which 2 arms have to be crossed.</p> <p>(15)Final crossing onto Taff Trail dangerous as cars doing 40mph+ on A469</p> <p>(16) Link 14 ccbc 14b- as above, poor quality route, on road, have to get off bike due to signage &amp; narrow railway bridge.</p> <p>(17) Link 15 ccbc 15a- route shared with pedestrians, not wide enough-severe climb here makes it unsuitable for learner cyclists. Route then has downhill section with barriers to prevent access again. Have to then walk bike- this is not active travel!</p>	<p>(14)Whilst the route has a number of junctions/crossings The standard of the route does not prohibit the section being included in the Active Travel Existing Routes Map.</p> <p>(15) Crossing of the A469 the speed limit on the A469 has been evaluated and whilst a delay for cyclists may occur crossing the road it is considered to negligible.</p> <p>(16)The standard of the route does not prohibit the section being included in the Active Travel Existing Routes Map.</p> <p>(17)The gradient is for small sections of the route across the Castle grounds and does not prohibit the section being included in the Active Travel Existing Routes Map. Barriers are in place to prevent conflict between fast moving cyclists and pedestrians.</p>
<p>(18) Link 13 ccbc 13- shared pavement- barriers joining route to the west, barriers in Morgan Jones Park. No direct link to crossing on Nantgarw road.</p>	<p>(18) Some physical barriers are put in place to prohibit use by motorbikes.</p> <p>(19)(20)(21) Some barriers are used to discourage and</p>

<p>(19) Link 14 issues with ccbc 14d as above</p> <p>(20) Link 15 issues with ccbc 15a as above</p> <p>(21) Link 15 issues with ccbc 15b as above</p> <p>(22) Link 15 ccbc 15c- low quality surface in parts (tree routes etc)- shared path gets extremely narrow towards Lansbury park- less than 1.5m for bidirectional cycling + pedestrians. Another cycle barrier here that serves no purpose but prevents some disabled/non standard cycle access. Crossing road next to Mornington Meadows dangerous- fast traffic here. Shared pavement not too bad here, as quite wide &amp; foot traffic low.</p> <p>(23) Link 15 ccbc 15d- poor quality surface- speed bumps placed on this surface to restrict car speed- no way to avoid these on bikes. Narrow road- and can be busy due to the pub here. Horrible right turn onto shared cycleway before traffic lights. Again- another cycle barrier to prevent easy access, coupled with a steep incline- not easy for beginner cyclists.</p> <p>(24) Link 15 ccbc 15e- lovely route in general, however cycle barrier to west restricts access. If foot traffic high, then path not hugely wide for cycling. Towards east- path gets quite bendy &amp; reduces speed/access. Just before road- another cycle barrier, preventing access. Crossing road here horrible- fast road &amp; 2 stage crossing. As you join</p> <p>(25) Link 15 ccbc 15f- another cycle barrier- 2 stage so less bad, but still not great. Quality of path surface here awful, lots of tree roots etc- also hardly ever cleared of leaves etc. Seems to have cycle marking on ground- however this has worn away.</p> <p>(26) Link 15 ccbc 15g- Pretty good path, only comment here is that the path ends &amp; you are back onto the road.</p>	<p>prevent inappropriate use by motorised and non-motorised traffic especially where it is impossible to ensure segregation between vulnerable modes. The comments regarding the use of barriers are noted.</p> <p>(22) The critical width for cycle lane single direction is 1.5 metres. The route however is not marked in direction of flow in the cycling area and therefore is considered appropriate width given the volume and flow of cyclists. The walking and cycling routes are segregated. Some physical barriers are put in place to discourage use by motorcyclists accessing the route.</p> <p>(23) The maintenance of the road is monitored by the highways department and officers will be asked to consider if any remediation is necessary. The use of traffic calming is to ensure that vehicle speeds are kept to an appropriate level and enhance the safety for cyclists and other road users. Access to the off road cycle link is restricted by the river bridge and would be difficult to improve. The nature of the route prohibits the reduction in the gradient but is considered acceptable as it is only over a short distance. The cycle barrier aims to discourage use by motorcyclists.</p> <p>(24) The barrier is in place to restrict access for motorcyclists. The winding alignment is due to the topographical constraints along the route. The crossing of the A468 (Principal Road) is not considered to significantly delay the</p>
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	<p>pedestrian/cyclists.</p> <p>(25) The quality/maintenance of the cycle path will be considered by the department and measures considered/taken if practicable.</p> <p>(26) Noted</p>
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4.3 Question 3 Please use the following space for any further comments you wish to make to inform the development of the “Existing Routes”. It would greatly assist us if you provide as much detail as possible.

4.4

COMMENT	RESPONSE
<p>(1) I can only speak of link 14 from Caerphilly boundary to Caerphilly town centre, which is fine. I am unable to cycle to work as there is no safe route within the borough between Caerphilly and Ystrad Mynach - I could cycle up the Taff Trail and back down through Nelson but that doubles the journey</p> <p>(2) I consider that all physical barriers i.e. A frames, K barriers, chicanes etc. should be removed from the existing routes to enable cyclists to travel unimpeded thereby helping to reduce journey times. From my experience illegal off road motorcyclists are still able to access these routes from adjacent areas along their lengths and the barriers present more drawbacks than benefits. Such barriers also present significant challenges/hazards to horse riders and disabled persons in wheelchairs.</p> <p>(3) No comments - I regularly use the Oakdale Business Park to North of Blackwood Town Centre route and it is excellent. My only concern is what happens when the new school is built. The speed of traffic on this road far exceeds the 40mph speed limit.</p> <p>(4) I would like to see an extension of the Penallta-Nelson to Abercynon as there is a large workforce that goes to Abercynon it is also our</p>	<p>(1) The cycle link from Caerphilly to Ystrad Mynach will need to be developed and included in the next stage of the Active Travel Integrated Network. This additional link will be one of the projects progressed and is already included in the South East Wales Valleys Local Transport Plan/Caerphilly LDP.</p> <p>(2) The point made about physical barriers is noted however where installed they been included to address local problems and to ensure where possible the routes for walking and cycling are protected. If access is an issue then users may contact the council to see if their specific needs can be accommodated.</p> <p>(3) Noted. This is the subject of a separate planning application process.</p> <p>(4) The need to provide a dedicated cycle route connecting Networks in Abercynon and Caerphilly is acknowledged. The provision of</p>

nearest sports centre the old railway line still exists as a track and working with RCT, WG and Sustrans this extension is both viable and necessary without too much cost or infrastructure change.

- (5) Many of the routes are on or beside main routes - ideally, the routes need to have some kind of physical segregation from main traffic in order for cars and lorries not to collide with cyclist etc. Appropriate measures need to be taken at uncontrolled crossings.
- It is very encouraging to see different modes of transport promoted in and around the County Borough, especially in areas where poor air quality is prevalent. Residents of the County Borough only stand to benefit from Active Travel both in terms of their health and in terms of the reduction in the number of cars using the roads causing increased levels of noise and congestion / pollution.
- (6) Environmental Health is fully supportive of the Active Travel Routes Maps and would be grateful if you keep us up to date of any new and proposed routes in and around the County Borough especially in the Caerphilly and Crumlin areas where they can be included within the Air Quality Action Plan.
- (7) A bus up to Bryn Aber Abertridwr would be great as it is up on the mountain and its hard to get to the shops and back when you have a disability or illness as the hill is very long and very steep.
- (8) It would be useful to show the links from the main route to the schools in the area for each Link route (map). People usually struggle with the last part of the route if they have to leave the main route to get somewhere when there is no additional guidance. Some people are not very confident with map reading, and thus find it difficult to find the start of the active travel route (even if it's in their local area). Sometimes it's useful to include the postcode or highlight a specific feature or directions to the start, so they know where the route starts. This is also the case when leaving and joining the route mid way,

any route will need to undergo feasibility and be considered in a future LDP and South East Wales Regional Transport Plan.

- (5) The comments on cycle provision are noted. Future development of the cycle network will seek to provide the appropriate infrastructure and be compliant with the guidance provided in the Active Travel Wales Act (2013) where practicable. Support is noted for the development and promotion of cycling and walking networks and their wider environmental and health benefits.
- (6) Support for the development and promotion of cycling and walking networks and their wider environmental and a health benefit is noted. Officers will be informed of new projects in the forward programme of Active Travel Schemes.
- (7) Passed to the Integrated Transport Unit for consideration.
- (8) Development of the Integrated Network Map and how the information is made available the public will be a key activity. It is planned that the 'Active Travel Existing and Integrated Network Maps' will be made available both in electronic and paper based versions that can respond to all needs enabling the public to plan and make informed journeys.
- (9) Response to comments 8 & 9. The inclusion of distances to main destinations and settlements is a useful suggestion and will be included

which people will probably need to do for individual journeys. It would be useful to include distances for the routes for each link, as this would encourage people to use them for active travel and make it easier for them to plan their journeys. The routes could highlight the total distance for the route and/or be broken down into shorter sections to highlight the distance along the route (e.g. (9) Link 7, Hengoed rail station to Ystrad Mynach = ? miles, Ystrad Mynach to Maesycwmmmer = ? miles). If there are other traffic free routes off the main routes for each link, is it possible to highlight them. It might be that they only go for a few miles, but it might be the few miles someone needs to travel and this would highlight other options. They could be added as 'other traffic free routes diverting off the main route'. Is there an option to add additional routes? Looking at the map, there are quite a few areas that don't have any identified Active Travel Routes, such as Newbridge, Blackwood etc. but I'm guessing that there are traffic free routes/ paths in these areas. People will usually travel short distances for active travel to work, school etc. so it's important to identify all routes, especially the short ones.

- (10) Routes need to stop using shared pavements wherever possible. Any routes that do use these really need priority at side Roads; else they will not be as fast as using the road & hence will not be used. Shared paths where the path is narrow only encourages conflict between pedestrians & cyclists, so should not be used. Whilst it might seem good/cheap to route active travel through an estate. These routes are not used with the number of cars we now have on our roads as it becomes quite dangerous especially during school/work commutes. This also makes routes much slower than the direct route (that is usually possible by road). An example would be Morgan Park > Start of Taff Trail, using the road this takes me approx 10 minutes. If I use the provided 'cycle route' it takes 16 minutes almost twice as

where appropriate. The designated cycling/walking routes have not been included where either the community is not subject to the duty or there is no suitable route that the Highway Authority considers should be included in the 'Existing Active Travel Routes Map'. All Active Travel routes must define an origin and destination for the Minister to consider if the route can be adopted as an Active Travel Route, which means WG agrees that the criteria specified in the design guidance is satisfied. The integrated network map will identify where new routes are required or where existing routes not currently meeting the minimum standard require enhancement/or can be included. The duty requires continual improvement.

- (10) Shared use routes that segregate traffic from cyclists have been provided to meet all abilities and because there is often limited road space to reallocate for cycle lanes. The need to provide an on road cycle route would need a feasibility study. The suggestion will receive consideration in the development of the Integrated Network Plan.
- (11) The needs of non standard cycling equipment is difficult to cater for but may be considered in the design phase of new schemes. If access is an issue then users may contact the council to see if their specific needs can be

long. This is due to both the extended length of this route & the fact that I have to give way 10+ times. Nantgarw road easily has enough space to have a separate cycle path/lane on- if the hatching is removed. This would serve many houses- including lots of new build- that currently cannot easily access the current 'cycle path'. Please contact me if you require any pictures/videos, or further thoughts etc.

- (11) I find that any non standard active travel is very difficult in the borough For example I have a bike trailer for small children and can't get through many of the barriers designed to allow bikes through. Equally people with disability and my parents can't lift their bikes through some of the barriers
- (12) Although I understand that this is a mandatory exercise, the Authority seems to ignore the needs of walkers. Waunfawr Park and the canal towpath are used extensively by local people for leisurely walking and for the 30 mins, 5 times a week recommended by health experts. Both locations give people of all ages and even some in relatively ill health the chance to exercise in gloriously beautiful surroundings. Parents and grandparents use these routes to take babies and young children. Speeding cyclists put these in danger. Personnel in the Rights of Way department have been cut so that our extensive network of public footpaths is more overgrown than ever and illegal obstructions are not being addressed quickly. It should not be forgotten that keeping rights of way open and easy to use is also mandatory. The Authority seems to pick and choose which mandatory obligations it supports. (This is not a criticism of the Rights of Way Department, but a criticism of where the Authority puts its resources.) This is another way in, which the rights of walkers is being eroded. Cyclists have had tens, if not hundreds of thousands of pounds spent on them locally in Cwmcarn Forest, but they are not content with this and they use illegal tracks in the forest to speed

accommodated.

- (12) The canal Towpath is part of the National Cycle Network and the Authority permits use by cyclists. The use of any shared infrastructure requires courtesy and the authority has worked will local schools and the community to encourage safe cycling practices. The use of the rights of way network in the forestry and management of cycling behaviours is a matter for National Resources Wales. The Active Travel Wales Act (2013) seeks to encourage sustainable travel as part of everyday journeys i.e a journey made to or from a workplace or educational establishment or in order to access health, leisure or other services or facilities. The use of infrastructure included in the Active Travel Routes map for leisure or exercise will not be restricted.
- (13) The viewpoint is noted. The canal Towpath is part of the National Cycle Network and the Authority permits use by cyclists. The use of any shared infrastructure requires courtesy and the authority has worked will local schools and the community to encourage safe cycling practices.
- (14) The provision of a link from the bowls R/A to the start of the cycle route needs a feasibility study and will be considered in the development of the Integrated Network Plan. The suggestion of new safe route along the

downhill, emerging onto public footpaths and then the canal towpath. When such illegal activity is reported to NRW it is met with a shrug of the shoulders and a wry smile - 'Well, what can you do?' I appreciate that the Authority has little or no influence over NRW, but it could put its foot down and stand up for its non-cycling citizens and say 'It is time that we made sure that walkers rights are protected.'

- (13) The canal towpath from Pontywaun to Crosskeys is a Public Footpath, but the Authority has seen fit to allow cyclists to use it, thus further limiting the rights of walkers to have a stroll in peace. Yet another erosion of places where people can walk without being expected to stand aside for cyclists.
- (14) The Link from Abertridwr Cycle Path at the Bowls (link 12) to St Cenydd needs a dedicated cycle lane as road is very congested at rush hours and the hill slows cyclists down. All existing routes are fine but we desperately need a safe route along the A468 (St Cenydd School to Penrhos roundabout). There is plenty of verge there.
- (15) Ideally a route should be developed to connect NCN Route 4 with NCN Route 47 parallel to the A469 and A468 from Bedwas Bridge to the Cedar Tree roundabout and then past Llanbradach and through to Ystrad Mynach. This would provide greater connectivity to key employment sites at Bedwas Industrial Estate, Dyffryn Industrial Estate, Ystrad Mynach Hospital, Sporting Centre of Excellence and a link to Penallta Industrial Estate, helping to increase journey options and reduce congestion on an extremely busy road network at the Cedar Tree at key travel times during the day.
- (16) Some of the routes are very difficult for disabled people to use. Cycling is fantastic but if you are a novice you cannot cycle on a main road. For me to get to any of the active travel routes I would have to make a car journey first. There are some great walks where I live but again a lot them you have to make a car journey first.

A468 (St Cenydd School to Penrhos R/A is noted and will be considered in the Integrated Network evaluation.

- (15) The link between NCN4 and NCN 47 parallel to the A469 will need to be developed and included in the next stage of the Active Travel Integrated Network plan. This additional link will be prioritised and is already included in the Authorities, South East Valleys Local Transport Plan and Caerphilly LDP. It is also noted that this corridor is congested at present and alternative cycling and walking infrastructure has the potential to alleviate problems during the peak hour.
- (16) Disability needs are an important part of access to sustainable travel routes. The use of cycle barriers has been used to address illegal use by motorised transport and the risks and problems that these modes can create for vulnerable modes. If access is a problem for an individual they are encouraged to contact the Authority to see if their needs can be accommodated. The Active Travel Wales (2013) duty focuses on certain communities. The first part of the duty requires the Authority to identify an existing routes network that meets the standard. The duty focuses on walking and cycling for short everyday journeys. The next stage will consider the 'Active Travel Integrated Network Map' and will consider additional

<p>(17) One of the main observations of these routes is the lack of use as a means of transport to and from work. While they serve a useful purpose as recreational facilities mainly for dog walkers and families with young children they are not used by the lycra clad cyclist. In fact the Lycra clad cyclists will not use them even if adjacent the carriageway a fact that causes unnecessary obstruction to other road users.</p> <p>(18) Not Suitable Link Map 13 Trecenydd R/A footbridge - Shown as uncontrolled crossing. In fact an impossible crossing - unsuitable for wheelchairs, manual or motorised due to type of ramp design. i.e. steps could be altered to provide a slope surface.</p> <p>(19) Changes Omissions from map: - a) Links from Ystrad Mynach College of Further Education to existing NCN4 Cycle path. b) Links from Ysbyty Ystrad Fawr to existing NCN4 Cycle path.</p> <p>(20) Link 12 1/2 - No link to Ysgol Ifor Bach to Cycle Path even though it passes its front door.</p> <p>(21) Link 13 - No link to Plasyfelin School, Cwrt Rawlin School both of which are very close to existing cycle path. Also nothing to Castle View Estate using subway under B4600 Nantgarw Road. Caerphilly.</p> <p>(22) Map 15 Existing Trethomas - Machen Cycle path. – Not marked from entrance top of Upper Glyn Gwyn Street to entrance by Signals feature on Ridgeway/Nr Graig y Rhacca School.</p> <p>(23) I think that the plans show a very good network that if developed will provide a safe environment for many people.</p>	<p>routes in these communities.</p> <p>(17) The observation regarding current use of the routes is noted. The Design Guidance Active Travel (Wales) Act 2013 encourages the Authority to designate cycle and walking routes that are assessed to comply with the standard and the designated journey purposes. These routes are considered to connect residents with workplaces, transport interchange, services and facilities. The conditions are specific and all of the routes have been assessed against the criteria. The Act aims to be inclusive and develop a Network to provide for all abilities. There will be many cyclists that feel confident about using the existing road network and the duty is not about discouraging this activity.</p> <p>(18) The observation regarding the bridge along route 13 is noted. Route 13 will be reduced to remove the bridge section and will now provide a walking/cycling link from Trecenydd to Caerphilly Town Centre. The bridge is not DDA compliant at present.</p> <p>(19) The links suggested are useful in the development of the Integrated Network Map. (Subject to funding availability).</p> <p>(20) Will be considered in the development of the Integrated Network Map (subject to funding availability).</p> <p>(21) Will be considered in the development of the Integrated Network Map (subject to funding</p>
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	<p>availability).</p> <p>(22) Will be considered and included in the Integrated Network Map (subject to funding availability).</p> <p>(23) The positive comment on the network is noted.</p>
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**ACTIVE TRAVEL CONSULTATION DISTRIBUTION LIST INCLUDING  
PARTNERS/ EXTERNAL/INTERNAL STAKEHOLDERS**

**INTERNAL STAKEHOLDERS**

- Corporate Director for Communities
- Caerphilly CBC Heads of Service
- Caerphilly County Borough Ward Members
- Community and Town Councils

**INTERNAL / EXTERNAL GROUPS VIA CO-ORDINATORS**

- Howard Rees – Programme Manager for Partnership Development & Collaborative Improvement
- Jackie Dix – Policy & Research Manager – Voluntary Sector Liaison Committee
- Simon Dixon - Disability Access Officer - Caerphilly Disability Access Group
- Alison Palmer - Community Planning Co-ordinator
- Tina McMahon - Community Regeneration Manager
- Mandy Sprague - Development Officer for Older People
- Clare Jones - Children & Youth Partnership
- David A Thomas - Senior Policy Officer (Equalities & Welsh Language)
- Paul Cooke Team Leader, Sustainable Development & Living Environment

**LOCAL GOVERNMENT (LAs & bodies in the S E Wales Valleys)**

- Cardiff City Council
- Monmouthshire County Council
- Newport CC: City Council
- Merthyr County Borough Council
- Blaenau Gwent County Borough Council
- Torfaen County Borough Council
- Rhondda Cynon Taff County Borough Council

**PUBLIC SECTOR & STATUTORY BODIES**

- Brecon Beacons National Park Authority
- Cadw Welsh Government
- The Crown Estate
- Natural Resources Wales
- Welsh Water

**HEALTH AND EDUCATION SECTOR**

- Coleg y Cymoedd
- Aneurin Bevan University Health Board
- Abertawe Bro Morgannwg University Health Board

- Cwm Taf University Health Board
- University of South Wales
- Health Challenge Wales
- Planet Health Cymru

#### **RAIL OPERATORS**

- Arriva Trains Wales
- First Great Western
- Network Rail

#### **PRINCIPAL BUS OPERATORS**

- NAT Group
- First Cymru
- Stagecoach in South Wales

#### **COMMUNITY TRANSPORT ORGANISATIONS**

- Community Transport Association (Wales)

#### **EQUESTRIAN ORGANISATIONS**

- British Horse Society

#### **MOTORCYCLING ORGANISATIONS**

- British Motorcyclists Federation

#### **CYCLING ORGANISATIONS**

- Cyclists Touring Club (Cymru)
- Sustrans Cymru
- Wheels for Wellbeing

#### **ROAD ORGANISATIONS**

- Freight Transport Association (Wales)
- RAC Foundation
- South Wales Trunk Road Agency
- **WALKING ORGANISATIONS**
- Ramblers Cymru

#### **PUBLIC TRANSPORT USER & INDUSTRY ORGANISATIONS ORGANISATIONS REPRESENTING BUSINESSES**

- Confederation of British Industry (Wales)
- Federation of Small Businesses (Wales)
- Institute of Directors (Wales)
- South Wales Chamber of Commerce

#### **ENVIRONMENTAL GROUPS**

- Canal and River Trust
- Friends of the Earth Cymru
- Groundwork
- Living Streets

- Open Spaces Society
- The Wildlife Trust of South & West Wales
- Woodland Trust

#### **MISCELLANEOUS**

- The National Trust
- Railway Paths
- Campaign for Better Transport
- Wales TUC

#### **PROTECTED GROUPS UNDER EQUALITY ACT**

- Action on Hearing Loss Cymru
- Age Cymru
- Age Concern Morgannwg
- Bi Cymru
- Bridges Into Work
- Caerphilly CB Access Group
- Deafblind Cymru
- Dewis Centre for Independent Living
- Disability Can Do
- Disability Wales
- Guide Dogs
- Menter Iaith
- National Bureau for Students with Disabilities
- Race Council Cymru
- Rhondda Cynon Taf Access Group
- Royal National Institute of Blind People Cymru
- Sea Cadets
- Snap Cymru
- Stonewall Cymru
- Wales Council for Deaf People
- Wales Council for Voluntary Action
- Work Clubs
- YMCA
- Yr Urdd

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## REGENERATION AND ENVIRONMENT SCRUTINY COMMITTEE – 8TH DECEMBER 2015

**SUBJECT: PUBLIC CONSULTATION ON WASTE MANAGEMENT, HIGHWAYS AND ENVIRONMENTAL MAINTENANCE SERVICES**

**REPORT BY: CORPORATE DIRECTOR – COMMUNITIES**

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### **1. PURPOSE OF REPORT**

- 1.1 To provide members with the results of the biennial survey of the Authority's key frontline services including refuse collection, waste disposal, environmental cleansing and streetscene maintenance.

### **2. SUMMARY**

- 2.1 Every two years the Community and Leisure Division (formerly Public Services) undertakes a survey to assess how well we deliver our frontline environmental services. As part of the process we also gauge opinion on what residents perceive as priority environmental matters.
- 2.2 High levels of satisfaction have been maintained for 2015 and these results compare favourably with those of previous surveys. This is reassuring given that the Authority has implemented a number of changes to key services and demonstrates that we are continuing in the right direction to meet the needs and aspirations of our residents.

### **3. LINKS TO STRATEGY**

- 3.1 Public consultation is a key element of how the Community and Leisure Division shapes its services and determines priorities. This ensures that we meet the needs and aspirations of our customers whilst at the same time delivering services that are effective and efficient. This ethos fits in with the "Caerphilly Delivers-Single Integrated Plan" with its aims of contributing to a Greener Caerphilly, a Safer Caerphilly and a prosperous Caerphilly.

### **4. THE REPORT**

- 4.1 In order to meet the aspirations and needs of our residents and to provide even better services, we asked the public what they think about:
- The quality of their local environment.
  - The range of services that we deliver.

#### The Survey

The survey took place in August/September 2015. Questionnaires were sent to a random selection of 1500 residential addresses covering properties in all wards of the County Borough. (The survey was available to all on line too).

There were 382 completed questionnaires received equating to a response rate of 25.5%.

### Response Rates

Year	Returns	% Returned
2005	336	22.4%
2007	450	30%
2009	400	26.6%
2011	418	27.9%
2013	424	28.3%
2015	382	25.5%

### Taking the Holistic Approach

In the early years of our survey work questions focussed on waste collection and cleansing matters. However, over the years as departments have joined together our surveys have become more comprehensive and encompassing. It is worth noting that holistic approach is in line with what the WAO Wales Audit Office has previously commented on seamlessness.

Developing on this “joined up” approach a series of questions on highways, transportation and engineering have been included in this years form. In this way we have covered the key aspects of the streetscene across the County Borough.

### Levels of Satisfaction and Service Importance

Residents were asked to indicate how satisfied or dissatisfied they are with our services. They were also asked to rate the importance of services.

### Waste Management

It is encouraging to see that satisfaction levels for the waste management services have remained high again although in comparison with the previous survey they have dropped slightly. This is possibly attributable to a number of changes and refinements to our collection and disposal services: e.g. the introduction of charging for green garden waste sacks and the implementation of strict site user policies at our Household Waste Recycling Facilities has been the subject of lively debate. Indeed this is evidenced by the feedback received from staff currently undertaking the “Seven Sins” Recycling Awareness Campaign.

### Satisfaction Rates for Waste & Associated Services

Function	Importance	Satisfaction	
	2015	2015	2013
Refuse Collection	98.1%	92.7%	95.1%
Street Cleansing	95.3%	77.3%	75.2%
Recycling	93.2%	91.4%	95.0%
Food Waste Caddy Collection	77.4%	77.9%	87.9%
Garden Waste Green Sack Collection	79.7%	73.4%	85.6%
Civic Amenity Household Waste Recycling Sites	84.9%	74.3%	86.1%
Public Conveniences	77.1%	46.6%	48.1%
Grass Cutting & Weed Control	84.4%	63.3%	70.0%

### Recycling Collections

Year	Satisfaction Level
2007	84.2%
2009	88.2%
2011	94%
2013	95%
2015	91.4%

The satisfaction level for weekly kerbside recycling collection service compares favourably with previous years results.

### Recycling Container

When we asked about satisfaction with the type of container provided for recycling more than 90% of respondents were satisfied (only 2% were dissatisfied with their container). With all the debate about recycling targets and collection systems, we also asked the public about the possibility of changing collection methods to systems involving source segregation of methods with boxes and sacks. Although, some thought source segregation was a good idea, the vast majority of respondents were against change and some commented adversely about several of the Welsh coastal local authorities where source separation schemes operated.

### Garden Waste (Green Hessian Sack) Collections

Year	Satisfaction Level
2007	78.7%
2009	77.2%
2011	81.6%
2013	87.0%
2015	73.4%

The introduction of weekly garden waste collection services (operating all year round) has previously resulted in a steady improvement in satisfaction levels. The trend has not continued this year and we have witnessed a slight down turn in satisfaction levels. This may be attributable to the introduction of a charging policy for the green hessian sacks.

### Grass Cutting & Weed Control

There has been a drop in satisfaction levels (from 70% to 63%) this year and this may be attributable to the reduction in the grass cutting frequency and/or that conditions may have been more favourable for vegetation growth this year.

### Street Cleansing

From the survey results the public regard Street Cleansing as the second most important service we provide (refuse collection was regarded the most important). So it is reassuring that the satisfaction levels for street cleansing had actually improved on those of the 2013 survey.

Year	Satisfaction Level
2007	73.6%
2009	73.4%
2011	69.4%
2013	75.2%
2015	77.3%

Developing on this the public were asked what their priority cleanliness issues are. Yet again, *food on the go* (fast food) litter and *dog fouling* were the top two matters of concern. It is worth noting that fly tipping, cigarette ends and chewing gum were also perceived as major problems too.

### Town Centres

82.2% were satisfied with the general cleanliness of their local town centre.

### Parks & Play Areas

67% of the public were satisfied with the condition of your local park/play area. Coincidentally, this mirrors the satisfaction level in 2013.

### Civic Amenity/Household Waste Recycling (CA/HWR) Sites

Year	Satisfaction Level
2007	79%
2009	77%
2011	82%
2013	87%
2015	74%

The Authority presently operates a network of 6 CAHWR sites which are located across the County Borough. Since the last survey in (2013) there have been a number of major changes to operations. Significantly, this includes the implementation of a strict site user policy which prohibits traders and larger vehicles using the sites. As part of new procedures a permitting system has been introduced to ensure that our sites are not abused and are there simply for the residents of our County Borough to recycle and dispose of their excess wastes. In addition, working hours have been rationalised resulting in each site being closed for at least 1 day of the 7 days per week. These measures could have contributed to a slight downturn in satisfaction levels with this function.

### Highways, Transportation & Engineering Services

This is a new element of the survey and it was noticeable that although satisfaction levels were generally lower than waste services their importance to the public was very high. The difference in satisfaction levels is probably due to the fact that the waste services are delivered weekly to all properties 52 weeks of the year. Highways services on the other hand, are arguably not as on 'the doorstep' as much as the Authority's collection teams.

### Highways Transportation & Engineering Importance & Satisfaction Levels

Function	Importance	Satisfaction
Road Surfaces (pothole repair)	93.7%	53.5%
Pavement Surfaces	93.1%	67%
Street Lighting (lantern replacement)	88.7%	81.8%
Winter Maintenance (gritting)	92.1%	72.4%
Walking and Cycling Routes (for active travel)	74.9%	62.9%
The Local Rail Service Overall	74.5%	70.1%
The Provision of Rail Park & Ride	69.8%	65.7%
The Provision of off Street Parking	81.8%	55.7%
Pedestrianised Areas	81.5%	71.1%

At this juncture we have no comparable data to review however, there is some interesting information that we can consider. A positive outcome in the highways question was that when asked about carriageway surface treatments 68.2% were satisfied with work undertaken. This information is food for thought and provides a baseline for future comparison and in the meantime allows us to think about where we can target resources and reshape our services.

## **5. EQUALITIES IMPLICATIONS**

5.1 There are no significant equalities implications associated with this report.

## **6. FINANCIAL IMPLICATIONS**

6.1 There are no financial implications associated with this report.

## **7. PERSONNEL IMPLICATIONS**

7.1 There are no personnel implications associated with this report.

## **8. CONSULTATIONS**

8.1 The views of the consultees where appropriate have been reflected in the report.

## **9. CONCLUSION**

9.1 This years satisfaction levels have been maintained although there has been a slight dip in satisfaction across the board with the noticeable exception of cleansing which has improved in trying conditions. Two services that have experienced a drop in satisfaction levels are garden waste collections and CAHWR sites. It is possible that implementing certain MTFP measures in these functions have affected results. However, on a positive, satisfaction levels have remained high in the key kerbside collection services. This is important because they are the functions that people see and expect every week of the year.

It is also worth mentioning that since the Authority's last survey in 2013, two Welsh Government commissioned surveys have been undertaken which reveal that Caerphilly is standing out amongst other Councils in Wales. For example, in the *2013 National Survey of Wales* Caerphilly came top of all the Local Authorities for i)provision of high quality services and ii)top for the way it informs local people about how they are performing. In the *2014 National Survey of Wales*, Caerphilly had an 88% satisfaction level for its recycling service (the highest in Wales).

So Caerphilly can continue to be proud of its frontline functions although, there is still room for improvement. To this end the customer satisfaction results and more importantly the comments received will be taken on board and will help us shape our services accordingly and ensure we remain a citizen focussed and caring service provider.

## **10. RECOMMENDATIONS**

10.1 Members are asked to note the contents of this report.

## **11. REASONS FOR RECOMMENDATIONS**

11.1 To ensure that service delivery meets the needs and aspirations of our Council tax payers where that aspiration is affordable.

## **12. STATUTORY POWER**

12.1 Highways Act 1980, Environmental Protection Acts 1990, Local Government Act 2000.

Author: Rhodri Lloyd, Special Projects Officer  
Consultees: Christina Harray, Corporate Director - Communities  
Mark Williams, Head of Community & Leisure Services  
Councillor Nigel George, Cabinet Member  
Terry Shaw, Head of Engineering Services  
Tony White, Waste Strategy and Operations Manager  
Derek Price, Parks and Outdoor Facilities Manager  
Clive Campbell, Transportation Engineering Manager  
Graham Parry, Operations Group Manager  
Hayley John, Principle Waste Management Officer



## GRANTS TO THE VOLUNTARY SECTOR PANEL

MINUTES OF THE MEETING HELD AT PENALLTA HOUSE, TREDOMEN PARK  
ON WEDNESDAY, 15TH JULY 2015 AT 5.00 PM

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### PRESENT:

Councillor Mrs G. Oliver - Chair  
Councillor R. Gough - Vice Chair

### Councillors:

L. Ackerman, H.A. Andrews, Mrs A. Blackman, C. Cuss, D. Havard, A. Lewis, K. Lloyd,  
R. Saralis and E. Stenner.

### Together with:

S. Harris (Interim Head of Corporate Finance), D. Roberts (Principal Group Accountant -  
Financial Advice and Support), G. Elliot (Communities First Finance Assistant), C. Evans  
(Committee Services Officer).

### 1. APPOINTMENT OF CHAIR

Councillor Mrs Gaynor Oliver was appointed Chair of the Committee for the ensuing year.

### 2. APPOINTMENT OF VICE CHAIR

Councillor Robert Gough was appointed Vice Chair of the Committee for the ensuing year.

### 3. APOLOGIES

Apologies for absence had been received from Councillors D.G. Carter and M.J. Prew

### 4. DECLARATIONS OF INTEREST

Councillors H.A. Andrews, C. Cuss and K. Lloyd declared an interest in Agenda Item 5,  
Appendix 2 (Applications for Financial Assistance). Details of the declarations are recorded  
with the relevant item.

### 5. MINUTES – 18TH MARCH 2014

The Panel received and approved the minutes of the Grants to the Voluntary Sector Panel  
held on 18th March 2014 (minute nos. 1 - 4; page nos. 1 - 3).

## 6. REVISION OF CRITERIA FOR FINANCIAL ASSISTANCE

In the form of an interactive group discussion and training session Members considered the criteria for financial assistance and were afforded the opportunity to suggest alternative categories and allocations wherever appropriate.

Members considered the criteria and various categories and sought further information on the award of grant to individuals representing Wales at home and individuals representing Wales abroad. Members queried the current process of only awarding one grant in each financial year to such individuals. It was pointed out that if an individual receives a grant for representing Wales at home (£130) and then represents Wales abroad later in the same financial year then they would not be entitled to a further grant. Conversely, if an individual only represents Wales abroad during the year they would receive a single grant of £250. Following discussions it was agreed that individuals representing Wales should receive maximum funding of £250 in a single financial year. In circumstances where individuals represent Wales at home initially they would be entitled to a grant of £130 and if they then go on to represent Wales abroad later in the same financial year they would be entitled to a top-up grant of £120.

Following consideration and discussion it was moved and seconded that Members recommend to the Interim Head of Corporate Finance that the revised set of criteria be approved under delegated powers.

Members noted that an additional training session would be scheduled for the next meeting.

## 7. APPLICATIONS FOR FINANCIAL ASSISTANCE

### 7.1 Statement of Expenditure

Members noted the budget available for 2015-2016 as £72,614.36, which included the estimated reduction for Discretionary Rate Relief and budget carried forward. If all awards in the report are agreed the remaining budget would be £61,124.36.

### 7.2 Welsh Church Act Fund

Members noted the Welsh Church Act Fund applications received and approved by officers since the last meeting in accordance with the agreed criteria as set out in Appendix 4. The total allocated amounts to £6,356.67.

Members noted the process and the information contained within the report.

### 7.3 Applications for Financial Assistance: Panel Awards

Members were asked to consider the applications listed in Appendix 1 to the report and to make appropriate recommendations to the Interim Head of Corporate Finance for approval.

RECOMMENDED that the following applications for financial assistance be referred to the Interim Head of Corporate Finance for approval under delegated powers:-

	£
(a) SYDIC	£200.00
(b) St Andrews Church, Penyrheol	£200.00

Members discussed the application relating to Lower Machen Festival and it was noted that Lower Machen was not within the Caerphilly County Borough boundary. Officers agreed to clarify this and, depending on the outcome, either award or decline the grant.

RECOMMENDED that the following application for financial assistance be referred to the Interim Head of Corporate Finance for approval under delegated powers, subject to further information.

(a)	Lower Machen Festival	£ £200.00
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#### 7.4 Applications for Financial Assistance: General Criteria Awards

Councillor H.A. Andrews declared an interest in application 15/GC023 – Gilfach Old People’s Welfare Committee and 15/GC039 – Gilfach Old Age Pensioners Association due to involvement with both groups.

Councillor C. Cuss declared an interest in application 15/GC018 – Ael-Y-Bryn Table Tennis Club due to close family membership and;

Councillor K. Lloyd declared an interest in application 15/GC020 – Trinant and Pentwyn Allotment as a plot owner.

Members noted the applications received since the last meeting, as listed in Appendix 2, which are in accordance with the agreed criteria and to be processed by officers.

The meeting closed at 5.47 p.m.

Approved and signed as a correct record subject to any amendments agreed and recorded in the minutes of the next meeting.

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CHAIR

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## **BARGOED TOWN CENTRE MANAGEMENT GROUP**

### **MINUTES OF THE MEETING HELD AT PENALLTA HOUSE, TREDOMEN PARK ON WEDNESDAY, 7TH OCTOBER 2015 AT 4.00 P.M.**

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PRESENT:

Councillors:

H. A Andrews, K. James, D. Price, K. Reynolds

Together with:

V. Stephens, H. Llewellyn, D. Morgan (Town Councillors)

Also:

Inspector Muirhead (Gwent Police), Mr. Peter Collins (Bargoed Chamber of Trade), A. Highway (Town Centre Development Manager), S. Wilcox (Assistant Town Centre Manager), A. Dallimore (Team Leader - Urban Renewal), P. Hudson (Marketing & Events Manager), A. Jones (Clerk)

#### **1. TO RECEIVE APOLOGIES FOR ABSENCE**

Councillor Price Chaired the meeting as Councillor Davies had sent apologies.

Cllrs: D. Carter, D. T. Davies, A. Higgs, A. Collis (Town Councillor).

#### **2. DECLARATIONS OF INTEREST**

There were no declarations of interest made.

#### **3. MINUTES OF PREVIOUS MEETING HELD ON THE 3RD JUNE 2015**

The previous minutes were taken as read.

#### **4. UPDATE ON UNIT SHOPS**

Mr Dallimore advised that there has been some positive activity with value retailers seeking to trade in Units 1/2 & 3. Negotiations are at a delicate stage and there is no guarantee that these retailers will sign on the dotted line. The interest reported previously from 99p Stores has ended following their merger with Poundland, which was referred to the Competition Commission. There has also been some local interest.

Officers continue to work to let one of the larger units which would act as an anchor store to attract other tenants. Discussions are at a delicate stage and 'white boxing' is still considered as an option with quotes being obtained.

## **5. UPDATE ON PHASE 2**

Mr Dallimore advised that the Council is looking to move forward after the Odeon decision and is now set on 'soft market' testing the vacant sites to assess potential development options and also develop viability options. Two consultants have tendered returns for this work and officers will consider these.

Members requested confirmation as to whether or not the funding set aside for the cinema would still be utilised for that area. Mr Dallimore advised that he could not give an assurance that it would be spent in Bargoed.

Councillor Reynolds confirmed as the ODEON cinema is no longer an option the money will be subject to Council approval and therefore cannot give assurances that the money will be spent in Bargoed.

Members asked what sites were being looked at. Mr Dallimore confirmed that there are 4 sites in total - which are outlined in the brief which went out to consultants.

Mr Dallimore advised that during Spring, the Council, budget permitting, will be looking to improve the main site through soft landscaping works along with some drainage improvements.

## **6. CHOOSE THE HIGH STREET CHRISTMAS CAMPAIGN**

Mr Highway presented the report to the group.

Members were advised that this year there will be a voucher booklet with over 100 offers which is more than in 2014.

Mr Highway wished to thank the retailers for participating and also thank the Council's Graphics Team who designed the booklet and associated publicity material.

Councillor Price thanked Mr Highway and Mr Wilcox for their hard work and the report.

## **7. CHOOSE THE HIGH STREET PAST & PRESENT – ANALYSIS REPORT**

Mr Highway presented the report to the group.

Mr Highway informed the group that the exhibitions were very successful and thanked Mr Wilcox for all of his hard work.

The group were advised that the only disappointment was with the lack of interest from the schools. Only Blackwood Comprehensive participated and they were very enthusiastic in bringing forward ideas for what they would like to see in the town.

Councillor Price thanked Mr Highway and Mr Wilcox for their hard work and the report.

## **8. SOUTH EAST WALES TOWN CENTRE VACANCY RATES**

Mr Wilcox presented the report to the group.

Members discussed the figures of vacant premises within the table and were advised that these may well have changed as the report was from October 2014. Mr Wilcox confirmed that he could bring updated figures to future meeting and forward data to members of the group.

Councillor Price thanked Mr Wilcox for the report.

## **9. TOWN CENTRE PROMOTIONAL SPACES**

Mr Wilcox presented the report to the group.

Members discussed the report and Mr Highway informed the group that Mr Wilcox has worked hard to build a good working relationship with the promoters who use the site and is very grateful for all of his hard work.

Councillor Price thanked Mr Wilcox for the report.

## **10. BARGOED TOWN CENTRE AUDIT – AUGUST 2015**

Mr Highway presented the audit report to the group and the following items were raised.

Mr Dallimore confirmed that there is a problem with the steps at Hanbury Road and the repair costs will be circa £27,000.

Members were advised that the 'red clay' is susceptible to frost penetration and is cracking and breaking up, there is also a grey liquid that is bleeding out. Mr Dallimore confirmed that the steps are safe at present but overtime they will continue to deteriorate further.

Members were advised that a report will be prepared to go to senior officers for a decision to be made.

Mr Highway invited Inspector Muirhead to update the group on the parking problems in the town.

Inspector Muirhead advised that there is an ongoing parking problem throughout the town including side streets. A special task team has been out issuing tickets and trying to cover all areas and also educating by enforcement.

The group were advised that the installation of some bollards has helped but there are still issues of illegal parking and officers are trying to resolve but really needs traffic wardens back.

Mr Highway advised that there is a Council seminar in November about parking which he will be attending.

Councillor Price asked for clarity over loading bays and whether vehicles can or cannot park in them. Inspector Muirhead confirmed that this does vary depending on the Traffic Order.

Councillor Reynolds raised concerns over parking problems in Aberbargoed where lorries are parking on junctions and vehicles cannot see past and have to reverse onto main road.

Inspector Muirhead confirmed that he will look into the issues raised in Aberbargoed.

Councillor Price thanked Inspector Muirhead for his update.

Mr Dallimore advised the group that the Council is still seeking confirmation as to whether or not there is a design fault on the granite channel blocks and is in discussions with Capita Simmonds. His team are also looking into other products to prevent the 'rocking motion' with some blocks which needs to be rectified.

Mr Highway confirmed that the tree lights on the High Street have been addressed and thanked Tom Llewellyn for his work.

Mr Hudson informed the group that Morrison's have agreed to the Ice rink going in the car park of Morrison's over a 4 day period with other attractions. Morrison's are keen to be part of the community and legal papers are being drawn up to protect all parties.

Councillor Llewellyn advised the group that the Town Council is fully supporting this event and thanked Paul and his team for all of their hard work and enthusiasm in organising the events in the town.

There were no further issues raised on the audit.

The meeting closed at 17:17

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CHAIR



## **BLACKWOOD TOWN CENTRE MANAGEMENT GROUP**

**MINUTES OF THE MEETING HELD AT THE COUNCIL OFFICES, PENALLTA HOUSE  
ON FRIDAY 16TH OCTOBER 2015 AT 2:00 P.M.**

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PRESENT:

Councillors:

Councillors: P. Cook, K. James, T. Williams

Together with:

Councillor Z. Hammond (Town Councillor), Mr J Hold (Clerk), Sgt M Thomas (Gwent Police)

Also:

A. Highway (Town Centre Manager), A. Dallimore (Team Leader – Urban Renewal & Conservation), P. Hudson (Marketing & Events Manager), A. Jones (Complaints Officer - Clerk)

### **1. TO RECEIVE APOLOGIES FOR ABSENCE**

Councillors – D. T. Davies (Consultee), N. Dix, Mr H Edwards (Blackwood Retail Partnership), Mr S Wilcox (Assistant Town Centre Manager).

Councillor Cook took the meeting in the absence of Councillor Dix.

### **2. DECLARATIONS OF INTEREST**

There were no declarations of interest.

### **3. MINUTES OF PREVIOUS MEETING 5TH JUNE 2015**

The previous minutes were taken as read.

### **4. CHOOSE THE HIGH STREET CHRISTMAS CAMPAIGN**

Mr Highway presented the report to the group.

Members were advised that this year there will be a 'Choose the High Street' Christmas Voucher Booklet with over 100 offers which is more than in 2014.

Mr Highway wished to thank the retailers for participating and also thank the Council's Graphics Team who designed the booklet and associated publicity material.

Mr Highway was thanked for the report.

#### **5. CHOOSE THE HIGH STREET PAST & PRESENT – ANALYSIS REPORT**

Mr Highway presented the report to the group.

The group were informed that the exhibitions were very successful and Mr Wilcox was thanked for his hard work.

The group were advised that the only disappointment was with the lack of interest from the schools. Only Blackwood Comprehensive School participated, they were very enthusiastic in bringing forward ideas for what they would like to see on the high street.

Councillor Cook thanked Mr Highway for the report.

#### **6. SOUTH EAST WALES TOWN CENTRE VACANCY RATES**

Mr Highway presented the report to the group in the absence of Mr Wilcox.

Members discussed the figures of vacant premises within the table and were advised that these may well have changed as the figures were from October 2014. Mr Highway confirmed that Mr Wilcox could bring updated figures to future meeting.

Councillor Cook thanked Mr Highway for the report.

#### **7. TOWN CENTRE PROMOTIONAL SPACES**

Mr Highway presented the report to the group in the absence of Mr Wilcox.

Members discussed the report and Mr Highway informed the group that Mr Wilcox has worked hard to build a good working relationship with the promoters who use the site and is very grateful for all of his hard work.

Mr Highway advised that the Town Council are invited to use this space free of charge.

Councillor Cook thanked Mr Highway for the report.

#### **8. REQUEST FOR FUNDS FOR DEFIBRILLATORS**

Mr Hold advised the group that Blackwood Town Council met and agreed to fund the installation of one defibrillator in the town but were looking to the Town Centre Management Group for funding of a second defibrillator for installation possibly at the bus station.

Mr Highway informed the group that he had checked the budget and there are no funds available as the £7,000 within the Area Forum Budget has been set aside to pay for the maintenance and repairs to steps in the town.

Mr Dallimore confirmed that NCS are currently arranging for quotes for the works. The group were advised until the costings are provided no decision can be made. It was agreed that once the figures have been provided should there be any balance left then this matter could be brought back to the group and the monies made available towards the cost of installing a second defibrillator.

Members of the group were invited to vote on this proposal.

Members of the group voted 5 in favour of the proposal there were 0 against.

## **9. CHRISTMAS EVENT UPDATE**

Mr Hudson confirmed that the event is taking place on the 5th and 6th December. There will be 45 stalls, Reindeers and Donkeys, the funfair will be as in previous years and Santa's grotto will be in Tidal Stores.

Mr Hudson advised that his team is looking at walk about entertainment and children's craft workshops for both ends of the high street and also hoping to organise a Nativity scene.

The event has been advertised in 'What's On' guide, 40,000 leaflets have been produced, posting of social media feeds, and radio adverting on Heart FM. This year a single Christmas Market flyer has been produced to cover all of the Christmas events across five town centres.

Sgt Thomas asked Mr Hudson to provide him with the link for the event so that he can arrange for it to go on the Blackwood Police Twitter page.

Mr Hold informed the group that the Town Council had purchased new lamp post figurines for £20,000 and the lights will be turned on the 23rd November.

## **10. RED LION UPDATE**

Mr Dallimore advised the group that Mr Tim Stephens has written to Jackson Property Ltd who own the building and is awaiting a response before determining what action is taken.

The group were advised that Planning may take further action if needed but this will depend on the response provided by the owners.

## **11. BLACKWOOD TOWN CENTRE AUDIT – AUGUST 2015**

Mr Highway informed the group that he has spoken with the architect for former Poundstretcher's site but at present until the insurance is resolved no new scheme can progress.

Mr Dallimore advised that in relation to the cleaning of the artwork he has a small budget but some of the cleaning is required to be done by the artist.

Mr Dallimore updated the group that nothing had changed in relation to the toilet block.

Mr Highway informed the group that the new managing agents for Blackwood Retail Park and they are implementing a new cleaning program.

Mr Dallimore confirmed that the bench has been removed as large groups were gathering.

Sgt Thomas advised that his officers have difficulties in issuing tickets, however the Community Safety Wardens have powers to issue tickets.

Sgt Thomas advised that the number of calls has reduced and the number of patrols have been increased. The area is under a Public Space Protection Order enabling Community Safety Wardens to move people on. Since the removal of the bench the number of gatherings has reduced.

There will be a drug rehabilitation team in the area for the next 4 weeks to engage with drug users. The local authority has served notice on rough sleepers camping under the Chartist Bridge.

The meeting closed 15:07.

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CHAIR



## RISCA TOWN CENTRE MANAGEMENT GROUP

MINUTES OF THE MEETING HELD AT PENALLTA HOUSE, TREDOMEN PARK  
ON MONDAY, 2ND NOVEMBER 2015 AT 5.00 P.M.

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PRESENT:

Councillors:

N. George, K. James, P. Leonard

Together with:

M. Parker (Risca Town Councillor), B. Hancock (Risca Town Councillor), Mr R Campbell (Clerk Risca Town Council), Insp C Williams (Gwent Police)

Also:

A. Highway (Town Centre Manager), S. Wilcox (Assistant Town Centre Manager), A. Dallimore (Team Leader Urban Renewal), A. Jones (Clerk)

### 1. APPOINTMENT OF CHAIR

Mr Highway opened the meeting and asked for nominations. Councillor George was nominated and seconded. Councillor George accepted the post.

### 2. APPOINTMENT OF VICE CHAIR

Councillor George nominated Councillor Leonard as Vice Chair. This was seconded and Councillor Leonard accepted the post.

### 3. TO RECEIVE APOLOGIES FOR ABSENCE

Councillors E. M. Aldworth (Consultee), D. T Davies (Consultee), P Griffiths, R. Passmore, D. Rees, C. Edwards (Risca East Community Councillor), Mr G James (Clerk Risca East).

### 4. DECLARATIONS OF INTEREST

There were no declarations of interest.

**5. TO RECEIVE AND NOTE PREVIOUS MINUTES OF MEETING 30TH JUNE 2015**

On previous minutes under the Audit it stated that the clerk Ceri Mortimer used to arrange the installation of the Christmas Lights. Members of the Town Council informed the group that the finances have been checked and confirmed that no monies went out for Christmas Lights.

The minutes were taken as read.

**6. 'CHOOSE THE HIGH STREET CHRISTMAS CAMPAIGN'**

Mr Highway presented the report to the group.

Members were advised that this year there will be a 'Choose the High Street Christmas Voucher booklet with over 100 offers which is more than in 2014.

Mr Highway wished to thank the retailers for participating and also thank the Council's Graphics Team who designed the booklet and associated publicity material.

Councillor Hancock confirmed that if assistance to knock on doors is required he is more than happy to help to get support.

Councillor George thanked Mr Highway and Mr Wilcox for their hard work and the report.

**7. RISCA CANAL OVERVIEW**

Mr Dallimore informed the group that Caerphilly Council is working with Torfaen Council on a joint Tourism orientated bid which focuses in on the Mom and Brecon canal corridor. This bid is one of 9 nationally being submitted by Visit Wales to The Welsh European Funding Unit (WEFO).

The group were advised that Caerphilly could receive upwards of £2.6m for the upper section of the Crumlin Arm if the bid is successful.

The aim is to develop the canal as a regional tourism destination by developing attractions along its route such as Cwmcarn and by developing complementary uses such as cycle routes linking to the forest drive. If successful there would also be an outdoor play area, possible toboggan run. And it may help secure a privately run zip wire in the unused quarry.

Inspector Williams requested that consultation with Crime & Disorder Officer would be appreciated. Mr Dallimore agreed that this would be a good idea.

Mr Dallimore advised that the bid has been submitted to Visit Wales and officers are awaiting feedback from Visit Wales' discussions with WEFO - which could be as early as December. Mr Highway hoped that where possible the Town Councils could lend their support to the bid.

Members discussed issues with cyclists on the tow path. Mr Dallimore advised that as cyclist will be encouraged to use the path and will look at design process. Mr Highway suggested that the management of the tow path could be looked at in future meetings.

**8. 'CHOOSE THE HIGH STREET PAST & PRESENT'**

Mr Highway presented the report to the group.

Mr Highway informed the group that the exhibitions were very successful and thanked Mr Wilcox for all of his hard work.

The group were advised that the only disappointment was with the lack of interest from the schools. Only Blackwood Comprehensive participated and they were very enthusiastic in bringing forward ideas for what they would like to see in the town.

The Chair thanked Mr Highway and Mr Wilcox for their hard work and the report.

## **9. SOUTH EAST WALES TOWN CENTRE VACANCY REPORT**

Mr Wilcox presented the report to the group.

Members discussed the figures of vacant premises within the table and were advised that these may well have changed as the report was from October 2014. Mr Wilcox confirmed that he could bring updated figures to future meeting and forward data to members of the group.

The Chair thanked Mr Wilcox for the report. Councillor George leaves the meeting and Councillor Leonard replaces him to chair the meeting.

## **10. TOWN CENTRE PROMOTIONAL SPACES**

Mr Wilcox presented the report to the group.

Members discussed the report and Mr Highway informed the group that Mr Wilcox has worked hard to build a good working relationship with the promoters who use the site and is very grateful for all of his hard work.

Councillor Hancock asked for confirmation as to when would the lights be installed in the promotional space. Mr Dallimore will check with street lighting.

The Chair thanked Mr Wilcox for the report.

## **11. RISCA TOWN CENTRE AUDIT – OCTOBER 2015**

Mr Dallimore advised that the legal dialogue over the bridge has stopped.

Insp Williams confirmed that since June he has met with Councillor Rees, Councillor Dix and the Deputy Police and Crime Commissioner in relation to Parking Issues in Town Centres. It was suggested that a joint approach could be considered, where the Council and the Police could jointly issue tickets.

Insp Williams assured the Group that the police were enforcing parking as best they could given available resources. He also explained that officers had urged local businesses to park more considerately.

Councillor Parker advised that when Traffic Wardens were in Risca there was no problem with parking. Mr Highway will feed all information back to colleagues in Traffic Management.

Mr Dallimore informed the group that Keep Wales Tidy are taking lead for maintenance of the site around the cuckoo statue and confirmed that the project is progressing well, back in August they completed Phase 1 which involved a full ground clearance. Six new birch trees were planted and four tonnes of chippings laid down.

Mr Dallimore advised that Keep Wales Tidy are keen to work on this as a community project with Tesco. There will be a lot of activity over the winter as Tesco work with Keep Wales Tidy to periodically carry out litter picks to maintain the area and cut the grass.

Mr Dallimore advised that there is a new habitat for slow worms incorporated into the feature around the base which Countryside Officers have been helping with.

The Town Council wished to thank officers for the works undertaken on the collapse of footway outside the Risca Inn.

The group were advised that the grit bins are available for shop owners to use whenever necessary and if the bins need refilling if they could contact Mr Highway he will make arrangements for them to be filled.

Councillor Hancock requested that the toilets in the Park be open in the summer months. The Town Council has requested this previously and have offered to contribute to the reasonable costs of the toilets being open. Mr Dallimore advised that he will take this up with Tony White.

The meeting closed at 18:21 p.m.

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CHAIR



## REGENERATION AND ENVIRONMENT SCRUTINY COMMITTEE – 8TH DECEMBER 2015

**SUBJECT: SUMMARY OF MEMBERS' ATTENDANCE – QUARTER 2 – 1ST JULY  
2015 TO 30TH SEPTEMBER 2015**

**REPORT BY: ACTING DIRECTOR OF CORPORATE SERVICES AND SECTION 151  
OFFICER**

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### **1. PURPOSE OF REPORT**

1.1 To report Members' levels of attendance at scheduled meetings of Caerphilly County Borough Council.

### **2. SUMMARY**

2.1 The report details the attendance of Members at scheduled meetings throughout the Quarter 1st July to 30th September.

### **3. THE REPORT**

3.1 Appendix 1 details Members' attendance for quarter 2 (1st July 2015 to 30th September 2015), at the following meetings:

- Council;
- Cabinet;
- Scrutiny Committees;
- Planning Committee;
- Audit Committee;
- Democratic Services Committee; and
- Sustainable Development Advisory Panel.

3.2 The information is compiled from attendance sheets signed by Members at these meetings.

3.3 The appendix also allows for a comparison with the same period in the preceding two years. When making comparisons to previous quarters/years, please note that overall averages given are the weighted average to reflect the number of meetings in each quarter.

3.4 Details for the next quarter (1st October 2015 to 31st December 2015) will be reported to the next appropriate meeting of the Scrutiny Committee.

### **4. EQUALITIES IMPLICATIONS**

4.1 There are no specific equalities implications arising as a result of this report.

**5. FINANCIAL IMPLICATIONS**

5.1 There are no specific financial implications arising as a result of this report.

**6. PERSONNEL IMPLICATIONS**

6.1 There are no specific personnel implications arising as a result of this report.

**7. CONSULTATIONS**

7.1 None.

**8. RECOMMENDATIONS**

8.1 That Members note the content of the report.

**9. REASONS FOR THE RECOMMENDATIONS**

9.1 To inform Members of attendance levels at scheduled meetings of Caerphilly County Borough Council from the Annual Meeting of Council, 2015.

Author: A. Dredge (Committee Services Officer)

Background Papers:  
Member attendance sheets

Appendices:  
Appendix 1 Schedule of Members' Attendance 2013 to 2016

## Quarterly Summary of Attendance Levels (Percentages)

APPENDIX 1

## AGM to AGM

	2013-2014					2014-2015					2015-2016				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
Council	87	82	82	88	85	84	84	75	84	82	84	80			
Crime & Disorder		69		94	82		81		56	69		75			
Education For Life	72	75	69	75	73	66	65	81	72	71	69	78			
Health, Social Care & Wellbeing	75	66	78	69	72	75	73	74	85	77	63	64			
Regeneration and Environment	69	63	81	84	74	81	80	77	78	79	78	81			
Policy & Resources	69	78	84	85	79	78	77	88	77	80	94	84			
Planning Committee	75	82	85	89	83	85	75	73	75	77	65	83			
Audit Committee	83	75	67	83	77	58	83	58	92	73	75	83			
Democratic Services Committee	69		69	75	71	88	75	69	88	80	69	88			
Sustainable Development Advisory Panel	64	64		64	64		82	55	73	70	55				
<b>Average Attendance per quarter</b>	<b>74</b>	<b>72</b>	<b>77</b>	<b>81</b>	<b>76</b>	<b>77</b>	<b>86</b>	<b>81</b>	<b>76</b>	<b>80</b>	<b>72</b>	<b>80</b>			
Cabinet	95	82	92	93	91	93	93	95	91	93	83	86			

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