

# **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
<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). 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>

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		<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>	

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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

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		<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>



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		<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>	<p>Plan amended to show Hafod-y-Dafal as Very Large and text changed</p>
<p>Sorrel Jones Conservation Officer Gwent Wildlife Trust</p>	<p>Disagree</p>	<p>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?</p>	

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	<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>Developments in the <i>Very Large category will be assessed on a case by case basis.</i></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>This study is only concerned with the landscape sensitivity of the HOV area and not with achieving government policy/targets across 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>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.</p>
<p><b>Q3: Do you agree with the proposed definition of sensitivity?</b></p>			

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

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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>

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		<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>



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		<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>
		<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>

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		<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>

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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
<p>Jill Kibble Planning Liaison CPRW Montgomeryshire Branch</p>		<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
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> <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
	<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>
	<p>Skyline and setting – agree that LU19 does not possess a distinct skyline and that therefore landscape susceptibility under this criterion is low.</p>	<p>Noted</p>

Respondent	Comment	Response
	<p>Movement – agree that the key landscape role that is played by the recently upgraded A465 ensures that landscape susceptibility under this criterion is low.</p>	<p>Noted</p>
	<p>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.</p>	<p>Noted</p>
	<p>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.</p>	<p>This sensitivity study does not remove the need for a detailed LVIA. It does highlight where and why there is higher susceptibility.</p>
	<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>

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
<p>Sorrel Jones Conservation Officer Gwent Wildlife Trust</p>	<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>	<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</p>
<p>Sergio Zappulo Development Manager REG Windpower</p>	<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>	<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.</p>

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>