

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

Report of Consultation

1 Introduction

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

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

Appendix 1: Summary of Responses

	AJ Associated	Disagree	SLA Boundary
--	---------------	----------	--------------

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	AJ Associated	Disagree	Inconsistencies in LU1 designation
--	---------------	----------	------------------------------------

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	AJ Associated	Disagree	Disagrees with sensitivity area in LU1
--	---------------	----------	--

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	AJ Associated	Disagree	Disagrees with capacity assessment of LU1
--	---------------	----------	---

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	Coal authority		Comment
--	----------------	--	---------

Summary Of Representation

No specific comments to make.

Officer Response

Noted

Recommendation

Noted

	LDA Design	Disagree	Larger set of criteria used in this landscape sensitivity
--	------------	----------	---

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	LDA Design	Disagree	Requirement of development sizes needed.
--	------------	----------	--

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

No change

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

Colours to be amended in final document.

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

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

Recommendation

No change.

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

Noted.

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

Noted.

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

Amend Figures accordingly.

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

No change.

	NRW	Comment	Clarification
--	-----	---------	---------------

Summary Of Representation

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

Officer Response

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

Recommendation

Noted. Document will be amended.

	NRW	Comment	
--	-----	---------	--

Summary Of Representation

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

Officer Response

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

Recommendation

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