

APPENDIX A – SUMMARY OF THE MAIN MATTERS

Appendix A – Summary of the Main Matters raised through the Public Consultation

Background

This appendix provides a summary for each chapter in the SPG:

- The main matters raised during the public consultation;
- Officers' response to these;
- Proposed Changes introduced;
- A summary of the main matters raised during the consultation on these changes;
- Officers' response to these;
- A summary of the changes to the Chapter in the final version.

This appendix should be read in conjunction with Appendix 'B' which includes comprehensive tables of all observations on the **Original Consultation** and the Council's response to them and Appendix 'C' which includes comprehensive tables of all observations on the **Proposed Changes** that have been received and the Council's response to these observations.

A copy of the SPG which is to be adopted can be seen in Appendix 'CH'.

Chapter 1 - Introduction	
The Main Matters raised during the public consultation on the First Draft.	No substantial matters raised.
Officers' response to these	Not relevant.
Proposed Changes introduced	The Council introduced two Proposed Changes to this chapter; namely the paragraph confirming the weighting when dealing with an application and a further bullet point regarding the Objective of the SPG.
The Main Matters raised during the public consultation on the Proposed Changes.	The term 'existing circumstances' is inappropriate.
Officers' response to these	Agree with this.
Changes to the Version Recommended for Adoption	Delete this term also amend the Introduction to reflect the fact this is the adopted SPG.

Chapter 2 – Background	
The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • Question how many jobs are created in the area as a result of wind turbines. • Allege that it is proven that wind turbines do not contribute towards reducing atmospheric carbon. • The table regarding the number of applications in the area should be updated.

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Chapter 2 – Background	
	<ul style="list-style-type: none"> • Need to clarify when more weight will be placed on a renewable energy development and when to protect the landscape.
Officers' response to these	<ul style="list-style-type: none"> • Introduce a proposed change to paragraph 3.16 to outline what is the number of jobs that can be obtained from renewable energy. • No evidence received in relation to the observations that turbines do not contribute towards reducing atmospheric carbon and officers have not come across evidence either. • The purpose of the table was to present part of the justification for creating a SPG, providing a snapshot of the situation at the time. No intention to update this. • Each application must be weighed up according to its own merits to see the possible advantages and effects of any application.
Proposed Changes introduced	The Council introduced two Proposed Changes in this chapter. The significant one is PC3, namely a new paragraph on how climate change has influenced planning policy for wind turbine developments.
The Main Matters raised during the public consultation on the Proposed Changes.	Further guidance should be provided on the capacity of the area to cope with wind turbines.
Officers' response to these	Work commissioned by the Council to Assess the Sensitivity and Capacity of the Landscape will provide further guidance on this.
Changes to the Version Recommended for Adoption	Include a reference to the Sensitivity work in a new paragraph, 7.5.8a.

Chapter 3 - Policy Context	
The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • Need to ensure that community engagement takes place. • Reference should be made to the section of TAN8 which states that community benefit should not influence planning decisions. • Need to emphasise that the UDP takes precedence over other policies. • Need to explain the meaning of 'small' and 'community' for the SPG. • An assessment of the impact of turbines

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Chapter 3 - Policy Context	
	<p>on tourism should be obtained.</p> <ul style="list-style-type: none"> Reference should be made to paragraph 3.7.2 of TAN6 which supports renewable energy on farms.
Officers' response to these	<ul style="list-style-type: none"> In accordance with National guidance, the SPG promotes community commitment but it cannot be enforced. Whilst the Council are supportive to obtaining community benefit from such proposals chapter 11 clearly states that community benefit should not influence planning decisions. The proposed change to PC1 explains the weight that should be given to the UDP and to other relevant considerations. Proposed change to PC20 providing a further explanation within chapter 6 of what is meant by 'small turbine' and to PC45 for a 'community development'. No robust evidence regarding the impact on tourism. A recent report (February 2014) from Regeneris to the Welsh Government shows that there is no evidence that there is a significant impact on tourism as a result of onshore wind energy developments. PC46 refers to developments on farms.
Proposed Changes introduced	Four Proposed Changes were introduced in this chapter. The significant ones are the further explanation for the work of Gwynedd Werdd on opportunities for Renewable Energy developments and a description of the purpose of the AONB.
The Main Matters raised during the public consultation on the Proposed Changes.	An observation states that a clearer explanation should be given regarding the contribution of onshore wind turbines to the figures in the Gwynedd Werdd report.
Officers' response to these	Agree that this should be explained more clearly.
Changes to the Version Recommended for Adoption	Introduce an additional sentence explaining the contribution of Onshore Wind Energy to these figures.

Chapter 4 – Characteristics of the Gwynedd Planning Authority Area

The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> Reference should be made to the Pen Llŷn a'r Sarnau (PLAS) SAC. No reference to a Special Historical
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	Landscape.
Officers' response to these	<ul style="list-style-type: none"> The PLAS SAC designation is for underwater habitats and is therefore not relevant. Agree that a reference to the Special Historical Landscape should be included.
Proposed Changes introduced	Two Proposed Changes were introduced to make minor amendments.
The Main Matters raised during the public consultation on the Proposed Changes.	No observations.
Officers' response to these	Not relevant.
Changes to the Version Recommended for Adoption	No further changes.

Chapter 5 – Restricted Areas

The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> Support no turbines in the AONB. Need to protect the setting of the AONB by creating a buffer. A fixed maximum should be introduced for turbines in the Landscape of Special Historic Interest.
Officers' response to these	<ul style="list-style-type: none"> Policy C26 clearly states no turbines in the AONB. Previous guidance from CCW (now part of NRW), that it is not appropriate to introduce a buffer to the AONB as the impact of an application can more or less depend on the nature of a specific location. No specific evidence submitted to justify a specific height within the Landscape of Special Historic Interest and officers have not come across any evidence either.
Proposed Changes introduced	Nine Proposed Changes were introduced. The most significant is PC12 which rephrased the paragraph for Landscapes, Parks and Gardens of Special Historical Interest.
The Main Matters raised during the public consultation on the Proposed Changes.	Only one observation expressing support.
Officers' response to these	Not relevant.
Changes to the Version Recommended for Adoption	<ul style="list-style-type: none"> Include a reference to the work on Landscape Sensitivity and Capacity currently taking place in paragraph 7.5.8a.

Chapter 6 – Wind Turbine Types and Scale

The Main Matters raised	<ul style="list-style-type: none"> Only support small scale or community
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<p>during the public consultation on the First Draft.</p>	<p>ones in the area (different heights proposed).</p> <ul style="list-style-type: none"> • Need a better definition of small scale, i.e. the difference between 20m to the tip of the blade and generating up to 5MW of energy. • Allege that restricting developments to 5MW is contrary to PPW which refers to developments up to 25MW. • Need a buffer around the AONB and Snowdonia National Park. • Need a buffer between different applications to prevent the creation of a wind farm in an area.
<p>Officers' response to these</p>	<ul style="list-style-type: none"> • No evidence submitted to justify that only small scale or community turbines should be promoted in the area. • Agree that there is some confusion within the chapter regarding the difference between scale based on height and scale based on the energy generated. • TAN8 makes a clear reference to a maximum of 5MW with up to 25MW on former industrial sites. • See the response to Chapter 5 regarding a buffer for the AONB and National Park. • The SPG refers to giving consideration to the impact of a series of individual applications forming a wind farm and the cumulative impact of developments.
<p>Proposed Changes introduced</p>	<p>Two proposed changes were introduced, namely a clearer explanation of the definition of turbine scales and an explanation of the need for an Environmental Impact Assessment with applications.</p>
<p>The Main Matters raised during the public consultation on the Proposed Changes.</p>	<ul style="list-style-type: none"> • Turbines should be restricted to 11m in the Historic Landscape Area and to 15m in the rest of Gwynedd. • Need a clearer explanation of what is meant by small in the context of wind turbines.
<p>Officers' response to these</p>	<p>No justification submitted to justify restricting turbines to 11m in the Historical Landscape Area and to 15m in the rest of Gwynedd. The Council has commissioned work on Landscape Sensitivity and Capacity and reference should be made to this.</p>
<p>Changes to the Version Recommended for Adoption</p>	<ul style="list-style-type: none"> • Include a reference to the work on Landscape Sensitivity and Capacity

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	<p>currently taking place in paragraph 7.5.8a.</p> <ul style="list-style-type: none"> • Include a reference to applications for individual turbines in the second sentence of paragraph 6.6d.
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Chapter 7 – Key Matters	
<p>The Main Matters raised during the public consultation on the First Draft.</p>	<ul style="list-style-type: none"> • Claim that the ETSU-R-97 guidance (relating to noise) is unsuitable. • An Environmental Impact Assessment (EIA) should be received with all applications. • The distances from houses should be 500m or 20 times the height of the turbine, whichever is the furthest. • No justification for having a minimum separation distance, rather separation distances should be a way of identifying the need for a Residential Amenity Assessment. • Clearer guidance is required regarding the impact on the landscape, LVIA is insufficient. • Increase the distance for assessing the impact on the landscape from 30km to 50km. • No reference to Special Landscape Areas. • Cumulative impact not given due attention, a map of all applications is needed on the Council's website. • A list of Council-approved appropriate specialists should be obtained. • Concern about the impact on tourism in the area.
<p>Officers' response to these</p>	<ul style="list-style-type: none"> • The Government continues to use ETSU-R-97 as a noise impact assessment tool. • Appropriate guidance exists to assess whether or not an Environmental Impact Assessment is required with an application. • The Welsh Government has reiterated that each application should be dealt with on its own merits giving consideration to the relevant individual factors. Consequently, it is not appropriate to include separation distances from houses; however, it is appropriate to include guidance for when a Residential Amenity Assessment will be required within specific distances to a

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Chapter 7 – Key Matters	
	<p>development.</p> <ul style="list-style-type: none"> • The LVIA is the acknowledged methodology for assessing the impact on the landscape. The Appendix to the SPG notes that the 30km figure used is a minimum. • Response to chapter 4 agrees to refer to the Special Historical Landscape. • It is felt that relevant attention is being given to the cumulative impact. Do not agree with the need for a map of all applications on the website. However, the Council maintains a register of all applications and thus holds appropriate information about the situation in the Council area, should it be requested. • Of the opinion that it is better to ask for specialists with appropriate qualifications rather than create a list of Council-approved specialists. • See the observation in chapter 3 for the impact on tourism.
Proposed Changes introduced	25 proposed changes were introduced and whilst the majority involve minor changes, three are substantial. These are the explanation regarding the separation distance to obtain a Residential Amenities Assessment (RAA), a new section on Community-led schemes and Developments on Farms.
The Main Matters raised during the public consultation on the Proposed Changes.	<ul style="list-style-type: none"> • Need to reintroduce the word ‘minimum’ (i.e. the distance from houses), within the SPG. • It is felt that the new section on Developments on Farms reads as a policy rather than a guidance.
Officers’ response to these	<ul style="list-style-type: none"> • Do not agree with the reintroduction of the word ‘minimum’. • Agree that a review is needed of the part on Developments on Farms.
Changes to the Version Recommended for Adoption	<ul style="list-style-type: none"> • Change a reference to wind farms in paragraph 7.7.3 to wind turbines. • Include a reference to the landscape sensitivity work in a new paragraph, 7.5.8a. • Change paragraph 7.8.3 by referring to the Gwynedd Archaeology Advisor. • Change the Developments on Farms section by deleting the first paragraph and

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<u>Chapter 7 – Key Matters</u>	
	<p>changing the third sentence to highlight that the criteria of policy C26 are appropriate.</p> <ul style="list-style-type: none"> • Include a reference to the Application of Separation Distances from Residential Properties work in a new paragraph, 7.9.10a.

<u>Chapter 8 – Location and Design</u>	
The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • There is a reference to the separation distances between houses and turbines. • Insufficient guidance regarding the potential impact on the landscape. More attention required to the cumulative impact. • The size of turbines should be restricted to no more than 15m outside the AONB in the Gwynedd Planning Area.
Officers' response to these	<ul style="list-style-type: none"> • See the observation in chapter 7 regarding the distances from houses. • It is felt that section 7.6 and Appendix 4 provide clear details for the assessment of the impact of turbines on the landscape. • No evidence submitted to support restricting turbines to a height of 15m in the rest of the Council's area.
Proposed Changes introduced	One Proposed Change was introduced which included a link to a specific document for further guidance on the location and design of wind turbines.
The Main Matters raised during the public consultation on the Proposed Changes.	No observations.
Officers' response to these	Not relevant.
Changes to the Version Recommended for Adoption	No further changes.

<u>Chapter 9 – Decommissioning and Restoring Land</u>	
<u>Chapter 10 – Requirements with Applications</u>	
The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • A bond for the decommissioning should be obtained. • Introduce a condition in order to decommission a turbine that has stood redundant for a specific period of time.
Officers' response to these	<ul style="list-style-type: none"> • Agree that the section on decommissioning should be reviewed in order to provide further guidance on the need for a bond and the period of time for which a turbine

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	stands redundant.
Proposed Changes introduced	Four Proposed Changes were introduced to chapter 9 and none were introduced to chapter 10. These provide clearer guidance on conditions for land restoration and instructions to ensure that resources are in place for the decommissioning.
The Main Matters raised during the public consultation on the Proposed Changes.	No observations.
Officers' response to these	Not relevant.
Changes to the Version Recommended for Adoption	No further changes.

Chapter 11 – Community Benefits and Developer Contributions

The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • These matters should not be referred to in the SPG. • In relation to a community application, there is a need to ensure that the observations of the entire community are considered.
Officers' response to these	<ul style="list-style-type: none"> • It is appropriate to refer to these matters as they are included in TAN8. • All observations that raise planning matters will receive relevant attention when dealing with any application – be that a community application or not.
Proposed Changes introduced	Three Proposed Changes were introduced; the most significant was PC53 in order to provide guidance regarding the social benefit of a development.
The Main Matters raised during the public consultation on the Proposed Changes.	That the figure of £5,000 for each MW is too low.
Officers' response to these	No new figure was proposed and there was no justification for requesting more either.
Changes to the Version Recommended for Adoption	Remove the reference to the Welsh Office Circular in paragraph 11.6 and 106 agreements in paragraph 11.8. Also, add the words, 'As good practice only', in paragraph 11.8.

Chapter 12 – Contact Details

The Main Matters raised during the public consultation on the First Draft.	No significant matters raised.
Officers' response to these	Not relevant.

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Proposed Changes introduced	One minor proposed change was introduced.
The Main Matters raised during the public consultation on the Proposed Changes.	No observations.
Officers' response to these	Not relevant.
Changes to the Version Recommended for Adoption	No further changes.

Chapter 13 – Further Reading

The Main Matters raised during the public consultation on the First Draft.	No significant matters raised.
Officers' response to these	Not relevant.
Proposed Changes introduced	One minor proposed change was introduced.
The Main Matters raised during the public consultation on the Proposed Changes.	No observations.
Officers' response to these	Not relevant.
Changes to the Version Recommended for Adoption	No further changes.

Chapter 14 – Glossary

The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • Need to rephrase the definition of Scheduled Ancient Monuments.
Officers' response to these	<ul style="list-style-type: none"> • Agree with the new wording proposed.
Proposed Changes introduced	Introduce the new wording for the definition of Scheduled Ancient Monuments.
The Main Matters raised during the public consultation on the Proposed Changes.	No matters.
Officers' response to these	Not relevant
Changes to the Version Recommended for Adoption	No further change.

Appendices

The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • Unclear about the purpose of the maps and how they would be used.
Officers' response to these	<ul style="list-style-type: none"> • These are part of the basis for the Landscape and Visual Impact Assessment. Agree that this could be explained better in Part 11 of Appendix 4.
Proposed Changes	Nine Proposed Changes were introduced with

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introduced	the majority being minor changes.
The Main Matters raised during the public consultation on the Proposed Changes.	<ul style="list-style-type: none"> • Need to review the radius of the cumulative impact assessment. • An error in PC61 as a sentence is repeated.
Officers' response to these	<ul style="list-style-type: none"> • No evidence submitted to support the observation about the radius of the cumulative impact assessment. • Agree to change PC61 by deleting a sentence.
Changes to the Version Recommended for Adoption	Delete a sentence from PC61.

<u>General Observations</u>	
The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • Lack of clear details within the SPG. • It is felt that the SPG is too restrictive and does not reflect National Policy. • What is the target that Gwynedd should meet and through what type of renewable energy will this be achieved? • Reference to Council-assessed independent specialists. • Does not reflect the conclusions of the Gwynedd Werdd report for Renewable Energy opportunities, in particular the three sites with a capacity of up to 25MW.
Officers' response to these	<ul style="list-style-type: none"> • There is clear detail within the SPG however that the nature of these types of developments mean that clear details cannot be presented on all relevant matters. • Chapter 3 refers to national policy and the matters for the SPG to consider. • National policy does not create a target for individual Authorities. • Reference is made to independent specialists in a response in chapter 7. • The purpose of the Gwynedd Werdd study was to scope the different potential opportunities of renewable energy on a strategic level in terms of technical requirements in Gwynedd. For the three areas with potential for 25MW, it is acknowledged that these are close to the National Park which could mean that they face planning restrictions, for example, in terms of the potential impact on views into

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General Observations	
	or out of the Park. Identifying the potential sites does not provide any guarantee that a proposal would be granted planning permission.
Proposed Changes introduced	None introduced.
The Main Matters raised during the public consultation on the Proposed Changes.	Observations on minor errors in the document.
Officers' response to these	Agree to make corrections to deal with the minor errors, such as spelling mistakes.
Changes to the Version Recommended for Adoption	Minor changes.

SA/SEA/HRA	
The Main Matters raised during the public consultation on the First Draft.	<ul style="list-style-type: none"> • There is a need to note that appropriate assessments are required, e.g. EIA, for each wind turbine development. • Further information is needed regarding the purpose of the SEA process. • Possibly the baseline information used is not up to date. No robust evidence submitted to support this. • Some of the SEA's objectives are irrelevant. • It is believed that the scale and design of the development are important considerations also. • Biodiversity protection should be strengthened in the document. • Minor observations submitted on the HRA document.
Officers' response to these	<ul style="list-style-type: none"> • The need for a EIA assessment will depend on a number of different factors. • Agree that more information should be added regarding the process. • It is considered that the baseline is up to date. • The document notes where objectives are irrelevant. It is felt that it is important to have consistency with other SEA documents that are based on matters facing Gwynedd. • Agree that a reference should be made to the design and location and strengthen the protection of biodiversity. • Minor changes introduced to the HRA document.
Proposed Changes	Eight proposed changes were introduced to

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introduced	the SEA and three were introduced to the HRA document – the majority of these are minor changes.
The Main Matters raised during the public consultation on the Proposed Changes.	<ul style="list-style-type: none"> • Maybe the baseline information used is not up to date. • Some of the SEA's objectives are irrelevant. • That micro and small wind turbines should be refused if they are within the AONB.
Officers' response to these	<ul style="list-style-type: none"> • It is considered that the baseline is up to date. • The document notes where objectives are irrelevant. It is felt that it is important to have consistency with other SEA documents that are based on matters facing Gwynedd. • It is agreed that the section referring to turbines within the AONB should be rephrased.
Changes to the Version Recommended for Adoption	<ul style="list-style-type: none"> • Minor changes.