

Appendix B - Table of Comments Received and Officers' Response on the Original Consultation

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
CHAPTER 1 -						
YG076			[Policy C26] does not ensure protection.	That the criteria of Policy C26 have already been breached.	No substantive evidence submitted to support the comments received.	No Change
YG080		Policy C26	Support a policy to refuse proposals within the Llŷn AONB.	Such developments would have a detrimental effect on the beauty of the area.	Note the comment.	No Change
CHAPTER 2						
YG006	2	2.2 a 2.3	We support these subsections	No evidence submitted to support the statement	Note the comments	No Change
YG014		2.13	More emphasis on paragraph 2.13 TAN 8 which enables authorities to refuse wind energy proposals that are over 5MW on lands in open countryside.	No evidence submitted to support the comments.	No specific evidence submitted to support the comments received.	No Change.
YG016		2.7	This begs the question (not answered in the SPG) of how to balance any intended benefits and contributions from the development against considerations such as impact on landscape, social and community issues	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

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YG016		2.8	A fourth aim should be added, namely: - to clarify and restate for all concerned what Gwynedd Council expects to see in the long term as the outcome of implementing its policy towards wind turbines.	A statement of this kind must be made somewhere, otherwise the Guidance will be worthless.	This is a comment on energy policy. However it might be helpful if para. 3.16 expands on the Gwynedd Werdd Project	Add commentary on current situation in relation to Gwynedd's strategy for promoting the renewable and low carbon energy sectors
YG017		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	at best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change
YG017		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread.	No substantive evidence submitted to support the comments received	No Change
YG018		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	at best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG018		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread.	No substantive evidence submitted to support the comments received	No Change
YG019		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons;	their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	This is a comment on national energy policy	No Change
YG019		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread.	No substantive evidence submitted to support the comments received	No Change
YG021		2.8	The aim of the SPG (para 2.8) should also be to explain the context, scope and detail of Gwynedd's onshore wind development policy to the public.	The SPG does not give a clear indication of the intentions and implications of the GUDP policy for the capacity, number and distribution of wind turbines within the planning area.	The policy is worded so that it is up to the developer to make a case for the size, location and generating capacity of the project within the constraints of the policy.	Agree to add bullet in relation to help for the public.
YG021		2.4	para 2.4) refers only to the period June 2010-June 2012. It should include those up to the date of SPG publication (for June 2010 to Jan 2013 – our records show 38 applications comprising 46	The incomplete record is symptomatic of a lack of strategic awareness and overview of the potential rate of penetration of single wind turbines throughout	The purpose of this paragraph is part of the justification for producing the SPG rather than to give an update of the latest	No Change

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			turbines, excluding screening applications which have progressed to a full application). The summary table should be accompanied by a list, analysis and location map of turbine applications which should be also be regularly updated on the planning website.	the GUDP area	position.	
YG022		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	at best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change
YG022		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread.	No substantive evidence submitted to support the comments received	No Change
YG024		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	at best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change
YG024		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				installations over a very wide geographic spread.		
YG027		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	at best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change
YG027		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread.	No substantive evidence submitted to support the comments received	No Change
YG029		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	at best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change
YG029		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread. This aspect has recently been covered in many Scottish newspapers when he was	The paragraph states that it could lead to job creation a point reiterated in the Gwynedd Werdd report.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				revealed that the Scottish Government had greatly inflated jobs created by the wind energy industry.		
YG030		2.2	It has been demonstrated that wind turbines do not contribute overall to reductions in atmospheric Carbons	At best their effect, when all elements of manufacture, installation and back up by fossil fuels are included, is at best neutral.	No substantive evidence submitted to support the comments received	No Change
YG030		2.2	It has also been demonstrated that wind turbines do not create jobs in a specific area.	The work involved in installation is short term and their maintenance is covered by very few individuals covering a huge number of installations over a very wide geographic spread.	No substantive evidence submitted to support the comments received	No Change
YG049		2.1	This statement should be changed to refer to the latest reports on the statistics by the Met Office which came out on Christmas Eve 2012,	which show that the earth did not warm as much as was forecast during the past ten years.	No substantive evidence submitted to support the comments received	No Change
YG049		2.2	This statement is incorrect	that the effect on the area's economy from FIT payments would increase residents' bills significantly. The claim that there will be jobs in the manufacturing industries field is irrelevant to Llyn. But the likely adverse effect on the tourism industry upon which the area is so dependent will cause job	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				losses and a huge detriment to the economy.		
YG049		2.3	This SPG should not refer to policies that relate to the Strategic Search Areas	as it is entirely irrelevant to Gwynedd.	No substantive evidence submitted to support the comments received	No Change
YG049		2.5	Using the word significant gives a misconception of the need to consider the National Policy.	Reference should be made again to the important sentence in a significant decision in a High Court case under the reference "(2012) EWHC 1419 (Admin)": "There is a statutory presumption in favour of the statutory development plan. Here that includes the local plan and its policies on landscape. In contrast, national planning policies--are merely other material considerations."	National Planning Policy can be a significant material consideration in dealing with certain applications.	No Change
YG049		2.6	Change "important trigger" to "key"	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change
YG049		2.7	There are constant references to maintaining the balance, but what needs to be done is to note clearly which one is to be prioritised, and under which circumstances?	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG049		2.8	Having weighed up, it should be noted that the UDP and landscape conservation will be prioritised?	The wider benefits of reducing the earth's carbon emissions are an irrelevantly small percentage compared with the adverse effect on Penrhyn Llŷn today and in the future.	No substantive evidence submitted to support the comments received	No Change
YG051		2.3	There are no SSAs within [Gwynedd]. It would be helpful if the SPG explained why WAG SSA locations have been selected and on what criteria	an explanation of why this is the case would help put the decision making process in context.	Strategic Search Areas were chosen on the basis of a number of economic, technical and environmental reasons (see para 2.9 of TAN8). It is not clear how providing this would help "put the decision making in context". Para. 2.3 of TAN 8 refers to the need to balance the need for renewable energy against the need to protect the landscape. It also states that the Government would support local plans that restrict almost all wind energy developments over 5MW to the Strategic search areas and urban and industrial brownfield sites.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					Part 6 of this SPG refers to this.	
YG051		2.4	Given 3.15.1 and 2.7 make it clear that contribution must be assessed shouldn't the distinction be made between these and cheaper, more efficient and beneficial models.	FIT turbines which are less efficient, less beneficial in terms of carbon saving and three times as costly	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG	No Change
YG051		2.6	There is no prominence and very scant reference in the SPG to PPW section5 or C11/99	Both are relevant to these designations and their purpose	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG	No Change
YG065		2.4	Needs to be updated	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change
YG067		2.4	Need to update the number of applications.	The statistics submitted are completely misleading.	The statistics are part of the justification over the need for the SPG. Not intended to be update since it will become out of date once the SPG is adopted.	No Change
YG073		2.1/2.2	Paragraphs should recognise that wind energy has only a small role to play in changing the amount and mix of energy usage	Electricity is only 18% of usage in UK and wind produces only a fraction of total electricity production	These are comments on the national energy policy which are beyond the scope and purpose of the	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					SPG	
YG077			The Planning Authority should add a substantial section to this SPG to reflect Welsh Government policies on Wind Energy schemes that are led by the community.	The SPG's remit is too narrow and is restricted to Technical Advice Note 8 only. There is reference to community schemes in that document. The Council seems to offer no guidance in this document for schemes that are led by the community.	Agree that a section on proposals driven by the community should be included.	Add a section which explains the approach towards community-led proposals.
CHAPTER 3						
YG002 YG011	3		There are doubts regarding the accuracy of the Welsh Government's target by 2017. It would mean constructing 33 turbines a day.	It is equivalent to 13.5 Giggawatt hours a day.	These are comments on national policies and on the policy framework of the local development plan, which is an objection that is beyond the scope and purpose of the SPG.	Note the comment
YG006	3		We support this section	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG005		3	To register my objection to further wind farms being allowed anywhere in Gwynedd or Anglesey,	No evidence submitted to support the statement.	No specific evidence submitted to support the comments received	No Change
YG010		3	In the rest of Gwynedd we object to turbines that are higher than 15 metres, unless the results of direct and indirect environmental impact assessments are submitted to a public consultation, which will prove beyond doubt that the turbine will not have any harmful or unacceptable effects.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG012		3	Emphasise our objection to the current movement to erect huge wind turbines in notable areas throughout the county.	Deforms our environment.	No substantive evidence submitted to support the comments received.	No Change
YG016		3.11	There should also be a more formal requirement for local authorities to take key responsibility for ensuring that community engagement is undertaken effectively and in a non-partisan fashion.	Fairness and transparency would not be guaranteed if left to the discretion of developers.	Para. 3.12 refers to para. 2.15 of TAN 8 but Guidance should also be repeated in Section 11.	Include reference to s 6.2 of TAN 8 local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals

APPENDIX B

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YG016		3.19	The statements in PP5 and PA5 need to be modified or corrected	they are not consistent with the overarching statement about wind turbine development made in C26	This is a comment on the contents of the AONB Management Plan.	No Change
YG023		3.12	Should also include reference to the explicit TAN 8 stipulation that community benefits must under no circumstances form part of the issues presented to the Planning Committee or determined by them	To do so would amount to bribery	No substantive evidence submitted to support the comments received	No Change
YG023		3.16	Energy is industrial activity	not a suitable form of employment for the nation's guardians of the landscape	No substantive evidence submitted to support the comments received	No Change
YG026		3	I wish to record my formal objection to further installation of on-shore wind turbines in Gwynedd	Due to the ruination of the natural beauty of our countryside and the resultant negative impact on tourism, flora, fauna and the quality of life for Gwynedd residents.	Note the comment	No Change
YG047		3	We are disappointed with the number of applications for wind turbines within the Council at the moment.	These are dotted around our countryside like unwelcome giants.	No specific evidence submitted to support the comments received.	No Change
YG048	3	3.20 and 3.21	I commend the Planners for acknowledging the importance of tourism in Snowdonia, Gwynedd and North Wales, and wish to refer to the fact that Gwynedd's economy is much more dependent on the tourism	with 16.3% of all the County's jobs in the sector in 2010 compared with a corresponding figure of 9.6% for Wales and 9.4% for Great Britain.	Note the comment.	No Change

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	Chap	Para				
			industry than Wales and Britain,			
YG049	3		The policies should be placed in their appropriate context e.g. which policy is given the priority. It should be noted clearly that the UDP is given the priority, and include the most relevant parts in full.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG049		3.1	The method you have chosen to present some sections of PPW out of their context, and sometimes rephrased, has led to conveying a different meaning to the actual meaning of the policy.	This gives a completely misleading presentation and it should be rearranged, ensuring it is worded correctly in the order that is most relevant to this part.	The SPG is a method of explaining more detailed guidelines on how to use a policy or policies that are relevant to a particular theme or area. In this case it explains Policy C26 on Onshore Wind Energy developments.	No Change
YG049		3.2	It should also be noted that this is a second consideration to the Gwynedd UDP, and clear reference should be made to Policy 5.5, 5.6 and 6.5	these are the policies that relate to protecting the natural heritage, the coast and the historic environment.	No substantive evidence submitted to support the comments received.	No Change
YG049		3.3	An explanation should be included of the difference between the sizes of individual turbines and individual developments in terms of the policy in the SSA	that a 5MW development is not suitable for most of Gwynedd.	Para. 2.3 of TAN 8 refers to the need to balance the need for renewable energy against the need to protect the landscape. It also states	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					that the Government would support local plans that restrict almost all wind energy developments over 5MW to the Strategic Search Areas and urban and industrial brownfield sites. Part 6 of the SPG refers to this.	
YG049		3.8	This has been quoted in fragments and has been rephrased, which changes its meaning completely at times. (Individual comments are submitted on the contents of the quotes).	This is a misleading and irresponsible way of presenting the policies and actually creates more confusion rather than offering more detailed guidelines and guidance as is required.	No substantive evidence submitted to support the comments received.	No Change
YG049		3.10.	First of all, reference should be made to the most relevant part of TAN 8 as is presented in the Countryside Council's guidelines here (Individual comments are also submitted on the contents of the quotes).	Presenting the sections out of their context and having been rephrased happens again, therefore this should be rectified.	No substantive evidence submitted to support the comments received.	No Change
YG049		3.15	This should be changed and the paragraph should be included in full (reference to paragraph number in bullet point 3).	Why leave out references to such key considerations?	A summary is presented here.	No Change

APPENDIX B

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	Chap	Para				
YG049		3.16	[Should] include what is the meaning of "community" and "small" in Onshore Wind Energy terms, which are suitable to the local surroundings.	No evidence submitted to support the comments.	Amendments to Chapter 6 and an additional section in Chapter 7 on Community Driven Schemes provide greater clarity.	Amend Chapter 6 and 7 to address these matters.
YG049		3.20.	An assessment should have been carried out of the resultant effect of the turbines on the tourism industry and the economy before permitting any wind turbine in the area.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG051		3.5	Can't this be shown in Nameplate capacity?	To state this figure is in this format is confusing	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG	No Change
YG051		3.6	will this 2010 information be relevant over the "implementation lifetime" of the SPG.	It will be out of date and therefore cannot be a good indicator	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG	No Change
YG051		3.7	Should the SPG avoid references that confuse building turbines with nuclear decommissioning?	To conflate the two is therefore misleading as the two are already misconstrued in public consciousness and undermine debate.	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG. The document referred to includes wind energy within "low carbon" sources.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG051		3.8	but it is perhaps incorrect to say PPW supports renewable energy projects	it ONLY supports development where appropriate	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG	No Change
YG051		3.15	the suitability of site and efficiency of turbine installation ought to be weighed against the impact,	sites are profit motivated and opportunistic, NOT optimised	These are comments that relate to the policy framework which is beyond the scope and purpose of the SPG	No Change
YG051		3.20.	[visitors] have a valid input to this debate	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG051		3.21	is the word unspoilt not used by visitors in this data	anecdotal evidence would indicate that its unspoilt nature is the major draw to the areas of Llŷn outside of Abersoch	No substantive evidence submitted to support the comments received	No Change
YG067		3.19	Question the policy of the AONB Management Plan.	Installations undermine the objective of protecting the AONB.	No substantive evidence submitted to support the comments received	No Change
YG077	Section 3		The Draft SPG notes a number of national policies in Section 3, but then it appears that inadequate attention is given to them in the document itself,	there is considerable emphasis on the visual element of Wind Energy, whilst other planning factors are omitted, e.g. community and economic benefit.	The main purpose of the document is to assist the public, applicants and decision makers to deal with the subject. National policies are reflected in the local policies.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG077			The Welsh Government's guidance in Technical Note 6 should be accepted and incorporated as they are noted in Chapter 3 of the SPG in the body of the Supplementary Planning Guidance.	Reference is made to paragraph 3.7.2 as evidence "Many economic activities can be sustainably located on farms. Small on-farm operations, such as food and timber processing and food packaging.....and <u>the production of renewable energy are all likely to be appropriate uses.</u> "	Accept the point.	Add a section under Key Issues Number 7 which relate to the production of wind energy on farms.
CHAPTER 4 -						
YG017		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism. However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG018		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism. However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG022		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.			
YG024		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism. However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG027		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism. However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG029		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism. However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG030		4	Here you acknowledge the beauty of the natural unspoilt wild landscape and its importance in the context of tourism. However, this must be taken in the overall context of Wales and the counties that surround Gwynedd.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

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	Chap	Para				
YG035	4		A reference to the PLAS SAC should be included.	Covers most of the Penrhyn Llŷn coast.	The Pen Llŷn a'r Sarnau (PLAS) SAC is a designation that applies to undersea habitats.	No Change
YG035		4.2	I don't see any mention of the old 'Character Landscape Areas' or the proposed 'Special Landscape Areas' in this.	The old areas cover most of Gwynedd outside the Park, but the proposed areas do not.	Accept that the historic landscape is an important part of the character and quality of the landscape.	Amend 4.2 to include reference to the landscapes of outstanding/special historic interest.
YG035		4.5	Again no mention of the PLAS SAC and perhaps there is a need to mention that several SACs have been designated for bats?	No evidence submitted to support the comments.	Special Areas of Conservation are designations that apply to undersea habitats.	No Change
YG068		Section 4	This section does not mention that substantial areas are historic landscapes	Several inquiries have deemed historic landscapes a material consideration	Accept that historic landscape is an important part of the characteristics and quality of the landscape	Amend 4.2 to include reference to the landscapes of outstanding/special historic interest.
YG077	4		Full attention should be given to the background of the planning area, including the economy. Attention should be given to the Welsh language and Culture of the planning area.	This section describes only the physical features of the County.	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
CHAPTER 5						
YG006		5.1.3	We object to this section.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG009		5.2	Council to adhere to the policy and refuse all applications for wind turbines within the AONB, Policy C26.	No evidence submitted to support the comments.	No specific evidence submitted to support the comments received.	No change.
YG010		5.2	Council to adhere to the policy and refuse all applications for wind turbines within the AONB, Policy C26.	No evidence submitted to support the comments.	Note the comment.	No change.
YG010		5.2	The SPG should provide a clear and firm guidance on the area outside the AONB boundary which only permits micro or small scale turbines i.e. up to 11 metres to the blade within the Landscape of Special Historic Interest.	Approving wind turbines that are larger than this is bound to cause significant harm to the character and beauty of this designated area and is therefore contrary to the policy of protecting the area from significant harm.	Para. 5.4.3 notes that applications should not cause significant harm to the character, appearance or setting of historic landscapes in accordance with Policy B12 of the UDP. It will be a matter for the developer to show that there will be no significant harm.	No change.
YG016		5.2.4	The word <i>significant</i> is used in this paragraph and on numerous occasions elsewhere in the document (e.g. para.	Without a contextual definition, the question of just how severe any harm or damage needs to be	The guidance reflects a general consensus amongst planning policy decision	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
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			7.5.8) without being defined in the context of harm to the environment/community/location etc.	before it is classified as 'significant' is left entirely to individual subjective assessment.	makers that decisions on applications need to take into consideration a mixture of general guidance and specific local circumstances.	
YG016		5.13	The purpose of the maps is unclear.	The maps seem to be the product of adherence to a rather bureaucratic 'guide to good practice'. In all likelihood the areas of high wind speed will come to be regarded as designated zones for wind turbine development with a lower threshold for refusal than other areas.	The map is based on the contents of the Practice Guidance on Planning for Low Carbon and Renewable Energy issued by Welsh Government to Local Authorities in 2010.	No change.
YG019	5		Should include all of the Upper Dee Valley.	Regard to flora and fauna present.	No substantive evidence submitted to support the comments received.	No change.
YG021		5.13	The maps should be further developed and clarified.	Additional analysis and maps are needed to clarify the implications for intermediate sizes e.g. 30-35m and 40-45m.	Section 5.13.3 states that these are examples and are related to the categorisation described in section 6.8.	No Change
YG021		5.2.3	The relevant sentence in C26 should be reiterated here. It should be clarified under what circumstances, if any, national policy might differ from or	The SPG still requires clearer wording with respect to the AONB policy.	The wording is a reiteration of the policy context.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			override local policy.			
YG023		5.3	SPG should make quite clear a significant separation required to ensure that industrial wind turbines do not spoil the visitor offer of the Snowdonia National Park anywhere within its boundaries.	Your current draft SPG does not do this adequately if at all.	No substantive evidence submitted to support the comments received.	No change.
YG029		5.2	There is a great deal of concern in the Upper Dee Valley area about the growing spread of wind turbine applications. And it seems that even Snowdonia National Park and AONBs aren't safe from them.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG032		5.2	I state that I object to any changes to Policy C26 which prohibits wind turbines within the AONB.	No evidence submitted to support the comments.	Note the comment.	No change.
YG032		5.2	Additionally I object to any wind turbines outside the AONB that are connected to the national grid especially the wind turbines that receive a FIT (feed in tariff).	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG032		5.2	In your Supplementary guidance you suggest that there is room for small turbines within the AONB in the Landscape Conservation Area and the	You say that turbines up to 5MW are small! 5MW EQUATES TO 100 wind turbines that are 50kw and 34 metres high or two enormous	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			Landscape of Special Historic Interest.	2.5MW turbines that are 125 metres high!		
YG032		5.12	Is there an explanation as to why you wish to destroy the landscape and the tourist industry?	Which brings over £800 million in to Gwynedd every year.	No substantive evidence submitted to support the comments received.	No change.
YG033		5.2	It is commendable that no wind turbines are to be permitted in the AONB.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG034		5.2	Very important that no turbines are sited within the AONB or close to the Coastal Footpath.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG035		5.5.3	Change the wording. It is better to mention that a Habitats Regulations Assessment will be needed rather than an Appropriate Assessment.	The HRA encompasses the entire process which includes the section relating to the Determination of Likely Significant Effect and an Appropriate Assessment, as required.	Agree with the suggestion	Amend the wording to refer to the Habitats Regulations Assessment.
YG038		5.2	Proposals for wind turbines will be refused on sites within the AONB.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG038		5.2	I am of the opinion that it should not be possible to see wind turbines from any AONB or from the Park.	As they affect their setting. The AONB and the Park are special because of what they contain and what can be seen from them.	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG038		5.2	What about the minimum distance from the AONB?	As suggested by Anglesey and more stringent screening obligations than usual.	No substantive evidence submitted to support the comments received.	No change.
YG038		5.2	I'm concerned that you will allow more wind turbines along the coast where they can be seen from Anglesey.	I am shocked that these have been approved as I assume that they can be seen from Llanddwyn AONB, which is a SSSI and a destination for thousands due to unpolluted scenery and a pre-modern medieval ambience.	No substantive evidence submitted to support the comments received.	No change.
YG046		5.2	There should be no Wind Turbine developments in the AONB.	It seems ridiculous that a wind turbine can 'conserve and enhance the natural beauty of the AONB'.	No substantive evidence submitted to support the comments received.	No change.
YG046		5.2	There should be an exclusion of Wind Turbines within 2km of the AONB and Snowdonia National Park.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG047		5.1	Consideration should be given to the impact on the ministry of defence using the area.	Their requirements change over time therefore we must consider their needs throughout the lifespan of the turbine - 25 years rather than a snap shot.	No substantive evidence submitted to support the comments received.	No change.
YG047		5.2	Wind turbines should be excluded within 2km of the AONB and Snowdonia National Park.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG048	5	Areas of Constraints	I believe it should also include the Upper Dee Valley and surrounding area.	...giving consideration to the flora and fauna present.	No substantive evidence submitted to support the comments received.	No change.
YG049	5	5.2	A MAP OF THE AONB SHOULD BE INCLUDED	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG049			PPW and Local Policies, C26 and B8, offer abstract guidance on terms such as "Significant Harm", however, the only firm guidance is that the application is less than 5MW.	This is totally inadequate, irresponsible and unworthy of the care Gwynedd Council should be taking with this unique landscape. The SPG, the Local Policy and the Llŷn AONB policies provide a clear and firm guidance that the AONB boundary should not be treated as a clear boundary and the land within the views and the setting of the AONB should be treated in the same manner as the land within the boundary.	The SPG method reflects the way that applications for developments need to be considered through a combination of policy and technical guidelines and specific situations	No change.
YG049		5.2.4	The appropriate size and distance from designated landscapes outside the Llŷn AONB should be introduced.	In order to avoid harming the peninsula and other designated areas within the unitary plan.	The SPG method reflects the way that applications for developments need to be considered through a combination of policy and technical guidelines and specific sites.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG049		5.3	Again, appropriate wind turbine distances and sizes should be noted.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG049		5.4	MAP SHOULD BE INCLUDED.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG049		5.4.1	The supplementary planning guidance should set 11m as a limit within the Llŷn and Bardsey Landscape of Special Historic Interest.	This is the only way of ensuring that there will be no significant harm to the character, appearance or setting of this landscape within the boundary and the views of the Landscape of Special Historic Interest.	Para. 5.4.3 notes that applications should not cause significant harm to the character, appearance or setting of historic landscapes in accordance with Policy B12 of the UDP. It will be a matter for the developer to show that there will be no significant harm.	No change.
YG049		5.5	Appropriate maps should be included to show the sites.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG049		5.9	The constraints should therefore be included.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG049		5.12	An independent assessment should be held on the impact of turbines on the tourism industry, before approving any	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			turbine higher than 15 metres in Gwynedd.			
YG049		5.13.1	We ask for a minimum of 1.5km between turbines and houses.	The same limit as more than 8000 people from Anglesey asked for.	No substantive evidence submitted to support the comments received.	No change.
YG049		5.13.1 3	We do not agree that the areas shown as possible examples are suitable for 20m wind turbines.	Due to the restrictions and the requirements of policies and legislation to protect the area due to its designations.	No substantive evidence submitted to support the comments received.	No change.
YG050		5.2	Any detailed assessment will be supported when an application is submitted.	Could affect the landscape and visibility due to the AONB etc., along with tourism and leisure interests.	No substantive evidence submitted to support the comments received.	No change.
YG051		5.13.4 Maps	Where does the definition wind speed >6m/s = high come from?		High = >6.5m/s. The source is referred to in para. 5.13.1	No change.
YG056		5.2	No case for supporting to Wind Turbines closer than 2km of the AONB borders or Snowdonia National Park.	Should views from within the AONB or Snowdonia National Park are adversely affected.	The criteria stipulates that a judgement needs to be made as to whether the development would cause significant harm to the setting and has to be assessed on a case by case basis.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG061		5.2	Large tall single wind turbines not only defile the landscape of Gwynedd and a ANOB.	Have significant loss of amenity to the resident living and going about their business.	Para. 5.2 relates to the AONB. National and local policies aim to maintain the integrity and quality of the AONB and no turbine development should cause significant harm to the landscape.	No change.
YG061		5.12	The prospectus of jobs created in building and maintenance, is a canard. The very real damage to tourism jobs is significant.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG061		5.12	The landscape is very precious income in to the local economy.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG063		5.4.3	Replacing "should not" with "which".	So that the sentence makes sense.	Accept.	Replace "should not" with "which".
YG063		5.9	Include reference to the regional Historic Environment Record (HER) for north-west Wales, maintained by Gwynedd Archaeological Trust.	Is the non-statutory database of archaeological information and encompasses the vast majority of archaeological sites.	Accept.	Include reference in 5.9 to the regional HER for North West Wales.
YG063		5.9.1	Add "setting" to criteria.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG063		5.9.1	<p>Add details in relation to archaeological designations. An archaeological assessment will be required where there is a probability or risk that a proposal (either alone or in combination with other plans or projects) will have a significant effect on the historic environment. Developers must provide sufficient information so that an informed judgement can be made as to the likely effects of the proposed development. Applications failing to provide this information will be refused. Where a proposal is likely to cause significant harm to the historic environment, it should only be permitted if it can be demonstrated that there are reasons for the proposal that outweigh the need to safeguard the archaeological value of the site and that impacts can be adequately mitigated.</p>	To explain the circumstances in which applications may be refused on archaeological grounds.	Accept the need to refer to relevant Policy of the UDP.	Include reference to Policy B7 of the UDP.
YG063		5.9.2	<p>Gwynedd Archaeological Planning Service should be consulted, because. This consultation will establish the need for, and scope of, archaeological assessment and evaluation and will identify viewpoints to be included in visual impact assessment where there is</p>	The council has no in-house archaeological expertise.	Accept.	Include reference to need to consult with GAPS.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			a potential visual impact upon archaeological sites.			
YG065		5.2.4., 7.6,7. 7	Reliance on LVIAs and photomontages provided by the client is wrong. Should be provided by Council and paid for by developer.	Photomontages do not show the effect of a moving object set against a tranquil background.	No substantive evidence submitted to support the comments received.	No change.
YG065		5.8	All turbines ought to be dark green in colour.	To minimise their effects.	No substantive evidence submitted to support the comments received.	No change.
YG067		5.2.2/ 5.2.4	Support these statements.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG067		5.2.3	This consideration undermines 5.2.2 and 5.2.4.	Opens the floodgates to unscrupulous developers.	No substantive evidence submitted to support the comments received.	No change.
YG068		Section 5.4	Reference needed to Register of Landscapes of Special Historic Interest in Wales (Part 2.2).	As above.	Accept that historic landscape is an important part of the characteristics and quality of the landscape.	Amend 5.4 to include reference to Register of Landscapes of Special Historic Interest in Wales (Part 2.2).
YG071		5.2.4	Amend this paragraph to read; Medium or large wind turbines within 2km of the AONB will not be supported.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG072		5.2.4	Amend this paragraph to read; Medium or large wind turbines within 2km of the AONB will not be supported.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG077	5		The Council should refrain from being too restrictive in dealing with applications within the Llŷn AONB.	Paragraph 12.8.11 of the Ministerial Interim Planning Policy Statement suggests that exceptions are a possibility, in special circumstances.	This policy provides clear and robust guidance in terms of applications within the AONB.	No change.
YG077		5.13	The guidance of seeking to limit development to 10X the height to the tip of the blade is too restrictive.	It leaves very little land that would be acceptable to the planning authority. The guidance is different to the majority of guidance used nationally. This is much larger and appears whimsical, without any scientific reasoning for the restriction. Other Authorities measure the multiple of the rotor's diameter. There are no technical, noise or right to view reasons that can be maintained with such a restriction. This appears to be an attempt to excessively hinder applications without any technical reasoning to support it.	Para 7.9.7 explains that there are few guidelines available. The guidance in 7.9.9 explains that any decision on separation distances should take into consideration a combination of general guidance and specific locational circumstances. Maps 1-3 reflect a buffer zone of 10x the height.	No change.
YG077		5.13 Maps	Detailed maps with an appropriate scale should be made available for consultation before approving the SPG.	The scale of the maps makes it impossible to clearly ascertain the different boundaries that are	Para. 5.13.2 and 5.13.4 make it clear that the purpose of the maps is to	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				proposed.	identify areas of potential given a number of restrictions relating to amenity, risk etc.	
YG080		Policy C26/5 .2.4	Disagree with considering applications outside of the AONB.	Such developments would have a detrimental impact on the area's beauty. No matter where they are erected, they are visible from all directions.	The SPG explains that any decisions on the impact on the setting of the AONB would take into consideration a combination of general guidelines and specific locational circumstances.	No change.
YG020	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG020			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			or Snowdonia National Park will be refused.			
YG035			[RSPB will only be submitting comments on the largest of wind turbines or those in designated bird areas. CCW also expects the Gwynedd Biodiversity Unit to deal with applications that do not affect SSSI or greater areas]	No evidence submitted to support the comments.	Note the comment.	No change.
YG039			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG039	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG040			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received.	No change.
YG040	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG040			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be refused.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG041			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG041	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG041			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be refused.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG042			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received.	No change.
YG042	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG042			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be refused.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG043			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG043	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG043			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be refused.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG044			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG044	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG044			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be refused.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG049			Support Policy C26 to refuse all applications for wind turbines within the AONB	To prevent causing substantial detrimental harm to the area's landscape.	Note the comment.	No change.
YG049			The Council should refuse all wind turbines that are higher than 11 metres within the boundary and views of the Llŷn and Bardsey Island Landscape of Special Historic Interest, the Landscape Conservation Area and other sensitive landscapes in Gwynedd.	To prevent causing substantial detrimental harm to the area's landscape.	Para. 5.4.3 notes that applications should not cause significant harm to the character, appearance or setting of historic landscapes in accordance with Policy B12 of the UDP. It will be a matter for the developer to show that there will be no significant harm.	No change.
YG049			The lead paragraph of C26 should be included which refers to the need to consider the policy in the context of the entire UDP.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG049			It should also include the policies named that have the closest association with policy C26 - A1 - Environmental Assessment and Other Impact Assessments; B7 – Sites of Archaeological Importance; B8 – Llŷn and Anglesey Areas of Outstanding Natural Beauty (AONB); B9 - The Heritage Coast, B10 – Safeguarding and	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			Enhancing Landscape Conservation Areas.			
YG057			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG057	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG057			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			refused.			
YG058			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG058	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG058			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			refused.			
YG059			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG059	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG059			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be	No evidence submitted to support the statement.	No specific evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			refused.			
YG062			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.
YG062	AONB		Conserve and enhance — this needs to be explained fully how a Wind Turbine could conserve or enhance an Area of Outstanding Natural Beauty. The guidelines should be black and white, with no room for manipulation. Therefore we argue that all micro and small turbine applications should continue to be excluded from the AONB and be refused.	Definition of the word conserve = protect, enhance = improve. Wind Turbine developments will neither protect nor improve our designated landscapes. There is no definition of how an industrial structure with a moving array of blades could enhance an Area of Outstanding Natural Beauty , it is a totally alien structure.	No substantive evidence submitted to support the comments received.	No change.
YG062			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			refused.			
YG076			The Guidance does not vary the contents of policies C26 (Renewable Energy) or B8 (the AONB) in any way.	This is acceptable in terms of maintaining and protecting the AONB;	Note the comment.	No change.
YG076			The document should refer to notes and policies relating to protecting the landscape and views that are contained within the AONB Management Plan.	For balance.	Paragraph 3.18 refers to the main strategic aim of the Management Plan.	No change.
YG076			The guidance should provide the explanation for 'community' and 'domestic' included in Policy C26;	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No change.
YG076			There should be some flexibility in the areas on the AONB boundary but ensure that the developments are not unruly.	In order to generate green energy.	No substantive evidence submitted to support the comments received.	No change.
YG076			It would be beneficial to know what Llŷn's energy needs are.	As it would be possible, maybe for it to be a green area - maybe through a combination of wind energy, solar energy and biomass possibly.	Not a matter for the Guidance, rather for the renewable energy promotion strategy.	No change.
YG077			Any recommendation on the setting of the Park through development within the Gwynedd Planning Authority boundary should concur with other Authorities that abut the park.	For consistency.	Note the comment.	No change.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
CHAPTER 6						
YG002		6.11	This part is unclear	'Homes' is not a scientific term that can be misinterpreted.	No substantive evidence submitted to support the comments received	No Change
YG008		6.1	There is no relevant section regarding how wind turbines generate electricity	No evidence submitted to support the comment	No substantive evidence submitted to support the comments received	No Change
YG016		6.8	The upper limit of 'Small' should be 15 metres.	One only has to look at the Castellmarch wind turbine to realise that anything above 15 metres cannot reasonably be defined as 'small'.	No substantive evidence submitted to support the comments received	No Change
YG029		6.8	Modern wind turbines are huge and even those involved in so-called 'farm diversification' are 100ft high and over	This is an extremely damaging issue as the overall total visual impact of growing numbers of turbines creates an industrial landscape rather than the wild landscape which brings tourists to rural Wales generally	No substantive evidence submitted to support the comments received	No Change
YG033			The SPG should specify the maximum hub height at 18meters and 25meter blade tip height which permits up to 11kw of generation	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG033		6	In other locations, only proposals for small scale or community or domestic based wind turbine developments to be approved	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG034		6	As the majority, if not all applications on the Llŷn Peninsula will be for single and small scale turbines It is important to make sure we do not end up with a landscape dotted with small scale turbines.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG039			We need the JPPU to confirm in the document what is meant by "small scale".	Is 'small scale" up to 20 metres to tip or is it a generating capacity of less than 5MW? There is a huge difference and this could easily be used a loop hole in the guidelines which will result in developers/ applicants taking advantage of the flexible interpretation of "small scale'.	Section 7 on issues makes it clear that it is the physical attributes (i.e. Size) that is used for the definition. However agreed that this could be made clearer in section 6.	Amend paragraphs 6.7 to 6.11 to clarify what is the criterion that will be used in considering the key issues in section 7.
YG045 YG053	6	6.15	Objects to this Section and recommends the deletion of these paragraph. The Gwynedd SPG currently runs contrary to this revised target set out in PPW in a letter from the Energy Minister dated July 2011. It is considered that the approach taken in the SPG does not reflect this. to impose a restriction of 5MW on wind farms in Gwynedd is	They do not reflect up to date national planning guidance, particularly Planning Policy Wales (2012). it should be noted that targets in the more recent Planning Policy Wales (2012) have increased significantly to 2GW of onshore wind power (by 2015-7) from the 0.8GW target (by 2010) established	Figure 12.3 and para. 12.8.16 for local authority wide onshore wind projects refer to a threshold of between 5MW and 25MW. A typical turbine rating would suggest a minimum of 10-12 large turbines or 20 medium turbines. Maps	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			overly restrictive, not in line with latest national planning policy, and goes beyond the remit of this SPG.	in TAN8. This increased target is now split between 1.7GW within the SSAs and 0.3GW outside the SSAs. Local authority-wide scale renewable energy developments are classed as schemes up to 25MW. Therefore where schemes of up to 25MW are possible within a local planning authority's area, this should be facilitated. It is not considered that the SPG facilitates this type of development, despite having an adopted development plan that has a presumption in favour of renewable development.	2 and 3 suggest that the scope for wind farms of at least this size is extremely limited and close to the boundary of the National Park. However para. 2.13 refers to the need to strike a balance between the desirability of renewable energy and landscape protection. WG would support a local plan policy that restricts almost all wind energy developments larger than 5MW to within SSAs and urban/industrial Brownfield sites.	
YG048	6	Types and size of wind turbines	It must be acknowledged that wind turbines are industrial installations. The fact that the turbines contain poisonous materials should not be disregarded.	This should be a relevant consideration in each planning application.	No substantive evidence submitted to support the comments received	No Change
YG049		6.7	It should be noted that there is no national agreement regarding the definition of a specific size. Therefore, 'small' and 'community' which would be suitable within the "micro-domestic"	By submitting these loose and open-ended definitions, you avoid defining appropriate sizes in the context of local environments.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			restrictions should be defined as 11.1m; "small" from 11 to 15 metres to the tip of the blade; "Medium" from 15 to 30 metres to the tip of the blade. Large 32 to 135m to the tip of the blade.			
YG049		6.11	It refers to the generating capacity of a turbine and defining it as small without offering more specific definitions on size leads to more confusion rather than offering detailed guidance and direction on policy C26.	This is a fundamental requirement in order to ensure consistency and fairness as the Council deals with wind turbine applications from now on.	No substantive evidence submitted to support the comments received	No Change
YG056		6.8	The use of the term 'small scale' needs clarifying	As the current descriptor is totally misleading. Wind Turbines no bigger than 15 meters to blade tip height should be described or classified as small.	No substantive evidence submitted to support the comments received	No Change
YG060	6		Scales of turbines need to be more clearly defined	Generally turbines of rated power of less than 50KW are considered a small wind turbine as supported by TAN8	Section 7 on issues makes it clear that it is the physical attributes (i.e. Size) that is used for the definition. However agreed that this could be made clearer in section 6.	Amend paragraphs 6.7 to 6.11 to clarify what is the criterion that will be used in considering the key issues in section 7.
YG065		6.8, Table 1	Definition of small should be 11.1 - 15 metres	20m is far too high to be called "small"	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG077		6.12	This should be changed in accordance with the Council's current policy and the Recommendations of the Inspector.	Attempting to define a wind farm as a development with two or more turbines appears contrary to the comment of the Planning Inspector on Policy C26 and Suggestion 0358 of the report on the UDP. The recommendation has been accepted as a change to the UDP by the Council.	The SPG acknowledges that there is no clear definition of a wind farm but it has followed the guidelines of the EIA Regulations published following the UDP Inspector's Report (in 2008). The definition is "more than 2" not "2 or more".	No Change
YG080		Table 1	Concern about the definitions of the height of turbines.	In Llŷn, micro and small turbines would be very visible and alien to the character of the Llŷn Peninsula.	The SPG explains that any decision on the impact on the setting of the AONB should take into account a combination of the general guidance and specific locational circumstances.	No Change
YG004			The Council should refuse all turbines that are higher than 11 metres in any landscape.	To avoid causing significant harm to the landscape of an area.	These are observations on the policy framework that are beyond the scope and purpose of the SPG.	Note the comment
YG009			The Council to refuse every turbine that is higher than 11 metres within the Llŷn and Bardsey Island Landscape of Outstanding Historical Interest.	To avoid causing significant harm to the landscape of an area.	Para. 5.4.3 notes that applications should not cause significant harm to the character, appearance or setting of historical landscapes in accordance with policy B12 of the UDP.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					It will be a matter for the applicant to show that there will be no significant harm.	
YG010			The Council to refuse every turbine that is higher than 11 metres within the Llŷn and Bardsey Island Landscape of Outstanding Historical Interest.	To avoid causing significant harm to the landscape of an area.	Para. 5.4.3 notes that applications should not cause significant harm to the character, appearance or setting of historical landscapes in accordance with policy B12 of the UDP. It will be a matter for the applicant to show that there will be no significant harm.	No Change
YG010			That a 5MW wind turbine development (the restriction outside the AONB) is unsuitable.	Contrary to the principle of protecting the environment and landscape from unsuitable developments.	The 5MW figure has been used by the Government and refers to a cap on wind farms. The height of the turbine would be the criterion used to assess the development against the policy.	No Change
YG015			If turbines are required then they should be kept small. In reality we would go so far as to restrict the size to approximately 15 metres.	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG020, YG040, YG041, YG042, YG043, YG044, YG057, YG058, YG059, YG062			We need the JPPU to confirm in the document what is meant by "small scale".	Is 'small scale" up to 20 metres to tip or is it a generating capacity of less than 5MW? There is a huge difference and this could easily be used a loop hole in the guidelines which will result in developers/ applicants taking advantage of the flexible interpretation of "small scale'.	Section 7 on issues makes it clear that it is the physical attributes (i.e. Size) that is used for the definition. However agreed that this could be made clearer in section 6.	Amend paragraph 6.1 to clarify what is the criterion that will be used in considering the key issues in section 7.
YG039			Consideration must also be given to the views to and from the AONB and the National Park. We should have a buffer zone around these designated areas. Medium or large scale wind turbines within two kilometres of the Llŷn AONB or Snowdonia National Park will be refused.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG040			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG041			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG042			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG043			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					needs to take into consideration a mixture of general guidance and specific locational circumstances	
YG060			ETSU-R-97 is not applicable to smaller wind turbines	The noise characteristics of small and large turbines differ considerably. The contribution from small turbines to renewable energy generation is much less for the amount of noise generated. Suggest adoption of standards used by Cornwall and Renewable UK	ETSU-R-97 makes reference to single turbines and wind farms with very large separation distances. Smaller wind turbines generally generate less noise. Local Authority Environmental Health Officers assess proposals involving smaller turbines and apply the most stringent interpretation of ETSU-R-97. This approach should protect local residents from any potential noise nuisance.	Comment noted, no change in approach deemed necessary.
YG060			Should be a minimum of 2km separation distances between sites	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG062			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications	Dwyfor - the number of individual applications for one or two turbines already approved along	The guidance reflects a general consensus amongst planning policy decision	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			to prevent the effects of a dispersed wind farms throughout the County	with live applications awaiting approval are concentrated within the same area.	makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	
YG074			Whilst 'small' turbines can generally be accommodated within the landscape, we consider the installation of the larger 'medium' and 'large' turbines, with heights of up to 135 meters, are inappropriate close to the National Park.	Suggest creation of buffer-zone adjoining the Park within which such proposals would not be normally accepted	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG074			Consider that the suggested minimum visual separation distances are too small	Would not prevent the emergence of a mini wind-farm effect in some areas.	No substantive evidence submitted to support the comments received	No Change
YG076			[The] Guidance includes detailed information about the policy background and technical details and includes a useful definition of micro, small, medium and large turbines.	No evidence submitted to support the comments	Note the comment.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG076			The height of wind turbines outside the AONB should be restricted to between 11 and 15 metres with attention also being given to the capacity.	The vast majority of the Llŷn area is visible from the AONB.	No substantive evidence submitted to support the comments received	No Change
CHAPTER 7						
YG002		7.13.3	It should be hang-gliding	Correct term	Accept	Change
YG003		7.9.8	TAN8 advises that all turbines should be set back a minimum distance, equivalent to the height of the blade tip from the edge of any public highway or railway line.	No evidence submitted to support the statement..	No substantive evidence submitted to support the comments received.	No Change
YG003		7.9.11	Location Plans should Show the position of highways, public footpaths and railway lines within the turbine's topple distance (tip height + 50 metres) in the case of trunk roads and railway network, or the turbine's topple distance + 10% in the case of other local authority transport network.	No evidence submitted to support the statement..	No substantive evidence submitted to support the comments received..	No Change
YG005		7.7	Each turbine will kill significant numbers of birds each year.	No evidence submitted to support the statement..	No substantive evidence submitted to support the comments received.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG006		7.3.5	We object to this section.	No evidence submitted to support the statement..	No substantive evidence submitted to support the comments received.	No Change
YG006		7.3.5	Following the standard in ETSU R-97 is misleading.	ETSU-R-97 states that the choice of limit within the 35-40db limit should depend on the number of dwellings affected, the number of kWh generated and the duration of the level of exposure. For night time periods the external noise limit...is 43dB LA90 or 5 dB above the background, whichever is the greater.	Ultimately it is for the Local Authority to consider which noise limits are appropriate for a given development in a particular location.ETSU-R-97 is a guidance document. The Local Authority will consider the guidance contained therein whilst assessing relevant proposals.	No Change
YG006		7.9.8	We object to this section.	The separation distances given in Table 4 are not scientific and are misleading. The assumption of height is arbitrary. Toolkit in TAN 8 should be used to define separation distances.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG013		7.9.8	We consider that installations of the larger "medium" and "large" turbines, with heights of up to 135 metres, are inappropriate close to the National Park boundary.	We suggest therefore the creation of a buffer-zone adjoining the Park within which such proposals would not normally be accepted.	No substantive evidence submitted to support the comments received. Policy C26 (i) and para. 5.3.2 refers to the intention to protect the setting of the National Park.	No change
YG013		7.13	Whilst supporting the principle of community involvement, the prospect of local community benefits should not be allowed to influence the acceptability of environmentally damaging proposals.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG013		7.9.8	We consider that the suggested minimum visual separation distances are too small.	Would not prevent the emergence of a mini wind-farm effect in some areas.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change
YG014		7.5	Authority concerned about the potential harmful visual impact deriving from any wind energy development on the boundaries of the Park that are prominent in the landscape.	Policies 14 and 26 of the LDP refer to this and the Guidance reiterates the planning substance of these policies.	The guidelines reflect the need to take into account a combination of national and local policies and the conditions of specific	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					locations.	
YG014		7.5.1	I would like to see a reference to the National Park in paragraph 7.5.1	No evidence submitted to support the comments.	Accept that the National Park is an important designation.	Include a reference to the National Park
YG016		7.5.7	This paragraph needs to be corrected to read: - "In accordance with Policy C26 of the UDP, wind turbines will be refused within the AONB. Additionally, and subject only to tightly defined exceptional criteria, Policy B8 of the UDP reinforces an overarching policy to refuse wind turbines in and adjacent to the Llŷn AONB."	this statement is to be welcomed and should be used to trigger automatic rejection of a turbine application in these locations, irrespective of any other merits/benefits proposed by the applicant.	Agree that para. 7.5.7 should refer to Policy C26.	Change reference to policy C26
YG016		7.9.8	This paragraph is a total nonsense!	Such a statement scarcely adds to the sum of human knowledge and the attempt to justify all the words by reference to a 'mathematical system' is laughable. It is actually junk arithmetic. As for the table and diagram, all they show is what happens when you multiply a number by 10! If it appears in the published Guidance it will simply be ridiculed.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG016		7.13	This section should be strengthened by placing a greater responsibility on the local authority to extend its own consultation arrangements.	(current) is totally inadequate for a wind turbine.	No substantive evidence submitted to support the comments received.	No Change
YG017		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	There is worldwide evidence that there should be substantial separation distances between turbines and habitation.	In July 2012 The Welsh Government rejected a proposal to establish a minimum separation distance of 1500m between wind turbines and residential property. The guidance in the document TAN 8 therefore remains unchanged; 500 m is currently the minimum separation distance advised. TAN 8 stipulates that this distance should not be applied in too rigid a manner as it could lead to conservative results.	The Local Authority views the minimum separation distance as stated in TAN 8 as an adequate initial point of reference. However, each case is considered upon its own merits.
YG017		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG017		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG017		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG017		7.9	minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG018		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	there is worldwide evidence that there should be substantial separation distances between turbines and habitation.	No substantive evidence submitted to support the comments received.	No Change
YG018		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG018		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG018		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG018		7.9	minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG019	7		Electrical connections should always be underground.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG019		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	there is worldwide evidence that there should be substantial separation distances between turbines and habitation.	No substantive evidence submitted to support the comments received.	No Change
YG019		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG019		7.3	The Cox, Unwin and Sherman Review findings suggest that the science behind the ETSU guidance is not reliable.	see Cox, Unwin and Sherman Report attached "Wind Turbine Noise Impact Assessment - Where ETSU is silent".	Several papers, including the Cox, Unwin and Sherman report question the adequacy of ETSU in addressing certain aspects of noise generated by wind turbines and the methods by which Local Authorities apply the guidance to specific projects. ETSU - R -	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					97 remains central to UK and Welsh Government wind energy policy. The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG019		7.5	Developers tend to use presentation methods which “flatten” the landscape and so diminish the visual impact of the turbines in the landscape.	This can be readily observed when looking at existing installations and then comparing that with the material provided by the developers.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG019		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG019		7.7.	all but the smallest proposal should be subject to a full Environmental Impact Assessment.	Such is the importance of Gwynedd to wildlife.	No substantive evidence submitted to support the comments received.	No Change
YG019		7.9.8 and 7.11	I suggest that a minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	Councillors in Anglesey recently voted to adopt the "20" factor.	No substantive evidence submitted to support the comments received.	No Change
YG019		7.12	There should be a presumption that any installation will disturb the hydrology and that the developer/owner/operator is responsible for providing alternative water supplies where a private supply has dried up within 1km of a turbine.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG020	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG020		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment published on 21 May, 2013 relates to the application of ETSU-R-97 and does not relate to policy aspects. The Authority will take note of, and consider, its recommendations and requires acoustic specialists to be accredited and follow the Institute of acoustics recommendations on good practice.	No change in approach

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG020	Landscape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	No substantive evidence submitted to support the comments received.	No Change
YG020	Cumulative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG020	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received.	No Change
YG020		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application	Gwynedd Council Environmental Health Officers scrutinize planning applications and are suitably qualified to	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			interests in the Wind Energy Industry.	C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	provide expert unbiased opinion.	
YG021		7.9.9	The wording of the first part of para 7.9.9 needs improvement.	[An] explicit minimum residential separation distances should be adopted, comprising a minimum 500m buffer and a sliding scale based on 15-20 times total height for turbines over 15m high. there should be a stated presumption to refuse proposals outside these limits, rather than automatic triggering of a Residential Amenities Assessment.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change
YG021	7		the SPG does not give adequate guidance on the potential impact on the wider landscape. In particular, we do not have confidence in the SPG's reliance on the required Landscape and Visual Impact Assessments (LVIAs) and photomontage. there should be firmer safeguards which ensure that these assets are not carelessly undermined by weak policy implementation. In particular, we look for more explicit and objective limits on the permitted size	The landscape is now the principle(sic) physical asset and the main basis for tourism on which the local economy increasingly depends.....[LVIAs] are commissioned by the applicant, built on essentially subjective judgements and open to bias and manipulation.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			and distribution of wind turbines within Arfon and Dwyfor.			
YG021		7.5.7	Policy C26 should also be specified here.	This relates explicitly to wind turbines, while B8 does not.	Agree that paras. 7.5.7 and 7.5.8 should also include reference to Policy C26.	Include reference to policy C26
YG021		7.5.1	We do not agree with the SPG's assumption that reliance on an LVIA is a sufficient means of identifying potential visual impact.	Experience from turbines that have been erected in Gwynedd to date suggests that LVIA's and accompanying photomontage, as commissioned by the applicants, are not a reliable guide to actual impact. The matrices determining 'significance' of impact are built up from a sequence of judgements regarding magnitude of change and sensitivity of receptors which are wide open to subjective interpretation. 'Significant' overall impacts are rarely, if ever, identified in these studies. The scope for providing misleading representations and understatement of impact through photomontage is also evident and well known.	The use of LVIA is an accepted method of assessing landscape and visual impact.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG021		7.13 and Checklist item 10	The new requirement on the applicant for a pre-application Community Engagement Statement (section 7.13 and checklist item 10) is welcomed. The LPA needs to take a more active role in informing the public about proposals and ensuring that community engagement is effective.	There should be more evidence of wide and genuine majority support from local communities for such major projects.	Note comments	No Change
YG022		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	there is worldwide evidence that there should be substantial separation distances between turbines and habitation.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					consider, its recommendations.	
YG022		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG022		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG022		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG022		7.9	minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG023		7.7.2	Your draft SPG does not specific describe the threat to bats.	they suffer from air pressure changes in the vicinity of the rotors, without necessarily colliding with the blades.	The paper "Bats and Wind Turbines" (www.snh.gov.uk/docs/B999258.pdf) produced by Scottish Natural Heritage, English Nature and Countryside Council for	Include reference to paper in section 7.7 and include reference to bats under para. 1 of Checklist 12.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					Wales published June 2012 notes that there is considerable evidence that the siting and operation of wind turbines can have an adverse impact on bat populations particularly medium and large turbines and wind farms. The results of further research are expected over the next couple of years.	
YG024		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	there is worldwide evidence that there should be substantial separation distances between turbines and habitation.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May,	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG024		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG024		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG024		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG024		7.9	minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG027		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	There is worldwide evidence that there should be substantial separation distances between turbines and habitation.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG027		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received.	No Change
YG027		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG027		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			Environmental Impact Assessment.			
YG027		7.9	minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG028		7.9.8	They are sited about 1/2 mile away, high above the hill and in full view of our rear aspect, and sited far too near to our property and of our neighbours in Garreg Lwyd.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG028		7.9.8	The minimum distance should be GREATER than 1/2 mile, AND we are concerned about the impact on the future valuation of our properties.	Will the Welsh Assembly Government compensate property owners for loss of value, caused by the negative impact of wind turbines sited too near to properties, as The Danish Government has had to do?	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances Compensation for loss of	No change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					property values under the Land Compensation act 1973 only applies to works undertaken under statutory powers. House of Commons Library Standard Note published July 2012 (Wind Farms - Distances from Houses) states that there is no conclusive evidence as to the relationship between wind farms and house prices.	
YG029		7.3	It is well established that the ETSU-R-97 guidelines are inadequate.	there is worldwide evidence that there should be substantial separation distances between turbines and habitation.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG029		7.3	It is also accepted that total wind turbine noise has significant adverse health effects.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG029		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG029		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG029		7.9	Minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10.	This would mean that some existing wind turbines in the North Wales area would not have been approved as they are well within this separation distances, which could create health issues for local residents, as well as impact upon the value of their homes or their saleability This aspect has been recognised by the Valuation Office	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				Agency where houses council tax bands have been rebanded downwards due to proximity of wind farms. Examples of this are in Devon and Cumbria, and there are a number of other councils currently going through this process.	circumstances. Compensation for loss of property values under the Land Compensation act 1973 only applies to works undertaken under statutory powers. House of Commons Library Standard Note published July 2012 (Wind Farms - Distances from Houses) states that there is no conclusive evidence as to the relationship between wind farms and house prices.	
YG030		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG030		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG030		7.6.12	The distance of 30km should be extended to 50km.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG030		7.7	Such is the importance of Gwynedd to wildlife that all but the smallest proposal should be subject to a full Environmental Impact Assessment.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG030		7.9	minimum distance of 500 metres should be established for all properties not within the occupation of the applicant/developer and that the distances in the table according to tip height should be multiplied by 20 rather than the current 10	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG034		7.11.4	No property should be exposed to noise / shadow flicker from some one else's turbine.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG034		7.3 7.11	It is important to make sure that individual residences are not impacted by turbines, (not related to their property), especially with regard to shadow flicker and noise.	This is an important as much of the Peninsula is rural, and it could be that only one or two properties are affected by a turbine in this way.	Wind turbine developments are scrutinized by Local Authority Environmental Health Officers. Noise and shadow flicker issues are considered. The same approach is taken irrespective of the number of residential properties which could potentially be affected by a development.	Comment noted, no change in approach deemed necessary.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG035		7.5	Again, no mention of the former/proposed Landscape Areas	No evidence submitted to support the observations	No substantive evidence submitted to support the observations received.	No Change
YG035		7.7	Is using 'Ecological & Ornithological' a bit confusing? Would ' Ecological features & species ' be better?	No evidence submitted to support the comments.	Agree with the suggestion.	Change the title of the section to Ecological Features and Species
YG035		7.7.2	This paragraph could be phrased better - the majority of birds have been protected not just "some" only.	Bats have the highest level of conservation.	Agree with the suggestion.	Amend the wording to include a reference to the "majority of birds". Also, amend section 7.7 to include a reference to the threat to bats (see reference to the "Bats and Wind Turbines" paper under YG023. Amend para 1 of Number 12 of the Checklist to include a reference to bats.
YG035		7.7.3	Replace "ornithology" with " birds "	Ornithology = the study of birds	The description "Protected species and habitats" includes protected birds	Amend wording in title 7.7 and 7.7.3 to omit the term

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					and therefore an additional category is not required.	"ornithology"
YG035		7.7.4	second to last sentence should read “ In the event that an EIA is required, then the environmental statement should provide sufficient information, including information on ancillary development, such as grid connections, substations, access routes, etc. [full stop] Information may be required by the Local Planning Authority (as the competent authority) to carry out any HRA.”	No evidence submitted to support the statement.	Agree with suggestion	Amend wording as per suggestion
YG035		7.7.5 (2nd sentence)	<i>A proposal that is not within a designated site or Wildlife Site may still require this assessment.</i> The features of designated sites often include mobile species such as birds and bats.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received	No Change
YG035		7.7.6	This should be ‘will be required’ or ‘is usually required’ 7.7.6 In particular, a survey is usually required if an application is near to a site of known importance for bats and birds. , or if a site is proposed within 50 metres from relevant habitat features that offer foraging/ commuting/ roosting	In order to strengthen this	Agree with the suggestion	Amend the wording so that it reads "A survey is required...."

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			opportunities. In order to minimise the impact on wildlife in particular bats, it is advisable that turbines should be a minimum of 50 metres away from foraging/ commuting/ roosting features. Applicants may contact the Council's Ecologist ["Ecological and Environmental Adviser" is a little confusing] for advice, at the pre-screening stage. Early consultations with the Countryside Council for Wales and RSPB should also be undertaken. The Gwynedd Biodiversity Action Plan (Gwynedd Nature) can be referred to for the background biodiversity context of the area.			
YG035		7.7.7	<i>"A Phase 1 habitat survey should be provided and in some instances an NVC vegetation community survey may be required."</i>	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received	No Change
YG035		7.7.8	This wording is very weak	"Where possible" and "It should" makes it sound very optional!	No substantive evidence submitted to support the comments received.	No Change
YG037		7.7	Conscious of the need to preserve our biodiversity and have devoted the last 12 years to arresting the decline of our native honey bee.	Other species are just important and the proposed location of future turbines on the Gwynedd/Denbighshire border	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				could not have been more badly placed.		
YG038		7.9	If turbines are erected, they should be a sufficient distance away from a residential dwelling.	So that they do not have a detrimental impact on the residents.	No substantive evidence submitted to support the comments received.	No Change
YG038		7.9	They should be a sufficient distance away from the highway.	More than total height to the tip of the blade so that fragments cannot disintegrate and cause accidents.	No substantive evidence submitted to support the comments received.	No Change
YG039	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG039		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG039	Cumulative Impact	7.6	The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG039		7.6	An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County.	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational	No change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					circumstances.	
YG040	Separation from dwellings and tourist accommodation	7.3/7.9	A minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment.	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change
YG040	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG040		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL &	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG041	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG041		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			interests in the Wind Energy Industry.	C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG042	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the statement..	No substantive evidence submitted to support the comments received.	No Change
YG042		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These	The information is not always correct and there are ways for applicants / developers to manipulate the data to their	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			specialists should have NO vested interests in the Wind Energy Industry.	advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG043	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG043		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	No change in approach
YG044	Noise and Amplitude Modulation	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap (AM)	Para				
YG044		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG044	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG045	Noise	7.3	The draft SPG provision above, suggesting that applicants need to go beyond the requirements of ETSU-R-97 is a direct challenge to UK government policy as ratified by Parliament as recently as July of this year..... the suggestions in the draft SPG are not based on an actual problem or need and should be deleted.	This broad spectrum of considerations makes it the best current guidance and the most effective way of protecting communities. ETSU-R-97 represents the output from acoustic, planning and industry experts as to what is regarded as "appropriate" for the protection for residential amenity. Another benefit of the application of ETSU-R-97 guidance by the developers and local planning authorities allows them to include planning conditions on decisions, setting appropriate noise limits and therefore safeguarding against the possibility of noise becoming the nuisance for the local area.	ETSU-R-97 is merely guidance and it is for the Local Authority to interpret the document and set limits which are most suitable for its area. The Local Authority usually adopts a strict interpretation of ETSU-R-97 when considering development proposals.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG045		7.3.7	The suggested separation distance of 400-500 metres from residential properties is unjustified and should not be specified in the SPG.	Such criteria for the siting of turbines is not appropriate in our view, as they do not take account of the actual noise effects of a turbine or windfarm, actual background noise levels, or local topography which can also affect how far noise travels. Additionally, the acoustic noise aspects of micro turbines (up to 50kW) are covered by the Microgeneration Certification Scheme (MCS).	Para. 7.3.6 and 6.3.7 cover the case of a Small or single turbine development (up to 20m) and describes ETSU-R-97's simplified method. ETSU -R-97 is merely guidance and it is for the Local Authority to interpret the document and set limits which are most suitable for its area. The Local Authority usually adopts a strict interpretation of ETSU-R-97 when considering development proposals.	No Change
YG045		7.5.7	We do not agree that Policy B8 restricts/prohibits development within the AONB	a blanket ban on turbine development within the AONB does not give sufficient flexibility to reflect local circumstance and the siting of any particular development	No substantive evidence submitted to support the comments received.	No Change
YG045		7.9.8	Use of the term "minimum separation distances" in these paragraphs is very misleading and will lead to confusion.	This term would suggest that turbines are not permitted within the distances shown – the literal interpretation of 'minimum separation distance' would lead to only this conclusion. Whilst	Accept point. Amend para. 7.9.8 and title of Table 4, Column 2 to refer to "Minimum separation distance that triggers a requirement for a	Amend para. 7.9.8 and Table 4 as per response

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				RenewableUK has no objection to the inclusion of some sort of trigger mechanism for providing a RAA, it should clearly be termed as such and not referred to as a “minimum separation distance”. This is misleading to any reader of the guidance – including developers, Councillors, and members of the public.	Residential Amenities Assessment (RAA).	
YG045		7.9.14	we feel this section should be deleted.	RenewableUK Cymru is not aware of any published research which supports the implication that there are tourism impacts as a result of the construction of onshore wind turbines.	No substantive evidence submitted to support the comments received.. However the intention is to require the developer to identify "significant adverse effects on tourism and recreational interests".	No Change
YG046		7.9.8	There should be a minimum distance of 500 meters or 20 times the Total Height to blade tip from the nearest residence, whichever is greater.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG046		7.6	Cumulative impact should be clarified.	Map showing the cumulative impact on the area should be available and a 2km separation distance between turbines should also be enforced.	The Planning Service keeps a planning register of all applications. This can be made available for applicants to undertake a cumulative assessment.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					The criteria stipulates that a judgement needs to be made as to whether the cumulative development would cause significant harm to the setting and has to be assessed on a case by case basis.	
YG046		7.13	Community schemes: clear benefit should be proved for these schemes.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG046		7.13	It should be proved that the majority of the profits will go to the community and not private investors, it needs to be clear what the percentage is, e.g. 90% or more.	Otherwise this will be used as a loop hole to get unsuitable development passed based on community benefit.	No substantive evidence submitted to support the comments received.	No Change
YG047		7.9.8	There should be a minimum distance of 500 meters or 20 times the Total Height to blade tip from the nearest residence.	Consider the recent recommendation of Anglesey SPG.	No specific evidence submitted to support the comments received.	No Change
YG047		7.4	The council should take health and safety into consideration.	Especially the distance from hospitals, schools and residential homes.	No specific evidence submitted to support the comments received.	No Change
YG047		7.13	In relation to community projects.	The benefit for the community should be assessed by an independent body.	No specific evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG048	7	Key Matters	I believe all electrical connections should be underground.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG048			Many accept that the ETSU-R-97 guidelines are inadequate, especially as the turbines are now much taller.	Evidence from across the world shows that there should be substantial separation distances between the turbines and residences. It must be accepted that the noise of the wind turbines have a substantial detrimental impact on health.	In essence, local government should determine which noise levels are appropriate for a particular development in a specific location. ETSU-R-97 is for guidance only. The Local Government will consider ETSU-97 while addressing relevant applications. No evidence has been provided to support the comments made and to justify the comments.	No change in the way applications involving wind turbines are dealt with.
YG048		7.3	Many accept that the ETSU-R-97 guidelines are inadequate, especially as the turbines are now much taller. Worldwide evidence shows that there should be a substantial distance between the turbines and residences.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG048		7.5	Developers tend to use innovation methods that "flatten" the landscape and therefore reduce the visual impact	This is clear to see when looking at the existing settings, and then comparing this with the material in	Para. 11 in the Checklist provides guidance in terms of who should undertake	Amend Section 11 in the Checklist through inclusion

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			of the turbines on the landscape.	the planning application provided by the developer.	the Assessment, how it should be undertaken and its contents. The list of documents needs to be updated to include the Third Volume of the Landscape Institute Guidelines published in Spring 2013. It would be helpful if the guidelines were to describe the process and the contents of the assessments that need to be undertaken.	of Summary Table.
YG048		7.6	I believe this is very important. It is vital that any scheme is also considered in the context of all the proposed developments, even if the proposed developments have not submitted a formal planning application yet.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG048		7.6.12	I believe the distance should be extended from 30km to 50km.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
		7.7	With the exception of very small ones I believe every application should be the subject of a full Environmental Impact Assessment.	Such is the importance of wildlife in Gwynedd.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG048		7.9	Where the document notes that "wind turbine development should not have a significant negative impact on the local economy" I believe the word "substantial" should be deleted all together.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG048		7.9.8	I believe a minimum distance of 500metres should be established for all the properties that are not within the applicant / developer's occupation and that the distances in the table, in accordance with the height of the tip of the blade, should be multiplied with 20 rather than the current 10.	Anglesey Councillors recently voted to multiply by 20	No substantive evidence submitted to support the comments received.	No Change
YG048		7.12	It should be presumed that any setting would have an impact on the hydraulics, and that the developer / owner /agent is responsible for providing another water supply within 1km from a turbine.	Where a private supply has dried as a result.	No substantive evidence submitted to support the comments received.	No Change
YG049		7.5.2	Definitions required.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG049		7.5.7	Needs to be changed.	This is either a mistake and therefore needs to be corrected or is an effort to change the policy.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG051		7.5	Why is there no reference to C11/99 ? Gwynedd are failing to observe both the purpose and intent of C11/99 which reflects protection of visual amenity both within, and bearing upon, Sensitive Areas as set out in PPW section 5.	[This]specifies when such circumstances will require an EIA.	The Checklist refers to the EIA process. However it would be useful if the body of the SPG referred to when an EIA is required in section 6.	Include new section on EIA.
YG053		7.9.8	Use of the term “minimum separation distances” in these paragraphs is very misleading and will lead to confusion.	This term would suggest that turbines are not permitted within the distances shown – the literal interpretation of ‘minimum separation distance’ would lead to only this conclusion. WCE has no objection to the inclusion of some sort of trigger mechanism for providing a RAA, it should clearly be termed as such and not referred to as a “minimum separation distance”. This is misleading to any reader of the guidance – including developers, Councillors, and members of the public.	Accept point. Amend para. 7.9.8 and title of Table 4, Column 2 to refer to "Minimum separation distance that triggers a requirement for a Residential Amenities Assessment (RAA).	Amend para. 7.9.8 and Table 4 as per response
YG053		7.9.14	we feel this section should be deleted.	WCE is not aware of any published research which supports the implication that there are tourism impacts as a result of the construction of onshore wind turbines.	No specific evidence submitted to support the comments received.. However the intention is to require the developer to identify "significant adverse effects on tourism and	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					recreational interests"	
YG054		7.5.7	Policy 8B of the UDP should be quoted.	To strengthen the guidance.	Agree that paras. 7.5.7 and 7.5.8 should also include reference to Policy C26.	Include reference to policy C26
YG055		7.9	Proximity to the new Wales Coastal Path, both for visitors and residents should also be considered.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG056		7.13	The draft lacks in depth clarity and is worryingly lacking in detail in several areas.	Certainly as presented, the draft cannot adequately protect the residents of Gwynedd against encouraged developers keen to extract the maximum return so called community projects where grant funded loop holes are clearly being exploited to glean undesirable and largely unwanted developments considered.	No substantive evidence submitted to support the comments received.	No Change
YG055		5.12	Gwynedd economy heavy reliance on tourism.	Which depends mainly on the extremely beautiful landscape.	No substantive evidence submitted to support the comments received.	No Change
YG055		5.2	Landscape and economy of the whole Gwynedd interdependent with those of Snowdonia National Park to which all the non-park areas (except Llŷn which is	Large medium or even large small turbines e.g. on hills near Corris would probably be seen from Cader Idris ridge and Tal y Llyn.	The criteria stipulates that a judgement needs to be made as to whether the development would cause	No change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			an AONB in its own right) are in close proximity.		significant harm to the setting and has to be assessed on a case by case basis.	
YG056		5.2	It is an anathema to consider any Wind Turbine developments either within or close to the borders of any AONB.	And that a wind turbine could 'conserve and enhance the natural beauty of the AONB ' is tantamount to misrepresentation.	The criteria stipulates that a judgement needs to be made as to whether the cumulative development would cause significant harm to the setting and has to be assessed on a case by case basis.	No Change
YG056		7.9.8	There should be a minimum distance of 500 meters from any residential dwelling regardless.	No evidence submitted to support the statement..	No substantive evidence submitted to support the comments received.	No Change
YG056		7.6	Cumulative impact should be clarified.	Map showing the Cumulative impact on the area should be available and a 2km separation distance between turbines should also be enforced.	The Planning Service keeps a planning register of all applications. This can be made available for applicants to undertake a cumulative assessment. The criteria stipulates that a judgement needs to be made as to whether the cumulative development would cause significant harm to the setting and has	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					to be assessed on a case by case basis.	
YG056		7.13	The majority of any turbine or turbine income when vaunted as a community project should rightfully feed into the community.	Rather than the coffers of the investors and landowners as is presently the case.	No substantive evidence submitted to support the comments received.	No Change
YG056		7.13	Nowhere near the effort of willingness shown by the investors and landowners to engage with their local community.	Worried landowners and investors knowing that they risk a backlash from their communities, present as little information as feasible to the community.	No substantive evidence submitted to support the comments received.	No Change
YG058	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the comments.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG058		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	Gwynedd Council Environmental Health Officers scrutinize planning applications and are suitably qualified to provide expert unbiased opinion.	No change in approach
YG059	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and it was recently proven that it is not a reliable reference source. This proposed change should be taken into consideration.	No evidence submitted to support the comments.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG059		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
	Separation Distance and Noise	7.3	Applicants/ developers should be asked to specify the turbine to be used.	The use of ETSU-R- 97 assessment does not take into account the lower sound insulation levels of caravans and mobile homes.	It is accepted that a caravan or mobile home will not afford the same level of sound reduction when compared to a structure with a higher mass, such as a house. ETSU does not make specific reference to caravans and mobile homes. Local Authority Environmental Health Officers may consider the potential impact of noise from wind turbine developments within such abodes when thought appropriate to do so.	No Change
YG060		7.3	Allowance should be made in the SPG for an update to the ETSU guidelines.	They are likely to be updated soon.	The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013.	Any updated publication will be given weight as a material consideration in

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					This guidance will relate to the application of ETSU-R-97. It is agreed that allowances should be made within the SPG to accommodate updates in guidelines.	applicable applications.
YG060		7.3	Predicted noise levels will be far greater in a caravan than a building due to their construction.	ETSU guidelines do not take into account the lower sound insulation qualities of mobile homes and caravans.	It is accepted that a caravan or mobile home will not afford the same level of sound reduction when compared to a structure with a higher mass, such as a house. ETSU does not make specific reference to caravans and mobile homes. Local Authority Environmental Health Officers may consider the potential impact of noise from wind turbine developments within such abodes when thought appropriate to do so.	Comment noted. No change in approach required.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG060	Proximity	7.9	Minimum separation distance should be the greater of either a minimum of 500meters or 20x the height of the turbine.	TAN 8 recommends a minimum separation distance of 500 meters.	TAN 8 guidance (Appendix D on Strategic Search Areas 3.4 states "500m is considered a typical separation distance between a wind turbine and residential property to avoid unacceptable noise impacts. However ...some flexibility is advised." Does not refer to visual amenity. In my view the authority adopts an appropriate flexibility in this case.	No Change
YG060	Landscape and Visual Impact Assessment	7.5/ App 3	Assessments should be carried out by an independent assessor.	to ensure true and representative photomontages are prepared.	Paragraph 11 of the checklist provides guidance in terms of who should carry out LVIA and its approach and contents. The list of documents needs to be updated to include 3rd edition of the Landscape Institute's Guidelines for Landscape and Visual Assessments published Spring 2013. The clarity of the advice might also be helped by	Update reference to LVIA guidelines. Include summary of process and components applying to the size of turbines in tabular form.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					describing the process and components of the assessments required.	
YG060	Cumulative Impact	7.6	A map should be provided by Gwynedd showing all approved, refused and current applications and requests for screening opinions.	This would demonstrated the cumulative impact of proposals within Gwynedd.	Such a map would not show cumulative impact.	No Change
YG060		7.13	Applicant should provide clear evidence how they have engaged with local community and businesses and how views have been taken into account	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG062	Noise and Amplitude Modulation (AM)	7.3	ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG062		7.3	A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most	No change in approach

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				invalid/incomplete.	stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May, 2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, its recommendations.	
YG063		7.2.2 (iii)	Sentence should be amended to read: "The potential impact upon groundwater, ecology, archaeology , topsoil removal, rate and quantity of rock to be excavated should all be considered."	No evidence submitted to support the statement.	Agree to include 'archaeology' in the paragraph.	Amend 7.2.2 (iii) through including 'archaeology'.
YG063		7.8.2	We would suggest amending the second sentence as follows: "Where archaeological features are or may be present, an archaeological assessment and/or evaluation may need to be undertaken and the results submitted with the planning application. Where a proposal is granted consent, there may be a requirement for archaeological	to clarify the stages by which archaeology is addressed in the planning process.	Accept the intention of the suggestion but would suggest wording it similar to other sections e.g. ecology.	Amend second sentence of 7.8.2 as follows: "Where archaeological features are or may be present, an archaeological assessment and/or evaluation may

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			<p>mitigation before and/or during the construction phase to ensure any archaeological features are appropriately recorded. Mitigation may include avoidance of archaeological features so that they are not damaged or destroyed.</p> <p>The Gwynedd Archaeological Planning Service must be consulted on the requirement for archaeological work (whether pre-application or after consent).</p> <p>It should be noted that archaeological assessment (possibly including intrusive/non-intrusive evaluation) may be needed irrespective of whether EIA or landscape and visual impact assessment is required.</p>			<p>need to be undertaken and the results submitted with the planning application. Where a proposal is granted consent, there may be a requirement for archaeological mitigation before and/or during the construction phase to ensure any archaeological features are appropriately recorded.</p> <p>Mitigation may include avoidance of archaeological features so that they are not damaged or destroyed.</p> <p>Further advice and guidance is</p>

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
						<p>contained in the Checklist (section 13) and may also be obtained from The Gwynedd Archaeological Planning Service suggest amending the second sentence as follows: "Where archaeological features are or may be present, an archaeological assessment and/or evaluation may need to be undertaken and the results submitted with the planning application. Where a proposal is granted consent, there may be a requirement for archaeological</p>

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
						<p>mitigation before and/or during the construction phase to ensure any archaeological features are appropriately recorded.</p> <p>Mitigation may include avoidance of archaeological features so that they are not damaged or destroyed.</p> <p>The Gwynedd Archaeological Planning Service must be consulted on the requirement for archaeological work (whether pre-application or after consent).</p> <p>It should be noted that archaeological assessment (possibly including</p>

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
						intrusive/non-intrusive evaluation) may be needed irrespective of whether EIA or landscape and visual impact assessment is required.
YG063		7.8.3	'Heritage evaluation' is not a recognised term and should be replaced with 'archaeological assessment' and 'archaeological evaluation', It may be helpful to include definitions of these terms in 14 Glossary .	which have recognised specific meanings (for desk-based assessment and field investigation respectively).	Accept	Amend as per suggestion
YG065		7.5.7	Include reference to Policy C26 which states refusal within the AONB.	This is the relevant policy as regards turbines within an AONB.	Agree that paras. 7.5.7 and 7.5.8 should also include reference to Policy C26.	Include reference to policy C26
YG065		7.13.3	Consultation should not be limited to close neighbours only.	Potential impact of development can be wide.	No substantive evidence submitted to support the comments received.	No Change
YG067		7.5	Welcome the statements in 7.5.7,7.5.8 a 7.7.2.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG068	Checklist	Section 7	It should be made clear that an EIA requires a statement of reasonable alternatives in relation to scheme details.	To lessen scheme impacts.	Accept	Amend 2nd paragraph "including a statement of reasonable alternatives"
YG071		7.9.8	Amend Paragraph to read; For turbines over 20m separation distances from residential or tourism properties will be greater of 500m or 20 times tip height (in meters).	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG072		7.9.8	Amend Paragraph to read; For turbines over 20m separation distances from residential or tourism properties will be greater of 500m or 20 times tip height (in meters).	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG073		7.12.1	Insufficient protection given to farmers and residents on private supplies.	The flow of water through strata is not a precise science nor fully understood.	Section 16 of the Checklist includes reference to making of assessment on risk to groundwater and surface water.	No Change
YG077		7.9.9	The third bullet point protects holiday homes, for people who perhaps do not live there.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG073			ETSU R97 has largely been discredited.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG073			It would be prudent to include an appropriate caveat relating to infrasound.	The jury is out on the medical effects of infrasound.	ETSU - R -97 states that two main elements are considered to add to the character of wind turbine noise, blade swish and tones.ETSU-R-97 allows for the application of a penalty to measured wind turbine noise if a tone is identified. If this approach fails to address any low frequency issue The Local Authority may look to address the matter utilising the statutory nuisance provision within The Environmental Protection Act 1990.	Comment noted. Further evidence based guidance is required.
YG077		7.9.8	This proposal should be refused and a normal screening procedure should be followed that would be closer to 6x the diameter of the rotor.	There is nothing to justify excluding Gwynedd Planning Authority from other Authorities in Wales. Paragraph 7.11.3 mentions 10X per rotor, on completely flat land where a turbine casts a direct shadow on a dwelling.	7.9.7 explains that not many guidelines are available. The guidance in 7.9.9 explains that any decision on separation distances will consider a combination of general guidelines and specific locational circumstances.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG013			There does not appear to be a reference to any transmission lines or infrastructure works associated with new proposals.	We think that the SPG should have regard to the environmental impact of such developments.	Sections 7.2 and 8.8 cover Infrastructure.	No change
YG019			wind turbines have an adverse impact on the rural Welsh economy.	It is also well established that wind turbines drive tourists to other areas. It is also now accepted that the presence of wind turbines can reduce property values. It is also evident that the possibility of turbines being built in certain areas blights the housing market as vendors and estate agents report that buyers are unwilling to purchase in such areas.	No substantive evidence submitted to support the comments received.	No Change
YG020			The proliferation of medium and large wind turbines will seriously damage the landscapes, wildlife, economy and residents of Gwynedd. It will also compromise the AONB, The Snowdonia National Park and other designated sites of high importance in the County.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG020	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.		
YG035			Council's 'Ecologist and Environmental Adviser' a bit confusing.	Another different term used in Section 7.7.7 and Appendix 4 no. 12. This term needs to be rationalised.	Agree with the suggestion.	Amend the wording to create consistency
YG039	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change
YG040	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	The evidence submitted to support the statement is limited to reference to an objection from one neighbouring tourist accommodation site.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG041	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change
YG042	Separation from dwellings and tourist accommodation		a minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment.	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change
YG042	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely	No substantive evidence submitted to support the comments received.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.		
YG043	Separation from dwellings and tourist accommodation		a minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment.	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change
YG043	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG044	Separation from dwellings and tourist accommodation		a minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment.	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances.	No Change
YG044	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change
YG055			Restrictions on wind turbines should not be assumed to harm the economy in areas outside the National Park.	since holiday makers in perhaps less attractive areas of caravan parks etc may enjoy hill-walking in the National Park or bird watching at Broadwater, Tywyn from which activities turbines could seriously	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				detract..		
YG057	Noise and Amplitude Modulation (AM)		ETSU R97 is outdated, and has been proven to be a very unreliable reference source in more recent times. An allowance for this prospective amendment should be made.	No evidence submitted to support the statement.	No substantive evidence submitted to support the comments received.	No Change
YG057	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change
YG058	Separation from dwellings and		a minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
	tourist accommodation		than the condition of a Residential Amenity Assessment.		needs to take into consideration a mixture of general guidance and specific locational circumstances.	
YG058	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change
YG059	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the Holiday Parks location.	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG060			Noise assessments should include an appropriated background noise assessment for the location concerned.	Background noise levels are location specific.	Where thought necessary to do so the Local Authority will require developers to undertake noise background surveys before a proposal is fully considered.	No change in approach
YG062	Separation from dwellings and tourist accommodation		a minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG062	Tourism and the Economy		Tourists will not want to visit Gwynedd to witness a landscape peppered by Industrial Wind Turbines.	Application C11/0690/14/LL & C12/1022/14/LL Coed Helen Holiday Park owned by The Haulfryn Group approx 600 meters away from a wind turbine application are obviously gravely concerned and have objected to both applications as they feel the turbine will impact upon their tourism business due to the	No substantive evidence submitted to support the comments received.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				Holiday Parks location.		
YG076			The Guidelines did not address the monitoring masts.	The purpose of the masts is to prepare for the installation of a wind turbine;	Paragraph 7.2.1 refers to wind measuring masts but it is not considered to be a very important matter	No Change
YG076			The Guidelines should provide further information regarding the proximity of proposed turbines to residences.	The information is restricted to turbines that are 21 metres and 65 metres high to the blade with the median height being ignored.	No substantive evidence submitted to support the comments received.	No Change
YG076			Some investments in wind energy developments would benefit the local economy.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received.	No Change
YG077			Care should be taken not to prohibit turbines in order to promote tourism.	It could be argued that maintaining the existing tourism economy rather than developing it further would be better.	No substantive evidence submitted to support the comments received.	No Change
CHAPTER 8						
YG021		8.6.1	We argue for a presumption of darker conservation colours in planning conditions.	Most turbines so far erected in the planning area have a whitish colour, which tends to be highly conspicuous, especially in bright weather conditions. In contrast to many conventional wind farms	Section 8.6 advises that "the colour of wind turbines is an important consideration and needs to relate to the ..backdrop"	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				elsewhere, most local turbines have a backdrop of the landscape rather than the sky. From experience with caravan sites this is the worst colour for blending into our landscapes, while adoption of dark green tones can be very effective in reducing visual impact. More emphasis needs to be given to this issue		
YG067		8.8	Ancillary infrastructure requirements underline the industrial nature of the developments	They are alien objects.	No substantive evidence submitted to support the comments received	No Change
YG019			It must be recognised that the impact of turbines is much wider than the boundaries of individual Local Authorities	Standing on top of Snowdon allows one to see turbines on Anglesey, in Conwy, Denbighshire, Powys and in the sea.	There is recognition in the draft SPG through the additional guidance on landscape and visual impact of the need to agree on the scope of the areas to be considered when undertaking an LVIA.	No Change
YG020	Separation from dwellings and		A minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
	tourist accommodation		than the condition of a Residential Amenity Assessment			
YG020			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval concentrated within the same area.	No substantive evidence submitted to support the comments received	No Change
YG039	Separation from dwellings and tourist accommodation		A minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG039	Landscape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4,	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				throughout the landscape of Gwynedd.	section 11)	
YG040	Landscape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change
YG040	Cumulative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	This would easily show the cumulative impact upon an area.	Such a map would not show actual cumulative impact	No Change
YG041	Separation from dwellings and tourist accom		A minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
	modat ion				general guidance and specific locational circumstances	
YG041	Landsc ape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change
YG041	Cumul ative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG042	Landsc ape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
				Gwynedd.		
YG042	Cumul ative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG043	Landsc ape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change
YG043	Cumul ative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG044	Cumul ative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG044			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG049			The Council should refuse all applications for turbines exceeding 15 metres in the rest of Gwynedd, unless the results of direct and indirect Assessments of Environmental Impact are submitted to a public consultation which prove beyond all doubt that there will be no harmful or unacceptable impacts.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG055			I agree with the 'DimGwynt' organisation that the height of turbines seen there should be limited to 11m, with those in the other planning areas of Gwynedd not exceeding 15m.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG057	Separation from dwellings and tourist accommodation		a minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG057	Landscape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG057	Cumul ative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG057			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG058	Landsc ape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG058	Cumul ative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG058			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational circumstances	No Change
YG059	Separation from dwellings and tourist accommodation		A minimum separation distance from any Wind Turbine should be the greater of either a minimum of 500 meters or 20 times the tip height. It should also be clearly stated that outside these limits there is a presumption to refuse, rather than the condition of a Residential Amenity Assessment	This will safeguard residents and businesses from noise, shadow flicker and protect their visual amenity / outlook from their homes and businesses.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of general guidance and specific locational	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					circumstances	
YG059	Landscape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change
YG059	Cumulative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No specific evidence submitted to support the comments received	No Change
YG059			An amendment should be made to the SPG stating that there should be at least a 2km separation between applications to prevent the effects of a dispersed wind farms throughout the County	Dwyfor - the number of individual applications for one or two turbines already approved along with live applications awaiting approval are concentrated within the same area.	The guidance reflects a general consensus amongst planning policy decision makers that decisions on applications concerning distance from property needs to take into consideration a mixture of	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					general guidance and specific locational circumstances	
YG062	Landscape Impact		The SPG does not provide adequate guidance for the potential impact these industrial turbines will have on the wider landscape.	The landscape of Gwynedd is the main driving force behind tourism of which is a major player in our local economy we must ensure that a detailed and robust set of guidelines are in place to prevent the proliferation of wind turbines throughout the landscape of Gwynedd.	The SPG works within the policy framework provided by national and local planning policies. The SPG guidance on landscape and visual impact is referred to in 7.5.2 and Appendix 4, section 11)	No Change
YG062	Cumulative Impact		The cumulative impact is clearly not addressed in this Draft SPG. We ask that a map is made available via the Gwynedd Councils website pinpointing all the application sites, approved, refused and live along with all screening requests.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
CHAPTER 9						
YG002		9.2	Remove 'Perhaps'. Also add a clause that is relevant for a turbine that has not been generating for a period (e.g. a year or two years) and is considered suitable for decommissioning.	In America, many wind turbines are left in the landscape after they have broken down.	It is not appropriate to include a requirement in every case. Accept the second point regarding developments which	Add a clause that refers to removal of turbines after period of inactivity.

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					require planning permission. The SPG of the County of Cornwall includes a clause to provide for cases where the turbine has not been used for a period of 12 months or more. Also, see the condition by the inspector in Appeal 20C277.	
YG008		9	Decommissioning and land restoration must be considered, namely to attach a clause where a turbine which has not generated for a period is to be considered for decommissioning so that it is not left in the landscape after it has broken down.	No evidence submitted to support the statement.	No substantive evidence submitted to support the observations received.	No change
YG017		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal of the foundations and taking them away from the site.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG018		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and taking away the	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			foundations from the site.			
YG019	9		It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and export from site of the foundations.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG022		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and export from site of the foundations.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG023	9		Require the developer/owner to lodge a bond sufficient in size to pay the cost of removing the concrete foundations of the turbines	It is not sufficient merely to cover over the surface and leave the underground structures in place.	No substantive evidence submitted to support the comments received	No Change
YG024		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and taking away the foundations from the site.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG027		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and taking away the foundations from the site.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG029		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and taking away the foundations from the site.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG030		9	It is absolutely essential that a bond is lodged for the full projected decommissioning costs. Decommissioning should include removal and taking the foundations away from the site.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG040	9		Another amendment to the SPG should state applicants/ developers will be required to submit a bond before planning permission is released to ensure sites are properly cleared once a wind turbine becomes redundant. The cost of clearing sites will then not be left to the tax paying public.	Turbines already erected in Gwynedd. LVIAs and photomontages submitted by applicants /developers do not show the true impact upon the landscape. This is now clearly evident in the Dwyfor area	Advice states that developers may be required to ensure that sufficient finance is set aside to enable them to meet full restoration obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) . The LA may also	No change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					wish to include reference to restoration should the turbine(s) cease functioning say for over 12 months unless there are genuine mitigating circumstances.	
YG040	9		Applicants/ developers will be required to submit a bond before planning permission is released	To ensure sites are properly cleared once a wind turbine becomes redundant.	Advice states that developers may be required to ensure that sufficient finance is set aside to enable them to meet full restoration obligations. The authority may wish to limit pp to a certain number of years (e.g. 25). The LA may also wish to include reference to restoration should the turbine(s) cease functioning say for over 12 months unless there are genuine mitigating circumstances.	No change
YG048		9	It is absolutely essential that a bond is lodged for decommissioning costs. Decommissioning should include removal of all the foundations and to transport them all from the site.	No evidence submitted to support the observations.	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG073		9.2	A bond should be compulsory and be sufficient to pay for break up and removal of concrete foundations	Experience elsewhere suggests removal condition insufficient	No substantive evidence submitted to support the comments received	No Change
YG080	9	9.1	Concern about the ability to enforce producers to clear the site.	Several examples of lack of enforcement in the caravan sector.	Section 9 explains that Authorities must consider appropriate conditions when decommissioning wind turbines and land restoration, along with the possibilities of asking for a bond. The Guidance takes into consideration specific circumstances.	No Change
YG020, YG039, YG041, YG042, YG043, YG044, YG057, YG058, YG059, YG062			Another amendment to the SPG should state applicants/ developers will be required to submit a bond before planning permission is released to ensure sites are properly cleared once a wind turbine becomes redundant. The cost of clearing sites will then not be left to the tax paying public.	Turbines already erected in Gwynedd. LVIAs and photomontages submitted by applicants/developers do not show the true impact upon the landscape. This is now clearly evident in the Dwyfor area	Advice states that developers may be required to ensure that sufficient finance is set aside to enable them to meet full restoration obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) . The LA may also wish to include reference to restoration should the turbine(s) cease functioning say for over 12 months	Amend paragraph 9.2 to refer to decommissioning statement.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					unless there are genuine mitigating circumstances.	
CHAPTER 10						
YG021		7.13 and Checklist item 10	The new requirement on the applicant for a pre-application Community Engagement Statement (section 7.13 and checklist item 10) is welcomed. The LPA needs to take a more active role in informing the public about proposals and ensuring that community engagement is effective	There should be more evidence of wide and genuine majority support from local communities for such major projects.	Note comments	No Change
YG035		10.4	Add to 'Environmental Impact Assessment' '...and any relevant species surveys'?	No evidence submitted to support the observations.	No substantive evidence submitted to support the comments received.	No Change
YG077		10.3	As a Community Group we welcome this observation and <u>note it as a substantial change to the current practice.</u>	No evidence submitted to support the observations.	No substantive evidence submitted to support the comments received.	No Change
YG020			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.			
YG039			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG039	Consulation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG040			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG041			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG041	Consul tation / Comm unity engag		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap ement	Para				
				Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).		
YG042			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG042	Consulation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG043			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG043	Consulation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG044			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.			
YG020	Consul tation / Comm unity engag ement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG044	Consul tation / Comm unity engag ement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG046			EIAs should be mandatory for any turbines above 15 meters total height	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG056			EIAs should be mandatory for any wind turbine above 15 meters total height, certainly once above these sizes.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG057			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG057	Consultation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG058			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			/ developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.			
YG058	Consulation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG059			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			independent assessment.			
YG059	Consulation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG060			Full visualisations from surrounding viewpoints should be provided by the applicant	to enable a full assessment to be made	Checklist makes exceptions to applications for small turbines of less than 20m (blade tip) where a formal visual impact analysis is less likely to be required dependant on location, context, and presence of sensitive areas and or receptors. Requirement therefore depends on a case-by-case assessment.	No change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG062			It is clearly evident from photomontages submitted with the applications to date that the details provided from applicants / developers cannot be relied upon. There should be more detail / evidence required from an application showing how people, their homes, gardens and businesses WILL NOT be affected by these developments. Any supporting information should be sourced from an independent assessment.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG062	Consulation / Community engagement		There should be clear evidence provided within an application showing how the applicant / developer has engaged with the public	Application C11/0690/14/LL Section 8 on the application form neighbour and community consultation. 9 names and addresses of neighbours used 7 were not consulted. Also the Planning notices placed in the area by the planning department were removed (this tactic is well known and frequently used).	No substantive evidence submitted to support the comments received	No Change
YG076			There is a need for more consultation and local engagement prior to developments being approved.	No evidence submitted to support the observations.	No substantive evidence submitted to support the comments received.	No Change
YG040	Consulation/Comm		There should be clear evidence provided within an application showing how the applicant / developer has engaged with	The evidence submitted to support the statement is limited to reference to an objection from one	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
	unity engag ement		the public	neighbouring tourist accommodation site		
CHAPTER 11						
YG017		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG018		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG019	11		Such elements do not fall within the purview of Planning Law and should be excluded from this document.	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG022		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG023	11		This is Government-sponsored bribery and should be deleted in toto from the SPG	The reasons are clearly shown in TAN 8.	No substantive evidence submitted to support the comments received	No Change
YG024		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG027		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG029		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG030		11	Such elements do not fall within the purview of Planning Law and should be excluded from this document	They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG048		11	They should be excluded from this document.	These elements do not fall within the purview of Planning Law...They are tantamount to bribery.	No substantive evidence submitted to support the comments received	No Change
YG065		11.8	Amend sentence to read "50kw and over"	Many applications to date are for 50kw turbines and are not obliged to make a community contribution	Accept the point	Change "over 50kW" to "50kW and over"
YG068	Checklist	Section 11	Insert reference to Guide to Good Practice on Using the 'Register of Landscapes of Historic Interest in Wales in the Planning and Development Process ' (Cadw 2nd (revised) ed. 2007).	When assessing EIA Statements	Accept	Insert reference to Guide in Checklist Section 11
YG076		11.8	Change the wording to "expect every wind energy development including medium or large wind turbines with a commercial generating capacity of 50KW or more to make a contribution (financial or otherwise) to local	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			communities that are affected".			
YG020			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received.	No Change
YG039			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG040			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	The evidence submitted to support the statement is limited to an objection from one neighbouring tourist accommodation site	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG041			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG042			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG043			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG044			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG057			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG058			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG059			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG062			Where an application is submitted as a Community Project the application must take into consideration the views of everyone in the community and clearly show that the opinions of every resident have been taken into account	Application C12/0316/37/LL reports from residents around this project state that not everyone was fully supportive of the application, not everyone was advised about the project, meetings took place behind closed doors and it has still not been made clear how the funds will benefit the community.	No substantive evidence submitted to support the comments received	No Change
YG074			The prospects of local community benefits should not be allowed to influence the acceptability of environmentally damaging proposals.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG076			Need a definite explanation regarding the scale of a community turbine;	A community turbine must be medium or large in order to be viable,	Agree that a section on proposals driven by the community should be included.	Add a section which explains the approach towards community-led proposals.

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG079			The need to care for the environment and its peaceful enjoyment has to be set against the community's economic well-being	But in the majority of wind turbines applications the beneficiaries are individuals where it is not clear that the community will benefit	No substantive evidence submitted to support the comments received. Local Planning Authorities are required to exercise their planning functions with the objective of contributing to the achievement of sustainable development.	No Change
CHAPTER 12						
YG063		12.1	Replace Gwynedd Archaeological Trust with The Gwynedd Archaeological Planning Service, rather than	This is the more appropriate contact name for matters relating to planning.	Accept	Amend as per suggestion
CHAPTER 13						
No Comments						
CHAPTER 14						

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG063		14	The definition of a Scheduled Ancient Monument needs rewording. Suggested wording "A legally protected archaeological site or monument of national importance. The designated area may have upstanding remains or may be wholly below ground."	Current explanation is too vague	Accept	Amend as per suggestion
APPENDICES						
YG002	Appendix		Need an appendix which explains the physics of wind production	The description in 6.10 is superficial	These are comments on the policy framework which are beyond the scope and purpose of the SPG.	Note the comment
YG035	Appendix 1		Should they provide a map showing the old 'Landscape Areas' and the proposed ones?	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change
YG048	Appendix 1	Wildlife Conservation Designations Map	Errors on the map.	Have not included Bala Lake and the River Dee as RAMSAR sites.	Bala Lake is completely within the boundary of the Snowdonia National Park which isn't a part of the SPG area. The part of the River Dee that is within Gwynedd has not been designated as a RAMSAR site.	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG060		App 3	No planning application should be validated and registered until checklist has been completed	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG073		App 3	Traffic Management Plans should include details of proposals involving the crossing of railways	to avoid serious rail crossing accidents	Section 14 of the Checklist includes reference to making of A Construction Traffic Management Plan. Accept that reference could also be made to liaising with Network Rail and/or private railway operators where relevant	Amend Section 14 of Checklist to include reference to rail crossings
YG076			The purpose of the maps and the way they would be used when considering a planning application is not clear.	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change
YG021			We welcome the detailed Application Checklist and introduction of the principle of Residential Separation Distances.	We consider the present Consultation draft an improvement on earlier versions	Note comments	No Change
GENERAL						
YG007	General		Object to any onshore tubines in Gwynedd	They are extremely ugly, require more energy than is produced. The example of Spain shows what can happen.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG008			There is considerable concern regarding the size of the turbines.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG008			Turbine developments should not have a negative impact on the interests of tourism and leisure, they could have a substantial impact on the local economy.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG008			The landscape and visual impact should be given serious consideration because of the high value of the environment.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG016, YG076	General		The document is far too long. ..in key areas, fails in its aim of providing greater clarity.	Much of it simply repeats or summarises other existing policies and guidance. Other parts are excessively detailed, becoming overly bureaucratic and pseudo-scientific.	The nature of the issue means there are a number of matters that need to be addressed.	No Change
YG019	General		We are disappointed not to have been included on the list of official consultees.	We have hundreds of supporters/members many of whom live in Gwynedd	Apart from statutory consultees all other individuals and groups have been afforded the same opportunity to scrutinize and respond to the draft consultation	No Change
YG020, YG039, YG040, YG041, YG042, YG043,	General		We feel there is a complete lack of clarity, detail and direction. The vagueness of some parts of the	This leaves the guidelines open to manipulation by applicants and developers and will not protect the	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG044, YG057, YG058, YG059, YG062			proposed SPG document leads us to the conclusion that this guide lacks detailed specification and guidance.	residents, landscapes or tourist economy here in Gwynedd.		
YG031			It is a factual document that would be beneficial when making decisions; however, it is not a policy and it does not convey Gwynedd Council's stance on onshore wind energy.	No evidence submitted to support the statement	Note the comments	No Change
YG032			These onshore wind turbines do not contribute anything towards reducing CO2 emissions.	Simple reason that the coal and gas powerhouses have to burn in the background, whether or not the wind is blowing!	No substantive evidence submitted to support the comments received	No Change
YG037			After speaking to our guests I am convinced that business would be seriously affected by wind farms	Resulting loss would probably make it unprofitable as insurance costs, advertising and other overheads would make the whole thing unprofitable	No substantive evidence submitted to support the comments received	No Change
YG038			Concerned that there will be overclustering in some areas, thus making them appear as wind farms.	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change
YG046	G		Draft lacks clarity and is vague in many areas	Would not adequately protect the residents of Gwynedd against developers finding loop holes to get unsuitable developments past.	No substantive evidence submitted to support the comments received	No Change
YG052			The opinion was that it was satisfactory enough. The only further comments received between then and now is that	No evidence submitted to support the comments.	Note the comment	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			some Councillors support the views of Nefyn Town Council.			
YG053	General		We feel that elements of the SPG are overly restrictive	Conflicts with Planning Policy Wales	No substantive evidence submitted to support the comments received	No Change
YG054	General		Welcome the contents of the document and pleased that it identifies the characteristics of the Planning Authority Area including quality and value of the landscape	Reflects the number of landscape designations attributed to the area	Note the comments	No Change
YG060	General		Careful consideration needs to be given to the siting of wind turbines	to ensure that they do not adversely affect existing tourism businesses or influence holidaymakers decisions to avoid the area	Note the comments	No Change
YG061			Carbon footprint is huge in manufacture, erection.	The pay back of carbon far exceeds the life of these units.	These are comments on the national energy policy which are beyond the scope and purpose of the SPG	No Change
YG067	Policy C26		Support the policy	No evidence submitted to support the comments	No substantive evidence submitted to support the comments received	No Change
YG066			Turbines have a limited life, need maintenance and the benefit (if any) to the community must be properly and fairly assessed	No evidence submitted to support the comments	No specific evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG066			Has insurance cover ever been obtained re. health and safety?	Should be part of the planning procedure and ruling	Not a land use planning consideration	No Change
YG077	General		More time needed to ensure that the views of all stakeholders are heard.	We suspect that only a few people will respond to this document with the consultation being held over the Christmas period.	No specific evidence submitted to support the comments received	No Change
YG005			The efficiency of these turbines has been consistently exaggerated by the industry	No evidence submitted to support the statement	No specific evidence submitted to support the comments received	No Change
YG005			Wind energy would be non-viable were it not for over generous subsidies	No evidence submitted to support the statement	No specific evidence submitted to support the comments received	No Change
YG005			Wind energy is not carbon neutral when the manufacture and transport of the turbines is considered	No evidence submitted to support the statement	No specific evidence submitted to support the comments received	No Change
YG005			The industry claim of a 25+ year life span has proven to be more like 10-15 years	No evidence submitted to support the statement	Note the comments	No Change
YG020, YG057, YG058, YG059, YG062	Other		There are numerous references to "Island" throughout this document please amend and correct.	No evidence submitted to support the statement	Agree to remove reference to Island.	Remove reference to Island.
YG020, YG039, YG040, YG041, YG042, YG043, YG044, YG057,	Independent Reports		We request that a list is formulated by the JPPU of independent specialists who applicants / developers can choose from when considering a full planning	Is has already been proved that the reports in question are not always correct. We have seen numerous applications where the supplied	Gwynedd Council Environmental Health Officers scrutinize planning applications and are	No change in approach

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG058, YG059, YG062			application for Wind Turbines. These independent specialists should have no affinity whatsoever with the Wind industry at all.	information has been left unchallenged by the authorities, and a little investigation has shown that the information is misleading, incorrect, or blatantly untrue.	suitably qualified to provide expert unbiased opinion.	
YG014			The guidance is comprehensive and refers to the impact of wind turbines on the setting and features and special character of the Park.	No evidence submitted to support the comments.	Note the comments	No Change
YG010			The area will be polluted as turbines are granted permission and they will have a very bad impact on the tourism industry which is very important to the area.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG015			It appears that generous subsidies have been awarded to get the turbines in place.	No evidence submitted to support the comments.	Note the comments	No Change
YG015			Considering the amount of energy generated and the carbon footprint left when manufacturing the turbines in the first place, is it all worth the conflict that comes as a result of the turbines?	It appears, rightly or wrongly, that cheap energy could be on its way with fracking.	This is a comment on national and local policies that is beyond the purpose of the SPG.	No Change
YG020			In the SPG it should be explained how much of this target Gwynedd is required to produce, what we are currently producing and details of the way the energy is being produced i.e. wind, hydro, tidal etc.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG028			The key issue with regard to turbines is the fact that the turbines are ONLY sustainable...	...because they are subsidised by our increasing fuel bills - which I believe are immoral and an absolute disgrace in our small island country, with the cold and damp weather that we are subjected to - when particularly the elderly and poor are suffering and choosing between heating their homes or eating. If renewable energy was a viable power source, it wouldn't need a penny from bill payers.	No substantive evidence submitted to support the comments received	No Change
YG034			No homeowner should be negatively(sic) impacted by a neighbours turbine	Locals struggle to buy in the property market	No substantive evidence submitted to support the comments received	No Change
YG020, YG039, YG040, YG041, YG042, YG043, YG044, YG057, YG058, YG059, YG062			In the SPG it should be explained how much of this target Gwynedd is required to produce, what we are currently producing and details of the way the energy is being produced i.e. wind, hydro, tidal etc.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG045	General		The SPG does not appear to reflect the conclusions of Gwynedd Werdd Scoping Renewable Energy Opportunities in Gwynedd (SREOG) report . This report identified a number of sites for potential	This SPG introduces restrictions on development which would render the sites identified in the SREOG report undevelopable. The report identified 5 sites with the potential	The SPG provides technical guidance to, works within, the policy framework provided by national and local planning policies.	Include reference to Gwynedd Werdd Renewable and Low Carbon Energy strategy and

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			development in Gwynedd in line with the existing UDP and seeks to inform the development of the LDP. It is of concern that the draft SPG may be inadvertently placing barriers to achieving the economic potential of renewable energy in Gwynedd.	of generating 5MW or more of renewable energy, with 3 of capacity up to 25MW.	para. TAN 8 para 2.13 refers to the need to strike a balance between the desirability of renewable energy and landscape protection. WG would support a local plan policy that restricts almost all wind energy developments larger than 5MW to within SSAs and urban/industrial brownfield sites.	SREOG Report
YG057			A list of independent specialists approved by the JPPU and the Gwynedd Planning Department should be used by applicants / developers. These specialists should have NO vested interests in the Wind Energy Industry.	The information is not always correct and there are ways for applicants / developers to manipulate the data to their advantage. Application C11/0690/14/LL & C12/1022/14/LL Noise data submitted with this application was reviewed and found to be invalid/incomplete.	ETSU - R -97 remains central to UK and Welsh Government wind energy policy .The Local Authority considers ETSU-R-97 to be the most relevant reference document available at present and looks to apply the most stringent application of ETSU when assessing relevant proposals. The Institute of Acoustics' Good Practice Guide on wind turbine noise assessment is to be published on 21 May,	No change in approach

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
					2013. This guidance will relate to the application of ETSU-R-97. The Authority will take note of, and consider, it's recommendations.	
YG062			In the SPG it should be explained how much of this target Gwynedd is required to produce, what we are currently producing and details of the way the energy is being produced i.e. wind, hydro, tidal etc.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG063			Reference must also be made to the potential impact on as yet undiscovered archaeological remains.	No evidence submitted to support the statement	No substantive evidence submitted to support the comments received	No Change
YG076			Information needs to be provided regarding any differences or conflict that could occur between national policies and the Unitary Development Plan.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG076			The general public would suffer.	[because] of the high costs associated with generating wind energy.	No substantive evidence submitted to support the comments received	No Change
YG076			[No] attention is given to the applications submitted since June 2012.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change

APPENDIX B

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
YG076			Some consideration should be given to the impact of the turbines on the sea.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG076			That the reference made in the document to the National Policy is very fragmented with some important points receiving due attention.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG076			There is a need to question the value of wind turbines in relation to greenhouse gas emissions.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG076			That this Joint-committee is given a further opportunity to consider a further draft report before the guidance is adopted.	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change
YG077			Other important and relevant recent documents and policies have not been named in the document: The Report of the National Assembly's Environment Committee on Energy and Planning Policy in Wales. The response of the Government to the Committee's recommendations. The Council needs to take full consideration of the Report and the Government's response to it. Also, the Council giving more support in a policy (by means of the Supplementary Planning Guidance), and practically, to	No evidence submitted to support the comments.	No substantive evidence submitted to support the comments received	No Change

Reference (commentator)	SPG		Summary of the Comment Received	Justification for the Comment	Officers' Response	Recommendation
	Chap	Para				
			community-led schemes.			
YG077			Insufficient attention is given to the implications of wind energy developments on the future of the Welsh language.	The Welsh language is an important planning factor and has been recognised so. The economy has a substantial impact on the language. Securing a long-term sustainable income for farms is certain to strengthen the language.	No specific evidence submitted to support the comments received. There is a reference in paragraphs 2.8 and 3.13 to the economic and social benefits of wind energy developments and their function in supporting sustainable rural communities.	No Change
YG077			There are a number of Important Strategies on Sustainable Development, Climate Change, as well as a Minister's Statement being noted in chapter three of the Draft document, [however] they do not seem to have been considered or included when preparing the Supplementary Planning Guidance.	The Supplementary Planning Guidance is flawed as it does not give attention to each of the relevant National Strategies and National Policies. The Planning Authority is behaving in a very dismissive way towards those Policies and Strategies.	The purpose of the SPG is to provide guidelines to show how the policy will be implemented in specific circumstances or areas. I am satisfied that the SPG refers to the main national policy considerations.	No Change

Comments on the Strategic Environmental Assessment (SEA)

Commentator	Section	Comments	Council's Response / Amendments
Environment	Table 3.1	SA Framework of objectives, point 11 is not complete	Agree. A section of the table including SA

Commentator	Section	Comments	Council's Response / Amendments
Agency		and finishes mid sentence.	objectives 7-11 has been omitted. This should be corrected.
CCW	Table 4.2	The proposed / recommended change to policy (7.7.3) should be strengthened to ensure that relevant assessment processes (EIA and HRA) will be required for all wind energy developments, including ancillary development.	<p>No change. The requirement for EIA will depend on a number of factors including the scale, location and the likelihood of significant effects. The Local Planning Authority will determine whether an EIA is required.</p> <p>Paragraph 7.7.4 of the SPG stipulates the need to consider ancillary development as part of the EIA process.</p>
CCW	Appendix 1 SA Objective 1	The requirement to undertake EIA at project level to 'guard against the risk' of adverse effects on biodiversity does not, in itself compromise an avoidance or mitigation measure.	<p>Agree. The sentence should be re-worded to reflect the precise role of EIA.</p> <p><i>SEA Document:</i></p> <p>A number of potential mitigation measures are identified, through the application of the development plan policies and site specific measures. as well as The requirement to undertake EIA <u>also means that potential adverse impacts are identified and mitigated.</u> that is used routinely to guard against such risks.</p>
CCW	2.2	The CCW agrees that the SEA process should avoid and mitigate for adverse effects upon the environment but it should also be noted that the SEA process requires consideration of both positive and negative effects on the environment	<p>Agree. Text should be included to reflect this:</p> <p><i>SEA Document:</i></p> <p>Strategic Environmental Assessment (SEA) on the</p>

Commentator	Section	Comments	Council's Response / Amendments
			<p>other hand is a process that aims to enable a high degree of protection for the environment, inform decision making and ensure that environmental issues are integrated into plan making with an aim to promoting sustainable development. <u>It aims to identify the likely positive and negative significant effects on the environment arising from the implementation of the plan...</u></p>
CCW	2.6	CCW agrees that the SA and SEA processes may be integrated however; care must be taken to ensure that the requirements of the SEA Directive and its implementing Regulations are met.	<p>No change. The scoping exercise for the SA of the JLDP involved the collection of a wide range of statistics covering a number of different topics using wide ranging and up to date information. This analysis of the current state of the environment, and sustainability issues and problems facing the area, led to the development of sustainability objectives to assess the effects of the plan. These objectives also included a number of sub-objectives which allows a thorough and detailed assessment. The requirements of the SEA Directive were fully met in this respect and it is considered that the appropriate steps were followed. It is also considered that it is important to have consistency in the assessment methodology with regards to related documents i.e. the emerging JLDP and the SPG. It is therefore considered that the data collected as part of this process along with the objectives used to assess the SPG is sufficiently robust for the purposes of this SEA.</p>
CCW	3	The tables in this section should be labelled correctly	Agree.

Commentator	Section	Comments	Council's Response / Amendments
			<p><i>SEA Document:</i></p> <p>Table 3.2 3.1: SA Framework</p>
CCW	3.4	The use of data from a previous study to establish an environmental baseline and key sustainability issues may mean that data used is out of date and key issues may no longer be relevant.	No change. It is considered that the data used as part of the scoping process is up to date and relevant. See also response to comment relating to section 2.6 above.
CCW	3.5	CCW would suggest that it may not be appropriate to use a generic SEA scoping report for one (now defunct) plan to service the SEA process for this SPG. The SEA process requires consideration of the effects of the implementation of a plan in the context of the specific environmental baseline of the plan area. The objectives and indicators used within the assessment process must be relevant to and reactive to the specific policies under scrutiny.	No change. See response to comment relating to section 2.6 above.
CCW	Table 3.1	<p>Objective 1: CCW would suggest the addition of sub-objectives relating to the need to maintain and enhance ecological capacity and function and also the need to maintain and enhance soils and soil functions.</p>	<p>No change. It is considered that the current sub-objective sufficiently addresses the need to maintain and enhance existing ecological capacity.</p> <p>With regards to the comment relating to soils, it should be noted that the omitted section of the SA Framework as noted in comment on Table 3.1 above contains a specific objective relating to soils and soil function.</p>
CCW	Table 3.1	Objective 2:	It is acknowledged that some of the objectives are

Commentator	Section	Comments	Council's Response / Amendments
		Some of the sub objectives are not directly relevant to the guidance under scrutiny i.e. meet the needs of an ageing population.	not directly relevant to the SPG. This is stated where relevant in the appraisal.
CCW	Table 3.1	Objective 6: It is not clear how the planning guidance relates to providing access to training, education and skills development opportunities for all sectors of the community.	It is acknowledged that some of the objectives are not directly relevant to the SPG. This is stated where relevant in the appraisal.
CCW	Table 3.1	Objective 8: As well as protecting and enhancing special landscape qualities of the plan area, including AONBs, coastal/seascapes and townscapes, the SPG should also aim to protect and enhance National Parks	Agree. <i>SEA Document:</i> Protect and enhance the special landscape qualities of the plan area, including AONBs, coastal/ seascapes and townscapes, <u>and the setting of the National Park.</u>
CCW	Table 3.1	Objectives 4, 7 and 10 CCW would suggest that these objectives are not relevant to or reactive to the plan under scrutiny. SEA objectives should be relevant to the plan under scrutiny and capable of reaction to the policies and recommendations being proposed. CCW accepts and acknowledges that the objectives selected are based on generic objectives produced for other plans and programmes but would suggest that the objectives selected should be focused down to those issues which are relevant to and reactive to the context of Onshore Wind Energy.	The objectives that constitute the SA Framework have been derived from a robust baseline analysis of the current situation in Gwynedd. It is considered that it is important to have consistency in the assessment methodology with regards to related documents i.e. the emerging JLDP and the SPG, and the inclusion of all objectives, whilst acknowledging that some may not be directly relevant to the SPG, provides context and consistency with the assessment of other documents. Overall, it is considered that the objectives are adequate for the purposes of

Commentator	Section	Comments	Council's Response / Amendments
			assessing the SPG.
CCW	4.7	CCW notes with concern that the only alternative considered is the 'no action' alternative. It is suggested that considering alternatives only in the context of 'business as usual' does not represent best practice and compromises the potential for the assessment process to inform and enable the development of robust policies.	SEA Guidance stipulates that reasonable alternatives should be assessed as part of the process. It is considered that the 'do-nothing' scenario represents such an alternative.
CCW	4.9	CCW welcomes the provision of a summary appraisal matrix however, in the absence of any details on the policies assessed and mitigation/avoidance measures recommended, it is difficult to comment further.	Comment accepted.
CCW	4.10	CCW acknowledges that mitigation and avoidance measures can reduce potential (adverse) effects on landscape however, no explanation or information has been provided regarding the nature of mitigation and avoidance measures. Without further detail being provided, it is not possible to consider the efficacy of proposed mitigation measures.	It is considered that Appendices 1 and 2 sufficiently outline possible mitigation and avoidance measures.
CCW	4.13	Clarification would be welcomed regarding the nature of the amendments made to the 2nd draft SPG., notably because Table 4.2 refers to 'recommendations' and not to amendments	The following amendment should be made to the SEA Document for clarity: Table 4.2 Recommendations for <u>Amendments to</u> the SPG
CCW	Table 4.2	Point 7.7.3 - CCW acknowledges that whether or not a project has a cumulative affect is site specific. However all sites should be assessed for this potential	Agree. SEA Document and SPG:

Commentator	Section	Comments	Council's Response / Amendments
		effect. The wording 'where appropriate' should be removed.	7.7.3... The potential cumulative impacts on biodiversity should also be considered where appropriate .
CCW	Table 6 Point 1	It is recognised that location is also an important factor in determining as to whether or not a turbine will have an adverse impact on biodiversity. However, consideration should be given not only to location of a proposed development but also to its magnitude and design.	Agreed <i>SEA Document:</i> The impact upon biodiversity assets will depend on the location, <u>magnitude and design</u> of the development.
CCW	Table 6 point 8	See point above.	Agreed <i>SA Document:</i> This section outlines the different size and scales of turbines which may determine the level of impact upon heritage / culture when combined with other factors such as location, <u>magnitude and design</u> .
CCW	Table 7 Point 1	Reference should not be made to the Conservation of Habitats and Species Regulations 2010 (as amended).The CCW welcomes the commitment of the authority to avoid adverse effects upon the environment by stipulating that no project alone/cumulatively should have a significant effect on biodiversity however, it is suggested that the proposed amendments be strengthened so as to require relevant assessment processes.	It is agreed that reference should not be made to the Conservation of Habitats and Species Regulations 2010 (as amended): <i>SEA Document:</i> Paragraph 7.7 provides a detailed account of the potential impact upon biodiversity resources. The requirement to undertake an ecological survey for proposals that are likely to have a significant effect

Commentator	Section	Comments	Council's Response / Amendments
		<p>See comment on Table 4.1 above- CCW acknowledges that whether or not a project has a cumulative affect is site specific. However all sites should be assessed for this potential effect. The wording 'where appropriate' should be removed.</p>	<p>on nature conservation as well as reference to the need to undertake an appropriate assessment under the requirements of the Habitats Regulations 1994, should ensure that the potential impacts upon biodiversity assets are thoroughly investigated given adequate protection. Mitigation measures for any potential ecological damage are highlighted and are considered adequate.</p> <p>It is considered that the SPG contains sufficient information regarding the requirement for relevant assessment processes.</p> <p>It is agreed that the wording 'where appropriate' should be deleted.</p> <p><i>SPG Document and SEA document:</i></p> <p>7.7.2...The potential cumulative impacts on biodiversity should also be considered where appropriate.</p>
CCW	Table 10 point 1	<p>Unless further clarification can be given regarding the nature of positive effects on Biodiversity, the avoidance of further negative effects (through EIA) cannot be considered to be a positive impact. CCW would therefore suggest that the 'scoring' for this objective should be reconsidered.</p> <p>It should be stipulated that any project reaching this stage will be re-assessed for it potential cumulative</p>	<p>The Gwynedd Onshore Wind Energy SPG does not include a section on 'Repowering'. Therefore, table 10 (section relating to 'repowering') as included in the SEA is not relevant to the Gwynedd SPG and should be deleted.</p>

Commentator	Section	Comments	Council's Response / Amendments
		impacts on the environment.	
CCW	Table 10 Points 2, 5 and 8	The completion of assessment such as EIA/ LVIA relating to repowering a project (unless further clarified) is not itself a positive impact. Also, It can not be presumed that the development of new wind turbines in new locations will have a larger adverse effect than repowering. CCW therefore cannot agree with the 'scoring' conclusion reached.	As above