

### Appendix C - Table of Comments Received and Officers' Response on the Proposed Changes

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
General						
AYG001	General		No wind turbines in this area.	Permission for a turbine has been granted in Morfa Bychan and is very visible. Permission has set a dangerous precedent.	Observations completely contrary to those given as a result of the first Consultation (namely in favour of renewable wind energy)	Note the observation.
AYG002	General		The Council should adhere to Policy C26.		These are observations on the implementation of the local development plan's policies.	Note the observation.
AYG003	General		The Council should adhere to Policy C26.		These are observations on the implementation of the local development plan's policies.	Note the observation.
AYG004	General		The Council should adhere to Policy C26.		These are observations on the implementation of the local development plan's policies.	Note the observation.
AYG005	General		No observation but happy to leave it in	His ward is in	Note the	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			the hands of the Planning Committee and the Gwynedd Councillors affected.	Snowdonia National Park.	observations.	
AYG011	General		Welcome better clarity and strengthening of the guidelines to support development that would lead to local benefit, community-led projects.		Note the observations.	No Change.
AYG012	General		They are not in keeping with the area of beauty, contrary to the policy whereby it is statutory for a Councillor to protect the AONB.		No robust evidence submitted to support the observations received.	No Change.
AYG020	General		I wholeheartedly and unreservedly support the movement that is trying to stop large wind turbines from being erected on Pen Llyn.		No substantive evidence submitted to support the comments received	No Change
AYG021			Question the value of the document...	...following the permission granted on appeal in Bodfel.	No robust evidence submitted to support the observations received.	No Change.
AYG035			The AONB Unit welcomes the number of minor amendments and additions to the document based on clarity and accuracy. The proposal to refer to additional matters in terms of considering the impact of developments on the landscape and natural environment, such as referring to LANDMAP, ASIDOHL, etc., is supported.		Noted.	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG036	General		No wind turbines above 10kW / 15m should be allowed in Gwynedd.	Wales has a disproportionate amount of wind turbines already in the seven designated strategic search areas (SSA'S). Gwynedd and Anglesey rely upon tourism; people come to visit Wales to escape industrialisation. To protect tourism it is essential that scenic areas are kept free of turbines	No substantive evidence submitted to support the comments received	No Change
AYG036	PC Consultation:		All residents should be consulted for every development. The SPG should incorporate the consultation guidelines determined by Eric Pickles Communities Secretary on 18 November 2013.	Turbines on the Llyn affect the whole peninsular. Notifying people of a planning application by a blurred water soaked A4 sheet of paper wrapped around the post of a sign is hopelessly inadequate.	Consultation guidelines are different in Wales. Consultation guidelines apply to large (i.e. over 50MW) applications and/or to England only	No Change
AYG036			The Gwynedd planning system is not fit for purpose when dealing with wind turbines. In Gwynedd they have already been hoodwinked into approving turbines which are several times too large for the associated property.	Clearly the planning officers are not technically competent or qualified to understand the technicalities of submitted planning applications.	No substantive evidence submitted to support the comments received	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG036		Compensation for affected properties	The SPG should determine appropriate levels of compensation for lost of business income and council tax reduction for properties affected by wind turbines.		No substantive evidence submitted to support the comments received	No Change
Chapter 1 - Introduction						
AYG026	PC1	New Para. Between 1.1.and 1.2	We do not accept that "current circumstances" is valid as a material consideration	this is much too vague and all-encompassing a phrase	Agree that this is vague.	Remove reference to "current circumstances". Second sentence to read "Material considerations, for example, could include policies in an emerging development plan and the planning policies of the Welsh Government."
Chapter 2 – Background						
AYG026	PC3	New Para. After 2.2	The SPG should give a clearer indication .....for the capacity number and distribution of wind turbines witin the planning area.	We still think this is weak.	The criteria adopted in C26 do provide guidance on locational factors. However, it is possible the study and strategy on landscape sensivity due to be completed shortly will give further guidance on the settings of	Subject to the adoption of the Gwynedd Landscape sensitivity Study and Strategy include appropriate reference to the work in paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
					sensitive areas.	
Chapter 3 – Policy Context						
AYG033		PC6	<p>There should be NO wind turbines within the AONB under any circumstances. Gwynedd was not selected to host SSA's (as per TAN8) for a reason! Reason - The impact upon the landscape of Gwynedd its scenery and history.</p>	<p>We should be aiming to enhance these valued areas. Below is an extract taken from Rough Guide to Wales confirming our landscape is important. "Perched on the rocky fringe of western Europe, Wales packs a lot of physical beauty into its small mass of land: its mountain ranges, lush valleys, ragged coastline, old-fashioned market towns and ancient castles all invite long and repeated visits. The culture, too, is compelling, whether in its Welsh- or English-language manifestations, its Celtic or its industrial traditions, its ancient cornerstones of belief or its contemporary chutzpah. Wales often gets short shrift in comparison to its</p>	<p>These are comments on the policy itself not on the SPG.</p>	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				<p>Celtic cousins of Ireland and Scotland. Neither so internationally renowned nor so romantically perceived, the country is usually defined by its male voice choirs and tightly packed pit villages. But there's far more to the place than the hackneyed stereotypes and, at its best, Wales is the most beguiling part of the British Isles. Even its comparative anonymity serves it well: where the tourist pound has swept away some of the more gritty aspects of local life in parts of Ireland and Scotland, reducing ancient cultures to misty Celtic pastiche, Wales remains brittle and brutal enough to be real, and diverse enough to remain endlessly fascinating."</p>		
AYG033		PC7	The statement indicates that 110 megawatts will produced from	110 Megawatts by 2020, 160 operational	The Scoping Report identifies	Include additional sentence to explain

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			renewable energy generation. More clarity is needed.	jobs and £16m into the local economy. Provide a breakdown in the SPG document of how this will be achieved e.g wind, hydro, solar etc (Wrexham Council have an excellent programme of residential solar power - Green Gwynedd needs to consider all methods not wind alone). The statement is extremely random and implies that the 110 megawatts will be provided by On Shore wind alone. If this statement is not backed up with a comprehensive breakdown developers will latch onto this and use this as an argument within their Planning/Design and Access Statements.	that Onshore Wind Energy has the potential to contribute up to 33MW (29.7% ) of the additional Renewable Energy deployed but only 12.8% new manufacturing and installation jobs across the UK and three operational and maintenance jobs.	the report's findings on the potential contribution of onshore wind energy to renewable energy capacity and jobs.
AYG035		PC8	Also, the proposal to include a new paragraph on the AONB (PC 8), is supported. However, it is believed that the paragraph on the AONB should include a reference to the AONB	(as noted in the original observations).	Noted.	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			Management Plan.			
Chapter 4 – Characteristics of the Gwynedd Planning Authority Area						
None						
Chapter 5 – Areas of Constraints						
AYG035		PC11	Also, the proposal to include a new paragraph on the Landscape of Special Historical Interest is supported.		Noted.	No Change.
Chapter 6 – Types and Sizes of Wind Turbines						
AYG002	6	PC20	The Council should refuse turbines measuring more than 11 metres within the Llŷn and Bardsey Island Landscape of Outstanding Historical Interest.		No robust evidence submitted to support the observations received.	Note the observation.
AYG002	6	PC20	Protect the countryside – no more than 11 metres within the AONB historical landscape. No more than 15 metres in the rest of Gwynedd.	To avoid causing substantial harm to the area's landscape.	These observations on scale relate to policies and not the SPG. The criteria of Policy C26 provide guidance on location but it is possible that the study and strategy on the sensitivity of the landscape that will be completed in the near future will provide further guidance for the layout of sensitive areas.	Subject to the approval of the study and strategy, include a reference under paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG003	6	PC20	The SPG should note the appropriate scale and location for 11 metre turbines within the Llŷn and Bardsey Island Landscape of Outstanding Historical Interest.	To avoid causing substantial harm to the area's landscape.	These observations on scale relate to policies and not the SPG. The criteria of Policy C26 provide guidance on location but it is possible that the study and strategy on the sensitivity of the landscape that will be completed in the near future will provide further guidance for the layout of sensitive areas.	Subject to the approval of the study and strategy, include a reference under paragraph 7.5.8a.
AYG003	6	PC20	Need further guidance to place a reasonable restriction on the appropriate scale and location for turbines.	To avoid causing substantial harm to the AONB landscape.	These observations on scale relate to policies and not the SPG. The criteria of Policy C26 provide guidance on location but it is possible that the study and strategy on the sensitivity of the landscape	Subject to the approval of the study and strategy, include a reference under paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
					that will be completed in the near future will provide further guidance for the layout of sensitive areas.	
AYG004	6	PC20	The SPG should note the appropriate scale and location for 11 metre turbines within the Llŷn and Bardsey Island Landscape of Outstanding Historical Interest.	To avoid causing harm to the layout and views of Llŷn AONB.	These observations on scale relate to policies and not the SPG. The criteria of Policy C26 provide guidance on location but it is possible that the study and strategy on the sensitivity of the landscape that will be completed in the near future will provide further guidance for the layout of sensitive areas.	Subject to the approval of the study and strategy, include a reference under paragraph 7.5.8a.
AYG004	6	PC20	Need further guidance to place a reasonable restriction on the appropriate scale and location for turbines.	To avoid causing harm to the layout and views of Llŷn AONB.	These observations on scale relate to policies and not the SPG. The criteria of Policy	Subject to the approval of the study and strategy, include a reference under paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
					C26 provide guidance on location but it is possible that the study and strategy on the sensitivity of the landscape that will be completed in the near future will provide further guidance for the layout of sensitive areas.	
AYG007	6	PC20	An explicit limit of 11-15 m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB .’	Not only local objections, but evolving assessment of the reducing return of large investment in wind turbines, should persuade the planners to reject any further thought of building the outsize structure that has been proposed. As you know: ‘The present definition of a ‘small’ scheme is inadequate. The proposal to increase the height to 74 m at Bodfel is outrageous.	No substantive evidence submitted to support the comments received. The appeal did not take into consideration the draft SPG	No Change
AYG008	6	PC20	The only reasonable way of ensuring that	The decision to	No robust evidence	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			the harmful impact of the commercial turbines on the landscape is restricted, including its layout in the AONB, is to include policy guidance that will restrict the height of turbines to 11-15 metres high.	approve the 74m high turbine in Bodfel on appeal, contrary to strong local opposition, proves that the current definition of 'small scale' in the SPG is completely insufficient.	submitted to support the observations received. The draft SPG was not considered in the appeal.	
AYG009	6	PC20	An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB .'	'The allowance on appeal of a 74m high wind turbine at Bodfel, contrary to almost universal local opposition, shows that the present definition of a 'small' scheme is inadequate.	No substantive evidence submitted to support the comments received. The appeal did not take into consideration the draft SPG	No Change
AYG010	6	PC20	The only reasonable way of ensuring that the harmful impact of the commercial turbines on the landscape is restricted, including its layout in the AONB, is to include policy guidance that will restrict the height of turbines to 11-15 metres high.	The decision to approve the 74m high turbine in Bodfel on appeal, contrary to strong local opposition, proves that the current definition of 'small scale' in the SPG is completely insufficient.	No robust evidence submitted to support the observations received. The draft SPG was not considered in the appeal.	No Change.
AYG012	6	PC20	The height of these turbines should be reduced to around 14m.		No robust evidence submitted to support the observations	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
					received.	
AYG013		PC20	An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB.	I note with incredulity, that on appeal, the 74m high wind turbine at Bodfel has been permitted, contrary to almost universal local opposition. This clearly highlights that the present definition of a 'small' scheme is totally inadequate. It appears that certain privileged landowners, and external financial institutions and investors in the 'city', are considered more important than the people who live on Pen Llyn;	No substantive evidence submitted to support the comments received. The appeal did not take into consideration the draft SPG	No Change
AYG014	6	PC20	The only reasonable way of ensuring that the harmful impact of the commercial turbines on the landscape is restricted, including its layout in the AONB, is to include policy guidance that will restrict the height of turbines to 11-15 metres high.	The decision to approve the 74m high turbine in Bodfel on appeal, contrary to strong local opposition, proves that the current definition of 'small scale' in the SPG is completely insufficient.	No robust evidence submitted to support the observations received. The draft SPG was not considered in the appeal.	
AYG015	6	PC20	The only reasonable way of ensuring that the harmful impact of the commercial	The decision to approve the 74m high	No robust evidence submitted to	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			turbines on the landscape is restricted, including its layout in the AONB, is to include policy guidance that will restrict the height of turbines to 11-15 metres high.	turbine in Bodfel on appeal, contrary to strong local opposition, proves that the current definition of 'small scale' in the SPG is completely insufficient.	support the observations received. The draft SPG was not considered in the appeal.	
AYG016	6	PC20	The only reasonable way of ensuring that the harmful impact of the commercial turbines on the landscape is restricted, including its layout in the AONB, is to include policy guidance that will restrict the height of turbines to 11-15 metres high. '	The decision to approve the 74m high turbine in Bodfel on appeal, contrary to strong local opposition, proves that the current definition of 'small scale' in the SPG is completely insufficient.	No robust evidence submitted to support the observations received. The draft SPG was not considered in the appeal.	No Change.
AYG017	6	PC20	The only reasonable way of ensuring that the harmful impact of the commercial turbines on the landscape is restricted, including its layout in the AONB, is to include policy guidance that will restrict the height of turbines to 11-15 metres high.	The decision to approve the 74m high turbine in Bodfel on appeal, contrary to strong local opposition, proves that the current definition of 'small scale' in the SPG is completely insufficient.	No robust evidence submitted to support the observations received. The draft SPG was not considered in the appeal.	No Change.
AYG018		PC20	An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape,	'The allowance on appeal of a 74m high wind turbine at Bodfel, contrary to almost	No substantive evidence submitted to support the	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			including the setting of the AONB .'	universal local opposition, shows that the present definition of a 'small' scheme is inadequate.	comments received. The appeal did not take into consideration the draft SPG	
AYG019		PC20	An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB .'	'The allowance on appeal of a 74m high wind turbine at Bodfel, contrary to almost universal local opposition, shows that the present definition of a 'small' scheme is inadequate.	No substantive evidence submitted to support the comments received. The appeal did not take into consideration the draft SPG	No Change
AYG021		PC 20	1) Approval should not be granted to any turbine higher than 11 metres throughout Gwynedd.	In an attempt to rectify the situation.	No robust evidence submitted to support the observations received.	No Change.
AYG024		PC20	Planning policy should seriously change in terms of the scale of wind turbines – 11-15 metres is sufficient.	If something is taller, it is unfair that next door or the nearby farm has to live with huge wind turbines; at the end of the day, those that measure in excess of 11-15 metres completely destroy the community – this is happening already but it is not sufficient evidence. It is about	No robust evidence submitted to support the observations received.	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				<p>time to obtain a clear response with wind turbines and a robust policy at the end of the day. It is disheartening that Gwynedd Council is so slow that it cannot look after its communities for the people who do not wish to see them in their back gardens. Yes, this happens already and so, on behalf of our communities where there is very strong opposition, a strong policy should stand with a 11-15 metre restriction, so every one of us would then have fair play and be able to live from day to day with nothing but kindness towards each other. We are merely flesh on bones at the end of the day and not here to divide our communities.</p>		

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG025		PC20	The allowance on appeal of a 74m high wind turbine at Bodfel, contrary to almost universal local opposition, shows that the present definition of a 'small' scheme is inadequate.	An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB . The construction of the large turbines which are visible even from the beach at Newborough as a feature of an otherwise spectacular natural landscape, clearly show the damage caused over a large area by inappropriate development.	No substantive evidence submitted to support the comments received	No Change
AYG026	PC20	6.7 - 6.11	The revised explanation still fails in our view to address a confusion in scale definitions between energy capacity and physical size	The capacity limit of 5W is defined ...as an upper threshold. This is referred to in Policy C26 as a scheme scale limit without further explanation. Does not follow that this threshold alone is an acceptable definition when applied to single wind farms.	agree that the second sentence could be made clearer	add to para. 6.6d, second sentence "However in the majority of cases <b>and in all cases involving single turbines</b> , the larger...."

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				The principal qualifying criteria relate to the significance of visual impact on the landscape. The principle of prescriptive limits is well established.		
AYG026	6	6.9	This is a useful framework and should be tied to the policy		Noted	No Change
AYG026	6	6.6d	We would expect to see the same level of scrutiny applied to all applications based on the required studies and documents		Noted	No Change
AYG026	6	6.18	It should be made clear that cumulative visual impact is different from cumulative energy output.		No substantive evidence submitted to support the comments received	No Change
AYG027	6	PC20	The SPG must contain a clearly stated turbine height limits for turbines. Whilst within AONB a limit of 10 - 15m is suggested.	That is the only certain way of limiting the damaging impact in environmentally sensitive areas and the AONB in particular. The central problem is that the SPG still use a threshold of 5MW, which would allow wind turbines as large as any in the world to be built in Gwynedd in the vicinity of the	The criteria adopted in C26 do provide guidance on locational factors. However, it is possible the study and strategy on landscape sensitivity due to be completed shortly will give further guidance on the settings of sensitive areas.	Subject to the adoption of the Gwynedd Landscape sensitivity Study and Strategy include appropriate reference to the work in paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				AONB and other sensitive areas. It must be replaced by a more practicable, understandable and appropriate measure.		
AYG028	6	PC20	A specific restriction of 15 metres is needed on the height of turbines in Gwynedd.	The area is not extensive enough to accommodate large turbines. This would confirm that Gwynedd Council supports and promotes renewable energy; but more importantly, protects the most important source of income in our area, namely tourism, by restricting the visual impact of wind turbines. The latest figures show beyond all doubt the importance of tourism to our local economy in our rural area.	No robust evidence submitted to support the observations received.	No change
AYG029		PC20	We would like to reaffirm that the current SPG still fails to give a clear or adequate definition of what a 'small' wind energy scheme is. Height limits of 10 – 15m should be imposed.	The use of the 5MW threshold would allow wind turbines as large as any in the world to be built in Gwynedd. It is clear since the	The criteria adopted in C26 do provide guidance on locational factors. However, it is possible the	Subject to the adoption of the Gwynedd Landscape sensitivity Study and Strategy include

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				allowance of the 74m high wind turbine at Bodfel on appeal, which contrary to almost universal local opposition, shows that the present definition of a 'small' scheme is inadequate. An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB .	study and strategy on landscape sensitivity due to be completed shortly will give further guidance on the settings of sensitive areas.	appropriate reference to the work in paragraph 7.5.8a.
AYG030		PC20	[Turbines]should specifically NOT be allowed over a height limit of 11-15m.	The current definition of size of a small development being under 5 MW could allow very large size turbines, with associated harmful effects.	The criteria adopted in C26 do provide guidance on locational factors. However, it is possible the study and strategy on landscape sensitivity due to be completed shortly will give further guidance on the settings of sensitive areas.	Subject to the adoption of the Gwynedd Landscape sensitivity Study and Strategy include appropriate reference to the work in paragraph 7.5.8a.
AYG032		PC20	Therefore, in brief, the grounds to our	By now we all know	No robust evidence	No change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			<p>observations was the need for the Supplementary Planning Guidance to include further guidance to the criteria in the policy, prohibiting developments that will have a <b><u>“substantial harmful impact”</u></b> on the landscape and setting of the AONB. That is, a turbine of what scale and type will have a <b><u>“substantial harmful impact”</u></b> on a place.</p>	<p>that the only reference to scale in the policy refers to the capacity of generating “less than 5MW” is insufficient. Continuing with a process that is open to personal views and opinions, rather than providing appropriate guidelines in its place, is negligent. Since the previous consultation, an application for an 800kw turbine has been approved on appeal in Bodfel. It was approved by the inspector because of the lack of appropriate policy guidance regarding what scale of turbine would have a “substantial harmful impact”. This decision proves the need to restrict the scale in sensitive landscapes and for it to be introduced in</p>	<p>submitted to support the observations received. The draft SPG was not considered in the appeal.</p>	

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				supplementary planning guidance to the policy. This decision also proves that not putting guidance in place has been negligent and irresponsible on the Council's part and has led to a 74m high turbine that will have a substantial harmful impact on the landscape and on the AONB.		
AYG033		PC20	We need the JPPU to confirm in the document what is meant by "small scale". A 5MW wind turbine is normally used off shore and have blades spanning in excess of 120 meters. We need a definition of small scale within the SPG.	The meaning is not fully explained and it is imperative that this is clear within the SPG. Is 'small scale' up to 20 meters 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'. The	No substantive evidence submitted to support the comments received	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				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.		
AYG033			An explicit limit of 11-15m on the height of commercial turbines is the only sure way of limiting the damaging impact of commercial turbines on the landscape, including the setting of the AONB.	The allowance on appeal of a 74m high wind turbine at Bodvel, contrary to almost universal local opposition, shows that the present definition of a 'small' scheme is inadequate.	No substantive evidence submitted to support the comments received	No Change
AYG034	6	6a 6b	It would help all parties if the SPG was to be clear on what is "Small" and in what contexts it should be used. Can it be confirmed and stipulated that column 1 table 3.1 will be the definitive definition of size.	To clarify using 5MW and applying it to single turbines in this context single 5MW wind turbine is not simply large, it would be the biggest single onshore turbine in Europe. Unless they are clarified and put in context the terms	No substantive evidence submitted to support the comments received. However further guidance on Residential Amenity Assessments is	Subject to the adoption of the Gwynedd Landscape sensitivity Study and Strategy include appropriate reference to the work in paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				<p>small medium and large are useless and have already been misused in numerous planning Applications. 6a 6b equating "Smaller" in TAN 8 2.12 and using it as a definition of small in the context of C26 is simply wrong. See photographic representation. As an aid to all parties involved in addition to size (and even table 3.1 is not great) it may be helpful to employ an empirical measure or methodology to agree of the visual impact of vertical structures on the observer and to provide this would aid common understanding and reduce any element of subjectivity. The Statutory Advisor NRW use a simple calculation of 26 times height (proven by Planning Inquiry</p>	<p>expected in the forthcoming Gwynedd Landscape Sensitivity Strategy and this should be referred to in the SPG.</p>	

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				<p>precedent) to define visual impact of "Dominant or Greater". Can the SPG therefore formulate a similar calculation for visual impact of Dominant or greater.</p> <p>NRW precedent            &lt;26 x height            Significant Visual impact (see C26)            &lt;50 x height?            Moderate visual impact            &lt;75 x Low visual impact            &gt;75 x height?            These are only suggested values and can be calibrated from existing examples such as Crugeran above using a 50mm lens (that which most closely replicates the human eye and employing a 60 degree horizontal arc like the human eye sees excluding peripheral vision.</p>		
AYG035	6	PC20	We disagree with these new paragraphs. It is believed that a stricter definition	This is an opportunity to analyse TAN for	These observations on scale relate to	Subject to the approval of the study

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			than developments with a generating capacity of up to 5MW should be provided. In reality, 5MW is a substantial development in an area like Gwynedd.	what is suitable for Gwynedd outside the AONB. It must be borne in mind that one of Gwynedd's main assets is the beautiful and unpolluted natural environment, much of which has been designated based on the value of that and on conservation.	policies and not the SPG. The criteria of Policy C26 provide guidance on location but it is possible that the study and strategy on the sensitivity of the landscape that will be completed in the near future will provide further guidance for the layout of sensitive areas.	and strategy, include a reference under paragraph 7.5.8a.
AYG035	6	PC20	Although they are not a part of the Proposed Changes – it is believed that these definitions in terms of the scale of turbines need to be re-examined. There is a broad range between the scales in the table and it is believed that additional categories between 20m and 65m and 65m and 135m should be included as this range is very broad.		No robust evidence submitted to support the observations received.	No Change.
AYG036		PC20	The limit of 5MW is incorrect and unacceptably high, this figure has been incorrectly taken from Tan8 which refers to "wind farms". Therefore the SPG should concern itself with single turbines.	Gwynedd is outside the seven designated SSA's and no wind farm should be permitted in Gwynedd.	No substantive evidence submitted to support the comments received	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG036			Turbines in Gwynedd should be limited to 10kW and 15metres maximum. Every smallholding in the community with a suitable site should be encouraged to install a wind turbine to ensure the economic value is spread as widely as possible. The SPG in its present form simply permits offshore investors to profit from despoiling and exploiting our countryside.	The present system permits a few rich influential landowners to make extortionate profit from the taxes of poor people; this is in direct contravention with Plaid Cymru's aims of claiming to be the "party of the people of Wales".	No substantive evidence submitted to support the comments received	No Change
Chapter 7 – Key Issues						
AYG006	7	PC30	In the second sentence of 7.7.3, the word "windfarms' ought to be deleted and replaced with the word " wind turbines".	This would then cover single turbines. (Incidentally, "windfarms" do not seem to be defined although reference is made to them throughout the SPG)	Paragraphs 7.7.1 and 7.7.2 refer to wind turbines. Windfarms are clearly defined in para. 6.13 of the draft SPG as "more than 2 turbines". For consistency therefore it is agree that the second sentence should read "wind turbines" rather than "wind farms"	Change reference in second sentence to "wind turbines".
AYG006	PC46	PC46	After the words " scheme to be a proposal where:" the following wording ought to be added - "ALL of the following criteria are met:".	This is to prevent 'cherry-picking!'	No substantive evidence submitted to support the comments received	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG011	7	PC38	A consultation should be undertaken with a recognised expert, such as the Gwynedd Archaeological Planning Service...It is not acceptable to note one service provider.	There are a number of other companies and individuals who could offer this service.	Agree with the observation. However, it is more appropriate to change the reference in the fourth sentence of PC37.	Change “Gwynedd Archaeological Planning Service” to “Gwynedd Archaeological Advisor”.
AYG011	7	PC41	1) Suggest changing para 7.9.14 in its entirety to include the impact on the economy as defined by Chapter 7, Planning Wales.	There is no justification for this paragraph as it is written. Research shows that wind turbines do not have a negative impact on tourists visiting an area.	No robust evidence submitted to support the observations received.	No Change.
AYG026	7	PC26	Glad to note that C26 rather than B8 is now identified as the policy explicitly excluding wind turbines from the AONB		Noted	No Change
AYG026	7	Residential Amenity PC39 / PC40 Table 4	There should be a minimum residential separation distance of not less than 500m.	A proposed buffer of 10 times total turbine height gives insufficient protection. RAA introduces a further element of complexity and uncertainty.	No substantive evidence submitted to support the comments received. However further guidance on Residential Amenity Assessments is expected in the forthcoming	Subject to the adoption of the Gwynedd Landscape sensitivity Study and Strategy include appropriate reference to the work in paragraph 7.5.8a.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
					Gwynedd Landscape Sensitivity Strategy and this should be referred to in the SPG.	
AYG026	7	Farm Diversification - PC46	Welcome and support these constructive proposals		Noted	No Change
AYG033	7	PC34	The majority of the[habitat or species] surveys which have been carried out have been desktop based (how often are these records updated?) accompanied by a 1 day site visit.	This is totally unacceptable and no one can make a rigorous assessment of the ecology of an area based on a walkover visit taking one day!. Evidence Application C12/1022/14/LL	No substantive evidence submitted to support the comments received	No Change
AYG033		PC39	Reinstate the word minimum.	There will always be instances where the developer/agent will state the separation distance is greater than it really is. Residents of Gwynedd need to know that the homes they work exceptionally hard to keep and maintain will not become blighted by developments in too close proximity. There have been	No substantive evidence submitted to support the comments received	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				<p>reports recently within the press that the development of wind turbines does in fact devalue property (indeed in Denmark compensation is often offered by developers) TAN 8 guideline suggests a minimum of 500m. If the Welsh Government Document can include the word minimum then I am sure that Gwynedd can too. The requirement of a Residential Amenities Assessment (RAA) must be provided by a suitably qualified individual or company (again a list approved by Gwynedd Planning Department should be used). Example of misrepresentation of distance from residential properties and an unqualified individual commenting on Residential Amenity- Application C12/1022/14/LL.</p>		

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
AYG033	7	PC40	Reinstate minimum (see above)	<p>There will always be instances where the developer/agent will state the separation distance is greater than it really is. Residents of Gwynedd need to know that the homes they work exceptionally hard to keep and maintain will not become blighted by developments in too close proximity. There have been reports recently within the press that the development of wind turbines does in fact devalue property (indeed in Denmark compensation is often offered by developers) TAN 8 guideline suggests a minimum of 500m. If the Welsh Government Document can include the word minimum then I am sure that Gwynedd can too. The requirement of a Residential Amenities Assessment (RAA)</p>	No substantive evidence submitted to support the comments received	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				must be provided by a suitably qualified individual or company (again a list approved by Gwynedd Planning Department should be used)		
AYG033		PC44	Hard evidence needs to be provided by developers i.e. leaflets, proof of community exhibition etc, to show how the developers / agents and applicants have engaged with the local community.	An example of no community consultation can be found within application C11/0690/14/LL. Applicant and agent have provided a list of names and properties within the application stating that these people have been consulted. NOT TRUE names and addresses were used falsely. The local councilors were also lied to about the true extent of the development.	Community engagement/consultation by applicants is not mandatory and the way in which this is carried out is a matter to be considered and weighed at planning application stage. dealt with	No Change
AYG033	7	PC46	Re Farm Diversification	Renewable energy can support farm diversification (allowing the farm to use monies saved on energy costs to be utilized elsewhere in the business). We	Noted	No Change

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				would not object to wind turbines of small scale (11-15m tip height) outside AONB's and designated areas providing they were sited close to the farm buildings and nearer to the farm house than that of the neighbours. We recognize the importance of the agriculture sector however if not managed correctly we are in danger of farms becoming obsolete swapping food production with energy production due to the generous Feed In Tariff System.		
AYG034	7		When looking at the issue of Community Schemes can it be stressed that all Community benefit is funded by Families in the larger community via their electricity Bills whatever community benefits are claimed	At March 2013 the cost of FIR installations to consumers stood at £0.54bn and this is largely funded from domestic fuel bills	No substantive evidence submitted to support the comments received	No Change
AYG034	7	PC39	shouldn't this include "or at any location where their impact upon it will be significant"	I again recommend an empirical formula as suggested above the best and most	No substantive evidence submitted to support the	Subject to the adoption of the Gwynedd Landscape

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
				equitable way of establishing same.,	comments received. However further guidance on Residential Amenity Assessments is expected in the forthcoming Gwynedd Landscape Sensitivity Strategy and this should be referred to in the SPG.	sensitivity Study and Strategy include appropriate reference to the work in paragraph 7.5.8a.
AYG035	7	PC30	Have to doubt the accuracy and suitability of the statement made in this additional paragraph.	How can a wind energy development that would have a “detrimental” impact on species, habitats or sites be approved?	The criteria is a <b>substantial</b> detrimental impact.	No Change.
AYG035	7	PC41	We disagree with this Proposed Change. Applications should not be assessed on the basis of their impact on tourism and leisure facilities alone.	By affecting the landscape and natural environment, wind turbines can impact the tourist industry that is such an important industry for Gwynedd, and the Llŷn Peninsula in particular.	No robust evidence submitted to support the observations received.	No Change.
AYG035	7	PC45	The principle of providing support to renewable energy for community benefit is praiseworthy. However, there are	It is believed that there is a risk as a result of this and that the main	Policy C26 provides clarity regarding the	No Change.

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			<p>different types of renewable energy and it is not believed that this should result in more flexibility in terms of wind turbines specifically.</p> <p>This final paragraph suggests that “community” wind energy projects will be considered differently to proposals submitted by others. However, will that result in less emphasis being placed on the impact on the natural environment and views specifically?</p>	<p>consideration at all times should be the impact on the landscape.</p>	<p>context and criteria used to approve applications.</p>	
AYG035	7	PC46	<p>It is suggested that this Proposed Change needs to be revisited. As with community proposals, it appears that there is more flexibility in terms of considering wind turbines in some cases. As noted already, the main consideration at all times should be whether or not the proposal is acceptable in terms of its impact on the natural environment, and the landscape in particular. There is concern regarding the statement which refers to wind turbines as a suitable method of diversification and as an “opportunity for farmers to sell or rent land to commercial wind energy companies, or support community renewable energy projects”. It must also be noted that TAN 6 does not refer specifically to wind energy when it</p>	<p>This is a significant addition to the SPG which appears as a policy statement rather than information to include within Supplementary Planning Guidance. It is believed that this is an open-ended statement and that there is a need to consider the potential implications and controls in detail. There are many types of other renewable energy that could be suitable on farms such</p>	<p>The addition considers, amongst other things, the encouragement given in TAN 6 (see summary in paragraphs 3.13 – 3.15), and the UDP itself for rural diversification. The encouragement is subject to other considerations within the SPG and that the main activity of the farm is protected. However, it is</p>	<p>Delete the first paragraph. Change the third sentence of the second paragraph to read “Therefore, the principle of establishing a renewable energy project such as wind turbines is a valid diversification activity on a farm subject to the criteria of Policy C26.”</p>

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			refers to “renewable energy”. The criteria that have been set for considering applications are very detailed and again read more like a policy than guidelines. Also, it is believed that it could be difficult to implement some of them, e.g. why would only full-time farmers be eligible and how could this be controlled? There is also concern about coupling the capacity of a turbine and the electricity needs of an agricultural unit -?	as solar (it would be very suitable on agricultural sheds), biomass, anaerobic digestion, hydro electricity, etc. What about units with substantial electricity requirements such as milking parlours? How is that in keeping with adopted planning policies on wind turbines and protecting the landscape?	agreed that parts of the first paragraph where it refers to an “opportunity for farmers to sell or rent land to commercial wind energy companies”, gives a misconception of the encouragement intended here.	
Chapter 8 – Siting and Design						
None						
Chapter 9 – Decommissioning and Reinstating of Land						
None						
Chapter 11 – Community Benefit and Developer Contributions						
AYG026	11	Community Schemes & Benefits - PC45	Welcome the introduction of a definition of community driven energy project.		Noted	No Change
AYG026	11	Community Schemes & Benefits - PC53	The guideline contribution should be related to a proportion of the gross annual income expected to be generated by the turbine	The figure of £5,000/Mw is a derisory amount	No substantive evidence submitted to support the comments received	No Change
Gwynedd Council	11	11.6 & 11.8	Reference to circular 13/97 in paragraph 11.6 and Section 106 agreement in 11.8 should be removed. The words ‘As good	Following discussions with developers and to ensure that there is no	Accept the change to ensure that the guidance is in line	Delete reference to circular 13/97 in paragraph 11.6 and

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			practice' should be included at the beginning of paragraph 11.8.	misinterpretation for this part of the guidance.	with National guidance.	Section 106 agreement in 11.8. Add the words 'As good practice' should be included at the beginning of paragraph 11.8.
Chapter 12 – Contacts						
None						
Chapter 13 – Further Reading						
None						
Chapter 14 – Glossary						
None						
Appendix 4 – Checklist						
AYG026	A4	EIA - PC61	It is not clear why it is felt necessary to repeat the sentence "Subject to the likelihood..."		Editorial error. The sentence has been moved but its original place has not been deleted.	Delete first "subject to the likelihood..."sentence
AYG026	A4	Landscape & Visual Imp Assess - PC62	Statements regarding the cumulative impact assessment radius need reviewing		No substantive evidence submitted to support the comments received	No Change
AYG033	A4	PC62	Developers must use the Approved list provided by Gwynedd Council.			
AYG033	A4	PC64	Change - It may be necessary for applicants to commission an archaeological assessment and/or archaeological evaluation to - To - It may be necessary for applicants to commission an archaeological assessment and / or archaeological			

Reference	Draft SPG 2		Summary of Comments Received	Justification for the Comment	Response from Officers	Recommendation
	Chapter	Change No.				
			evaluation, the archaeological programme must be carried out by an appropriately qualified professional person or organisation. The Institute for Archaeologists maintains a list of Registered Archaeological Organisations on their website <a href="http://www.archaeologists.net/ro">http://www.archaeologists.net/ro</a> whilst an impartial list of archaeological contractors is available on the British Archaeological Jobs Resource website <a href="http://www.bair.org/WhoseWho/contractor.asp">http://www.bair.org/WhoseWho/contractor.asp</a>			
Other Minor Changes						
AYG011	7	PC38	1) Language correction in the Welsh version – “ <i>gyda</i> ” instead of “ <i>efo</i> ”.		In written Welsh, the custom is to use “ <i>gyda</i> ”.	Change “ <i>efo</i> ” to “ <i>gyda</i> ” in Welsh version.
AYG026		para 2.3	missing indefinite article.... 'There <b>is not a</b> Strategic Area...'		Agreed	Change
AYG026		para 3.20	spending a total of 21.5m on tourism days' - meaning unclear; does this refer to £ monetary value?		Reference is for 21.5m tourism days spent in the area and not tourism spend.	Remove the word 'on' after 21.5m.
AYG026		para 5.2.4	there is a reference to para 5.3.7 which does not appear in the SPG		This refers to a paragraph in PPW.	Change to explain it is a paragraph in PPW.
AYG026		para 5.13.4	Line 3 punctuation. '...in these areas. All proposals....'		Agreed	Change
AYG026		para 5.4.1	typos: ...Cadw's 'Register....		Agreed	Change
AYG026		para 7.5.3	D' missing from LANDMAP		Agreed	Change
AYG026		para 7.9.8	line 20 'blade'		Agreed	Change

**Comments on the Strategic Environmental Assessment (SEA)**

<b>Commentator</b>	<b>Section</b>	<b>Comments</b>	<b>Council's Response / Amendments</b>
Natural Resources Wales (AYG031)	Table 3.2	<p><b>Table 3.2</b></p> <p><b>Objectives 4, 7 and 10.</b> We 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. We 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.</p> <p><b>Objective 2</b> – Some of the sub objectives are not directly relevant to the guidance under scrutiny i.e. meet the needs of an ageing population.</p> <p><b>Objective 6</b> – 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.</p>	<p>It is acknowledged that some of the objectives are not directly relevant to the SPG. This is stated where relevant in the appraisal.</p> <p>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 assessing the SPG.</p>
Natural Resources Wales (AYG031)	Section 3.4	<p><b>Section 3.4</b></p> <p>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. It is suggested that a review of the data and key issues is undertaken.</p>	<p>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 table 3.2 above.</p>
Natural Resources Wales (AYG031)	Section 3.5	<p><b>Section 3.5</b></p> <p>We suggest that it may not be appropriate to use a generic SEA scoping report for one 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</p>	<p>No change. See response to comment relating to table 3.2 above.</p>

Commentator	Section	Comments	Council's Response / Amendments
		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.	
Natural Resources Wales (AYG031)	Section 7.12.2	<p><b>Section 7.12.2</b></p> <p>Makes reference to Environment Agency. This should be amended to read Natural Resources Wales.</p>	<p>Agree.</p> <p><i>SEA Document:</i></p> <p>7.12.2 An assessment of the risks to water quality will be required for each medium to large scale wind energy developments and <del>the Environment Agency</del> <b><u>Natural Resources Wales</u></b> will be consulted where appropriate.</p>
Natural Resources Wales (AYG031)	Section 12.1	<p><b>Section 12.1</b></p> <p>The contact addresses for Countryside Council for Wales and Environment Agency Wales should be removed and replaced with: Natural Resources Wales, Llwyn Brain, Ffordd Penlan, Parc Menai, Bangor, Gwynedd LL57 4DE, <a href="mailto:planning@cyfoethnaturiolcymru.gov.uk">planning@cyfoethnaturiolcymru.gov.uk</a></p>	<p>Agree.</p> <p><i>SEA Document:</i></p> <p><del>Countryside Council for Wales</del>  <del>Plas Penrhos</del>  <del>Ffordd Penrhos</del>  <del>Bangor</del>  <del>LL57 2BX</del>  <del><a href="http://www.ccw.gov.uk">www.ccw.gov.uk</a></del></p> <p>Environment Agency Wales  Ffordd Penlan  Parc Menai  Bangor  LL57 4DE  <a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a></p> <p><b><u>Natural Resources</u></b>  <b><u>Wales, Llwyn Brain, Ffordd Penlan, Parc Menai, Bangor, Gwynedd LL57 4DE,</u></b></p>

Commentator	Section	Comments	Council's Response / Amendments
			<a href="mailto:planning@cyfoethnaturiolcymru.gov.uk">planning@cyfoethnaturiolcymru.gov.uk</a>
CPRW (AYG026)	Key Issues Table (p33)	The SA should be made clear that in accordance with Policy micro and small scale wind energy schemes continue be excluded from the AONB.	<p>Agree.</p> <p><i>SEA Document:</i></p> <p>The AONB is given full protection where proposals for <b>wind turbine developments will be refused</b> <del>medium and large turbines are not supported and micro and small scale developments will only be supported if they demonstrate they conserve and enhance the natural beauty of the AONB.</del></p>
CPRW (AYG026)		The summary explanation in the main text should also mention that the EIA Regulations require all wind turbine proposals wholly or partly in a sensitive area, including an AONB, to be screened for EIA.	<p>The Council agrees that projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria. This is referred to in Appendix 4 of the SPG.</p> <p>The Council feels that providing such details within the main body of the Guidance would add unnecessary detail and repetition.</p>