



**CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

**GWYS A RHAGLEN**

**SUMMONS AND AGENDA**

ar gyfer

for a

**CYFARFOD  
ARBENNIG O  
GYNGOR SIR  
YNYS MÔN**

**EXTRAORDINARY  
MEETING OF THE  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

a gynhelir yn

to be held at the

**SIAMBR Y CYNGOR  
SWYDDFA'R SIR  
LLANGEFNI**

**COUNCIL CHAMGER  
COUNCIL OFFICES  
LLANGEFNI**

**DYDD IAU, 24 IONAWR, 2013**

**THURSDAY, 24 JANUARY 2013**

**→ am 10.00 o'r gloch ←**

**→ at 10.00 am ←**

## A G E N D A

**1     DECLARATION OF INTEREST**

To receive any declaration of interest from any Member or Officer in respect of any item of business.

**2     TO RECEIVE ANY ANNOUNCEMENTS FROM THE CHAIRPERSON, LEADER OF THE COUNCIL, BOARD OF COMMISSIONERS OR THE HEAD OF PAID SERVICE.**

**3     ON-SHORE WIND ENERGY SUPPLEMENTARY PLANNING GUIDANCE  
(Pages 1 - 244)**

(a) To report that the Executive at its meeting on 14th January, 2013, had resolved “to refer the matter to the County Council for discussion”.

(b) To submit the report of the Head of Service (Planning and Public Protection)

**4     LOCAL DEVELOPMENT PLAN PREFERRED STRATEGY (Pages 245 - 264)**

(a) To report that the Executive at its meeting on 14th January, 2013 had resolved “to recommend to the County Council that it approves the draft Preferred Strategy document for the purposes of public consultation”.

(b) To submit the report of the Head of Service (Planning and Public Protection)

**[Copy previously issued to all members as part of the Executive papers for 14th January, 2013]**

**5     ADOPTION OF A COUNCIL TAX SUPPORT SCHEME (Pages 265 - 282)**

(a) To report that the Executive at its meeting on 14th January, 2013, had resolved to recommend to the County Council as follows:-

- “That it notes the making of the Council Tax Reduction Scheme and Prescribed Requirements (Wales) Regulations (“the Prescribed Requirements Regulations”) by the Welsh Assembly on 19th December, 2012;
- That it notes the outcome of the consultation exercise undertaken by the Council on the introduction of the Council Tax Reduction Scheme;
- That it adopts the Scheme as set out in Appendix 1 of the report.”

To give consideration to the above.

(b) To submit the report of the Head of Function (Resources)

<b>ISLE OF ANGLESEY COUNTY COUNCIL</b>	
<b>Report to</b>	<b>County Council</b>
<b>Date</b>	<b>24 January 2013</b>
<b>Subject</b>	<b>SPG Onshore Wind Energy</b>
<b>Portfolio Holder(s)</b>	<b>Councillor R. Ll. Hughes</b>
<b>Lead Officer(s)</b>	<b>Mr Jim Woodcock Head of Planning &amp; Public Protection Service</b>
<b>Contact Officer (s)</b>	<b>Gwyndaf Jones Chief Planning Officer 01248 752 403 and Bob Thomas (Team Leader) Joint Planning Policy Unit 01286 685 000</b>
<b>Nature and reason for reporting</b>	
<p>The Council has prepared a SPG regarding development that involve onshore wind energy development that was revised following the first public consultation period, which was then subject to another public consultation period. This report sets out the recommended response to the representations that were received and seeks the Council's approval of the recommended responses and the changes to the SPG</p>	

<b>A - Introduction / Background / Issues</b>
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## **A1. Introduction**

A1.1 A Supplementary Planning Guidance (SPG) is a means of setting out more detailed guidance on the way in which the policies of a plan will be applied in particular circumstances or areas. Therefore it cannot be used to create a **new policy**. The development plan process is the method for producing a new policy for a particular subject. Therefore preparing the Anglesey and Gwynedd Joint Local Development Plan will provide an opportunity to gather and review the evidence and prepare new policies.

A1.2 The existing Supplementary Planning Guidance (SPG) for dealing with Wind Turbine applications was adopted in 1994 and therefore pre-dates the adopted Ynys Môn Local plan (1996). It was also prepared in relation to dealing with wind farm applications. Over the past 18 to 24 months the Council has been dealing with a number of applications for single or up to three turbines rather than applications for specific wind farms.

A1.3 To ensure that the relevant issues that need to be addressed with each application and to provide information over the type of information required to support and assess such applications it was felt necessary to produce a revised SPG which if adopted would supersede the 1994 SPG.

A1.4 If adopted this document will supplement policies in the 1993 Structure Plan and the 1996 Local Plan. Since the stopped UDP (2005) is a significant material planning consideration this document also sets out how its policies should be considered. The SPG will be a material consideration in dealing with current and future applications until the aforementioned plans are superseded by the adopted Joint LDP and/or any relevant SPG that may be formulated to support its policies..

## **A2. Background**

A2.1 A Draft SPG was prepared and discussed at the Environmental & Technical Scrutiny Committee (referred to as Scrutiny Committee in remainder of the report) on the 24 October 2011 and an Executive Decision by the Commissioner Alex Aldridge to conduct a 8 week Public Consultation exercise between 16 December 2011 and 10 February 2012.

A2.2 Following this consultation exercise, which resulted in over 900 responses

being submitted, a report on the Key Issues raised was reported to the Scrutiny Committee on the 26 April 2012. At this meeting certain key stakeholders were also invited to present their views to the Committee.

A2.3 A full report was submitted to the Scrutiny Committee on the 26 July 2012 which suggested significant changes to the Draft SPG. It was recommended that the revised document be subject to a further consultation exercise due to the scale of changes.

A2.4 The Second Public Consultation exercise, for 8 weeks, was undertaken between 16 August 2012 and 11 October 2012. Following this period 186 responses were received as well as a number of petitions which meant that in the region of 8,000 individuals/ groups/ organisations responded to the 2<sup>nd</sup> Draft document.

A2.5 A verbal presentation about the consultation was given to the Scrutiny Committee on the 25 October 2012. It was resolved to seek the Executive Committee's support regarding the submission of a detailed report on the consultation about 2<sup>nd</sup> Draft SPG to the Full Council meeting on the 24 January 2013 rather than at the Scrutiny Committee.

### **A3. Issues**

A3.1 The representations received on the second public consultation can be categorized into two broad camps being:-

- Camp 1 - Objectors who feel the document should be more prescriptive in detail e.g. providing clearer guidance over separation distances and tighter constraints in the AONB;
- Camp 2 – Objectors who feel the current revised document is too prescriptive already and extends beyond the remit of an SPG e.g. height restrictions in the AONB.

A3.2 The vast majority of the objections received fall into Camp 1 and this includes a petition of over 7,500 names collected by Anglesey Against Wind Turbines. However as with any consultation exercise it is the issues raised and the justification/evidence provided that need to be examined when considering making any changes to the document.

A3.3 Since wind turbine development is not a type of development that lends itself to a 'one size fits all' approach, the SPG advocates an approach that requires the Local

Planning Authority to deal with **each application on its own merits**. The document provides guidance over the different issues that may be applicable and the type of information required with different types of applications. This will be dependent upon the size of the proposal, its location and any designations that may be affected by the proposal.

A3.4 From the 186 representations received in the region of 1224 individual issues were raised. These have been collated into specific topics and a summary of the representation received has been prepared. Any supporting justification / evidence was reviewed before the Officers Response and Recommendations were prepared.

A3.5 The Tables in Appendix 1 provides a detailed response to all of the issues raised during the public consultation exercise and **must** be read in conjunction with this report in order to understand, consider and respond to the report's recommendations.

A3.6 The report agrees that certain amendments should be made to the SPG in response to the representations made, and these can be viewed in Appendix 2 (additional text shown in Bold underline with text being removed shown as strikethrough (new text = , text removed = )). In accordance with the requirements of SA/SEA, the changes made to the SPG as a result of the public consultation (Aug- Oct 2012) have been considered to determine if they would result in any changes to the findings of the SA/SEA and HRA of the guidance. It was considered that the changes made to the guidance were not significant; rather they were minor revisions or clarifications that would not materially alter the SA/SEA/HRA findings. A link to the SA/SEA and HRA Screening Report is provided in the Background Papers section. Minor changes to the SA/SEA and HRA have been recommended and these are shown in Appendix 4.

A3.7 A detailed response to the 3 Key Issues raised during the consultation period is outlined in section B below. Officers are of the opinion that some of the matters raised relate to National Policy e.g. separation distances. Planning Policy Wales requires that appropriate weight is given to National Planning Policy and any deviation from it must be substantiated by robust evidence. **Given the degree of change sought by some objectors at a local level it is considered that National Planning Policy would need to be amended in order that the change could be incorporated locally.**

## **B - Considerations**

B1 Whilst objections cover a number of different topics it is considered that there are three issues that are referred to by/ common to a number of objectors:

- Separation Distances;
- Noise Impact; and
- impact of turbines on the AONB.

## **B2 Separation Distances**

B2.1 A vast number of objection were made seeking minimum separation distances between ‘commercial’ turbines and residential properties. (‘commercial’ defined by objectors as those not primarily for the use of an individual domestic residence). Whilst a variety of distances are suggested the majority of objectors sought a separation distance of 1.5km.

B2.2 Further objections sought a separation distance buffer from the AONB to afford greater protection for the designation.

B2.3 On the other hand there are objections that feel the separation distances are based upon arbitrary choices. Also comments have been made that if the separation distances are a trigger for providing a Residential Amenity Assessment it should clearly be termed as such and not referred to as ‘minimum separation distances’.

B2.4 The evidence provided by objectors for the introduction of separation distances can be summarised as:

- There is extensive evidence from other parts of the UK and abroad that state that a minimum separation distance of 2km should be introduced. This is supported by the World Health Organisation.
- Reference given to various authorities who have introduced separation distances e.g. Cornwall, Scotland and Carmarthen.
- Does not accord with 500m separation distance advocated in TAN8.
- Reference is made to Staffordshire County Council which state no turbines within a 2km buffer to their AONB.

B2.5 Officer’s Response - A review by Officers of the evidence submitted can be summarised as follows:

- The national and regional policy varies from country to country.
- The Cornish guidance specifically refers to “key views from important viewpoints” and states that turbines are likely to be prominent in the landscape

at distances of less than 2km.

- The World Health Organisation Guidelines on Community Noise relate to sound levels not 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.
- 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.
- The document by Staffordshire County Council is a Cabinet Position Statement published 17 October 2012 and refers to its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee). Viewed as a policy statement not guidance.
- In response to the 1km buffer to the AONB that was included in the First Version of the SPG the Countryside Council for Wales objected to the inclusion of a buffer zone since the effects of wind turbines can extend well beyond 1km. This was therefore removed from the Second Consultation Draft of the SPG.
- It is felt that including figures that trigger the requirements for a Residential Amenity Assessment in support of an application is an useful guidance in the document.

B2.6 Officer's Recommendation – Based upon a review of the evidence provided and in light of recent Welsh Government advice to the Petitions Committee (see Noise Impact section below) as well as comments made by the Countryside Council for Wales it is not recommended that the guidance be amended. Rather applications should be dealt with on a case by case basis which could mean applications at greater distances could be refused if the evidence and its analysis lead the decision maker to decide that the turbine(s) would be unacceptable.

### **B3 Noise Impact**

B3.1 A number of objections were received in relation to the need for greater separation distance in relation to noise Impact (see separation distance issues above). Objectors also raised the impact of Amplitude Modulation and Low frequency



Noise and that noise emission tests should be conducted at actual turbine height rather than at 10m height.

B3.2 Objections were also received stating the SPG misapplies the ETSU-R-97 guidance by omitting the 35-40dB range and entirely omitting the 43dB night time limit.

B3.4 Evidence provided to support the objections in relation to noise impact:

- Reference is made to the following evidence:
  - French National Academy of Medicine (2006) which recommends separation distance of 1.5km to protect people from Amplitude Modulation and low frequency noise;
  - Bulletin of Science, Technology, and Society (Aug 2011); and British Medical Journal (Mar 2012) which concluded that wind turbine noise seems to affect health adversely and that an independent review of evidence is long overdue.
  - There is a small but significant body of scientific literature which identifies the harmful effects of low frequency noise generated by large wind turbines.

B3.5 Officers Response - A review by Officers of the evidence submitted can be summarised as follows:

- The Local authority advocates the use of measured 10m height wind speeds rather than hub height, because the latter would affect the Local Authority's ability to monitor compliance independently, because of technical issues.
- The National Assembly for Wales' Petitions Committee in May 2012 considered the issue of the "Control of Noise from Wind Turbines" and recommended increasing the separation distance between residences and wind turbines to 1500m in certain circumstances. The Welsh Government responded by rejecting this recommendation in July 2012 stating that "TAN 8 states that "500m is currently considered a typical separation distance between a wind turbine and residential property to avoid unacceptable noise impacts, however when applied in a rigid manner it can lead to conservative results and so some flexibility is advised", we would therefore expect separation distances to be determined locally based upon the rigorous assessment of local impacts." The Welsh Government's stance therefore supports the local response set out in the SPG, which advocates a 'case by case approach' in order to consider the site specific factors that are pertinent to each case in point.

- The causes of amplitude modulation (AM) are not clearly understood and the vast majority of wind turbine locations do not appear to be causing complaints about AM. Statutory nuisance measures are available in the event of AM causing noise nuisance post commissioning. The Noise levels recommended within ETSU-R-97 took into account the character of noise described as blade swish as outlined in Paragraph 27 of the Executive summary of that document. Blade Swish or Amplitude modulation is also discussed further on page 68 of the report. The Guidance contained within TAN 8 specifies that the Local Authority should take into account ETSU-R-97 when assessing wind turbine noise.
- Wind turbine applications are assessed on a site specific basis and TAN 8 recommends the use of ETSU-R-97. The Welsh Government has rejected calls by the National Assembly's petitions committee to extend the buffer zone to 1500m.
- The Consensus opinion is that modern upwind turbines are not significant sources of infra sound or low frequency noise (Ref. Wind Farm Noise Statutory Nuisance Complaint Methodology: April 2011). Although, like most noise sources, a wind turbine's noise may contain a wide spectrum of noise frequencies including some at low frequency, this is subject to the same 6dB per doubling of distance reduction as all other frequencies. Wind Turbines should be assessed on a case by case basis and a standard 1.5km separation distance would be overly restrictive.
- 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 has chosen a strict interpretation of ETSU-R-97 to take account of uncertainties and the extremely low background noise levels which exist on the island. The Local Authority has chosen to apply the lower ETSU criterion of 35dB(A) or 5dB(A) (measured as LA90, 10 min) above the background, whichever the greater, up to wind speeds of 12m/s at 10m height, rather than upper criterion of 40dB LA90 or +5dB and the night time level of 43dB LA90 or + 5dB .

B3.6 Officer's Recommendation – The Officers believe that a minimum separation distance of 1.5 km for all wind turbines is inappropriate and it favours a system of individual noise assessment and that the correct interpretation of ETSU-R-97 is used in the SPG. This would mean that each application is dealt with on a case by case

basis based upon a rigorous assessment of the local impacts.

#### **B4 AONB**

B4.1 A number of objectors support the Anglesey Against Wind Turbines petition calling for no commercial wind turbines within the AONB. In addition there are objections stating that there should be no turbines in the AONB. Further objections stated that it is not possible to conserve and enhance the AONB through the development of turbines within the area.

B4.2 On the other hand there are objections that state the use of the word 'enhance' is too restrictive and is at odds with the policy statement in the AONB Management Plan.

B4.3 Evidence provided to support the objections in relation to the AONB:

- To address the requirements of Regulation 39 of the Conservation Regulations 2010.
- No specific evidence provided over no commercial turbines in the AONB or no turbines at all in the AONB other than reference to approach in other authorities particularly Staffordshire County Council which is referred to in the separation distances section above.

B4.4 Officers Response - A review by Officers of the evidence submitted can be summarised as follows:

- Regulation 39 of The Conservation of Habitats and Species Regulations 2010 refers to nature conservation in planning contexts and requires land use policies on development and use of land and conservation to take into consideration the need to encourage the management of landscape features which are of importance to wild fauna and flora. Will apply to new LDP not existing policy framework. Does not include reference to buffer zones.

B4.5 Officers Recommendation – The current adopted policy regarding renewable

energy development or the current adopted policy dealing with development in the AONB do not prevent the development of wind turbines within the AONB. Therefore to include this within the SPG would in effect create a new policy and therefore be beyond the remit of an SPG. The Officers are of the opinion that the guidance's approach in limiting possible development in the AONB solely to suitable Micro and Small Scale development in the AONB is the appropriate approach in the AONB.

[Note: Whilst we have not recommended amendments to the SPG in relation to separation distances, noise impact and development in the AONB it must be remembered that the SPG contains a number of requirements for various assessments to allow officers to assess the potential impact of specific proposals. Therefore these factors will be part of the decision making process.]

## **B5 Suggested Changes**

B5.1 The Officers have recommended a number of minor changes to the SPG, a table of these changes is contained in Appendix 3.

<b>C - Implications and Impacts</b>		
<b>1</b>	<b>Finance / Section 151</b>	None
<b>2</b>	<b>Legal / Monitoring Officer</b>	None
<b>3</b>	<b>Human Resources</b>	None
<b>4</b>	<b>Property Services</b> (see notes – separate document)	None
<b>5</b>	<b>Information and Communications Technology (ICT)</b>	None
<b>6</b>	<b>Equality</b> (see notes – separate document)	None
<b>7</b>	<b>Anti-poverty and Social</b> (see notes – separate document)	None

<b>C - Implications and Impacts</b>		
<b>8</b>	<b>Communication</b> (see notes – separate document)	None
<b>9</b>	<b>Consultation</b> (see notes – separate document)	2 separate Public Consultation periods conducted upon the draft SPG
<b>10</b>	<b>Economic</b>	None
<b>11</b>	<b>Environmental</b> (see notes – separate document)	None
<b>12</b>	<b>Crime and Disorder</b> (see notes – separate document)	None
<b>13</b>	<b>Outcome Agreements</b>	None

<b>CH - Summary</b>
<p>The report and its appendix provide a detailed response to the public consultation about the revised SPG. A third revised SPG showing the recommended changes has been prepared in response to representations made and is presented in Appendix 2</p>

<b>D - Recommendation</b>
<p>That the recommended changes are incorporated within the SPG and that it is adopted by the Council to be used as a material consideration in dealing with Onshore Wind Turbine applications.</p>

**Name of author of report: Bob Thomas**  
**Job Title: (Team Leader) Joint Planning Policy Unit**  
**Date: 14-1-13**

<b>Appendices:</b>
Appendix 1 – Tables of the Comments Received during the Second Public

Consultation period together with the Officer's Response and Recommendations.  
Appendix 2 – A Third Revised SPG and SA/SEA Report and HRA Screening Report.  
Appendix 3 – Table of Recommended Changes to the SPG  
Appendix 4 – Table of Recommended Changes to the SPG

### **Background papers**

- 1] Gwynedd Structure Plan (1993)
- 2] Ynys Môn Local Plan (1996)
- 3] Stopped Ynys Môn Unitary Development Plan (2005)
- 4] Draft SPG Onshore Wind Energy (2011)
- 5] Revised Version Draft SPG Onshore Wind Energy (2012)
- 6] Wind Turbine Applications – Checklist (2012)  
<http://www.anglesey.gov.uk/planning-and-environment/planning-control/making-a-planning-application/wind-turbine-applications/116491.article>
- 7] Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA) of the Onshore Wind Energy Supplementary Planning Guidance (Aug 2012)  
<http://www.anglesey.gov.uk/Journals/2012/08/09/SEA-Wind-Turbines.pdf>
- 8] Habitats Regulations Assessment (HRA) Screening Report of the Onshore Wind Energy Supplementary Planning Guidance (Aug 2012)  
<http://www.anglesey.gov.uk/Journals/2012/08/09/HRA--Wind-Energy-Saesneg.pdf>

**SPG : Onshore Wind Turbines - 1. Area of Outstanding Natural Beauty**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY001		5.2.3	All of Anglesey, and the Straits area in particular, is an area of outstanding beauty, and allowing construction of the turbines here would ruin the Anglesey landscape	Because of its beauty, and because of the historical remains here, tourism is booming, giving many a livelihood and contributing to the local agricultural economy	Draft Guidance 2 states that the Council considers that the turbines higher than 20m would not be supported. Under that it will be a matter for the developer to demonstrate that there will not be an unacceptable or negative impact on the landscape.	No Change
AY004		5.2.3 7.9				
AY006		5.2.3 7.9				
AY007		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY008		5.2.3 7.9				
AY009		5.2.3 7.9				
AY010		5.2.3 7.9				
AY011		5.2.3 7.9				
AY012		5.2.3 7.9				
AY013		5.2	Problem with this is that the AONB both looks out into the core, and those within the core also view the AONB from outside it. This means that it is not realistic to expect to protect the AONB from visual impacts	No realistic examination of this difficulty within the document, which throughout tends to deal with the island as a coastal area within an AONB, and a core that is separately considered outside the AONB.	The AONB is a nationally recognised landscape designation and so it's boundary and setting is a material consideration in terms of deciding on "adverse impact on.... landscape character". The SPG elaborates on how applicants are expected to address this issue	No change
AY017		5.2	No mention of how close turbine development could be to the AONB's.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY018	7	7.5.7	It is therefore surprising to find that the proposed guidelines are talking about allowing wind turbines - even some Micro-scale and small - within these areas	Anglesey topography is generally low, and coastal zone of Anglesey was designated as an Area of Outstanding Natural Beauty in 1966 in order to protect the aesthetic appeal and variety of the island's coastal landscape and habitats from inappropriate development. The document also refers to the approximately 2 million people who visit the island each year, being attracted from a number of areas in these countries as well as foreign countries to enjoy the landscape and to participate in sports and entertainment of all kinds. This contributes significantly to the island's economy	Draft Guidance 2 states that the Council considers that the turbines higher than 20m would not be supported. Under that it will be a matter for the developer to demonstrate that there will not be an unacceptable or negative impact on the landscape	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY018	7	7.5.7	The Island has a number of important Listed Buildings and Conservation Areas and moreover, it is particularly rich in SAMs. There should be strong guidelines to protect these by setting a definite distance between them and any wind turbine.	Any turbine should also be on a small or micro scale to ensure - as the document states - that no significant harm occurs as a result of any application.	Draft Guidance 2 states that it will be a matter for the developer to demonstrate that there will not be an unacceptable or negative impact on these areas	No Change
AY019		3.12	I also support the AAWT petition calling for no commercial wind turbines in the AONB and that none should be seen from the AONB.	Quoted by Isle of Anglesey County Council as "one of the most distinctive, attractive and varied landscapes in the British Isles"	No specific evidence submitted in support of the comment made	
AY021		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY022		5.2.3 7.9				
AY023		5.2.3 7.9				
AY024		5.2.3 7.9	They are not economic in energy production or financial terms	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY026		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY028	5	5.2	Any separation distance is not mathematical it is subjective and perceptible, so council team should pick a realistic figure - maybe 1.5km. This is very close to the figure most people want as a buffer zone on the AONB.	No evidence to support comment submitted	CCW advise that it is not good practice to impose a blanket buffer zone - as impact will depend on several site related factors. Need for developer to argue why development will not have unacceptable or significant adverse impact	Dim newid
AY028	5	5.2	Like the AONB buffer you need a buffer between turbines. So if the 2km ANOB is accepted why not apply the same rule.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY029		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY030		7.5.5	Include links to documents	No evidence to support comment submitted	Since there are several documents that deal with this subject and in order to keep the document as simple as possible a schedule of key documents are included in a separate appendix.	No change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY031		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY032	5	5.2	Consider adding a 2 kms buffer zone for commercial sized wind turbines to any AONBs (Areas Of Outstanding Natural Beauty) under your remit in the new draft SPG	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY033	3	3.12	It is not just construction of turbines within an AONB that should be curtailed, but also construction that can be seen from an ANOB	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY035		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties. Demand for this clause to be restored and suggest there should be a minimum distance of 2km between wind turbines and areas that have been designated AONB	The fact that they are ugly , noisy and likely to cause health problems to the islanders as the distances should be at least 1.5km from their homes.	No specific evidence submitted in support of the comment made	No change
AY036	5	5.2		No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY037		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY039		7.5.6	Paragraph misleading in terms of reference	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY039		7.5.8	The definition of what constitutes "significant harm" needs to be clear.	No evidence to support comment submitted	This is best dealt with at a planning application stage when all the necessary information is to hand. The SPG provides guidance about what type of issues that need to be considered.	No change
AY042		5.2.3 7.9	I also support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY043		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY044		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY045		5.2.3 7.9	In furtherance of my concerns, I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY046		5.2.3 7.9	In furtherance of my concerns, I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY047		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY048		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY057		7.5.8	Turbines should have a clearance to the edges of AONB in order to ensure these beautiful areas are not spoiled. I would therefore suggest a table is used similar to that for the clearance to dwellings but with a less steep gradient ie Clearance to boundary of AONB = 300m + 20x Turbine height.	Turbines must have a clearance to the edges of the AONB if it is not to appear that the turbines are actually in the AONB otherwise by default the AONB will appear to have been reduced in area.	The Policy has regards. Inter alia, to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY061		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY062		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY063	5	5.2	Introduce a 2km buffer zone to the Area of Outstanding National Beauty, within which no wind turbines can be built	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY064		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY065		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	The revised SPG does not provide sufficient protection for residential properties or the landscape of Anglessey because the separation distances it proposes are inadequate.	No specific evidence submitted in support of the comment made	No change
AY066		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY067		5.2				
AY069		5.2.4	Wishes to reinstate the 2km AONB bufer zone contained in the First Draft	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY071		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY072		5.2.3	There should be no wind turbines within an AONB. There should also be no turbines within 1.5km from the AONB.	It is difficult to see how any turbine can 'conserve and enhance the natural beauty of the AONB'	The Policy has regards. Inter alia, to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY074		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY075		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties plus a further distance of 15 times the height of the turbine	This would bring to proposals more in line with figures set by other parts of the UK.	The Policy has regards. Inter alia, to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY076		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY077		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY078		5.2.3	To respect a 'buffer zone' of 2km from any AONB as a turbine free-zone	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY081		5.2.3 7.9	We support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum of 1.5 KM separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY084		5.2.3	I think that placing wind turbines within the AONB should be avoided altogether.	I cannot see how a wind turbine can protect and enhance the natural beauty of the AONB.	Draft Guidance 2 states that the Council considers that the turbines higher than 20m would not be supported. Under that it will be a matter for the developer to demonstrate that there will not be an unacceptable or negative impact on the landscape	No change
AY085	5	5.2.3	All signatories of the Anglesey Against Wind Turbines (AAWT) petition which calls for no commercial wind turbines in any Area of Outstanding Natural Beauty (ANOB)	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY085	5	5.2	Call for the reintroduction in the SPG of the buffer zone around the Anglesey ANOB	To protect views both from and to this especially valuable and fragile local and national asset.	The Policy has regards. Inter alia, to places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY087		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY088		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY089	5	5.2.3	There should be no commercial wind turbine of any size in the AONB's.	Anglesey is unique in being a County encircled by a stunning coastline, steeped in geological, ecological cultural and historical heritage.	The Policy has regards. Inter alia, to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY090		5.2.3	There should be no commercial wind turbine, of any size in AONB.	No commercial turbine development can conserve or enhance an AONB	The Policy has regards. Inter alia, to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY091		5.2.3	there should be no commercial wind turbine, of any size in AONB's.	Anglesey is unique in being a County encircled by a stunning coastline, steeped in geological, ecological, cultural and historic heritage, which is protected by international designations and recognised for its immense natural beauty. It is absolutely logical that the AONB is protected from commercial turbine development, which CANNOT conserve and enhance the area.	The Policy has regards, <i>inter alia</i> , to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY092		5.2.3	there should be no commercial wind turbine, of any size in AONB's.	Anglesey is unique in being a County encircled by a stunning coastline, steeped in geological, ecological, cultural and historic heritage, which is protected by international designations and recognised for its immense natural beauty. It is absolutely logical that the AONB is protected from commercial turbine development, which CANNOT conserve and enhance the area.	The Policy has regards, <i>inter alia</i> , to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY093	5	5.2.3	A.C.C should not accept any wind turbines within or within 2km of any AONB	Except those for micro generation and then only if they conserve and enhance the natural beauty of the AONB.	The Policy has regards, <i>inter alia</i> , to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY093	7	7.5.8	No turbines should be permitted within a 2km buffer zone from an AONB or the Anglesey Coastal Path	Other than micro generation ones which demonstrate they can enhance the natural beauty of the landscape.	The Policy has regards, <i>inter alia</i> , to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY094		5.2.3	There should be no commercial wind turbine, of any size in AONB.	No commercial turbine development can conserve or enhance an AONB	The Policy has regards, <i>inter alia</i> , to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY094		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY096	5	5.2	As a 1/3 of Anglesey is designated as an ANOB and taking into consideration the small size of the island any wind turbines will have a huge detrimental effect on the landscape.	These ugly blights on the horizon would make any ANOB no longer an ANOB. An area of outstanding natural beauty cannot be destroyed by these monstrosities located nearby.	No specific evidence submitted in support of the comment made	No change
AY097		5.2.3 7.9	Anglesey Against Wind Turbines (AAWT) petition which calls for no commercial wind turbines in any Area of Outstanding Natural Beauty (AONB) and a minimum of 1.5km separation distance between any commercialising turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY097	5	5.2	call for the reintroduction in the SPG of the buffer zone around the Anglesey ANOB to protect views both from and to this especially valuable and fragile local and national asset.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY098		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY099		5.2				
AY100		5.2				
AY101		5.2.3	The use of the word "enhance" is too restrictive and is at odds with the policy statement in the AONB Management Plan	There should be no contradiction between the adopted AONB Management Plan and the SPG, but use of the word "enhance" introduces such a contradiction. Small wind turbines cannot be expected to "enhance" the AONB; rather some might have no significant impact while others would have an adverse impact. Micro and small scale developments (up to 20m to tip height) will only be supported if it is demonstrated that they will not have a significant adverse impact on the AONB. We agree that a tip height limit of 20 m is appropriate within an AONB.	The Policy has regards. Inter alia, to landscape character and heritage. The SPG places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY102		7.5.7	We wish to see this policy being changed to include micro turbines only - as defined in para 6.8 but still subject to the rigorous need to conserve and enhance the AONB.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY104		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY108	5	5.12 and Maps 1 - 3	Maps to include a buffer zone around the AONB and all SACs/SPAs/SSSI.	to address the requirements of Regulation 39 of the Conservation Regulations 2010	Regulation 39 of The Conservation of Habitats and Species Regulations 2010 refers to nature conservation in planning contexts and requires land use policies on development and use of land and conservation to take into consideration the need to encourage the management of landscape features which are of importance to wild fauna and flora. Will apply to new LDP not existing policy framework. Does not include reference to buffer zones	No change
AY116	5	5.2	There should be a buffer zone around AONB in which no turbines greater than 20 metre high are allowed. This buffer zone should be 2km wide or greater.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY118		5.2.3 7.9	Call for no commercial wind turbines in any	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY119		5.2.3 7.9	Area of Outstanding Natural Beauty and National Parks and a minimum of 1.5km separation distance between any commercial wind turbine development and residential properties, Heritage Sites, Listed Buildings and Historic Monument Site or Sites.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY120		5.2.3 7.9				
AY121		5.2.3 7.9				
AY123		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY124		5.2				
AY126		5.2				

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY127		5.2.4	The SPG should, wherever possible, be reducing areas of uncertainty and providing simple rules that are easy to interpret and apply. Currently there is pressure to establish a 2km buffer zone around the AONB which seems an eminently sensible solution to any uncertainty.	Without a specified buffer zone around the AONB, it becomes yet another area for dispute and uncertainty between developer, planner and residents	The SPG's approach is to set criteria against which individual applications are to be judged. A fixed zone does not allow judgement to be made on whether a development significantly adversely impacts on the setting of the AONB	No change
AY128		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY130		5.2				
AY133		5.2	AONB's should also be protected in Anglesey, no turbines should be sited within them or impact on them. The same should apply to any other sensitive areas, such as listed buildings, SSSI's, registered gardens, habitat sensitive areas including but not limited to nature reserves, parks etc.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY134	5	5.2	There are a number of areas of outstanding beauty across the island and it is clear that locating the turbines will damage this status – the status we should be proud of will be at risk.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY138		5.2.3	I also support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY139		5.2.3				
AY140		5.2.3				
AY143	5	5.2	There should be a buffer zone around AONB in which no turbines greater than 20 metre high are allowed. This buffer zone should be 2km wide or greater.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY144	5	5.2				

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY145		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY146		5.2.3	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY149		5.2.3				
AY150		5.2	Full consideration must be given to the location of turbines of any size. If they are in, or within reach, of an AONB or where the public can walk under or close to them, they should not be allowed.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY154		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change
AY155		5.2				
AY156		5.2				
AY157		5.2				
AY158		5.2.3	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY160		5.2	The Area of Outstanding Natural Beauty (AONB) cannot be conserved and enhanced if commercial wind turbine developments of any size are permitted either within its boundary or in close proximity to it. There are good reasons for considering a visibility buffer zone of at least 2kms	Staffordshire County Council has issued guidance stipulating that wind turbine developments should not be located within their AONB and National Park, or within 2km of the boundaries	The document referred to is a Cabinet Position Statement published 17 October 2012 and refers its policy on large scale wind energy developments on Council land or where the Council is the planning authority or a consultee (rights reserved on individual applications). Viewed as a policy statement not guidance	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY161		5.2	The SPG displays an ambivalent attitude towards the prospect of wind turbines being permitted inside AONBs.	In one place it suggests that micro-generation would not be allowed. Elsewhere we are told, applications for small turbines would have to be looked at carefully i.e. considered.	5.2.3 is not regarded as ambivalent. It states that "medium and large wind turbines will not be supported. Micro and small scale developments will only be supported if they demonstrate they conserve and enhance the natural beauty of the AONB". It places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY171	5	5.2	No turbines allowed in protected areas e.g. N Parks/ AONB	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY172		2.7	Call for a 1.5km separation distance between wind turbines and houses, and no commercial turbines in any AONB or similarly protected area.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY174	5	5.2	We should have no turbines around the Coastal Path in the AONB	so that the tourists keep on visiting the area.	No specific evidence submitted in support of the comment made	No change
AY175		7.5.8	Outside the AONB, in addition to an LVIA, we wish to see a minimum distance from the AONB boundary being established within which no turbines, other than micro, should be erected. This distance should be 1.5 kilometres.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY185		5.2	AONB's should also be protected in Anglesey, no turbines should be sited within them or impact on them. The same should apply to any other sensitive areas, such as listed buildings, SSSI's, registered gardens, habitat sensitive areas including but not limited to nature reserves, parks etc.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY003	7	7.9.12	Network Rail would wish to see such equipment (wind turbines) sited so that the lateral distance from the railway boundary to foot of mast is greater than height of mast + length of propeller blade + 3m.	Wind turbulence may be a factor to be considered and the applicant would need to ensure design/position of wind turbine does not present a potential problem for neighbours (railway included). Should the turbines collapse for any reason then the developer should ensure that any fail safe distance will include the wind-turbines potential for topple in the direction of the railway boundary.	7.9.12 refers to a "minimum" distance and to height of blade tip. Regarded as reasonable guidance with discretion for specific distance for individual proposals to be worked out	No change
AY005	7	7.9.8	10 times separation is unacceptable. At 30 times distance these direct effects are unobtrusive at least.	Locating a 20m wind turbine 200m from a residential property would result in an unacceptable drop in the quality of life offered to the inhabitants of the affected property. This weekend I stood at the 10 times separation distance from an existing turbine in the north of Ynys Mon and not only heard the action of the blades quite clearly, but witnessed the affects on the surrounding light patterns.	No specific evidence submitted in support of the comment made	No change
AY005	7	7.9.8	No mention is made in section 7.9.8 of topographic elevation. I would assume that a 20m turbine height located on a 5m rise above surrounding properties would effectively mean a total height of 25m when under planning consideration. This is not clear however.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY006		5.2.3	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY007		7.9	concern over the proposed adoption of the "10x rule" for onshore wind turbines in the Anglesey area	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY008		5.2.3				
AY008		7.9				
AY009		5.2.3				
AY010		7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY011		5.2.3				
AY011		7.9				
AY012		5.2.3				
AY012		7.9				

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY014	7	7.9	Overprotection from industrial wind turbines should be built into determinations of safe proximate distance as a matter of course. Human habitations and wind turbines being permanent structures	The SPG makes abundantly apparent the matter of proximity of wind turbines to human resident property is significantly under researched. Until such time as substantial incontrovertible evidence is available.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No change
AY014		7.9	In my opinion the absolute minimum distance between human habitation and wind turbine should be no less than 2.0 Kilometers.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY017	7	7.9.15	If applied on its own it would be a recipe for disaster both to residents and tourism businesses from visual amenity, and protection from noise considerations.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
			Another important issue is the distance between any turbine and the neighboring dwellings. As the document states, Anglesey is a predominantly rural area with a dispersed pattern of development. Because no area is far from existing settlements or individual properties, the effects of wind developments are likely to be significant in large parts of the island.	There is considerable information available, not only in the UK but internationally that suggests 2 km as a suitable distance between dwellings and industrial turbines	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	Dim Newid
AY018	7	7.9.7	Moreover, the mobile scale should also be suitable for the environment and in addition to that distance.	No evidence has been presented	No specific evidence submitted in support of the comment made	Dim Newid
AY018	7	7.9.7				

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY019	7	7.9	Support the Anglesey Against Wind Turbines (AAWT) response calling for a minimum 1.5km separation distance between any commercial wind turbine development and any residential property.	the accepted precedent in other parts of the UK (my initial response was a minimum 2km separation distance..	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY021		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY022		5.2.3 7.9				
AY023		5.2.3 7.9				
AY025		7.9	Local doctors on the island are concerned about the health and well being of anyone unfortunate enough to live in the proximity of a wind turbine.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY025	7	7.9.6	No wind turbine whatsoever can be placed on Anglesey as it must be virtually impossible to place one anywhere without it being a blot on the landscape.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY025		7.9	Turbines must have a separation distance of an ABSOLUTE MINIMUM of 1.5km from any residence.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY026		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY029		5.2.3 7.9				
AY030		7.9.8	Minimum separation distances are too small	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY030		7.9.9	Wording of intervening vegetation bullet point	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY031		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY033	7	7.9.8	I believe that these distances are inefficient to prevent an adverse effect on visual outlook and amenity and should be increased to a minimum of 1,500m from any property not connected to the turbine application	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY033	7	7.9.12	Minimum distance from turbine to a public highway or footpath or a railway line should be increased to twice the height of the turbine tip.	This minimum distance is inefficient to allow for public safety in the event of e.g. A total collapse of the structure.	This is an expression of a personal opinion not backed up by evidence . 7.9.12 refers to a "minimum" distance and to height of blade tip. Regarded as reasonable guidance with discretion for specific distance for individual proposals to be worked out	No change
AY034		7.9	No one can be expected to live closer than 1.5km to a turbine	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY035		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	The fact that they are ugly , noisy and likely to cause health problems to the islanders as the distances should be at least 1.5km from their homes.	No specific evidence submitted in support of the comment made	No Change
AY036	7	7.9.8	Mae Cyngor yn awgrymu yn gryf y dylai fod yna leiafswm o 500medr o bellter rhwng twrbein gwynt o unrhyw faint a'r annedd agosaf, a bod y pellteroedd wedyn yn cael eu gweithio allan ar raddfa 20 x yr uchder y twrbein at gopa'r llafr	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY037		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY038		7.9.8	Separation distances should be increased to a minimum of 1500 m from any property	distances insufficient to prevent adverse effects on visual outlook	No specific evidence submitted in support of the comment made	No change
AY038		7.9.12	Separation distances should be increased to twice the height of the tip blade. Present distance is insufficient	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY041		7.9	It is totally unacceptable to expect anyone to endure a wind turbine any closer than 1.5km to their residential property.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY041		7.9.8	I am a supporter of green projects but not at the expense of our stunning landscape nor should they bring misery to those who have to have them erected according to your supplementary guidance as close as 200 meters to their home for a 65m turbine.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY042		7.9	I also support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY043		5.12	The County would be in conformity with WG guidance if no further commercial developments were permitted unless they were more than 1.5km from people's homes.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY044		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY045		5.2.3 7.9				
AY046		7.9.8	At the very least, the 500 meter separation should be adhered to, with table 4 imposed on top, i.e. small turbine 11.1m — 20m tip separation distance should be 611 meters — 700 meters.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY049		7.9.8				
AY050		7.9.8				
AY051		7.9.8				
AY052		7.9.8/7.9.9	Paras 7.9.8 – 7.9.9 are misleading and it is suggested that they should either be deleted or at the very least re-worded. Use of the term "minimum separation distances" in these paragraphs is very misleading and will lead to confusion	Whilst WCE have 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.	Agree that this could be misleading.	Amend to exclude reference to minimum distances
AY055			Every Application for a wind turbine needs to undergo a LVIA, whether small, medium or large.	It is unacceptable that a structure of this size could be erected near to our communities without a Landscape Visual Impact Assessment.	Section 7.5.1 and Section 11 of Appendix 4 clearly state that an assessment of impact on the landscape is a key consideration	No Change
AY066		7.9.8	The sliding scale of height versus distance is a great improvement on the previous document but I do not agree that the slope of the graph should pass through the origin. It would be more appropriate if a minimum distance was included, ie the formula should be as follows: Minimum Separation Distance to property should = 300m + 10x height of Turbine to blade tip. So a 30m turbine would have to be 600m from property, a 40m turbine would be 700m from property and a 130m turbine would be 1600m from property etc.	The SPG does not address the problem of accumulation. The use of improved clearances within Table 4 as suggested above should significantly assist with this problem and limit this problem.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY057						

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY061		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties	The revised SPG does not provide sufficient protection for residential properties or the landscape of Anglesey because the separation distances it proposes are inadequate.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY065	7	7.9	Please consider making the distance between turbines and residences at least 2km	We live 1.7k from turbines and the noise is bad – there are two separate wind farms, with differing height turbines, and the turbulence makes the noise worse, and as they get older, it also gets worse.		No Change
AY068		7.9			The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY070		7.9	Distance of dwellings from turbines should be 2km at least	Do not take into account the scientific studies that show a setback of at least 2km is required to protect residents from the effects of noise and loss of amenity.		No Change
AY073		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY074						No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY075		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties plus a further distance of 15 times the height of the turbine	This would bring to proposals more in line with figures set by other parts of the UK.	Evidence is mixed and approach adopted depends on policy context. 7.9.9 notes that separation distances proposed are "not precise determinants of (visual) impacts	No Change
AY076		5.2.3 7.9	I support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum 1.5 km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY078		7.9	To set a minimum 1.5km separation zone from any industrial turbine to residential dwellings.	in other comparable, rural areas of the UK. Eg. In Scotland and Cornwall, Carmarthen, the distances are 2km, and 1.5 km respectively. The World Health Organisation recommends a minimum distance of at least 2km. That any industrial turbines should be considered on Anglesey less than 500m from residential properties is totally unacceptable.	The Cornish guidance specifically refers to "key views from important viewpoints" and states that turbines are likely to be prominent in the landscape at distances of less than 2km" The World Health Organisation Guidelines on Community Noise relate to sound levels not distances. Similar guidelines within British Standard 8233:1999 "Sound insulation and noise reduction for buildings - code of practice". In reality, there are examples of guidance across Britain that refer to different separation distances and some do not set a specific distance. The SPG that is subject to public consultation responded to the call for a sliding scale and identifies the distances where it can be an issue and the matters that must be considered on a case by case basis in order to reach a conclusion about the impact.	No change
AY079		7.9.8	At the very least, the 500 meter separation should be adhered to, with table 4 imposed on top, i.e. small turbine 11.1m — 20m tip separation distance should be 611 meters — 700 meters.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY080	7	7.9	In response to the consultation we the undersigned call for a 1.5km separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY081		5.2.3 7.9	We support the AAWT petition calling for no commercial wind turbines in the AONB and a minimum of 1.5 KM separation distance between any commercial wind turbine development and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY082	7	7.9	In response to the consultation we the undersigned call for a 1.5km separation distance between any commercial wind turbine development and residential properties. At the very least, the 500 meter separation should be adhered to, with table 4 imposed on top, i.e. small turbine 11.1m — 20m tip separation distance should be 611 meters — 700 meters.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY083	7	7.9.8	The Revised Draft SPG proposes a distance of 10 times the height of the turbine. This means that commercial turbines up to 50 metres in height could be placed within 500 metres of homes	No evidence offered in support of statement  This is less than the Welsh Government's suggested minimum separation distance	No specific evidence submitted in support of the comment made  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
AY089	7	7.9.8	Minimum of 500 metres plus a sliding scale based on 10 times the turbine height when measured to the tip of an upright blade	It should state that the buffer zone agreed at the Environment and Technical Services Scrutiny Committee on 26th July 2012	The draft SPG reflects the decision taken at the Committee and ratified at a later date.	No Change
AY089	7	7.9.8	Many other parts of the UK have adopted, or are in the process of adopting, much larger separation distances in their Local Plans	Wiltshire Council has agreed a range depending on turbine size from 1km to 3km). The Localism Act 2011 gives English Councils the right to make that choice in Neighbourhood Plans. In Scotland the suggested separation distance is 2km. It is also 2km in other European countries.	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
AY091		7.9.7	Disagrees with statement "There is limited guidance regarding separation distances between wind turbines and settlements or individual dwellings or tourism properties.	There is, in fact, a significant amount of information available, both within the UK and internationally, where 2km is generally accepted as an appropriate separation distance from commercial wind turbines and residential dwellings or tourism properties.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	
AY092		7.9.7				

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY093	7	7.9.8	There should be a minimum distance between onshore wind turbines and any residential property of 500 meters and thereafter for any turbine over 50meters a buffer distance of tip height x 10 meters should apply.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY093	7	7.9.12	The proposed set-back distance from public highways or railway lines is inadequate for safety and should be minimum of 500m for turbines up to 50m tip-height and for larger turbines tip-height x 10m.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY095		7.9.8 6.8-6.9	Should state that the buffer zone [be] a minimum of 500 metres plus a sliding scale based on 10 times the turbine height when measured to the tip of an upright blade. The maps on page 20, 21 and 22 of the SPG should have been drawn accordingly with appropriate wording to the text in 5.11 of the SPG.	Not a correct record of what was agreed at the Environment and Technical Services Scrutiny Committee on 26th July 2012 prior to the public consultation. Many other parts of the UK have adopted, or are in the process of adopting, much larger separation distances in their Local Plans	The draft SPG reflects the decision taken at the Committee and ratified at a later date.	Delete Table 1 and use illustration to show relative heights against existing landscape features
AY095			Section does not make clear how much impact larger turbines will have on the visual landscape	Illustrative example	Suggest that an illustration showing different turbine sizes against existing landscape features would better show relative heights	No Change
AY096	7	7.9	The distance from properties stated is way too low. A minimum of 650m should be placed on small developments, minimum of 1500m on medium development and a minimum of 3000 on large development.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY097		7.9	Anglesey Against Wind Turbines (AAWT) petition which calls for no commercial wind turbines in any Area of Outstanding Natural Beauty (AONB) and a minimum of 1.5km separation distance between any commercial turbine development-and residential properties.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
	7	7.9.8	The impression given is that the separation distances suggested in Table 4 have been derived in a scientifically valid way. This is misleading..... We therefore call for a policy that promotes case by case assessment based on widely accepted criteria in respect of noise, visual impact, ecological impact etc. and is not based largely on the imposition of minimum separation distances based upon arbitrary choices.	The formula is intended for use to derive the perceived height from a known distance and a known actual height. It can only be used to derive a separation distance if an assumption is made regarding an appropriate perceived height, i.e. if an assumption is made regarding the value of variable h. Any such assumption is entirely arbitrary; it is not based on any generally recognised suitable value for perceived height and has no scientific basis. Accordingly, the minimum separation distances cited in Table 4 are also entirely arbitrary. Selection of another arbitrary value for h yields completely different separation distances.	7.9.9 acknowledges that "separation distances are not precise determinant of impacts".	No Change
AY101	7	7.6	We support your requirement for a Landscape and Visual Impact Assessment to be carried out and wish to see this operated in all instances of indivisibility between applications. However, the LVIA must be conducted by an accredited independent body and not by an applicant.	In TAN 8, paragraph 2.13 clearly states that ".there is a case for avoiding a situation where wind turbines are spread across the whole of a county" and you acknowledge that in your Draft	Support and Comment Noted	No Change
AY102		7.6.10	The effects upon receptors of adjacent local authorities is a most important consideration. The distance of 5km in such instances should be increased to 10km.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY102		7.6.12	We agree with the distances of 5km between small turbines for consideration and also 15km for medium and large turbines	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY102		6.7	We strongly recommend that Anglesey should only allow up to 20 metre high turbines in any location	We make this request (a) because of the need to protect our generally low-lying countryside all of which is classified to be of Landscape Conservation Value and (b) because more importantly, Anglesey is already massively contributing to the national power supplies through our nuclear power output	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. The SPG needs to reflect both national environmental as well as energy policies and of necessity the SPG needs to clarify how those policy aims are balanced.	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY102		7.9.8	The policy should simply state that the minimum distance of a turbine from a residential property should be governed by the equation $S = r\theta$ (defining the parameters), with the angle of subtension of the turbine to the eye being 3° (or no more than 4° in any case) and with the minimum distance in all instances being 500 metres.	. We advise that this angle of 3° (or of that order) should be used in all calculations expressed by its value in radians of .042 (or equivalent).	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY103		7.9.8	This section should not be allowed to progress. It would be better to wait for such guidance to exist rather than enforce an unjustified and untested approach that would become SPG, creating buffer zones from 'sensitive' receptors.	Adopting such a policy actively discourages the development of renewable energy.		No Change
AY105		7.9.8	The residents of Penmynydd expressed their concerns regarding the impact of such structures on the landscape and the consequent effects upon the amenity of residents and the tourist population. The separation distance scale suggested in the SPG is totally inadequate.	Most European countries that have more experience of wind turbine development have stipulated separation distances of the order of at least 1.5-2km from residential properties. This recognises the fact that the visual effects of such structures can not be mitigated against and also the potential health implications of placing such structures so close to residential properties	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances. Agree to remove the word 'minimum' from the text and amend 7.9.9 to clarify triggers for RAA.	No Change
AY106		7.9.8/7.9.9	Paras 7.9.8 – 7.9.9 are misleading and it is suggested that they should either be deleted or at the very least re-worded. Use of the term "minimum separation distances" in these paragraphs is very misleading and will lead to confusion	Whilst we have 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.		Change to 7.9.8 and 7.9.9

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY113		7.9.8	Include any reference to research/evidence base used to establish these figures/principles. Present/ summarise case in more appropriate language	uncertain as to the value it adds to the section as a whole.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY118		5.2.3 7.9	Call for no commercial wind turbines in any Area of Outstanding Natural Beauty and National Parks and a minimum of 1.5km separation distance between any commercial wind turbine development and residential properties, Heritage Sites, Listed Buildings and Historic Monument Site or Sites.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY119		5.2.3 7.9				
AY120		5.2.3 7.9				
AY121		7.9.8	The sliding scale suggested at paragraph 7.9.8 is totally inadequate	The buffer zone is required to protect residents from the visual impact as well as the potential health implications associated with wind turbines and the noise they generate. Most European countries have recognised the need for a substantial buffer zone between dwelling houses and wind turbines with 2km being the favoured distance. 63% of the respondents to the first draft SPG requested a separation distance of at least 1.5km.	No specific evidence submitted in support of the comment made	No Change
AY131		7.5	The size and scale of wind turbines can not be effectively mitigated against. This is yet again confirmation that a considerable buffer zone is required between turbines and residential properties.	There is no planting or screening that can be put in place to hide or obscure such structures	No specific evidence submitted in support of the comment made	No change
AY132		7.9.8	The sliding scale suggested at paragraph 7.9.8 is totally inadequate	The buffer zone is required to protect residents from the visual impact as well as the potential health implications associated with wind turbines and the noise they generate. Most European countries have recognised the need for a substantial buffer zone between dwelling houses and wind turbines with 2km being the favoured distance. 63% of the respondents to the first draft SPG requested a separation distance of at least 1.5km.	No specific evidence submitted in support of the comment made	No Change
AY132						



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY136	7.9		My main concern is the proposed distance which onshore wind turbines should be sited from residential properties.	The draft revised SPG does not accord with the suggestion from WAG and TAN8 of a minimum distance from residential property of 500 metres	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
AY137	7.9	7.9	The new SPG should include Lord Reay's suggestions regarding distance, which will become law soon. If more are permitted, it should be ensured that there is 1km distance between dwellings if the turbine is between 25-50m, 1.5km if it is between 50-100m and 2km if it is between 100-150m high.	No evidence has been presented	No specific evidence submitted in support of the comment made	No Change
AY150	7.9		The distance must be at least 1.5 km.	There is growing evidence of the impact of wind turbines on the population. The SPG does not take nearly enough notice of this. It must look at the latest reliable evidence before deciding on distance	Mae'r CCA yn rhoi sylw priodol i ystyriaethau mwyrderau a iechyd gan rhoi arweiniad i ddatblygyr i ystyried lleoliad a gosodiad i liniaru unrhyw effaith	Dim Newid
AY150	7.9		No turbine over 15m in height should be within 1.5km to any residential property.	Dim tystiolaeth wedi ei gyflwyno	No specific evidence submitted in support of the comment made	No Change
AY161	7.9		This proposal of very close proximity between turbines and where people live is against TAN 8 guidelines, and therefore unacceptable.	The formula here presented is nonsensical. The moving of the decimal point to provide an accepted separation distance has no relevance scientifically, however copiously it is explained. It appears to be a convenient equation which only makes sense administratively.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
		7.9	No further validation is offered, from any source. Surely, best practice in other areas / countries could be sought, in terms of guidance? , In my opinion, [1.5km or 2km] is what the SPG should say in guidance to Applicants.	There is considerable local opinion calling for a 1.5 Km. (or even 2Km., in line with other European countries) separation distance	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY161		7.9	Matter of proximity to nearest residential property. I note that the 500 meter has been replaced by a sliding scale with no actual minimum. This is unacceptable.	Any application for a turbine to be sited within 500 meter s of residential property is against TAN 8 guidelines.	Para. 2.13 of TAN 8 encourages LA's to adopt a criteria based approach to considering proposed developments including consideration of separation distances from receptors and other developments. The SPG has a minimum distance of 10 times the tip height.	No Change
AY163	7	7.9	Ridiculous calculations mounting to move the decimal point to the right should be replaced with a standard 1.5km or 2km separation distance	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY164		7.9.8	I read that the 500 meter buffer of the previous SPG has been replaced by a sliding scale with no actual minimum.	This is against guidelines of TAN 8	Para. 2.13 of TAN 8 encourages LA's to adopt a criteria based approach to consideration of proposed developments including consideration of separation distances from receptors and other developments. The SPG has a minimum distance of 10 times the tip height.	No change
AY165	7	7.9.8	There is considerable local opinion calling for a 1.5km separation distance or even 2km in line with other European Countries	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY166	7	7.9.8	Separation distance be a constant 1.5 or 2km from dwelling regardless of height.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY167		7.6.1	Other applications between 5km and 30km should be considered	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY167	7	7.9	Separation distance should be 1.5km or 2km as in Scotland	Anglesey is too densely populated	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY168	7	7.9.8	Should be replaced with 1.5km or 2km separation distances.	As in Scotland	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY169			Does not take consideration recommendations that distance should be added to 500m basic	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY169	7	7.9.8	Should adopt standard 1.5km or 2km	As in Scotland	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY170	7	7.9.8	Separation distance is muddled with meaningless formula instead of adopting a min 1.5km - 2km distance.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY171	7	7.9	The SPG must include a 1.5km separation distance between turbines and dwellings	In line with practice in other countries	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change
AY172	7	7.9.15	Proliferation of even 20m high turbines will make people think twice about visiting Angelsey.	against TAN 8 guidelines	The SPG reflects the importance of the tourism sector requiring developers to consider this and provide appropriate evidence. There is clear guidance in the SPG regarding the need to ensure that development either on its own or in combination with others does not have a significant detrimental impact on the character of the landscape, which is one of the main reasons why people visit the area.	No Change
AY173	7	7.9.7	No minimum distance between turbines and house - not even the 500 meter TAN 8 recommendation	Surley this is against Assembly guidelines. Nor is there any reference to the idea of 'best practice' guidelines from other areas/countries.	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
AY173	7	7.9.8	There is a lot of support for the idea of 1.5km separation distance	In other countries it is at least this distance.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Responses in other sections of this report demonstrate that there is no basis to apply a minimum separation distance of 500m. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY174	7	7.9	We need a proper buffer zone between houses and any wind turbine ..... for peoples health	In Scotland it is 2kilometers and the same should be adopted here. Always things in the paper/ TV about other part of the world where turbines near villages and houses make people who live there unwell due to the switch of the turbines.	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY175		7.5.2/A pp4 s11	Turbines up to 20m in height should be required to produce a LVIA	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY175		7.9	Need for a bufer zone of 1.5km between tyrbines and houses	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY176	7	7.9.7	About 1.5km - 2km buffer zones	In lines with other countries like Scotland	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY177	7	7.9	A standard 2km separation distance is required	As in Scotland	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY178	7	7.9.8	Complicated formula should be abandoned in favour of 1.5 or 2km separation distance for all turbines over 11.1 meters.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY178	7	7.9.15	Need to be far firmer about the presentation of the tourist industry and the potential impact of industrializing Anglesey	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY179	7	7.9.8	A standard 1.5km or 2km separation distance would be far better for any turbine over 11.1	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY180		7.5.2/A pp4 s11	Turbines over 11.1m in height should be required to produce a LVIA	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
		7.9	Separation distance should be 1.5km or 2km as in Scotland	Anglesey is too densely populated	Scottish Planning Policy (SPP) adopts a criteria based approach to Onshore Ind Energy Planning Policy. Para. 190 on Wind Farms states "A separation distance of up to 2km between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact, but decisions on individual developments should take into account specific local circumstances and geography." Does not apply to individual residences and emphasises need to consider specific proposals.	No Change
AY180		7.5.2/A pp4 s11	Turbines over 11.1m in height should be required to produce a LVIA	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY181		7.9.9/7.9.10	Par 7.9.9 and 7.9.10 go some way to accommodate developments within separation distances. The SPG should find a method of rewarding developers that selects a turbine with a lower noise output	If turbine A has a tip height of 65m with 35dB (A) is achieved at 600m while turbine B is the same height but achieves 35dB (A) at 400m, then turbine B should have a shorter separation distance.	The guidance reflects a recommendation by Committee in response to comments during the first consultation that the SPG should include a sliding scale in order to better reflect the circumstances that will be relevant to each development. Examination of other guidance prepared by other authorities as well as decision statements by Planning Inspectors at an appeal stage demonstrates the need to take into consideration a mixture of general guidance and specific locational circumstances	No change
AY183		7.9	It could be argued that turbines could still be "dominant" at 26x height	Example given of inspector's report on Blaeu Bowi appeal	7.9.9 makes it clear that the separation distances are not precise determinants of impacts and that RAA required	No change
AY186						

\*[DETAILED TEXT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equaling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted from Scotland is not conclusive about the possible impact of wind turbines on tourism.

SPG : Onshore Wind Turbines - 3. Noise, Health & Safety

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY013	7	7.3.16	I have recently had conversations with consultants acting on behalf of developers intending to install smaller turbines amongst existing, larger turbines. Whilst this may appear to be a good means of overcoming local objections by extending what is already in place, there is a question as to the cumulative effect of such installations on noise, and indeed other impacts	Complex interactions, perhaps specific to geographical characteristics, between noise generated by the two sizes of turbine would appear to be likely, and an analysis of such interaction would appear to require significant effort to analyse objectively.	The Local Authority has been well aware of this issue for some time and cumulative noise impact is covered in detail within section 7.3.16 of the SPG. The Local Authority has purchased specialist noise prediction software in order to consider the effects of multiple planning applications.	Comment noted but no further action required.
AY014		7.3	The long term effects of noise, whether of high pitch or low pitch, stroboscopic effects, whether by light or shadow, are known to affect all humans to some extent.	The fact they affect humans to some extent depends on the unknown tolerance of the individual concerned.	Certain noise levels above specific magnitudes have the ability to cause sleep disturbance. Given the safeguards that the Local Authority has put in place it is unlikely that noise from wind turbines will exceed those specified by the World Health Organisation as likely to affect sleep.	Comment noted but no further action required.
AY014			Psychological damage inflicted upon an individual property owner where they are forced to accept and live with intolerable dominant industrial development, or their home and lifetime investment is forcibly devalued.	No evidence to support comment submitted	This is an expression of a personal opinion not backed up by evidence	No change
AY017		7.3	Potential for noise to adversely affect health through sleep disturbance	Recent RVM and WHO reports and the draft DTI/HMP reports confirm this. Turbines which result in external noise levels greater than 35dB (A) or are sited closer than 1.5km from housing	<b>*[DETAILED TEXT AT END OF DOCUMENT]</b> The World Health Organisation Guidelines for community Noise recommend that "for a good night's sleep, the equivalent sound level should not exceed 30dB(A) for continuous background noise". The noise level 30dB LAeq, 8hr is measured inside a bedroom. Outdoors, WHO recommend that the sound level 1m from the facade should not exceed 45dB LAeq, a 15dB(A) difference between internal and external levels normally accounts for the typical attenuation provided by a window left open in the typical manner to provide ventilation. Similar noise levels are advocated within British Standard 8233:1999 "Sound insulation and noise reduction for buildings - code of practice". The Local Authority has chosen to apply the lower ETSU criterion of 35dB(A) or 5dB(A) (measured as LA90, 10 min) above the background, whichever the greater, up to wind speeds of 12m/s at 10m height, rather than upper criterion of 40dB LA90 or +5dB and the night time level of 43dB LA90 or +5dB. These levels normally apply 3.5m from the facade of any residential property and a further 12dB reduction would be	Comment noted but no further action required.

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY030		7.3.4	Noise emission levels for actual turbine heights would be used rather than 10m	no evidence to support comment submitted	10m is a standardised turbine height specified in many documents including BSEN 61400-11:2003 "Wind turbine generator systems - Part 11: Acoustic noise measurement techniques". Most smaller turbines where the swept area is less than 200m2 (typically blade diameters of 16m) are accompanied by data prepared in accordance with the British Wind Energy Association's Small Wind Turbine Performance and Safety Standard (29 Feb 2008). This standard does specify noise levels at hub height, but the Local Authority converts down to 10m in order to be able to assess in accordance with ETSU-R-97. Many turbines have hub heights considerably higher than 10m and measuring wind speeds at these heights using portable masts would be considerably more difficult. Guidance is available on wind shear to enable conversions between various heights.	The Local authority advocates the use of measured 10m height wind speeds rather than hub height, because the latter would affect the Local Authority's ability to monitor compliance independently, because of technical issues. Recommendation rejected.
AY043		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	The National Assembly for Wales' Petitions Committee in May 2012 considered the issue of the "Control of Noise from Wind Turbines" and recommended increasing the separation distance between residences and wind turbines to 1500m in certain circumstances. The Welsh Government responded by rejecting this recommendation in July 2012 stating that "TAN 8 states that "500m is currently considered a typical separation distance between a wind turbine and residential property to avoid unacceptable noise impacts, however when applied in a rigid manner it can lead to conservative results and so some flexibility is advised", we would therefore expect separation distances to be determined locally based upon the rigorous assessment of local impacts."	The Local Authority believe that a minimum separation distance of 1500m for all wind turbines is inappropriate and it favours a system of individual noise assessment. Recommendation rejected.
AY043		3.26	Evidence from various research papers on the health effects of wind turbines should have been included	The Bulletin of Science, Technology, and Society volume 31, no.4 August 2011 published a research paper by Carl V. Phillips, PHD "Properly Interpreting the Epidemiologic Evidence about the Health Effects of Industrial Wind Turbines on Nearby Residents". The British Medical Journal published research in March 2012 undertaken by Christopher D. Hanning, (Honorary Consultant in Sleep Medicine, Sleep Disorders Service, University Hospitals Leicester, and Alun Evans, Professor Emeritus, Centre for Public Health, Queens University Belfast, which concluded that wind turbine noise seems to affect health adversely and that an independent review of evidence is long overdue."	The basis for noise limits contained in UK and Welsh Government policy remains ETSU R-97	No Change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY043	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	It would be impractical and unreasonable to expect developers to conduct background noise surveys at all properties within 2km of a turbine. The normal procedure would be for the number and location of background surveys to be agreed with the local Environmental Health Officer.	Recommendation rejected.
AY043		5.11	The minimum distance of 500 metres between commercial turbines and homes has not been included or referred to as the basis for determining the acceptable distance or buffer zone between commercial turbines and homes. The Revised Version SPG proposes a distance of 10 times the height of the turbine	This means that commercial turbines up to 50 metres in height could be placed within 500 metres of homes [and is] less than the Welsh Government's suggested minimum separation distance.	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
AY043		5.11.2	Should state that the buffer zone [be] a minimum of 500 metres plus a sliding scale based on 10 times the turbine height when measured to the tip of an upright blade. The maps on page 20, 21 and 22 of the SPG should have been drawn accordingly with appropriate wording to the text in 5.11 of the SPG.	Not a correct record of what was agreed at the Environment and Technical Services Scrutiny Committee on 26th July 2012 prior to the public consultation. Many other parts of the UK have adopted, or are in the process of adopting, much larger separation distances in their Local Plans	The minutes have since been checked for accuracy and ratified	No change
AY043		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	The causes of amplitude modulation are not clearly understood and the vast majority of wind turbine locations do not appear to be causing complaints about AM. Statutory nuisance measures are available in the event of AM causing noise nuisance post commissioning. The Noise levels recommended within ETSU-R-97 took into account the character of noise described as blade swish as outlined in Paragraph 27 of the Executive summary of that document. Blade Swish or Amplitude modulation is also discussed further on page 68 of the report. The Guidance contained within TAN 8 specifies that the Local Authority should take into account ETSU-R-97 when assessing wind turbine noise	Comments noted but no further action required as the issue of AM is discussed in the SPG.
AY043		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	The Den Brook planning decision merely attempts to define AM and requires that the wind farm operator, following the receipt of a complaint and at the request of the local planning authority, employ a consultant approved by the local planning authority, to assess whether noise immersion at the complainant's dwelling are characterised by greater than expected amplitude modulation. No further course of action is recommended once AM has been identified. Such a requirement could be replicated by the use of general statutory nuisance powers available to the Local Authority.	Comment noted but no further action required.

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY043		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	Amplitude modulation is often mistaken for Low Frequency Noise (10Hz - 200Hz) but blade swish or amplitude modulation usually occur at higher frequencies. The document "Wind Turbine Measurements for Noise Source Identification: ETSU W/13/00391/REP 1999" identifies that "frequencies below 250Hz octave band do not show modulation. Modulation is sometimes seen in the 500Hz octave band" but "modulation is most marked in the 1kHz and 2kHz octave bands".	Wind turbine applications are assessed on a site specific basis and TAN 8 recommends the use of ETSU-R-97. The Welsh Government has rejected calls by the National Assembly's petitions committee to extend the buffer zone to 1500m. Although the comments are noted, the suggestion is rejected.
AY047		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY047	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY047		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY047		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY047		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY048		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY048	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY048		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY048		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY048		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY049		7.3.2	I feel that an independent noise assessment should be carried out by a company or persons not associated with the developer or landowner.	No evidence to support comment submitted	Environmental Health Officers within the Local Authority have the necessary expertise to scrutinize reports.	No action required.
AY050		7.3.2	I feel that an independent noise assessment should be carried out by a company or persons not associated with the developer or landowner.	No evidence to support comment submitted	See response to same comment above.	
AY051		7.3.2	I feel that an independent noise assessment should be carried out by a company or persons not associated with the developer or landowner.	no evidence to support comment submitted	See response to same comment above.	
AY052		7.3.2	I feel that an independent noise assessment should be carried out by a company or persons not associated with the developer or landowner.	No evidence to support comment submitted	See response to same comment above.	
AY055		3.25	, it is suggested that this section should be deleted.	it seems to serve no purpose for this particular SPG.	Agreed that the inclusion of the section on the HSCW Strategy within the Policy Context section as it stands is not clear. The Strategy itself does not refer to health and wind turbines e.g. "There are currently no significant issues associated with noise pollution" (Theme 4 Environment p 12). Whilst concern about noise has been raised this is dealt with appropriately under section 7.	Delete section and move contents of section 7.3.1 to Policy section under TAN 8

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY055		7.3.2	The Section on noise goes beyond the Government ratified noise guidelines established in ETSU-R-97, and is considered to go beyond the remit of the SPG. The Section should be deleted or revised to more accurately reflect the ETSU guidance.	The SPG misapplies this guidance, by omitting the 35-40dB range and entirely omitting the 43dB night time limit	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 has chosen a strict interpretation of ETSU-R-97 to take account of uncertainties and the extremely low background noise levels which exist on the island. Page 63 of ETSU-R-97 recognises that "as the night-time lower fixed limit is greater than the day-time limit, the night-time limit could become superfluous".	Comment noted but no further action required.
AY055		7.3.13 - 14	These sections should be deleted or cross-reference to the relevant link regarding on-going work on this issue at national level should be made.	The paragraphs on amplitude modulation do not actually provide any useful guidance	The causes of amplitude modulation are not clearly understood and the vast majority of wind turbine locations do not appear to be causing complaints about AM. Statutory nuisance measures are available in the event of AM causing noise nuisance post commissioning. The Noise levels recommended within ETSU-R-97 took into account the character of noise described as blade swish as outlined in Paragraph 27 of the Executive summary of that document. Blade Swish or Amplitude modulation is also discussed further on page 68 of the report. The Guidance contained within TAN 8 specifies that the Local Authority should take into account ETSU-R-97 when assessing wind turbine noise	Comments noted but no further action required as the issue of AM is discussed in the SPG.
AY055		7.4.2	It is considered that the guidance referred to with regard to risk of injury to humans is unnecessary in such a planning document and it is unreasonable to require developers to provide supplementary information regarding the risk of injury to humans.	No members of the public either walking on a right of way, walking on common land or on open access land has been killed or injured by a turbine or part of a turbine in the 20 years these machines have been in use in the UK.	Section 6 of Appendix 4 deals with design and Access Statements, including layout and position. Statutory consultees will also need evidence of how public safety has been considered.	No Change
AY058		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY058	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY058		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY058		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY058		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY059		7.9	There must be a minimum of 1km between any dwelling (caravan, chalet or house) and a wind turbine over 15m	To avoid noise disturbance and the effect or noise on the quality of life and on health.	This is an expression of a personal opinion not backed up by evidence	No change
AY060		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY060	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY060		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY060		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY060		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY064		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY064	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY064		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY064		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY064		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY066		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY066		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY067		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY067		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY070		7.3	The second draft SPG goes into considerable technical detail about how the council proposes to apply ETSU R97. It is not relevant to ask the public to comment on this level of technical detail	No evidence to support comment submitted	The SPG is open to comment by developers and consultants who are interested in this level of detail.	No action required.
AY070		7.3.14	The second draft SPG does not put in place any satisfactory measures to protect the population from the effects of AM	We would have hoped that IOACC would have used the Inspectors ruling to help in determining the safety of any proposed installation,	The inspector's ruling suggests a way of measuring AM, not a course of action for its control. Further Guidance is necessary before a strict interpretation of AM and the penalty to be applied can be included. In the meantime, this issue can only be dealt with as part of a statutory nuisance investigation post commissioning.	Comment noted but no further action required.
AY071		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY071		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY073		7.3	The second draft SPG goes into considerable technical detail about how the council proposes to apply ETSU R97. It is not relevant to ask the public to comment on this level of technical detail		See response to same comment above.	
AY073		7.3.14	The second draft SPG does not put in place any satisfactory measures to protect the population from the effects of AM	We would have hoped that IOACC would have used the Inspectors ruling to help in determining the safety of any proposed installation,	See response to same comment above.	
AY077		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY077	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY077		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY077		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY077		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY079		7.3.2	I feel that an independent noise assessment should be carried out by a company or persons not associated with the developer or landowner.	No evidence to support comment submitted	See response to same comment above.	
AY083		7.3.2	I feel that an independent noise assessment should be carried out by a company or persons not associated with the developer or landowner.	No evidence to support comment submitted	See response to same comment above.	
AY086	7	7.9	Opposition to the erection of wind turbines within 1.5km of any residential property	Would detrimentally affect the health and lifestyle of the residents of Anglesey	This is an expression of a personal opinion not backed up by evidence	No change
AY087		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY087	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY087		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY087		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY087		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY090		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY098		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY098	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY098		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY098		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY098		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY099		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY099	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY099		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY099		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY099		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY100		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY100	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY100		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY100		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY100		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY101	7	7.3	SPG no noise buffer appears to have been applied in deriving Maps 1-3 on pp. 20-22.	This is presumably because, instead, the arbitrary "10 x tip height" criterion has been employed. That criterion has nothing to do with noise (but rather visual amenity).	The basis for noise limits contained in UK and Welsh Government policy remains ETSU R-97. An assessment needs to be made of the proposed development	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY101		7.3.6	We support adherence to the noise limits set out in ETSU-R-97. Regarding amplitude modulation, we agree that guidance should be developed on the basis of latest information from the Noise Working Group of the Institute of Acoustics.	for day-time periods the external noise limits suggested by ETSU-R-97 are 35-40 dB LA90 or 5 dB above the prevailing background noise, whichever is the greater. ETSU-R-97 states that choice of the limit within the 35-40 dB range 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 set in ETSU-R-97 is 43 dB LA90 or 5 dB above the background, whichever is the greater.	support Noted	No change
AY104		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY104	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY104		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY104		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY104		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY106		7.4.2	It is considered that the guidance referred to with regard to risk of injury to humans is unnecessary in such a planning document and it is unreasonable to require developers to provide supplementary information regarding the risk of injury to humans.	no members of the public either walking on a right of way, walking on common land or on open access land has been killed or injured by a turbine or part of a turbine in the 20 years these machines have been in use in the UK.	Section 6 of Appendix 4 deals with design and Access Statements, including layout and position. Statutory consultees will also need evidence of how public safety has been considered.	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY110	7	7.3.4	Although not covered in ETSU-R 97 we are advised that to overcome the above problem background noise levels should be correlated with derived (not measured) 10 meter height wind speeds.	Wind speed would need to be measured at to heights on site for the duration of baseline noise survey.	We area and this is reflected in the SPG	
AY115		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY115	7.3		The SPG should make provision to evaluate background noise levels of properties of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY115		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY116			Overall health effects of wind turbines on people living and working close to such developments is not given sufficient attention	No evidence to support comment submitted	This is an expression of a personal opinion not backed up by evidence	No change
AY116	7	7.9.8	Minimum separation distance from any residence should be determined by health considerations	The Impact of Wind Turbine Noise on Health ' recommended that the distances proposed in the bill presented to the House of Lords by Lord Reays were correct	The Ten Minute Bill was not supported by the House of Lords	No action required.
AY123		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY123	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY123		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY123		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY123		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY124	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY124		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY124		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY124		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY126		7.3	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY126	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY126		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY126		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY127		7.3	the effect diminishes with distance from the sound source and the scientific consensus is that a separation distance of 1.5km from large turbines is sufficient to avoid these effects. The precautionary principle should be used and a buffer zone of 1.5km between large turbines and dwellings should be applied	There is now a small, but significant, body of scientific literature which identifies the harmful effects of low frequency noise generated by large wind turbines (see Appendix : "turbine noise and health references").	The Consensus opinion is that modern upwind turbines are not significant sources of infra sound or low frequency noise (Ref. Wind Farm Noise Statutory Nuisance Complaint Methodology: April 2011). Although, like most noise sources, a wind turbine's noise may contain a wide spectrum of noise frequencies including some at low frequency, this is subject to the same 6dB per doubling of distance reduction as all other frequencies. Wind Turbines should be assessed on a case by case basis and a standard 1.5km separation distance would be overly restrictive.	Comment noted but no further action required.
AY128	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY128		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY128		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY128		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY130		7.3	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY132		7.3.1	The ETSU-R-97 guidelines are not sufficient	Greater separation distances will go some way to reducing the excessive noise associated with wind turbines.	The basis for noise limits contained in UK and Welsh Government policy remains ETSU R-97	No Change
AY133		7.9.8	Distance of dwellings from turbines should be 2km at least	in accordance with peer reviewed studies world wide. It is widely understood that health issues can result even at 2km and beyond. This disruption can affect the amenity of a generation, in particular their ability to sleep properly.	See response to same comment above.	
AY134		7.3	Mae yna dystiolaeth am yr effaith ar iechyd a teuluoedd gan dwrbeini gwynyt ac mae yna enghreifftiau o breswylwyr yn gadel eu cartrefi oherwydd twrbeini.	No evidence to support comment submitted	Mae hwn yn ddatganiad o farn personol heb dystiolaeth i'w gefnogi	Dim Newid
AY136		7.3	The current draft SPG is vague on the issue of amplitude modulation and low frequency noise produced by working wind turbines and the effects of this on the health of the community. a safe distance of 1.5 k between any wind turbine and any residential property should be adopted	Given the growing body of evidence of the negative effect on health of wind turbine noise	The basis for noise limits contained in UK and Welsh Government policy remains ETSU R-97	No Change
AY143			Overall health effects of wind turbines on people living and working close to such developments is not given sufficient attention	No evidence to support comment submitted	This is an expression of a personal opinion not backed up by evidence	No Change
AY143	7	7.9.8	Minimum separation distance from any residence should be determined by health considerations	The Impact of Wind Turbine Noise on Health ' recommended that the distances proposed in the bill presented to the House of Lords by Lord Reays were correct	The Ten Minute Bill was not supported by the House of Lords	No action required.
AY144	7	7.9.8	Minimum separation distance from any residence should be determined by health considerations	The Impact of Wind Turbine Noise on Health ' recommended that the distances proposed in the bill presented to the House of Lords by Lord Reays were correct	The Ten Minute Bill was not supported by the House of Lords	No action required.



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY145		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY145	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY145		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY145		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY145		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY150		7.9	The distance must be at least 1.5 km.	There is growing evidence of the impact of wind turbines on the population. The SPG does not take nearly enough notice of this. It must look at the latest reliable evidence before deciding on distance	The SPG does provide sufficient detail in relation to amenity and health issues through providing guidance to developers to consider suitable locations and placement to mitigate possible impacts.	No change
AY151		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY151	7	7.3.13	The SPG should clearly state that the 'Den Brook Valley condition will be a condition applied to all permitted developments of commercial wind turbines. The condition wording (conditions 16 to 21 as per Appeal/Q1153/A/06/201716 - 11thDecember 2009 heard by Inspector Andrew Pykett) should be inserted in para 7.3.13 on page 31 of the SPG.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY152		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY152			For information purposes the SPG should have included in the public consultation the distances set out in Lord Reay's Bil1.3	No evidence to support comment submitted	This is an expression of a personal opinion not backed up by evidence	No change
AY152		7.3.13	the SPG should clearly state that the 'Den Brook Valley condition will be a condition applied to all permitted developments of commercial wind turbines. The condition wording (conditions 16 to 21 as per Appeal/Q1153/A/06/201716 - 11thDecember 2009 heard by Inspector Andrew Pykett) should be inserted in para 7.3.13 on page 31 of the SPG.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY154		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY154	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY154		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY154		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY154		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY155		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY155	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY155		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY155		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY155		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY156		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY156	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY156		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY156		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY156		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY157		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY157	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY157		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY157		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY157		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY160		3.25	Para 3.25 page 12 of the SPG should note the evidence from the EU source. In 2006 the French National Academy of Medicine recommended that turbines should be sited at least 1.5km from homes in order to protect people from Amplitude Modulation (AM) and low frequency noise, which clinicians identified as the probable cause of sleep disturbance and health problems in some people	It is no less relevant than other EU information given in the SPG.	See response to same comment above.	
AY160	7.3		The SPG should make provision for this to evaluate background noise levels of properties within 2km of any proposed commercial turbines. Such tests should be provided for during the initial stages of the planning application process.	It has been accepted at Planning Appeals that the developer should pay the cost of independent acousticians for noise tests on behalf of residents, who live close to proposed turbine developments.	See response to same comment above.	
AY160		7.3.12	It is recognised that AM (the modulation of aerodynamic noise at blade passing frequency) is not adequately dealt with in ETSU-R-97 which is the methodology published in 1996 to measure and predict noise from wind turbines. The SPG needs to make it clear that is why it cannot only use, or rely on, this methodology.	The causes of excessive levels of AM are not clearly understood. Close sited or number of turbines, landform and surroundings, atmospheric conditions, design, age and type of turbine, and wind shear are all possible triggers for high level AM. It is recognised that in some situations AM noise seems to travel considerable distances	See response to same comment above.	
AY160		7.3.13	The SPG should clearly state that the 'Den Brook Valley' methodology and parameters will be a condition applied to all permitted developments of commercial wind turbines.	The Inspector's condition to prevent excessive AM and AM of low frequency noise has been upheld by the Courts	See response to same comment above.	
AY160		7.3.14	The SPG does not deal fully with the significant issue of Amplitude Modulation and low frequency noise that is also amplitude modulated [must adopt] a precautionary buffer zone between homes and turbines of at least 1.5km.	Anglesey County Council has a duty of care towards residents when outlining criteria for wind turbine development	See response to same comment above.	
AY163		7.3.12	The negative effects of Amplitude Modulation and low frequency noise are becoming increasingly well-documented.	No evidence to support comment submitted	See earlier comments about AM and LFN.	Comment noted but no further action required.

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY164		7.3 7.11	Lip service only given to important issues such as A.M., Flicker, Electromagnetic Fields and Vibration.	No evidence to support comment submitted	This is an expression of a personal opinion not backed up by evidence	No change
AY164		7.3	The Health implications need considerably more attention than afforded in this document.	No evidence to support comment submitted	This is an expression of a personal opinion not backed up by evidence	No change
AY165	7	7.3.12	There needs to be a buffer zone of 1.5km between residences and wind turbines	In accordance with other areas/countries. This will ensure proper protection from effects of the AM documented in the revised SPG	See response to same comment above.	
AY168			No mention of Health, Social Care and well-being strategy for Anglesey (2011-2014). No mention of potential health risks with turbines.	Poor response or no information available.	This is an expression of a personal opinion not backed up by evidence	No change
AY176	3	3.25	SPG does not seem to do much to promote residents Health and well-being	No buffer zones is put into the SPG	This is an expression of a personal opinion not backed up by evidence	No change
AY183		7.9.9/7.9.10	Par 7.9.9 and 7.9.10 go some way to accommodate developments within separation distances. The SPG should find a method of rewarding developers that selects a turbine with a lower noise output	If turbine A has a tip height of 65m with 35dB (A) is achieved at 600m while turbine B is the same height but achieves 35dB (A) at 400m, then turbine B should have a shorter separation distance.	Applicants are encouraged in the SPG to submit proposals that are well designed which will include noise considerations	
AY185		7.3.12	The second draft SPG does not put in place any satisfactory measures to protect the population from the effects of AM	If this is excessive it can interfere with the amenity of local residents and in particular can disturb sleep	See response to same comment above.	

**[DETAILED TEXT]** The World Health Organisation Guidelines for community Noise recommend that "for a good night's sleep, the equivalent sound level should not exceed 30dB(A) for continuous background noise". The noise level 30dB LAeq, 8hr is measured inside a bedroom. Outdoors, WHO recommend that the sound level 1m from the facade should not exceed 45dB LAeq, a 15dB(A) difference between internal and external levels normally accounts for the typical attenuation provided by a window left open in the typical manner to provide ventilation. Similar noise levels are advocated within British Standard 8233:1999 "Sound insulation and noise reduction for buildings -code of practice". The Local Authority has chosen to apply the lower ETSU criterion of 35dB(A) or 5dB(A) (measured as LA90, 10 min) above the background, whichever the greater, up to wind speeds of 12m/s at 10m height, rather than upper criterion of 40dB LA90 or +5dB and the night time level of 43dB LA90 or + 5dB . These levels normally apply 3.5m from the facade of any residential property and a further 12dB reduction would be expected within a building. This is the strictest possible interpretation of ETSU-R-97 and should provide addition reassurance that the noise levels from wind turbines on Anglesey are unlikely to give rise to complaints of sleep disturbance.

SPG : Onshore Wind Turbines - 4. Tourism

Reference (responder)	SPG Chap.	SPG Para	Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
AY017		7.9.15	If applied on its own it would be a recipe for disaster both to residents and tourism businesses from visual amenity, and protection from noise considerations.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY028		5.12	3 turbines at Brynisiencyn, sandwiched between SSSI's, SAM's, world heritage sites, National Parks, and National Cycle tracks has a massive visual impact on all of these important sites. Mathematics and scaled tables has no relevance - whether the turbines are 67m high or 20m high.	Evidence in form of photos. Photos show single turbine at 46m accurately scaled.	Agree it would be helpful to illustrate size with comparative examples	Include graph or photos to compare sizes with existing features of Anglesey landscape (e.g. Llanddona Mast, Tŵr Marcowis,
AY034		7.9.15	They do nothing to enhance the rural beauty of the island, nothing to benefit tourism or encourage the thousands of tourists who drive the fragile economy. In fact there is strong evidence to suggest it could have a grave effect on this industry.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY034		7.9.15	Have a detrimental affect on tourism and all business associated with it	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY035		7.9.15	Object to the erection of these commercial machines that will jeopardise our valuable tourist industry.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY040		7.9.15	Concerned of inevitable negative impact on tourism and also impact negatively on the geology in many areas which are also significant in Anglesey's economy	Currently at least 2,941 on shore wind turbines in UK, and these have to be highly visible in the landscape if they are to function at their best.	No specific evidence submitted in support of the comment made.	No change
AY041		7.9.15	They do nothing to enhance the rural beauty of the island, nothing to benefit tourism or encourage the thousands of tourists who drive the fragile economy. In fact there is strong evidence to suggest it could have a grave effect on this industry.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY043		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	<b>*DETAILED TEXT AT THE END OF THE DOCUMENT*</b> The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of 'views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equaling "strongly disagree" and 10 being "strongly agree" to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY044		7.9.15	It is definitely going to damage the tourist industry	Effects on the Scottish Tourist industry. That the machines are not green and do not reduce CO2 output because of other power stations needed on standby. That turbines are being sold off by European countries (Denmark) and that they are having to import Hydro Electric power from Norway.	No specific evidence submitted in support of the comment made.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY047	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	* <b>DETAILED TEXT AT THE END OF THE DOCUMENT</b> The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY048	7.9					
AY049	3.21		The Destination Management Plan (DMP) target seems at odds with the large scale introduction of Wind Turbines currently planned for the Island.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY055	7.9.15		it is considered that the list of requirements set out in Section 17 of the Appendix is too onerous and should be deleted.	despite the continued development of wind farm sites across the country, no evidence has come forward of effects in terms of a decline in numbers. . . Studies into tourism numbers and directly involving accommodation providers in areas with a number of wind farms have shown that visitor numbers in these areas have continued to grow even after the wind farms were developed, and adverse reactions from guests have been negligible. The issue is well summarised in a report prepared for the British Wind Energy Association for the All Party Parliamentary Group of MPs on Tourism.	This appears to be a comment on the policy itself which refers to the need to consider the impact on, inter alia, "the standard of amenity enjoyed by the tourist population". It is considered that guidance provided is appropriate	No change
AY055	3.24		, it is suggested that this Section be deleted – although reference to it for further reading could be retained in an Appendix.	Reference to the "threat" identified in the plan from pylons and turbines is unhelpful and misleading. The DMP Strategy makes no reference to either wind turbines or pylons. The DMP Delivery Plan makes a passing reference to the fact that turbines and pylons are causing concern among many stakeholders: there is no evidence that the presence of turbines leads to a reduction in turbine(sic tourism?) numbers	The relevance of the Destination Management Plan a part of the Policy Context in Section 3 could be made clearer. For example, it is not made clear that the purpose is to "co-ordinate the management of all the aspects of a destination that contribute to a visitor's experience". It does not replace the Local Development Plan. The DMP Delivery Plan in para. 3.1.4 identifies the need for protecting the coast through good and consistent application of planning policies and design. One issue that is identified that could affect the tourism offer is the potential proliferation of wind turbines and that priority is given to controlling such developments near tourism facilities and the underpinning of cables where they impact on the coast (where feasible)	Suggest that the wording of paragraphs 3.21 to 3.24 is altered to read ..... 3.2.1 The Det M Pla ..... In Anglesey. The purpose of such plans is to "co-ordinate the management of all the aspects of a destination that contribute to a visitor's experience". 3.22 The Plan is required due to the important role that tourism, along with the energy sector, play, and will play in the future economy. The Plan articulates a vision, strategic objectives and an Action Plan required to maximise tourism's contribution. The need to ensure that the coast in particular is protected through good and consistent application of planning and high quality design is recognised.
AY056	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	* <b>DETAILED TEXT AT THE END OF THE DOCUMENT</b> The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY058	7.9					
AY059	7.9.15		Consideration must be given to the effect on Tourism	Tourism is the main employer on the Island and supports many small family business which would suffer badly	No specific evidence submitted in support of the comment made.	No change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY060		7.9			*[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equaling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY062		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	No specific evidence submitted in support of the comment made.	No change
AY064		7.9				
AY065		7.9	The SPG must go beyond the consideration of individual tourism receptors and consider the wider tourism and landscape implication of each and every application.	There is a real danger of an adverse effect on tourism if industrial sized turbines are allowed to proliferate on the island	No specific evidence submitted in support of the comment made.	No change
AY066		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	*[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equaling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY067		7.9				
AY070		7.6	an Holistic approach is needed in order to preserve the landscape which is such an important factor for the success of the Tourist Industry. This is not achieved in the Second Draft SPG	Our main source of income comes from Tourism and Tourists do not want to see a small Island renowned for its stunning views, beaches, peace, tranquility and ecology littered with large industrial machines. The topography means that many of these machines will be seen from miles around, each machine will contribute to spoiling the amenity of not just its close neighbourhood but the whole Island	No specific evidence submitted in support of the comment made.	No change
AY071		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	*[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equaling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY073		7.6	an Holistic approach is needed in order to preserve the landscape which is such an important factor for the success of the Tourist Industry. This is not achieved in the Second Draft SPG	Our main source of income comes from Tourism and Tourists do not want to see a small Island renowned for its stunning views, beaches, peace, tranquility and ecology littered with large industrial machines. The topography means that many of these machines will be seen from miles around, each machine will contribute to spoiling the amenity of not just its close neighbourhood but the whole Island	No specific evidence submitted in support of the comment made.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY077	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	"DETAILED TEXT AT THE END OF THE DOCUMENT) The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 96% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY084	5.8		The Anglesey Coastal Path is an important attraction and I do not think wind turbines should be visible from it.	The tourism industry brings £223m into the local economy and supports over 4,000 jobs. I fear that it will be individuals only who will benefit from having a wind turbine on their land while others will suffer and lose money as Anglesey will not be appealing to tourists anymore People come to walk the coast for many reasons and one of the main reasons is to enjoy the natural scenery. I am concerned that wind turbines spoil the visitors' experience (you can see wind turbine from Port Wygwr in Cemaes and that is disappointing to be honest. The developments from Cemaes to Burwen are now oppressive in my opinion).	The evidence does not prove the statement one way or another	No change
AY087	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	"DETAILED TEXT AT THE END OF THE DOCUMENT) The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 96% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY088	7.9					
AY091	7.9.7		Disagrees with statement 'There is limited guidance regarding separation distances between wind turbines and settlements or individual dwellings or tourism properties.	There is, in fact, a significant amount of information available, both within the UK and internationally, where 2km is generally accepted as an appropriate separation distance from commercial wind turbines and residential dwellings or tourism properties.	No evidence offered that 2km is generally accepted within the UK and internationally.	No change
AY092	7.9.7		Disagrees with statement 'There is limited guidance regarding separation distances between wind turbines and settlements or individual dwellings or tourism properties.	There is, in fact, a significant amount of information available, both within the UK and internationally, where 2km is generally accepted as an appropriate separation distance from commercial wind turbines and residential dwellings or tourism properties.	No evidence offered that 2km is generally accepted within the UK and internationally.	No change
AY095	5.11.1		It should be made clear that protecting the entire Anglesey landscape is important	For protecting tourism and residents quality of life	Section 5 and Appendix 3 clearly describes the different visual quality of the Anglesey landscape	No change
AY096	7.9.15		The economic impact on tourism will be huge	No evidence has been presented	This is an expression of a personal opinion not backed up by evidence	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY098		7.9				
AY099		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	" <b>DETAILED TEXT AT THE END OF THE DOCUMENT</b> The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY100		7.9				
AY101		7.9.15	While the tone of this paragraph is measured, it still conveys a negative impression, especially in the final sentence	We feel it should be mentioned that there is in fact very little if any evidence that wind turbines are likely to have any impact on tourism, assuming that they are not located in designated areas. (Some)studies suggest that impacts on tourism are very unlikely to be significant as long as appropriate planning guidance is adhered to.	No specific evidence submitted in support of the comment made.	No change
AY104		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	" <b>DETAILED TEXT AT THE END OF THE DOCUMENT</b> The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY106		7.9.15	it is considered that the list of requirements set out in Section 17 of the Appendix is too onerous and should be deleted.	despite the continued development of wind farm sites across the country, no evidence has come forward of effects in terms of a decline in numbers. Studies into tourism numbers and directly involving accommodation providers in areas with a number of wind farms have shown that visitor numbers in these areas have continued to grow even after the wind farms were developed, and adverse reactions from guests have been negligible.	Agree there is no conclusive proof that the development of onshore wind turbines in an area leads to a decline in visitor numbers. However, the authority will need to assess the potential impact of a development on nearby tourism and recreation attractions and accommodation.	No change
AY113		7.9.15	request a separate Tourism Impact Assessment for medium and large scale wind turbine applications	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY116		7.9.15	The effects on tourism should not be assessed by the developer, an independent view should be obtained by the council paid for by the applicant	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY122		7.9.15	Concern about the possible negative impact the wind turbines may have on tourism and the pollution risks. Water contamination, particularly from the hydraulic oil within the turbines.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY123	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	"[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree" to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY124	7.9		Too much emphasis is put on the importance of tourism	Tourism is seasonal. Renewable energy will provide a secure and long term economic solution for the island	No specific evidence submitted in support of the comment made.	No change
AY126	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	"[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree" to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY130	7.9		Ensure that the SPG is totally non-ambiguous in order to protect the residents of Anglesey from damaging developments which are perilous for the local economy and will lead to inappropriate development.	If the SPG is not robust there will be an adverse effect on tourism, recreation and sport - activities that are key to the future of our island	No specific evidence submitted in support of the comment made.	Dim Newid
AY136	3.21		the potential impact on tourism needs to be given much greater weight in the SPG.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY142	3.21		For every 1% loss in tourism that's £2.3million & 40 jobs lost for a gain of maybe 5 !!	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY143	7.9.15		The effects on tourism should not be assessed by the developer, an independent view should	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY144	7.9.15					
AY145	7.9		any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	"[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree" to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY150			Each wind turbine application should include a full assessment of the local population, on tourism in Anglesey and its impact on people who live within their reach, i.e. can see them from their homes.	No evidence has been presented	No specific evidence submitted in support of the comment made.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY154		7.9				
AY155		7.9				
AY156		7.9	any commercial wind turbine planning application should include an area wide Tourism Impact Survey and Assessment of Tourism Amenity	Results of Scottish Visitor Survey showed that 20% of the UK respondents said the presence of a wind farm would affect their decision about where to visit, holiday or stay.	"[DETAILED TEXT AT THE END OF THE DOCUMENT] The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted	No change
AY157		7.9				
AY160		7.9				
AY165		7.9.15	Another consideration is tourism. The SPG acknowledges the importance of tourist industry in the County's income, and also the role that areas such as ANOB's play in this success story.	The SPG displays a potentially destructive attitude towards these protected areas, in that it proposes to consider carefully, rather than ban outright, turbine development in them.	In my view the draft SPG takes a balanced approach to development proposals and advocates restriction in appropriate circumstances and asks developers to consider carefully how the proposal will impact on a range of receptors.	Dim Newid
AY166		7.9.15	No mention of tourism in relation to Anglesey Energy island and how the two are totally incompatible. Council policies could lead to loss of jobs and depress house prices.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY167		3.24	The concepts of tourism and energy island are totally incompatible	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY168		7.9.15	In 20 years it could bankrupt the island Destroying the tourism industry	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY172		7.9.15	Proliferation of even 20m high turbines will make people think twice about visiting Anglesey.	against TAN 8 guidelines	No specific evidence submitted in support of the comment made.	No change
AY172		7.9.15	Concerned about the effect that allowing many turbines on Anglesey will have on the tourist industry	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY178		7.9.15	Need to be far firmer about the presentation of the tourist industry and the potential impact of industrializing Anglesey	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY179		7.9.15	Refers to Anglesey Energy Island, flawed idea which has potentially a very harmful effect on the future tourism on the island. Without tourism the future of Anglesey looks very bleak.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY180		3.24	The concepts of tourism and energy island are totally compatible	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY181		3.24				
AY182		3.24				

**\*[DETAILED TEXT]** The survey referred to was an attitudinal survey conducted in 2010 on wind farms (not defined). Overall the results reflect the wide spectrum of views on the subject within UK society. Respondents were asked about their attitudes (on a scale of 1-10 with 1 equalling "strongly disagree" and 10 being "strongly agree") to two statements. The score in relation to the statement "wind farms are necessary for the future generation of wind energy" was 7.63 suggesting that UK respondents tended to agree with the statement. The score in relation to the statement "wind farms are an eyesore on the landscape and ruin the tourism experience" was 4.63 suggesting that respondents do not agree with the statement. The annual Scottish National Visitor Survey published in January 2012 noted that one of the main reasons for visiting Scotland was the quality of the scenery/landscape. 94% were very or fairly satisfied with their experience; 98% definitely or probably would recommend Scotland to others and 84% definitely or probably would return to Scotland within 5 years. The evidence submitted from Scotland is not conclusive about the possible impact of wind turbines on tourism.

## SPG : Onshore Wind Turbines - 5. Community Engagement & Benefits

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY049	7.13		Community engagement should be mandatory, plus community responses entered with the application as evidence of this having taken place	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY049	7.13		it should not be left to the developer to make this assessment.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY050	7.13		Community engagement should be mandatory, plus community responses entered with the application as evidence of this having taken place	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY050	7.13		it should not be left to the developer to make this assessment.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY051	7.13		Community engagement should be mandatory, plus community responses entered with the application as evidence of this having taken place	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY051	7.13		it should not be left to the developer to make this assessment.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY052	7.13		Community engagement should be mandatory, plus community responses entered with the application as evidence of this having taken place	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY052	7.13		it should not be left to the developer to make this assessment.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY079	7.13		Community engagement should be mandatory, plus community responses entered with the application as evidence of this having taken place	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY079	7.13		it should not be left to the developer to make this assessment.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY083	7.13		Community engagement should be mandatory, plus community responses entered with the application as evidence of this having taken place	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY083	7.13		it should not be left to the developer to make this assessment.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY111	7.13		Consultation and and community engagement should be a co-ordinated exercise which we believe the Energy Island Programme is best placed to oversee	Due to the potential number of small onshore wind development along with other energy and non-energy related development there is a high potential for consultation overlap and fatigue	The advice here is connection with individual developments which require a different consultation and engagement channel to the a general policy context	No change
AY113	7.13		Is Community Engagement a "Key Issue" ?	is it an activity which developers should consider when they are developing their proposals	This statement agrees with the objectives of s. 7.13	No Change
AY148	7.13		not should - will have to?	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY161	7	7.13	Community Engagement is not treated with the respect that it deserves in this revised SPG. it should be a legal imperative.	It should be at the very heart of every wind turbine application, but here is given scant consideration. It is mentioned once in the Aims page, 2.9, an apparent afterthought. Also, later, in the check-list, guidelines regularly fall short of actually enforcing a legal requirement with regard to community engagement. Developers/landowners are "encouraged to engage with the local community", implying they have choice.	It is not within the powers of the authority to introduce legislation. However, the aim of the SPG could include an additional bullet point in 2.9 "help the wider public and other stakeholders understand the implications of the local development.	Insert additional bullet point in 2.9 [now relocated to paragraph 1.8]
AY166	7	7.13	The community engagement is very much an afterthought	Does not deal well enough with the compulsion to communicate with the Anglesey communities. Response in the SPG will lead to Energy Companies and Landowners ignoring Health and Amenity issues.	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY167		7.13	NO compulsion for developers to engage with community	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY168	7	7.13	Community engagement very weak, appears as an afterthought whereas it should be the most important part of the documented.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY169		7.13	Very poor response to Community Engagement. Poor concept of Health issues.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY170		7.13	Community engagement almost an afterthought. Poorly considered with little emphasis on health issues.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY175		7.13	Replace "encouraged" with "strongly recommended"	too loose	Agreed that wording could be stronger	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY176	7	7.13	Community engagement so far has been very limited and does nothing to make applicant consult the communities from the start.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY181		7.13	Replace "encouraged" with "strongly recommended"	too loose	Agreed that wording could be stronger	Include reference to s 6.2 of TAN 8 which states that local authorities and developers should endeavour to enter into discussions with local communities as soon as possible when formulating proposals
AY084		12.1	I am very uncomfortable with this.	How can the Council not consider this in fact if a wind turbine developer offers things to the community and you are working with developers (private sector)? Is there an opportunity to buy this Council and a chance to bribe the community?	Since April 2010 it is illegal to take account of a planning obligation unless it meets the following criteria: it is necessary to make the development acceptable in planning terms; it is directly involved in the development; and it is fair and reasonable in terms of the relevant scale and size of development (PPW 3.7.6). Is it reasonable to make it clearer that the contribution has been linked to FITs and the size and number of wind turbines?	Include an introduction to section 12 which sets the context of this. Make 12.8 clearer in its link to the size of the development.
AY183	12	12.1	The SPG needs clarity on this issue. The rate of contribution should be £3,000 per Megawatt per year and should be linked to the CPI.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY030		12.6	Web link to document	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY141		12.8	I disagree that affected local communities will derive any benefits (financial or otherwise) from medium and large (over 20m tip height) wind energy developments.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change



**SPG : Onshore Wind Turbines - 6. Decommissioning**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY014		9.1	After decommissioning, the secure provision of adequate monies for the complete removal of the reinforced concrete base of any wind turbine tower, shall be condition of initial grant of planning permission	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY030		9.1	Replace "may" with "will"	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY030		9.2	Replace "may" with "will"	Developers need to pay a bond before construction	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change
AY094		9.1. and 9.2	Provision inadequate.	Full restoration required	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change
AY102		9.2	It is imperative that the applicants must enable this undertaking by ensuring a financial bond which meets the requirements of the Planning Authority and the eventual cost of decommissioning.	We are very worried about the huge size of the foundation concrete bases that have to be provided for every turbine that is allowed, a considerable amount of carbon dioxide is released into the atmosphere when producing cement and when preparing the concrete. it is more than likely that to remove these blocks when decommissioning would cost too much and that they will remain in the ground for ever more.	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change
AY116		9.2	A bond to cover decommissioning cost should be required (not MAY) at the time of approval	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY126		9.2	The SPG should require, via a bond or other mechanism, that sufficient resources will be available in order to protect local ratepayers.	Existing statement is too vague	No specific evidence submitted in support of the comment made.	No change

AY130	9.2	The SPG should require, via a bond or other mechanism, that sufficient resources will be available in order to protect local ratepayers.	Existing statement is too vague	No specific evidence submitted in support of the comment made.	No change
AY142	9.1	A bond should be obligatory	there are many examples of abandoned turbines when companies go bust.	9.1 only refers to wind farms whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The requirement may vary according to size of turbine and/or farm.	
AY143	9.2	A bond to cover decommissioning cost should be required (not MAY) at the time of approval	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY144	9.2	A bond to cover decommissioning cost should be required (not MAY) at the time of approval	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY150	9	It is absolutely necessary that any developer or individual places a BOND with the Council at the beginning of the process that is equivalent to the cost of de-commissioning and restoring the land in full. This amount would be required to be placed at today's costs, including inflation at a level of 4 or 5% annually for a period of at least 25 years on top, to guarantee that these things will not be left after the end of their lives.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY161	9	A sizeable bond should be placed by the Applicant, together with the wind turbine company to cover the cost of removing all traces of the industrial structure after its useful life is ended	At the moment, there is no firm safeguard, only "a bond MAY be required"	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change
AY164	9	Weak response favouring landowners and energy company. wording indicates that the planning process does not extend 20 year to the future. Whole process of [decommissioning ] needs clarification	makes the whole document valueless.	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change

AY166	9.2	Decommissioning process is far to vague and should clearly state the size of the bond required, who should hold it and the various responsibilities if that site is no longer used and especially the landowners responsibilities.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY167	9	Decommissioning [conditions] not strong enough	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY168	9	As it stands it looks as the inhabitants of Anglesey will be funding the restoration of the Island in 20 years	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY169	9.2	No great emphasis on Decommissioning with failure to make provision for Energy companies and landowners responsible through depositing a substantial bond.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY170	9.2	Vague mention of decommissioning and a bond to cover cost. No mention of responsibility if energy companies is dissolved in the 20 years of the turbines life.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY171	9	The SPG must make it more legally binding that the applicant is responsible for the entire reinstatement costs.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY173	9.2	All applicants - landowners and companies alike should be compelled to pay a bond at the outset of development to pay for decommissioning	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY174	9	SPG does not give a firm safeguard, where sufficient funds are ring - fenced at the outset of a development to remove all traces of the industrial structure.	Learnit (internet/newspaper) that in different parts of the world subsidies have been withdrawn, and wind turbines have fallen into disrepair. After all, companies can go bust.	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change
AY175	9	Decommissioning is barely dealt with	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY177	9	The cost should be firmly stated to be the responsibility of the energy company and the landowner	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY178	9.2	Energy companies and landowners should jointly deposit a bond for decommissioning	Energy companies and landowners are the people gaining from these turbines.	9.1 only refers to wind turbines whilst TAN 8 refers to "wind farms and turbines". Advice also states that developers should consider setting aside sufficient finance to meet obligations. The authority may wish to limit pp to a certain number of years (e.g. 25) with requirement for full restoration. The LA may wish to vary requirement according to size of turbine and/or farm.	No change

AY179		9.2	Decommissioning - A very weak response with no clear imperative on the nature of the bond required and the extent of the decommissioning process.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY180		9	Decommissioning [conditions] not strong enough	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY181		9	Decommissioning [conditions] not strong enough	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change

**SPG : Onshore Wind Turbines - 7. Development Plan Policies**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY004		3				
AY006		3				
AY007		3	I oppose any further erection of commercial onshore wind turbines	they are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY010		3				
AY011		3				
AY012		3				
AY012		3	Support any move to develop nuclear power or tidal power as alternatives to wind power.	As a source of reliable electrical power, they are verging on useless.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY019		3	Support the (AAWT) response to the consultation on the SPG by opposing any further erection of commercial onshore wind turbines	they are damaging to our fragile economy, tourism, our health and wildlife. They are inefficient, noisy, visually unsightly and an intrusion on our precious island landscape	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY021		3	I oppose any further erection of commercial onshore wind turbines	they are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY022		3	We oppose any further erection of commercial onshore wind turbines	they are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY023		3	I oppose any further erection of commercial onshore wind turbines	they are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY024		3	I am implacably opposed to wind energy proposals whether onshore or offshore	They are serious blight on the landscape, noisy and the other effects that are detrimental to the environment.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY026		3				
AY029		3				
AY031		3	I oppose any further erection of commercial onshore wind turbines	they are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY035		3				
AY037		3				

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY038		1.3	"Clear demonstration" and "significantly adverse" are not defined	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY040		3	Objection to the principle of developing wind turbines	No evidence to support comment submitted	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY042		3	I oppose any further erection of commercial onshore wind turbines on Anglesey	Turbines have been shown to be an inefficient method of energy generation, and their operation can have serious effects on the health of those living nearby.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY043	1	1.2	The 1996 plan has primacy in law over national policy unless the national policy is also statutory, in which case each piece of law has to be considered as appropriate to the local context. should be spelt out in para 1.2 on page 3 of the SPG.	That is how the plan-led system has always worked and has been confirmed by The Honourable Mrs Justice Lang in a recent High Court case	PPW Section 3.1.2 states "applications for planning permission... Should be determined in accordance with the approved or adopted development plan for the areas unless material considerations indicate otherwise. Material considerations could include current circumstances, policies in an emerging development plan and planning policies of the Welsh Government and the UK Government. All applications should be considered in relation to up to date policies." . Agree that role of Welsh Government and UK Government Planning Policies should be spelt out more clearly	Provide a separate chapter which explains UK and Welsh Government planning policies
AY043		1.3	It is incorrect to say that more recent non-statutory plans have to be "applied"	Non-statutory plans are 'a material consideration'.	PPW Section 3.1.2 states "applications for planning permission... Should be determined in accordance with the approved or adopted development plan for the areas unless material considerations indicate otherwise. Material considerations could include current circumstances, policies in an emerging development plan and planning policies of the Welsh Government and the UK Government. All applications should be considered in relation to up to date policies." . Agree that wording could be improved.	Change to "considered" rather than "applied"

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY043		1.8	The SPG should therefore help to clarify what wind turbine development is 'unacceptable' to the Council and the population it serves, and how that might be demonstrated.	The SPG can only clarify, or as it were, put 'flesh' on the bones of the 1996 Plan	PPW Section 3.1.2 states "applications for planning permission... Should be determined in accordance with the approved or adopted development plan for the areas unless material considerations indicate otherwise. Material considerations could include current circumstances, policies in an emerging development plan and planning policies of the Welsh Government and the UK Government. All applications should be considered in relation to up to date policies." . Agree that aims and purpose of SPG could be more clearly stated	Relocate s 2.9 to Introduction and include additional aim: ". Help the wider public and other stakeholders with an interest in the development of their area understand the implications of proposals"
AY044		3	I oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY045		3	I do oppose any further erection of commercial onshore wind turbines	They are damaging to our WILDLIFE, the general wellbeing of our community, they are so inefficient costly to run and maintain and are very noisy with an immediate unsightly visual impact on our beautiful island landscape	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY046		3	I oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our natural environment, and our wildlife. They are also inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY053		3	I oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY055	General		Certain sections of the document are regarded as negative and overly-restrictive and will not enable national planning policy and energy targets to be achieved. It is also considered that elements of the guidance go well beyond adopted development plan policy	SPG are only intended to 'supplement' existing adopted development plan policy	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. The SPG needs to reflect both national environmental as well as energy policies and of necessity the SPG needs to clarify how those policy aims are balanced.	No Change
AY055		5.2.3	It is considered beyond the scope of the SPG to start introducing new policy such as height restrictions, without testing them through the correct channels in the first place i.e. formal development plan process.	It is unclear where the reference to 20m tip height comes from	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. Of necessity the SPG needs to clarify how those impacts are to be identified and assessed.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY055		5.9.4	Incorporating a 5km buffer around the two aviation bases (Mona and Valley) is again introducing new planning policy which goes well beyond existing development plan policies. It is therefore suggested that this is removed from the SPG, because this goes beyond both good practice procedures for dealing with aviation and beyond the development plan itself.	The SPG should not be the document within which further constraints on development be imposed particularly where the origin of the additional constraint is unclear. TAN 8 makes reference to the importance of consulting CAA, MOD etc. but it does not make reference to any buffer zones around aviation interests	A review of Best Practice revealed that a 5km buffer around the aviation bases should not of have been introduced.	Remove the 5km buffer from the maps.
AY055		5.12.4	using buffer zones up to 1.35km goes well beyond national planning policy and is beyond the remit of this SPG. In addition to this, the actual purpose of Section 5.12 is in fact unclear.	This overly negative approach will negate the potential contribution that Anglesey can make to achieving renewable energy targets. It is uncertain how this Section intends to guide developers and members of the public and it is considered to be potentially misleading.	Agreed that section could be clearer.	Amend text to clarify the purpose of the maps.
AY061		3	I oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY065		3				
AY074		3				
AY075		3				
AY076		3				
AY078		3	To not approve any commercial turbines in Areas of Outstanding Natural Beauty	Dim tystiolaeth wedi ei gyflwyno	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY080		3	We [exist to] oppose any further erection of commercial on-shore wind turbines	They are damaging to our fragile economy and to our health and wildlife, and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY081		3	We oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY082		3	We exist to oppose any further erection of commercial on-shore wind turbines	They are damaging to our fragile economy and to our health and wildlife, and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY089	5	5.2.3	There should be no commercial wind turbine of any size in the AONB's. Anglesey is unique in being a County encircled by a stunning coastline, steeped in geological, ecological cultural and historical heritage.	No evidence to support comment submitted	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY096		3	Ban all future onshore commercial wind turbines	They are damaging our fragile economy, our health and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY101			the subsequent alterations to the original draft SPG are diametrically opposed to the intentions of Welsh Government and Planning Policy Wales	they will severely restrict any further deployment of wind energy on Anglesey (as indicated by Maps 1-3 on pages 20-22).	PPW Section 3.1.2 states "applications for planning permission... Should be determined in accordance with the approved or adopted development plan for the areas unless material considerations indicate otherwise. Material considerations could include current circumstances, policies in an emerging development plan and planning policies of the Welsh Government and the UK Government. All applications should be considered in relation to up to date policies." . Agree that role of Welsh Government and UK Government Planning Policies should be spelt out more clearly	Add greater clarity within the introduction that application will be dealt with in line with the development plan unless material considerations indicate otherwise.
AY103		3	The policies and guidance used in the draft SPG contradict those in the adopted development plan	Policies in an SPD are meant to amplify and add detail to existing adopted development plan policies;	It is not my view that new policies are being introduced in the draft SPG	Note comment
AY106	General		Certain sections of the document are regarded as negative and overly-restrictive and will not enable national planning policy and energy targets to be achieved. It is also considered that elements of the guidance go well beyond adopted development plan policy	SPG are only intended to 'supplement' existing adopted development plan policy	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. The SPG needs to reflect both national environmental as well as energy policies and of necessity the SPG needs to clarify how those policy aims are balanced.	No Change
AY106		5.2.3	It is considered beyond the scope of the SPG to start introducing new policy such as height restrictions, without testing them through the correct channels in the first place i.e. formal development plan process.	It is unclear where the reference to 20m tip height comes from	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. Of necessity the SPG needs to clarify how those impacts are to be identified and assessed.	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY106		5.9.4	Incorporating a 5km buffer around the two aviation bases (Mona and Valley) is again introducing new planning policy which goes well beyond existing development plan policies. It is therefore suggested that this is removed from the SPG, because this goes beyond both good practice procedures for dealing with aviation and beyond the development plan itself.	The SPG should not be the document within which further constraints on development be imposed particularly where the origin of the additional constraint is unclear. TAN 8 makes reference to the importance of consulting CAA, MOD etc. but it does not make reference to any buffer zones around aviation interests	The section could better explain why the 5km has been used for the strategic assessment.	Include a fuller explanation of why the buffer has been adopted and reference source of "Best practice Guidance"
AY106		5.12.4	using buffer zones up to 1.35km goes well beyond national planning policy and is beyond the remit of this SPG. In addition to this, the actual purpose of Section 5.12 is in fact unclear.	This overly negative approach will negate the potential contribution that Anglesey can make to achieving renewable energy targets. It is uncertain how this Section intends to guide developers and members of the public and it is considered to be potentially misleading.	Agreed that section could be clearer.	Amend text to clarify the purpose of the maps.
AY118		3	Oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY119		3	Oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY120		3	Oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY121		3	Oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY125		7.9.8	[buffer] zones go against National Policies	Each application should be dealt with on a case by case	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 location circumstances	No change
AY129		3	We oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY138		3	I oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY138		3	There is no necessity to have additional wind turbines on the island.	Anglesey already has 3 wind farms and a nuclear power station, which is to be replaced. It is already doing its bit to reduce carbon emissions.	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY139		3				
AY140		3				
AY146		3				
AY149		3	I oppose any further erection of commercial onshore wind turbines	They are damaging to our fragile economy, our health, our wildlife and they are inefficient, noisy and unsightly	This is an objection to national policies and to the local development plan policy framework which is outside the remit and purpose of the SPG	Note comment
AY153		3				
AY158		3				

## SPG : Onshore Wind Turbines - 8. Cumulative Impact

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY013	7	7.3.16	I have recently had conversations with consultants acting on behalf of developers intending to install smaller turbines amongst existing, larger turbines. Whilst this may appear to be a good means of overcoming local objections by extending what is already in place, there is a question as to the cumulative effect of such installations on noise, and indeed other impacts	Complex interactions, perhaps specific to geographical characteristics, between noise generated by the two sizes of turbine would appear to be likely, and an analysis of such interaction would appear to require significant effort to analyse objectively.	Comments Noted	No change
AY038		7.7.	Need for further guidance on cumulative impact on ecological interests of multiple applications	Current draft does not address this issue	Reference is made to the need to consider the potential impacts on biodiversity is referred to in 7.7.3. However further explanatory guidance would be helpful on this issue	Insert paragraph to provide further explanatory material
AY049		7.6.4	I do not believe this aspect of cumulative impact has been properly addressed.	No evidence has been submitted	No specific evidence submitted in support of the comment made.	No change
AY051		7.6.4	I do not believe this aspect of cumulative impact has been properly addressed.	No evidence has been submitted	No specific evidence submitted in support of the comment made.	No change
AY079		7.6.4	I do not believe this aspect of cumulative impact has been properly addressed.	No evidence has been submitted	No specific evidence submitted in support of the comment made.	No change
AY083		7.6.4	I do not believe this aspect of cumulative impact has been properly addressed.	No evidence has been submitted	No specific evidence submitted in support of the comment made.	No change
AY108		7.7	Cumulative aspects of Ecology and ornithology need to be addressed by SPG not developers	Further work needed to identify areas where there are likely to be cumulative negative impacts on diversity is greatest	Reference is made to the need to consider the potential impacts on biodiversity is referred to in 7.7.3. However further explanatory guidance would be helpful on this issue	Insert paragraph to provide further explanatory material. Delete one version of relevant sentence that appears twice.
AY111		7.2.2	A cumulative impact assessment of all the onshore wind energy sites should be carried out	In order to ascertain the overall impact of each additional transmission cable on the landscape and visual impact	Cumulative impact on visual amenity of turbines is addressed in 7.316-7.3.18. Section should include reference to transmission lines and associated infrastructure as well	Include reference to transmission lines and associated infrastructure in guidance on assessment of cumulative landscape and visual impacts
AY133			The issue of the inevitable cumulative impact on Anglesey of many individual industrial turbines and the impact these would have on the amenity of the Island is not satisfactorily addressed	Anglesey is a small Island and it is not a county suitable for a program of numerous large industrial machines because of the many hamlets and villages	Cumulative impact on amenity is addressed in 7.316-7.3.18 and 7.6.	No change
AY147	7		the document does not identify the need for the cumulative effect of turbines development upon the effective operation of radars to be taken into account	No evidence has been submitted	No specific evidence submitted in support of the comment made.	No change
AY185			The issue of the inevitable cumulative impact on Anglesey of many individual industrial turbines and the impact these would have on the amenity of the Island is not satisfactorily addressed	Anglesey is a small Island and it is not a county suitable for a program of numerous large industrial machines because of the many hamlets and villages	Cumulative impact on amenity is addressed in 7.316-7.3.18 and 7.6.	No change
AY186		5.12.2/5.12.3	Include reference to ecological cumulative impact	No evidence to support comment submitted	Agree that further clarity should be included in relation to ecological cumulative impact but that this should be contained within the section on Ecology and Ornithology.	Amend paragraph 7.7.3 to expand reference to ecological cumulative impact.

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY186		7.7.7	Suggest rewording of paragraph	Clarify that Council is responsible for conducting assessment rather than the developer	Agree	Include rewording as per suggestion

**SPG : Onshore Wind Turbines - 9. Biological Interest**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY016	7	7.7	Considerations of the potential impact on any fish population in any watercourse that may be affected and how this effect could be mitigated should be included.	No evidence has been submitted.	Section 7 encourages assessment of impacts on all ecological features, which includes fish and their habitats.	No change
AY035	7	7.7.1	The commercial machines will have a massive adverse environmental impact on the habitats and our wildlife , bats, birds etc	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change
AY042		3.21	Also likely to reduce the tourist appeal of the area as well as having a detrimental effect on wildlife	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change
AY093	7	7.7.6	The proximity of a wind-turbines to a relevant habitat should be limited to 100m or more if so advised by experts in relevant field.	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change
AY108	4	4.2	Reference should be made to the importance of semi natural habitats	One of the key characteristics of Anglesey	Agreed	Change as per suggestion
AY108		7.7.6	The buffer zone of 50m is inadequate	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY108		7.7.5	Ecological Appraisal - further clarification on meaning of significant effects	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change
AY108		7.7.6	Add Cofnod and NWWT to list of possible expert advice. What types of development will require Enhancement Proposals and Management Plan	Advice on likely impact. Clarify aim of paragraph	Agreed - there appears to be a missing link between the two last sentences and the first part of the paragraph.	Insert words to clarify references to Enhancement Proposals and Management Plan
AY108		7.7.7	Survey should encompass hinterland to site and go beyond Phase 1 requirements	To aid proper identification of biodiversity interest	7.7.6	Include reference to sources of further advice and guidance on carrying out surveys (e.g. CCW, RSPB, The Bat Conservation Trust)
AY113		7.7.6	The impact that wind turbines have on wildlife is also a little weak	The document needs to emphasise that bat and/ or bird surveys must be done within season.	Agreed	Include wording to the effect that careful consideration needs to be taken early in the process as to the timing of surveys as they can impact on the preparation and submission of applications (and refer to (CCW) guidance)
AY122	7	7.9.15	Concern about the possible negative impact the wind turbines may have on tourism and the pollution risks	Water contamination, particularly from the hydraulic oil within the turbines.	Section 7 encourages assessment of impacts on all ecological features, which includes water habitats.	No change
AY136		7.4	I would draw your attention to the growing number of serious accidents associated with onshore wind turbines, the numbers of birds which are killed and the negative impact on the population of bats where onshore wind turbines are located.	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY137		7.4	I would draw your attention to the growing number of serious accidents associated with onshore wind turbines, the numbers of birds which are killed and the negative impact on the population of bats where onshore wind turbines are located.	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change
AY185		5.2	ACONB's should also be protected in Anglesey, no turbines should be sited within them or impact on them. The same should apply to any other sensitive areas, such as listed buildings, SSSI's, registered gardens, habitat sensitive areas including but not limited to nature reserves, parks etc.	No evidence has been submitted.	No specific evidence submitted in support of the comment made	No change

**SPG : Onshore Wind Turbines - 10. Geological Interest**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY005	7		No mention of the potential impact of Infrasound. I am extremely concerned that massive difference in transmission and attenuation rates in the different rock types underlying Ynys Mon is being deliberately omitted. Geological evaluation and understanding is essential between sites and must be a serious consideration before any consent is provided.	2005 study by Professor P Styles <i>et al</i> of the University of Keele; Geophysical Research Group into this phenomenon. This study was made to assess the impact of ground-transmitted microseismic effects on the seismic monitoring station Eskdalemuir, Southern Scotland.	Geological assessment is referred to in 7.7.5. However, given the importance of Anglesey in geological terms I suggest it should be contained in a separate section.	Insert separate section on guidance on geological assessment
AY016	7	7.12.1	Potential impact of windturbines on site hydrology particularly on surface water and sub-surface drainage.	Unmitigated trench construction and backfill/gravel packing around cables/pipes in sensitive areas may result in development of a preferential flow path, interception and conveyance of sub surface flow to an alternative point of discharge. The effects of this could include increased drainage and localised drying out.	This is dealt with adequately under section 7.12	No change
AY039		4.2	Nowhere in the document is it mentioned that Anglesey is designated a European and Global Geopark and as such is part of the Global Geoparks Network, supported by UNESCO	It is considered that the effect on the Geopark should be a material consideration in any planning guidance dealing with onshore wind energy.	Agreed that more specific reference could be made to GeoPark status although unclear as to whether this requires areas of constraint (other than as visual features in the landscape). Geological assessment is referred to in 7.7.5. However, given the importance of Anglesey in geological terms I suggest it should be contained in a separate section.	Insert reference to GeoPark in section 4. Insert separate section on guidance on geological assessment
AY039	5		Section 5 – there is no mention here of protection for Regionally Important Geological Sites (RIGS), which form the basis of Anglesey's designation as a European and Global Geopark	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY039		7.5.1	The RIGS and European/Global Geopark should be clearly identified here as material considerations in the siting of wind turbines.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY039		7.7.8	Mitigation would not be an appropriate response to proposals which will cause damage to important geological sites.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY039		App1	RIGS are not included on the relevant maps	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY113		7.7.5	The document is weak in relation to the importance of Geology on Anglesey.	Being a Geo-Park it has significant geological history and this is not reflected in the SPG.	Agreed that more specific reference could be made to GeoPark status although unclear as to whether this requires areas of constraint (other than as visual features in the landscape). Geological assessment is referred to in 7.7.5. However, given the importance of Anglesey in geological terms I suggest it should be contained in a separate section.	Insert separate section on guidance on geological assessment
AY113		7.7.5	Consideration needs to be given to the specific rock type within that area and the potential impact this could have on neighbouring residents. This assessment needs to be conducted by independent experts within the consultation period.	Being a Geo-Park it has significant geological history and this is not reflected in the SPG. Different rock types transmit vibration-induced energy at different speeds.	Agreed that more specific reference could be made to GeoPark status although unclear as to whether this requires areas of constraint (other than as visual features in the landscape). Geological assessment is referred to in 7.7.5. However, given the importance of Anglesey in geological terms I suggest it should be contained in a separate section.	Insert separate section on guidance on geological assessment
AY185		7.5.1	The Geo Park status, which is of international significance is also not properly represented in the SPG.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change

**SPG : Onshore Wind Turbines - 11. Shadow Flicker**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY003	7	7.11.2	Where developers of turbines must consider shadow flicker. There may be a risk to driver's vision (how they perceive signalling, the route ahead, stopping in the case of emergency etc) which may be impacted by a wind turbine.	The applicant may be asked to provide documentation to show that the full extent of shadow flicker has been investigated. Shadows lengthen throughout the day and the area where the shadows fall may include the operational railway. The applicant should therefore determine what the longest likely length of the shadows from the wind turbine blades over the course of a year is. This will show if the shadows fall across the railway and impact upon a train driver's vision	Agree that definition of impact of shadow flicker needs to be extended to impact on users of affected roads and rail.	Reword 7.11.1 and section 8 to include assessment of potential impact on road and rail users and possible mitigation actions.
AY013	7	7.11.2	I have previously submitted to you that the statement 'The time of year (the effect is greatest when the sun is brightest)' is factually incorrect. As previously stated, the sun is highest in the sky during summer, which is when the sun is brightest, but that is when shadows are shortest.	Shadow flicker is most likely when the sun is LOWEST in the sky, casting the LONGEST shadows, which is NOT when it appears to be brightest. Whilst there is some correction to be made for the longer day length in summer, overall, it is not correct to assert shadow flicker will be worst during summer, and certainly not for the reason given by the authority.	Agree that definition of impact of shadow flicker needs to be extended to impact on users of affected roads and rail.	Reword 7.11.1 and section 8 to include assessment of potential impact on road and rail users and possible mitigation actions.
AY030		7.11.1/7.11.3	Clarify extent of shadow flicker	No evidence to support comment submitted	no specific evidence submitted in support of the comment made	No change

## SPG : Onshore Wind Turbines - 12. Heritage Interest

Reference response	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY020	4		Should mention the two landscapes of outstanding historic interest, namely Amlwch and Parys Mountain, and Penmon.	Historic landscapes are non-statutory, but a material consideration	Agreed (already identified in Maps 1-3 ) but make reference to it in section 5.3	Clarify 5.3.1 and refer to the two landscapes of outstanding historic interest
AY020		5.3.2	On parks and gardens, reference could be made to the relevant policy in Planning Policy Wales.	Para 5.3.2: refers only to historic landscapes and ref to parks and gardens should be made clear	Agree	Include reference to parks and gardens
AY020		5.3.2	reword to read....'Information on the boundaries of these non-statutory designations can be found in Cadw's 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, Part 1: Register of Parks and Gardens of Special Historic Interest – Conwy, Gwynedd and the Isle of Anglesey'; and Part 2.1: Register of Landscapes of Outstanding Historic Interest	developers need to be made aware of the distinction between historic parks and gardens and historic landscapes	Agree	Include reference to parks and gardens
AY020		5.8.1	The list should include historic parks and gardens and historic landscapes.	No evidence submitted	This is an expression of a personal opinion not backed up by evidence	No change
AY020		7.2	To note the need to establish the potential for proposed schemes to impact on non-designated buried archaeological features The final sentence in 7.2.2(iii) could be revised to flag up potential for impacting on archaeological remains	Only a small percentage of known sites are designated as Scheduled Ancient Monuments.	agree that impact on known archeologically sensitive locations needs to be investigated and assessed during excavation works	Include reference to known archeologically sensitive locations
AY020	14		'Register of Landscapes of Outstanding Historic Interest in Wales' (Cadw 1998), should be added to Section 14.0 'Further Reading', and the term 'Historic Landscape' added to Section 15 'Glossary', as: 'Historic Landscape	No evidence submitted	No specific evidence submitted in support of the comment made.	No change
AY020	15	Glossary	Refer to Beaumaris not Blaenavon WHS	Erroneous example	Agreed	Reword "In the case of Anglesey this relates to Beaumaris and Caernarfon Castles and their settings"
AY084		5.8	I believe that wind turbines should not be seen from these places (Conservation Areas, Listed Buildings, Monuments, World Heritage Sites or Heritage Coasts) as the wind turbine can affect their context and atmosphere.	Often, the location of listed buildings, monuments and heritage sites were carefully chosen because of the view from them and because of the atmosphere of the place. It would be helpful if you consulted with the National Trust if there is an application for a development near their own properties.	I am of the opinion that the principle here is the same as the way the law treats a view from a domestic household i.e. there is no right to it	No change
AY109		4.2	This statement of character should include reference to the two Historic Landscapes of Outstanding Historic Interest – Penmon and Amlwch and Parys Mountain and the eight registered historic parks and gardens	both recognised through inclusion in the register as landscapes significant to the development of the Welsh nation. The [parks and gardens] can be particularly sensitive to the introduction of tall structures out of keeping with the character of the designed landscape	Agreed (already identified in Maps 1-3 ) but make reference to it in section 5.3	Clarify 5.3.1 and refer to the two landscapes of outstanding historic interest

Reference response	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY109		5.3.1	Para 5.3.1 appears to confuse historic parks, gardens and landscapes. This could be clearer.	No evidence submitted	Agree	Include reference to parks and gardens
AY109		5.3.2	On parks and gardens, reference could be made to the relevant policy in Planning Policy Wales.	Para 5.3.2: refers only to historic landscapes and ref to parks and gardens should be made clear	Agree	Include reference to parks and gardens
AY109		5.3.3	Suggest it be altered to 'registered historic parks, gardens and landscapes'.	unclear as to what it is referring	Agree	Include reference to parks and gardens
AY109		5.8.1	The list should include historic parks and gardens and historic landscapes.	No evidence submitted	Agree	Include reference to parks and gardens
AY109		7.2	To note the need to establish the potential for proposed schemes to impact on non-designated buried archaeological features The final sentence in 7.2.2(iii) could be revised to flag up potential for impacting on archaeological remains	Only a small percentage of known sites are designated as Scheduled Ancient Monuments.	agree that impact on known archeologically sensitive locations needs to be investigated and assessed during excavation works	Include reference to known archeologically sensitive locations
AY112		5.8.2 A App 4 a.13	Where any consultation requires such input, or where the Built Environment and Landscape Section is consulted, this should also be forwarded to Gwynedd Archeological Planning Service	local authorities of north-west Wales do not have any in-house archaeological expertise within the Built Environment and Landscape Section. This service is provided by GAPS through a Service Level Agreement with the Gwynedd Archeological Trust. In order that we can provide specialist advice on the potential impacts of a proposed scheme on the historic environment with specific regard to archaeological issues (see also Planning Policy Wales 2011 and Welsh Office Circular 60/96).	Agree	Include reference to Gwynedd Archeological Planning Service
AY112		7.2.2(iii)	The potential impact upon archaeology also needs to be considered.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY112		7.5 and 7.6	It would be helpful to include in these sections the potential need to liaise with archaeologists. It may also be helpful to reiterate here that archaeological assessment of setting or visual impacts may be needed regardless of whether EIA or LVIA is required.	This may differ from those deemed as sensitive from a landscape perspective. Liaison during the assessment process can avoid duplication of work.	Disagree. Archeological considerations are dealt with under 7.8	No change
AY112		7.8	The revised SPG has no reference as to where information about non-designated archaeological features may be obtained.	As the majority of the archaeological resource falls into this bracket, the Historic Environment Records (maintained by GAT) must be referenced in this SPG.	Agree	Include reference to Gwynedd Archeological Planning Service
AY112		13.1 Contacts	The Gwynedd Archeological Planning Service, rather than the Gwynedd Archeological Trust, is the more appropriate contact for matters relating to this SPG.	No evidence submitted	No specific evidence submitted in support of the comment made.	No change
AY112		14.0 Further Reading	The World Heritage Site Management Plan (2004) should be included in this.	No evidence submitted	No specific evidence submitted in support of the comment made.	No change

Reference response	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY112		15 Glossary	The definition of a Scheduled Ancient Monument is vague and 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." are these heritage or environmental designations.	No evidence submitted	No specific evidence submitted in support of the comment made.	No change
AY113		5.8.2		Clarification required	Disagree. They are clearly referred to as archaeological (i.e. Heritage) features	No change

SPG : Onshore Wind Turbines - 13. Property Value

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY047		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY056		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY058		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY060		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY065		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY071		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY087		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY088		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY098		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY099		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY100		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY104		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY115		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY123		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY136		2	the SPG should include a scheme for compensation [for loss of property values] and publish the terms of this.	It is well documented that where wind turbines are sited the value of the houses nearby fall considerably	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	No change
AY137		2	the SPG should include a scheme for compensation [for loss of property values] and publish the terms of this.	It is well documented that where wind turbines are sited the value of the houses nearby fall considerably	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	No change
AY145		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY150			The SPG should state that there are enough [wind farms] and allow only domestic developments that would not be more than 15m high	There are already three large wind farms in Anglesey.	Such a statement would be contrary to national policy and the local development plan.	No change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY151		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY152		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY154		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY155		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY156		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY157		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY159		2	Details of a procedure involving the impact of industrial turbines on property values should be included in the Guideline	No evidence in support of statement	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	No change
AY160		2	The SPG should explain that there is local evidence of potential property devaluation and property blight resulting from inappropriate onshore wind turbine development and that the economic and social impact of this needs to be considered.	Damaging property values diminishes the savings and investments people have made in their homes. It also reduces the revenue available to the local authority to provide essential services and to ensure a safe, healthy, productive, attractive and inspirational County for people to live in. If the onshore wind energy policy were to cause widespread property blight across the County, then that will inhibit people moving for work or family reasons and will make it more difficult to attract highly qualified professionals and business people to the island. This in turn will damage the County's economic prospects.	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	No change
AY161		2	property blight..... needs to be recognised as a potential risk in the SPG.	Loss of income due to property blight / glut would be felt across the board, not least by ACC who gain revenue from taxing properties at the highest rate.	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	No change
AY174		2.7 5.11	Fail to consider what the effect on property prices might be if wind turbines are allowed on Anglesey and visitors stop coming	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY174	7	7.9.15	If this becomes a wind farm by the back door then valuable tourist pounds may go elsewhere, second home-owners may decide to sell, and Anglesey could find itself in a downward spiral of lowered, property prices / community tax band lowered + failing services.	proliferation against TAN 8 guidelines -	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	No change

**SPG : Onshore Wind Turbines - 14. Transport Interest**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY003	7	7.10.1	Network Rail utilises radio/signalling equipment and we would not want to see this interfered with, particularly as it is safety critical and absolutely integral to the operation of the railway.	Provided careful attention is paid to siting, wind turbines should not cause any significant adverse effects on communication systems which use electromagnetic waves as the transmission medium (e.g. television, radio and microwave links). Typically a 100m clearance either side of a line of sight link from the swept area of turbine blades is required	Noted	Suggest that section 15 of the checklist include confirmation from developer that it has consulted with OFCOM at pre-application stage.
AY003			Some concern that vibration from turbines can affect ground conditions; with the possible issue here being embankments and potential instability (if a turbine was ever located close enough to the railway, in which case Network Rail would raise an objection and would wish consultation on a possible repositioning). The construction of the towers, heavy blades, gearbox and generator as well as guy lines to hold the tower in place put strain on the ground at the base of the structure.	The applicant may be requested to provide documentation showing that potential ground vibration of Network Rail equipment and land has been taken in to account within the proposal submission	Noted	Suggest that section 6 of the checklist includes confirmation from developer that it has consulted with Network Rail where there may be concern as to proximity to a railway.
AY043	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.		No change
AY043	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY047	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY047	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY048	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY048	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY056	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY058	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY058	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY060	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY060	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY062	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY062	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY064	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY064	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY066	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY067	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY071	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY077	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY077	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY087	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY087	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY088	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY088	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY093	7	7.9.12	The proposed set-back distance from public highways or railway lines is inadequate for safety and should be minimum of 500m for turbines up to 50m tip-height and for larger turbines tip-height x 10m.	No evidence in support of statement	The guidance within the SPG is in line with TAN	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY094		7.9.12	The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY098	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY098	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY099	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY099	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY100	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres . Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change



Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY100	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY104	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY104	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY115	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY123	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY123	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY124	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY124	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY126	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY128	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY128	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY130	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY142		7.2	no mention is made of damage to roads, hedgerows, trees etc, these costs should be paid for by the developer, or does the council tax payer have to bear this cost.	No evidence in support of statement		
AY145	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY145	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY150			There is a need for everyone who is making an application to give full details on how it would manage traffic.	No evidence in support of statement	No specific evidence submitted in support of the comment made	No Change
AY151		7.4	The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres for health and safety reasons.	There are many recorded accidents including 4 deaths and over 300 injuries to workers over 5 years in the UK according to Renewable UK.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY151	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	No evidence in support of statement	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY152		7.4	The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres for health and safety reasons.	There are many recorded accidents including 4 deaths and over 300 injuries to workers over 5 years in the UK according to Renewable UK.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY152	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Dim tystiolaeth wedi ei gyflwyno	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY154	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY154	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY155	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY155	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY156	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY156	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY157	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY157	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY160	7.4		The distance between commercial turbines and public Rights of Way (roads, footpaths, bridleways) and buildings or waterways should be a minimum of 500 metres. Turbines should not be placed in areas of open access land as defined by The Countryside and Rights of Way Act 2000, or other places where the public might reasonably be expected to be present.	for health and safety reasons.	Strategic Assessment in section 5.12 has adopted guidelines suggested by Welsh Government Best Practice	No change
AY160	App 4	14	Commercial wind turbine planning applications should submit a 'Traffic Management Plan' for approval by the Highway Authority, Police and emergency services. It should include a timetable and details of traffic movements and routes for construction; access arrangements for maintenance and emergencies; and arrangements for removal and restoration of the site at end of the planning term or when turbines become obsolete.	Impacts on the road network will need to be properly considered in view of the oversized loads associated with wind turbine developments	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change

**SPG : Onshore Wind Turbines - 15. Nuclear Interest**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY002	5		ONR would suggest that you consider making reference to the specific consultation arrangements that apply to Wyifa Power Station in Section 5.0 of the Supplementary Planning Guidance.	The consultation arrangements for developments in the vicinity of nuclear installations given on HSE's web site as follows: <a href="http://www.hse.gov.uk/landuseplanning/nuclear">www.hse.gov.uk/landuseplanning/nuclear</a> .	Agree	Insert wording accordingly
AY111	3		Proposed development area is considered a strategically suitable site for new nuclear build and as such listed in the National Policy Statement for Nuclear (NPS EN-6). Also ref to NPS-EN-1 and NPS- EN3. We believe [these] should be listed and summarised in the Policy Context section	Being a key piece of national legislation	Agree	Insert reference in section 3.14 and to off shore wind
AY129	5		The proposed nuclear power station at Wyifa, the 2GW Celtic Array offshore wind connection point and the necessary strengthening of the existing 400kv system are more than enough major works for the residents of Anglesey to contend with	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change

**SPG : Onshore Wind Turbines - 16. Re-powering**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY102		6.17	We ask for any re-powering to be restricted to the existing area already granted to that project. In the case of Rhyd-y-Groes and Trysglwyn Mawr on Anglesey, each windfarm has two separate areas and the restrictions should contain those original areas only - with none in between. Moreover, replacement turbines, if granted, should be no taller than existing. Furthermore, there should be no commercial exploitation by would-be turbine owners wishing to generate far more power than they need.	A 20 metre tip height turbine will generate up to 20 kilowatts which will be an adequate supply for most Anglesey farms - but only when the wind blows!	It is not clear how this comment relates to the information on existing wind farms. Any re-powering scheme will be dealt with on its own merits with consideration over the cumulative impact with other turbines in the locality being an important factor.	No change
AY110	10	10.3	To restrict the efficient re-powering of existing wind farm sites will also have implications on the delivery of WAG onshore wind energy as set out in PPW	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY110	10	10.3	Tan 8 does not, therefore, state that there should be a 'cap' on the installed capacity of a wind farm re-power scheme whatsoever.	To place a 'cap' of 25MW, as suggested in paragraph 10.3 of this draft SPG, is therefore wholly contrary to national planning policy.	The SPG reflects national and local policies and the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. Of necessity the SPG needs to clarify what scale of impacts are deemed unacceptable.	No Change



**SPG : Onshore Wind Turbines - 17. Water Interest**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY049	7.2.2		New electricity connection cables should be underground without exception. iii)Excavation and drainage works, there should be NO impact on ground water.	Many properties on Anglesey are not connected to water mains and rely on ground water levels, these should be totally protected.	Draft advice suggests that undergrounding is preferred option. However this could be made clearer as it is not directly referred to here or in Appendix 4. Section 16 includes reference to making of assessment on risk to groundwater and surface water	Include wording to clarify guidance on cabling
AY050	7.2.2		New electricity connection cables should be underground without exception. iii)Excavation and drainage works, there should be NO impact on ground water.	Many properties on Anglesey are not connected to water mains and rely on ground water levels, these should be totally protected.	Draft advice suggests that undergrounding is preferred option. However this could be made clearer as it is not directly referred to here or in Appendix 4. Section 16 includes reference to making of assessment on risk to groundwater and surface water	Include wording to clarify guidance on cabling
AY051	7.2.2		New electricity connection cables should be underground without exception. iii)Excavation and drainage works, there should be NO impact on ground water.	Many properties on Anglesey are not connected to water mains and rely on ground water levels, these should be totally protected.	Draft advice suggests that undergrounding is preferred option. However this could be made clearer as it is not directly referred to here or in Appendix 4. Section 16 includes reference to making of assessment on risk to groundwater and surface water	Include wording to clarify guidance on cabling
AY079	7.2.2		New electricity connection cables should be underground without exception. iii)Excavation and drainage works, there should be NO impact on ground water.	Many properties on Anglesey are not connected to water mains and rely on ground water levels, these should be totally protected.	Draft advice suggests that undergrounding is preferred option. However this could be made clearer as it is not directly referred to here or in Appendix 4. Section 16 includes reference to making of assessment on risk to groundwater and surface water	Include wording to clarify guidance on cabling
AY083	7.2.2		New electricity connection cables should be underground without exception. iii)Excavation and drainage works, there should be NO impact on ground water.	Many properties on Anglesey are not connected to water mains and rely on ground water levels, these should be totally protected.	Draft advice suggests that undergrounding is preferred option. However this could be made clearer as it is not directly referred to here or in Appendix 4. Section 16 includes reference to making of assessment on risk to groundwater and surface water	Include wording to clarify guidance on cabling

**SPG : Onshore Wind Turbines - 18. Turbine Colour**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY093	8	8.6.1	Careful choice of colour and surface of the whole structure including the blades should always be considered	To reduce impact by seeking to blend the structure into the landscape or sky i.e grey and matt are probably appropriate - bright white is not.	Noted	No change
AY094		8.6	Careful choice of colour and surface required of whole structure	to reduce the impact	Noted	No change

**SPG : Onshore Wind Turbines - 19. Defence Interest**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY001		5.9	RAF Valley. This is the home of the rescue helicopters that such an important service to Snowdonia. Turbines here could affect the radar here and they would be in the way of training aircraft.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY147		5.9.2	The MOD needs to review all applications for all types of wind turbines 11 metres or greater in height or for turbines with rotor blades 2 metres or greater in length.	The MOD does not recognise or endorse the 30-32km zone cited in relation to defence radars. The MOD assesses the effects of turbine development proposals upon defence radars based upon radar line of sight and not on prescribed distances from particular radar installations.	CAA policy is to include MoD in list of consultees	Include MoD within list of consultees
AY147	7		the document does not identify the need for the cumulative effect of turbines development upon the effective operation of radars to be taken into account	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY147			The guidance should identify the relevance of military aviation activities conducted beyond aerodrome environs. This as a distinct consideration applicable to all areas of the isle. This would be most relevant to turbine structures 50m or greater in height on Anglesey.	the potential for onshore wind turbine developments to cause an obstruction hazard to military low flying practise (including search and rescue practice activities).	CAA policy is to include MoD in list of consultees	Include MoD within list of consultees
AY147		5.9.4	The MOD does not recognise or endorse these 5km buffer zones	There are designated statutory safeguarding zones around each of these aerodromes defining height consultations zones (relative to topography) as well as zones defining explosive and technical safeguarding requirements. It would therefore be more appropriate to make reference to these statutory consultation zones	CAA policy is to include MoD in list of consultees	Include MoD within list of consultees
AY147			It may be appropriate for the document to make reference to this national level guidance Overarching National Policy Statement for Energy (EN-1) issued by the Department of Energy and Climate Change (DECC)	to take account of the direction it provides in relation to taking account of defence and aviation interests when considering new energy developments.	CAA policy is to include MoD in list of consultees	Include MoD within list of consultees

**SPG : Onshore Wind Turbines - 20. Comms**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY013	7	7.10.1	Turbines can cause interference with the transmission and reception of radio waves at both HF and VHF wavelengths	From recent (summer 2012) tests using low-angle signal paths intercepting wind turbines at Trysgwyn, that signal interruption is caused by the passage of turbine blades across the signal path. The interruption of the signal was seen to positively correlate with visual observations of the turbines	Amend the checklist to include reference to radio waves.	Change as per suggestion
AY107		App4	We feel that there is opportunity to expand within the Appendix on the considerations relating to potential interference on broadcasting networks and other electronic communications.	Appendix 4..... guidance relates solely to electro magnetic interference to mainly radar and CAA and NATS interests. [at present] Two suggestions - Guidance on 1. physically blocking signals used to link sites within the network or to the broadcast studios 2. the potential effect on viewer reception	Agreed to amend section 15 of Appendix 4 to encourage developers to contact Arqiva and include reference to Ofcom document in Chapter 14.	Change as per suggestion
AY107		5.1	It would therefore be helpful if the role of Arqiva is fully explained within the SPG and that developers are advised to liaise with Arqiva in advance of any wind related development.	To ensure that the integrity of the broadcasting networks are not undermined by a proposed wind development.	Agreed	Change as per suggestion
AY107		7.1	The SPG should encourage developers to follow the radio clearance process through OFCOM (wind farm coordination policy) prior to the making of a planning application.	To ensure continuity of existing broadcast services.	Agreed	Change as per suggestion

**SPG : Onshore Wind Turbines - 21. Classification of Turbines**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY030		6.8	Definition of scale of turbines	No evidence offered in support of statement	No specific evidence submitted in support of the comment made.	No Change
AY043		6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY047		6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY048		6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY055		6.14-6.18, 6.19,6.21	recommends the deletion of these paragraphs. To impose a restriction of 5MW on wind farms in Anglesey (Para. 16) is overly restrictive, not in line with latest national planning policy, and goes beyond the remit of this SPG	Planning Policy Wales states that "local planning authorities should plan positively for all forms of renewable and low energy development using up to date and appropriate evidence" (Para 12.9.1) [The analysis] does not reflect up to date national planning guidance, particularly Planning Policy Wales (2011).	The SPG reflects national and local policies and the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. Of necessity the SPG needs to clarify what scale of impacts are deemed unacceptable.	No Change
AY058		6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY060		6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY062		6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change

AY067		Every Application for a wind turbine needs to undergo a LVIA, whether small, medium or large.	It is unacceptable that a structure of this size could be erected near to our communities without a Landscape Visual Impact Assessment.	Section 7.5.1 and Section 11 of Appendix 4 clearly state that an assessment of impact on the landscape is a key consideration	No Change
AY071		Every Application for a wind turbine needs to undergo a LVIA, whether small, medium or large.	It is unacceptable that a structure of this size could be erected near to our communities without a Landscape Visual Impact Assessment.	Section 7.5.1 and Section 11 of Appendix 4 clearly state that an assessment of impact on the landscape is a key consideration	No Change
AY077	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY087	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY088	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY098	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY099	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY100	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY102	7.5.7	We wish to see this policy being changed to include micro turbines only - as defined in Para 6.8 but still subject to the rigorous need to conserve and enhance the AONB.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY103	6.8	The method used to divide these various scales are unjustified, and the difference between small and medium and medium and large scales are unbalanced	The planning policy unit should look at the models of turbines available, and seek to create balanced categories for labelling developments. We would also suggest that scale is influenced by both output and tip/hub heights of the development.	The scale adopted takes into consideration government advice and the approach adopted by other Ipa's with adjustments, where needed, for the local context	No Change

AY104	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY106	6	It is suggested that the comparison of vertical and horizontal axis is too long and potentially superfluous and could be deleted, reduced in length, or potentially just cross-referenced on the Council's web pages.	already a very long SPG,	This section adds clarity over the advantages and disadvantages associated with these two types of technology. It highlights the key issues to be considered and can therefore guide developers towards the appropriate technology in a particular location.	No change
AY106	6.9	it may be misleading to members of the public to state that pylons are "usually 30-35 metres"	Anglesey has a network of 400KV power lines across the island. The higher voltage lines will in fact be taller than this.	Suggest that an illustration showing different turbine sizes against existing landscape features would better show relative heights	Delete Table 1 and use illustration to show relative heights against existing landscape features
AY114	6.8	Feel there remains ambiguity towards the definition of small and micro turbines	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
6	6	Amend to include dedicated sections towards the varying sizes of wind turbines.	This would avoid confusion towards the varying requirements as set out for the different sized turbines.	The SPG will need to be kept up to date to reflect changes to the development plan and other material considerations	Include sentence to this effect in Introduction
AY114	6.11	Documentation should seek clarification for domestic and commercial usage. A 10kW wind turbine or less in capacity is classified as 'domestic use only' even if for utilisation on say an agricultural holding, as they will probably use all of the production	a domestic dwelling can easily command 5-10kW of import especially when the dwelling uses green technologies such as air and ground source heat pumps	Section 6.22 describes the new permitted development rights introduced in June 2012	No Change
AY115	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY123	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY124	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY125	6.11	The scale used in 6.8 is inconsistent with Table in 6.11. The maximum height for small turbines should be increased to at least 40m	Same as height of pylons	Paragraph 6.7 of the SPG explains that the categorisation in paragraph 6.8 is in line with Welsh Government guidelines.	No change

AY128	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY145	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY152	3.12	the aims summarised in Para 3.12 page 9-10 should apply to small wind turbines, except perhaps Micro, equivalent to the old wind mills size for domestic use only.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY152	3.12	the aims summarised in para 3.12 page 9-10 should apply to small wind turbines, except perhaps Micro, equivalent to the old wind mills size for domestic use only.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made.	No change
AY154	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY155	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY156	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY157	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change
AY160	6.13	Classify a wind farm as any single commercial turbine or group of commercial turbines for non-domestic use and designed to provide electricity to a business, industrial plant, or to the National Grid	All developments that do not fall within the definition of a stand alone wind turbine that would be permitted under the GDPO	6.12 and 6.13 explain what definition the Council proposes to use.	No change



AY161		5.2	the SPG displays an ambivalent attitude towards the prospect of wind turbines being permitted inside AONBs.	In one place it suggests that micro-generation would not be allowed. Elsewhere we are told, applications for small turbines would have to be looked at carefully i.e. considered.	5.2.3 is not regarded as ambivalent. It states that "medium and large wind turbines will not be supported. Micro and small scale developments will only be supported if they demonstrate they conserve and enhance the natural beauty of the AONB". It places the onus on developers to demonstrate that there will be no unacceptable or significantly adverse impact on these characteristics	No change
AY183		6.8	The SPG needs to clarify the scale and size of turbines that is in line with PPW. Micro-generation-Permitted Development should be classed as "Domestic" with a height of 11.1m and a rating of up to 2.5 kw. Small Turbines with a rating of 2.5 — 50kw need a tip height of 40m.	A 40m height would accommodate the range of turbines in the up to 50 kw range.	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 location circumstances	No change
AY184		6.8	Development of Small Micro renewable energy technologies, energy efficiency and follow a transition away from fossil fuels.	Anglesey's environment and communities will benefit more from such developments rather than industrial scale turbines.	No specific evidence submitted in support of the comment made.	No change
AY186		6.14	Condone approach but need to clarify whether there are suitable areas for large wind farm developments	No evidence to support comment submitted	Without an Island wide assessment it is not possible to confirm whether there are any opportunities or not on the Island.	No change

SPG : Onshore Wind Turbines - 22. Residential Interest

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY005	7	7.9.8	10 times separation is unacceptable. At 30 times distance these direct effects are unobtrusive at least.	Locating a 20m wind turbine 200m from a residential property would result in an unacceptable drop in the quality of life offered to the inhabitants of the affected property. This weekend I stood at the 10 times separation distance from an existing turbine in the north of Ynys Mon and not only heard the action of the blades quite clearly, but witnessed the affects on the surrounding light patterns.	This is an expression of a personal opinion not backed up by evidence	No change
AY095		5.11.1	It should be made clear that protecting the entire Anglesey landscape is important	For protecting tourism and residents quality of life	Section 5 and Appendix 3 clearly describes the different visual quality of the Anglesey landscape	No change
AY136		7.9	My main concern is the proposed distance which onshore wind turbines should be sited from residential properties.	The draft revised SPG does not accord with the suggestion from WAG and TAN8 of a minimum distance from residential property of 500 metres	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
AY136			little regard [is] being paid to the views of local residents.	a recent survey of public opinion [showed that]63% supported a minimum distance of 1.5 km between any turbine and residential property.	Sections 1.5 acknowledges the reasons why a further consultation was taken. Section 1.6 explains where further information as to how the revised draft version was arrived at.	No change
AY137		7.9	My main concern is the proposed distance which onshore wind turbines should be sited from residential properties.	The draft revised SPG does not accord with the suggestion from WAG and TAN8 of a minimum distance from residential property of 500 metres	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
AY137			little regard [is] being paid to the views of local residents.	a recent survey of public opinion [showed that]63% supported a minimum distance of 1.5 km between any turbine and residential property.	Sections 1.5 acknowledges the reasons why a further consultation was taken. Section 1.6 explains where further information as to how the revised draft version was arrived at.	No change

**SPG : Onshore Wind Turbines - 23. General**

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY025	General		Any wind turbine anywhere on the island will destroy the landscape character from the National Park.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY034	General		Anglesey should never have been called the energy island.	It is unique in its spectacular beauty and this should be saved at all cost.	No specific evidence submitted in support of the comment made	No Change
AY035	General		Object to the destruction of valuable land areas that will be filled with concrete to support these giant machines	It will be needed for food production in the future	No specific evidence submitted in support of the comment made	No Change
AY055	General		It is considered that the document could be more succinct and practical.	The SPG is also considered to be an unnecessary long document with some sections providing general description but very little guidance	Do not agree with this personal opinion.	No Change
AY055	General		nowhere within the SPG is reference made to this "presumption in favour". It is suggested that the positive approach advocated in Policy C7 should be reflected in the SPG	The role of the SPG is to "supplement" adopted development plan policy	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. Of necessity the SPG needs to clarify how those impacts are to be identified and assessed.	No Change
AY143	General		Find the document to be biased in favour of wind turbine development. Not enough weight is given to the fact that TAN 8 does not include Anglesey in the designated wind farm area.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY150	General		The SPG should state that there are enough [wind farms] and allow only domestic developments that would not be more than 15m high	There are already three large wind farms in Anglesey.	No specific evidence submitted in support of the comment made	No Change
AY178	General		The people of Anglesey are not informed by their Council about what is proposed for their environment.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY180	General		Should be compulsory requirement for public notification in newspapers and by post of impending applications for turbines paid for by the applicant	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY043		1.4	[Add] a statement of what the citizens of the County regard as 'acceptable'	In the 1st consultation only 1.6% of local respondents supported further wind turbine developments in Anglesey County; 63% wanted a minimum separation distance between homes and turbines of 1.5Km; 66.5% wanted a 15 metre height restriction on wind turbines; 73% did not think any wind turbines should be developed in the AONB.	Sections 1.5 acknowledges the reasons why a further consultation was taken. Section 1.6 explains where further information as to how the revised draft version was arrived at.	No change
AY025	2	2.2	This paragraph is totally untrue	It does create a few jobs but again is proven to destroy around 3.7 jobs for everyone that it creates. Overall impact is more people on unemployment benefit; many less jobs in the UK manufacturing	No specific evidence submitted in support of the comment made	No Change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY030		2.2	Replace "has" with "may have"	At best the evidence is mixed	Direction of travel of international and national policy supports the existing statement	No Change
AY030		2.6	Refer also to protection of the economy and tourism	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY030		2.9	Use of terms "wider" and "local"	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY030		2.9	Add additional aim of "guiding people who wish to object to proposed developments"	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY049		2.2	There is a growing amount of evidence to suggest that on shore wind turbines do NOT have "an important role to play in contributing to reducing or adapting to the harmful impacts of climate change"	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY098	Section 2: Background		the number, dimensions and power ratings of the existing (and soon to be commissioned) wind turbines on Anglesey should be given and logically should be placed between paragraphs 2.3 and 2.4. It is therefore completely unnecessary to further disfigure the landscape and the peace and quiet of the countryside, which residents and tourists alike enjoy, by the ad hoc development of industrial scale turbines across our beautiful island.	This would enable a comparison to be made, on a per capita basis for Anglesey, between the current position and the Welsh Government's Energy Policy Statement (2010) targets for onshore wind energy generation capacity by 2015/17. based on the output of the above 4 windfarms alone Anglesey, at 4:35kWh/d/p, will soon virtually reach its per capita share of the 2015/17 target, 5 years ahead of time....we can reasonably expect that by 2017 Anglesey will have exceeded its per capita share of the 2015/17 target by 100%!	The table in paragraph 2.5 of the SPG provides part of the justification over the need for a revised SPG. Any additional information in relation to the number, dimensions and power ratings of existing and those with extant permission will soon become dated.	No Change
AY101		2.9	The third point in this section should therefore be rewritten to eliminate bias "To help ensure that both the benefits of renewable energy generation, including mitigation of climate change and, potentially, local social and economic benefits, and possible adverse consequences, such as landscape impact and noise, are taken into account."	this item contains an inherent bias against wind energy applications that needs to be eliminated. The implication of the statement is that "landscape, economic, social and amenity impacts" will inevitably be negative	The SPG reflects the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. The SPG needs to reflect both national environmental as well as energy policies and of necessity the SPG needs to clarify how those policy aims are balanced.	No Change
AY113		2.5	Give possible reasons for increase in number of applications.	Possibly due to the financial incentives of such initiatives as Feed in Tariffs. The 'spike' may decrease if the FITs are phased out. The FITs were changed soon after June 2012.	Agree that it would be helpful to explain rise in demand for sites over recent times	Include paragraph to explain possible reasons for rise in demand for wind turbine sites
AY186		2.8	Erroneous cross-reference	Refers to designations in 2.4 not 2.6	Agree	Change paragraph number
AY049		3.7	Wind turbines are not low carbon if you include the construction and the numerous trips transporting materials, new road building, the tons of concrete all producing Co2.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY142		3.7	The existing windfarms (74 turbines) only support 2 local permanent jobs	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY186	3	3.17-3.20	Should include reference to PPW (sections 5.16 -Purpose of the AONB)	At present only refers to AONB Management Plan in the context of renewable energy developments	Agree	Insert reference to purpose of AONB as described in PPW 5.16
AY186	4	4.3	Features of AONB committed to shoreline features	Refer to other features to give a more balanced view	Agree	Refer to other features

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY186		4.5	Should mention two Registered Historic Landscapes sites	Arguably at least of equal planning status as Heritage Coasts	Agree - already acknowledged as a constraint in Section 5	Refer to the two Registered Historic Landscapes
AY015	5	5.2.4	Developers should be encouraged to contact Snowdonia National Park Authority if the zone of visual influence extends to the Park.	Possible the Authority will ask for Photomontages or wireframe diagrams from viewpoints in Snowdonia	Regard should be given to SNP in line with the Council's general arrangements for consultations with Gwynedd Council or any other neighbouring Authority.	Note the comment
AY101	5	5.12.4	The statement "The areas in red and orange are the areas of potential on the Island." is <b>incorrect or at least overly simplistic.</b>	the areas in red and orange are the areas of potential on the Island when applying a minimum separation distance derived by multiplying tip height by a factor of 10. The revised SPG fails entirely to quote the essential best practice guidance in the Toolkit	Agreed that section could be clearer. Suggest that discussion of types, sizes and effectiveness of Wind Turbines be part of a separate section on Capacity (also to include current situation).	No change in terms of content. Redrafting of sections to differentiate between Capacity and Constraints
AY182		5.9	The SPG should include a 1.5 Km. (or even 2Km, in line with other European countries) separation distance	There is considerable local support for this [criteria]	No specific evidence submitted in support of the comment made	No change
AY152	5	5.11	The concept of 'receptors' while important, is an extraordinarily limited concept and a limited measurement for well-being, quality of life, and environment.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY186	5		Condone approach in 5.2.3 and 5.2.4	No evidence to support comment submitted	This is an expression of support for the approach	No change
AY186		5.3.2	Suggest rewording of paragraph	It would help to clarify between the RHL and Historic Parks and Gardens Registers	Agree	Include rewording as per suggestion
AY186		5.3.3	Further clarity needed	Does not refer to national and local sites of importance	Agree - 5.3.1 and 5.3.2 suggest other sites need to be covered	Add "international and other .... Sites"
AY186		5.4.3	Suggest rewording of paragraph	Clarify what information is required of developers to meet criteria of informed judgment	Agree	Include rewording as per suggestion
AY186		5.8.1	Include reference to Registered Historic Landscapes	For completeness as mentioned in 5.3.2	Agree	Include rewording as per suggestion
AY030		6.6	Replace "often" with "almost always"	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY030		6.8	Definition of scale of turbines	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY055	6		It is suggested that the comparison of vertical and horizontal axis is too long and potentially superfluous and could be deleted, reduced in length, or potentially just cross-referenced on the Council's web pages.	already a very long SPG,	Agreed that section could be clearer. Suggest that discussion of types, sizes and effectiveness of Wind Turbines be part of a separate section on Capacity (also to include current situation).	No change in terms of content. Redrafting of sections to differentiate between Capacity and Constraints
AY055		6.9	it may be misleading to members of the public to state that pylons are "usually 30-35 metres"	Anglesey has a network of 400kV power lines across the island. The higher voltage lines will in fact be taller than this.	Suggest that an illustration showing different turbine sizes against existing landscape features would better show relative heights	Delete Table 1 and use illustration to show relative heights against existing landscape features
AY106	6		It is suggested that the comparison of vertical and horizontal axis is too long and potentially superfluous and could be deleted, reduced in length, or potentially just cross-referenced on the Council's web pages.	already a very long SPG,	Agreed that section could be clearer. Suggest that discussion of types, sizes and effectiveness of Wind Turbines be part of a separate section on Capacity (also to include current situation).	No change in terms of content. Redrafting of sections to differentiate between Capacity and Constraints

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY106		6.9	it may be misleading to members of the public to state that pylons are "usually 30-35 metres"	Anglesey has a network of 400kV power lines across the island. The higher voltage lines will in fact be taller than this.	Suggest that an illustration showing different turbine sizes against existing landscape features would better show relative heights	Delete Table 1 and use illustration to show relative heights against existing landscape features
AY106		6.14-6.18; 6.19,6.21	recommends the deletion of these paragraphs. To impose a restriction of 5MW on wind farms in Anglesey (Para. 16) is overly restrictive, not in line with latest national planning policy, and goes beyond the remit of this SPG	Planning Policy Wales states that "local planning authorities should plan positively for all forms of renewable and low energy development using up to date and appropriate evidence" (Para 12.9.1) [The analysis] does not reflect up to date national planning guidance, particularly Planning Policy Wales (2011).	The SPG reflects national and local policies and the need to balance the encouragement of renewable energy against the need to avoid or mitigate against any unacceptable or significantly adverse impact. Of necessity the SPG needs to clarify what scale of impacts are deemed unacceptable.	No Change
AY111		6.19-6.21	This section should contain as a minimum a description of how technical grid considerations are to be dealt with.	This section does not discuss on technical grid considerations such as grid stability or frequency response	Appendix 4 (Section 6) requires applicants to provide details of "the proposed connection to the transmission network"	No Change
AY131		6.12	The SPG has not quoted Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 in full	The applicable thresholds include: (i) The development involves the installation of more than 2 turbines; or (ii) The hub height of any turbine or height of any other structure exceeds 15 metres.	The discussion in 6.12 relates only to definition of wind farms not to the wider definition of Schedule 2 thresholds. The 2011 Regulations referred to only apply in England	No Change
AY132		6.12	The SPG has not quoted Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 in full	The applicable thresholds include: (i) The development involves the installation of more than 2 turbines; or (ii) The hub height of any turbine or height of any other structure exceeds 15 metres.	The discussion in 6.12 relates only to definition of wind farms not to the wider definition of Schedule 2 thresholds. The 2011 Regulations referred to only apply in England	No Change
AY137		6.7	little regard [is] being paid to the views of local residents.	a recent survey of public opinion [showed that] 63% supported a minimum distance of 1.5 km between any turbine and residential property.	Sections 1.5 acknowledges the reasons why a further consultation was taken. Section 1.6 explains where further information as to how the revised draft version was arrived at.	No change
AY137		6.7	I believe that there should be a restriction on the height of any new wind turbines.	The cumulative visual impact of such turbines on the landscape would be significant, and destroy the rural landscape we all currently enjoy.	No specific evidence submitted in support of the comment made	No change
AY141		6, 12	a wind farm should be defined as multiple individual wind turbine applications and/or existing wind turbines in relative close proximity.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY141			a wind farm should be defined as multiple individual wind turbine applications and/or existing wind turbines in relative close proximity.	Scotland recognises the damaging effects of giant wind turbines on residential amenity and, in Planning Policy SPP6, has an established 2 kilometre separation distance for projects over 20MW	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 mix of general guidance and specific locational circumstances	No change
AY183		6.9	Table 1 gives a pylon height of 30-35m. The pylons on the 400volt line are from 46-50 m in height.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY184		6.8	Development of Small Micro renewable energy technologies, energy efficiency and follow a transition away from fossil fuels.	Anglesey's environment and communities will benefit more from such developments rather than industrial scale turbines.	No specific evidence submitted in support of the comment made	No change

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY055		7.2.2	It is unclear whether this section refers to on-site cabling between turbines and the on-site substation or from the on-site substation into the electricity transmission network. If it is the latter, then the SPG should not assume that undergrounding should be the default option.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY057		7.11.4	references to tree planting and blinds should be removed	Terms included such as 'tree planting' and especially 'fitting window blinds' appear inappropriate and if used would be an infringement of one's personal way of life.	The land use planning system seeks, <i>inter alia</i> , to balance public interest and private amenity. These are suggested as mitigation measures for use as a last resort.	No Change
AY106		7.2.2	It is unclear whether this section refers to on-site cabling between turbines and the on-site substation or from the on-site substation into the electricity transmission network. If it is the latter, then the SPG should not assume that undergrounding should be the default option.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY113		7	Key issues) requires greater prominence in the final version of the SPG.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY131		7.5	The size and scale of wind turbines can not be effectively mitigated against. This is yet again confirmation that a considerable buffer zone is required between turbines and residential properties.	There is no planting or screening that can be put in place to hide or obscure such structures	No specific evidence submitted in support of the comment made	No change
AY131		7.6.11	It should be stressed to developers that any misleading visual representations will result in any planning permission being withdrawn.	The photographic evidence provided in support of wind turbine applications has attracted considerable complaint.	No specific evidence submitted in support of the comment made	No change
AY132		7.6.11	It should be stressed to developers that any misleading visual representations will result in any planning permission being withdrawn.	The photographic evidence provided in support of wind turbine applications has attracted considerable complaint.	No specific evidence submitted in support of the comment made	No change
AY142		7.2	no mention is made of damage to roads, hedgerows, trees etc, these costs should be paid for by the developer, or does the council tax payer have to bear this cost.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY142		7.3.10	specific turbine make & model data supplied should apply to all turbine applications regardless of size.	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY150		7.2.2.1	There is a need for everyone who is making an application to give full details on how it would manage traffic	No evidence offered in support of statement	No specific evidence submitted in support of the comment made	No Change
AY186	8		Suggest inclusion of reference to Scottish Natural Heritage technical advice	It would be of great assistance to users	Agree	Include reference to SNH technical guidance
AY113		Section 9	insist on a Management/ Delivery Plan (i.e. a method statement) from developers which will outline their procedures to decommission any turbines and reinstate land	useful tool for enforcement activities	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY186	14		Add a number of other useful references	No evidence to support comment submitted	Agree	Include references

Reference (responder)	SPG		Summary of Comments Made	Justification for the Comments	Officers Response	Recommendation
	Chap.	Para				
AY186	15		Clarify definitions	No evidence to support comment submitted	Agree	Clarify definitions
AY043	App 4		All planning applications should submit a 'Construction Method Statement' for approval by the Council	It should include details of construction, including all works necessary to connect to the National Grid, times of working, drainage, mitigation, restoration and reinstatement works. There should be provision made for the safe deposit of restoration and reinstatement funds for works to the site when approved wind turbine operation ceases.	Section 14 of Appendix 4 notes the need for a Construction Traffic Management Plan with all applications	No change
AY043	App 4		Wind speed, wind direction, overall power generation data and data for power delivered to the National Grid should be continuously logged and provided to the local planning authority at its request.	No evidence to support comment submitted	No specific evidence submitted in support of the comment made	No change
AY043	App 4	11	The SPG guidance [on photomontages] should be kept up to date with the latest research and best practice.	to enable the public and decision makers to correctly interpret and visualise the proposed development and its impact on the surroundings and the landscape.	Due to the process required to adopt an SPG it will not be possible to regularly update its content. Changes in research and best practice will be a material consideration that the decision maker will weigh up in reaching a decision on an application. The Council will consider including an addendum / best practice guidance note in addition to the SPG to ensure consistency with evolving practices.	No change
AY106		App1	The County map showing Conservation Areas, Listed Buildings, SAMs and WHSs [should be] deleted.	[It] is of little use, given its scale. As a developer, WCE would not be able to make any use of this	The Appendix explains that more detailed maps are available from the CCW website	No Change
AY186	14		Add a number of other useful references	No evidence to support comment submitted	Agree	Include references
AY186	15		Clarify definitions	No evidence to support comment submitted	Agree	Clarify definitions
AY186	Appendix 4		Clarify title of appendix and contents of sections	Justification for clarification is given for each comment	Agree	Clarify Appendix title and sections as per comment
AY186	Appendix 4	11	Remove reference to distance from dwellings within 15km to 30km	Specifying a specific distance would not accord with the requirements of an EIA	Agree	Amend text by removing reference to 500m - 1km
AY186	Appendix 4	11	Amend to refer to "up to 30km" instead of within 15km to 30km	In order to catch other development within 15km range	Agree	Amend text to read "up to 30km"
AY186	Appendix 4	13	Refer to possible requirement to carry out an ASIDOHL2	To ensure that applicant takes account of potential impact on registered historic landscapes	Agree	Amend to include reference to the impact assessment, crossreferencing to the published guidance promoted by Cadw and CCW





**CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

## **SUPPLEMENTARY PLANNING GUIDANCE (SPG)**

# **ONSHORE WIND ENERGY**

**(RECOMMENDED FOR ADOPTION, JANUARY 2013)**

**Isle of Anglesey County Council**

**Joint Planning Policy Unit  
Environment Service  
Regulatory Department  
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## 1.0 Introduction

- 1.1 A development plan should contain sufficient policies and proposals to provide the basis for deciding planning applications. Supplementary Planning Guidance (SPG) is a means of setting out more detailed thematic or site specific guidance on the way in which the policies of a plan will be applied in particular circumstances or areas.

**Applications for planning permission should be determined in accordance with the approved or adopted development plan for the areas unless material considerations indicate otherwise. Material considerations could include current circumstances, policies in an emerging development plan and planning policies of the Welsh Government.**

- 1.2 The current development plan for Ynys Môn consists of the adopted Gwynedd Replacement Structure Plan (1993) and the Ynys Môn Local Plan (1996). This SPG will therefore supplement policy C7 of the Structure Plan (1993) and policy 45 'Renewable Energy' of the Local Plan (1996) which read:

**POLICY C7.** There will be a presumption in favour of renewable energy projects, provided that the impact upon the locality is acceptable to the local planning authority. Where applicable, the proposals should be supported by an environmental assessment.

**45.** Renewable energy projects will be permitted where it can be clearly demonstrated that there will not be any unacceptable impact on:-

- i. Landscape character.
- ii. Sites of international, national, or local importance for nature conservation.
- iii. Species which are of nature conservation importance.
- iv. The standard of amenity enjoyed by the resident and tourist population.
- v. Essential public services and communications.

- 1.3 Due to the advanced stage reached in the preparation of the Ynys Môn Unitary Development Plan (UDP) the stopped Ynys Môn UDP (2005) is used as a significant material planning consideration in dealing with current applications. Policy 8b in Part One refers to Energy Developments and policy EP18 refers to Renewable Energy, and will therefore need to be applied **considered** when dealing with planning applications for onshore wind turbines . These policies are highlighted below:

**PO8b.** Applications for the development of renewable and non-renewable energy resources will be permitted where it can be demonstrated that there will not be an unacceptable adverse impact upon the environment. Preference will be given to the development of clean and renewable energy sources, but proposals for non-renewable energy projects can be permitted if they

encourage the maximum use of energy efficiency within their design.

**EP18.** Renewable energy projects will be permitted where it can be clearly demonstrated that there will not be any significant adverse impact upon :-

- i. Landscape character including sites of archaeological interest and their settings and the historic environment and / or;
- ii. Sites of international, national, or local importance for nature conservation and / or;
- iii. Species which are of nature conservation importance and / or;
- iv. The standard of amenity enjoyed by the resident and tourist population and / or;
- v. Essential public services and communications and / or;
- vi. The existing water environment.

- 1.4 The Council consulted upon a draft SPG for Onshore Wind Energy between 16 December 2011 and 10 February 2012 and this resulted in the region of 900 representations being made.
- 1.5 Due to the issues raised and the recommendations accepted by the Council's Members the draft SPG has been subject to significant changes. In light of these changes the Council has agreed to undertake a second public consultation exercise on the document.
- 1.6 To explain the changes within the revised SPG, and to justify why all the issues raised within representations to the draft version have not been included in the revised version, this SPG should be read in conjunction with the Environment and Technical Services Scrutiny Committee report of the 26 July 2012.
- 1.7 In order to conform to the Council's Committee reporting diary it will be necessary to begin the consultation period on the revised SPG during the holiday season. The Council have therefore decided to extend the consultation period from 6 weeks to 8 weeks.
- 1.8 Whilst the adopted Development Plan policies listed above are applicable for all types of renewable energy technologies the focus of this SPG is for onshore wind energy. This is due to the number of applications that the Local Planning Authority has had to deal with over the past couple of years. Other types of renewable energy proposals will still be considered against these policies and other applicable local and national planning policies.

The aim of the SPG therefore is to:

- **assist and guide applicants and agents regarding the information required at the pre-application, screening, scoping and planning application stages.**
- **assist case officers and the planning committee in making informed decisions on wind turbine applications. This will be a means of promoting a consistent approach when dealing with planning applications.**

- help ensure that the wider benefits resulting from renewable energy generation are balanced with local issues such as landscape, biodiversity, economic, social and amenity impacts on local communities.
- help the wider public and other stakeholders with an interest in the development of their area understand the implications of proposals.

1.9 Due to the nature of this subject matter a number of technical terms are used. To assist the reader a Glossary of Terms is included in section 15 of the SPG.

## 2.0 Background

- 2.1 It is now widely accepted that the burning of fossil fuels, which generates greenhouse gas emissions, is a major contributor to climate change.
- 2.2 Wind energy has an important role to play in contributing to reducing or adapting to the harmful impacts of climate change. It can also bring about social, and economic benefits through job creation in the manufacturing, construction and maintenance industries.

**The effects of climate change have had an important impact on national and international policies towards energy supply. The UK Government has committed itself to achieving significant reductions in greenhouse gas emissions and an increase in the proportion of our energy that comes from renewable sources. This commitment, coupled with UK and Welsh Government support for renewable technologies, has led to an increasing number of applications for wind turbine developments across the country.**

- 2.3 Ynys Môn adopted an SPG on Wind Energy Development in 1994. This was prepared as a response to the emerging technology of wind turbines and was aimed at giving guidance over potential sites on the Island for wind farms as opposed to single or small groups of wind turbines.
- 2.4 Over the past couple of years the nature of wind turbine applications has changed with the Authority having to deal with applications mainly for single turbines and up to three in certain cases throughout the Island rather than for specific wind farms as was the case back in 1994.
- 2.5 In the period June 2010 to June 2012 the authority has been dealing with:

Type of Application	Number of Applications Received
Screening Applications	75
Scoping Applications	2
Full Applications	48 (7 granted conditionally, 9 withdrawn, 2 returned to applicant, 4 refused and 26 not yet decided)

- 2.6 In addition to the criteria set out within the development plan and stopped UDP policies highlighted in section 1.0 above regard must be given towards other detailed policies within these plans. These include detailed policies over protection for the landscape, nature conservation, coastal development, archaeology, protection for high quality agricultural land, built heritage as well as a general policy which refers to effect on residential amenities. National planning policies and guidance about these topics are also significant material planning considerations.
- 2.7 The number of environmental designations within the area reflects its natural beauty, which is the area's main attraction as a tourist destination. The tourism industry is an important driver in the local economy of an area which has the lowest

Gross Value Added (GVA) in the UK at just 55.1% of the UK average with relative high levels of economic inactivity.

2.8 In dealing with wind turbine applications a balance needs to be made between this technology's contribution towards national targets for renewable energy against any adverse impact the proposal may have on the factors listed in paragraph 2.4 2.6 above.

~~2.9 The aim of the SPG therefore is to:~~

- ~~• assist and guide applicants and agents regarding the information required at the pre-application, screening, scoping and planning application stages.~~
- ~~• assist case officers and the planning committee in making informed decisions on wind turbine applications. This will be a means of promoting a consistent approach when dealing with planning applications.~~
- ~~• help ensure that the wider benefits resulting from renewable energy generation are balanced with local issues such as landscape, biodiversity, economic, social and amenity impacts on local communities.~~

### 3.0 Policy Context

- 3.1 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes.
- 3.2 Section 12.8 of PPW and TAN 8 provide specific policy and guidance in relation to Renewable and Low Carbon Energy production.
- 3.3 The consenting process for renewable energy projects in Wales depends on the size and location of the proposed renewable development. Onshore wind energy schemes up to 50MW will be dealt with by the Local Authority and Welsh Ministers. Schemes above 50MW will be dealt with by the Secretary of State for Energy & Climate Change/ Infrastructure Planning Commission/Appropriate Secretary of State.

**National Policy Statement: Overarching Energy (EN-1) - sets out the Government's policy for delivery of major energy infrastructure.**

**National Policy Statement: Renewable Energy Infrastructure (EN-3)- This National Policy Statement (NPS), taken together with the Overarching**

**National Policy Statement for Energy (EN-1), provides the primary basis for decisions by the Infrastructure Planning Commission (IPC) on applications it receives for nationally significant renewable energy infrastructure. The Guidance outlines the key considerations involved in the siting of an onshore wind farm.**

**Since Ynys Môn does not contain a Strategic Search Area for Onshore Wind Energy it is unlikely to have an application that would be dealt with by the IPC. However, EN1 does outline key considerations that could be relevant to proposals for clusters of turbines e.g. landscape and visual impacts.**

Planning Policy Wales (Edition 4 – Feb 2011)

- 3.4 Paragraph 12.8.1 of PPW states that the UK is subject to the requirements of the EU Renewable Energy Directive and these include a UK target of 15% of energy from renewables by 2020. The Welsh Government is committed to playing its part by delivering an energy programme which contributes to reducing carbon emissions as part of their approach to tackling climate change.
- 3.5 The Welsh Government's Energy Policy Statement (2010) identifies the sustainable renewable energy potential for a variety of different technologies. In relation to onshore wind the aim is:

*To have 4.5 kWh/d/p of installed onshore wind generation capacity by 2015/17.*

*(kWh/d/p – Kilowatt hours per day per person based on population of 3 million).*



To do this the Welsh Government will optimise the use of existing strategic search areas set out in TAN 8 and through promoting further use of brownfield or local sites for smaller-scale projects appropriate to their locations.

- 3.6 Annex 1 in the Welsh Government’s Energy Policy Statement (2010) gives the electricity generating capacity on all proposed equal or greater than 10 MW (together with a figure for onshore wind under 10 MW). In 2010 for onshore wind the current capacity stood at 0.73 kWh/d/p.
- 3.7 In Energy Wales: A Low Carbon Transition (2012) the Welsh Government sets out its Programme for Government which seeks to “*create a sustainable, low carbon economy for Wales*”. It focuses upon job opportunities within this sector and has specific reference to ‘Anglesey Energy Island’. It identifies the challenges and opportunities involved with nuclear decommissioning and new build, offshore wind development, biomass development, energy efficiency activity and infrastructure enhancements associated with the energy development.
- 3.8 Below are extracts from PPW which gives support for renewable energy projects including onshore wind development:

<b>Part of PPW</b>	<b>Summary of Issue Raised</b>
Paragraph 12.8.9	States that Local Planning Authorities (LPA) should facilitate the development of all forms of renewable and low carbon energy to move towards a low carbon economy. The relevant factors for onshore wind turbines that should be considered are: <ul style="list-style-type: none"> <li>• the contribution the area can make;</li> <li>• ensuring development control decisions are consistent with climate change obligations including contributions to renewable energy targets and aspirations; and</li> <li>• recognising the environmental, economic and social opportunities they make to planning for sustainability.</li> </ul>
Paragraph 12.8.12	Strategic scale wind energy continues to offer the greatest potential and is a key part of meeting the Welsh Government’s vision for future renewable electricity production.
Paragraph 12.8.19	Specific support for community driven renewable energy projects.
Paragraph 12.9.7	The potential from urban / industrial brownfield sites is identified.
Paragraph 12.9.9	Developments at a scale of between 50kW and 5MW are identified as Sub Local Authority. Projects within this threshold are applicable in all parts of Wales and development plans should encourage such development and clearly set out the local criteria against which such proposals

<b>Part of PPW</b>	<b>Summary of Issue Raised</b>
	would be evaluated.

3.9 Other parts of PPW highlight issues that need to be considered when dealing with such applications:

<b>Part of PPW</b>	<b>Summary of Issue Raised</b>
Paragraph 12.8.13	States the most appropriate locations for large scale wind farm development are identified as Strategic Search Areas (SSAs). Developments in these locations are expected to contribute significantly to the WGs onshore wind energy aspirations.
Paragraph 12.8.12	Highlights that: <ul style="list-style-type: none"> <li>• designated areas, species and habitats and historic environment are protected;</li> <li>• mitigation measures are required for potential detrimental effects on local communities whilst ensuring the potential impact on economic viability is given full consideration; and</li> <li>• renewable and low carbon energy in new developments should be optimised.</li> </ul>
Paragraph 12.8.12	The Welsh Government accepts that the introduction of new, often very large structures for onshore wind needs careful consideration to avoid, and where possible minimise their impact.
Paragraph 12.8.14	The development of large wind farms or other large scale renewable and low carbon energy schemes will not generally be appropriate in internationally or nationally designated areas and sites.

#### TAN 8 – Planning for Renewable Energy (2005)

3.10 The TAN sets out the major land use planning aspects of renewable energy technologies in Wales. This section focuses upon the issues relevant for onshore wind power.

3.11 Below are extracts from TAN 8 which give support for renewable energy projects including onshore wind development:

<b>Part of TAN 8</b>	<b>Summary of Issue Raised</b>
Paragraph 2.2	Stated that onshore wind power has the greatest potential for an increase in generation of electricity from renewable energy in the short to medium term.

<b>Part of TAN 8</b>	<b>Summary of Issue Raised</b>
Paragraph 2.11	Potential from urban / industrial brownfield sites is so far largely untapped, sites of up to 25MW on such sites should be encouraged.
Paragraph 2.12	Provides encouragement for smaller community based wind farm schemes (generally less than 5MW).
Paragraph 2.14	There will be opportunities to re-power and / or extend existing wind farms which may be located outside SSAs and these should be encouraged provided that the environmental and landscape impacts are acceptable.

3.12 Other parts of TAN 8 highlight issues that need to be considered when dealing with such applications:

<b>Part of TAN 8</b>	<b>Summary of Issue Raised</b>
Paragraph 2.4	The TAN identifies 7 strategic search areas (SSAs) which can accommodate large scale onshore wind power schemes. None of these areas are located within Ynys Môn.
Paragraph 2.7	Large parts of Wales excluded from consideration as SSAs in particular large wind proposals within the Area of Outstanding Natural Beauty would be contrary to well established planning policy and therefore not considered in these areas. Similarly the highest level of nature conservation and heritage designations have also been excluded.
Paragraph 2.13	Most areas outside SSAs should remain free of large wind power schemes. Local planning authorities may wish to consider the cumulative impact of small schemes in areas outside of the SSAs and establish suitable criteria for separation distances from each other. There needs to be a balance between desirability of renewable energy and landscape protection. Whilst that balance should not result in severe restriction on the development of wind power capacity, there is a case for avoiding a situation where wind turbines are spread across the whole of a county. Developments over 5MW outside SSAs and urban / industrial brownfield sites may be refused.
Paragraph 2.15	Encourages developers to take an active role in engaging with the local community on renewable energy proposals.

3.13 Paragraph 12.10.1 of PPW summarises the issues that should be taken into account in determining an application for renewable and low carbon energy development and associated infrastructure. These issues are summarised below:

- the contribution a proposal will play in meeting identified national, UK and European targets;
- the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development;
- the impact on the natural heritage, the Coast and the Historic Environment;
- the need to minimise impacts on local communities, to safeguard quality of life for existing and future generations;
- ways to avoid, mitigate or compensate identified adverse impacts;
- the impacts of climate change on the location, design, build and operation of renewable and low carbon energy development. In doing so consider whether measures to adapt to climate change impacts give rise to additional impacts;
- grid connection issues where renewable (electricity) energy developments are proposed; and
- the capacity of, and effects on, the transportation network relating to the construction and operation of the proposal.

### Energy Island Programme

- 3.14 The Anglesey Energy Island Programme is a collective effort between several stakeholders within the public and private sector (including UK Government and Welsh Government) working in partnership to put Anglesey at the forefront of energy research and development, production and servicing, bringing with it potentially huge economic rewards. The programme has been created and is led by Isle of Anglesey County Council.
- 3.15 A report on the Potential Outcomes and Performance Measures from the Energy Island programme was adopted by the Ynys Môn Board of Commissioners in October 2011.
- 3.16 In relation to onshore wind support is given towards micro generation which covers micro and small wind proposals. The code for sustainable homes is seen as a major driver in terms of new build and could stimulate a market for onsite measures of £2.3 billion per year by 2016. In relation to wind turbines the market size (UK) is estimated as being:
- Small wind (5-20kW) £204 million per year by 2016;
  - Micro wind £78 million per year by 2016.
- (Source: Energy Island: Potential opportunities and economic impacts (URS, 2010)

### Area of Outstanding Natural Beauty (AONB) Management Plan (2009-2014)

- 3.17 The Management Plan, which is an adopted statutory plan, includes a report on the current state of the AONB and details key changes since the production of the first plan in 2004. It also outlines the Vision (up to 2049) together with the Strategy and Actions for the future sustainable management of the AONB over the next 5 years.
- 3.18 ~~The main purpose of AONBs is to conserve and enhance the natural beauty of the designated area.~~ **The primary objective for designating AONBs is the conservation and enhancement of their natural beauty. Development plan**

**policies and development management decisions affecting AONBs should favour conservation of natural beauty, although it will also be appropriate to have regard to the economic and social well-being of the areas. Local authorities, other public bodies and other relevant authorities have a statutory duty to have regard to AONB purposes.**

- 3.19 Support is given towards appropriate scale renewable energy generation within the AONB in section CLC 2, as shown below:

*“CLC 2 Renewable Energy*

*CLC 2.1 Encourage and support energy conservation measures in order to help meet National and regional targets for energy consumption.*

*CLC 2.2 Encourage and support the development of appropriate scale renewable energy generation in order to help meet national and regional targets for renewable energy generation.”*

- 3.20 However, these policies are balanced against development policies that seek to prevent inappropriate development in section CCC 3, as shown below:

*“CCC 3 Development*

*CCC 3.1 Subject all development proposals within the AONB to rigorous assessment to minimise inappropriate development which will damage the special qualities and character of the AONB or the integrity of the European sites.”*

Destination Management Plan (DMP) (2012-2016)

- 3.21 The Destination Management Plan is a plan for all those with an interest in the future of tourism in Anglesey. **The purpose of the plan is to co-ordinate the management of all the aspects of a destination that contribute to a visitor's experience** It sets the parameters for tourism development within Anglesey for the next 4 years. The target is to aim for a realistic growth of 1-2% per annum in value terms or 5% overall growth over the next four years.
- 3.22 **The Plan is required due to the important role that tourism, along with the energy sector, play, and will play in the future economy. The Plan articulates a vision, strategic objectives and an Action Plan required to maximise tourism's contribution. The need to ensure that the coast in particular is protected through good and consistent application of planning and high quality design is recognised.** The plan recognises the important role that tourism plays in the local economy. According to the STEAM model it injects £233m into the local economy and supports over 4,000 jobs on the Island.
- 3.23 The primary attraction is the beautiful and varied coastline and excellent beaches linked by the Coastal Path. The draft Isle of Anglesey County Council Corporate Strategy also identifies tourism as a key priority.

- 3.24 One threat that has been identified in the plan is inappropriate development in the landscape or too close to tourism facilities (e.g. wind turbines / pylons).

Health, Social Care and Wellbeing Strategy for Anglesey (2011-2014)

- ~~3.25 The National Health Service Wales Act (2006) places a duty on each Local Authority and Health Boards in Wales to prepare a Health, Social Care and Well-being Strategy. This strategy has been developed jointly with the Betsi Cadwaladr University Health Board.~~
- 3.26 The strategy focuses on future planning and commissioning priorities for service delivery to improve the health and wellbeing of the population. In addition an emphasis has been placed on identifying and tackling the wider determinants of health and reducing health inequalities.

## 4.0 Characteristics of Anglesey

- 4.1 The topography of the island is generally subdued with a rolling, undulating pattern interspersed by harder, rocky outcrops such as Holy Island, Mynydd Parys, Mynydd Bodafon and Mynydd Llwydiarth. The landform falls east to west, with a number of low lying areas along the western coast including Aberffraw, Malltraeth Marsh and Newborough Warren. This landform pattern is reflected in the north east – south west alignment of water courses.
- 4.2 This general character belies a complex, underlying geology and effects of geomorphological processes such as glaciation. The island contains some of the oldest rocks in Wales and Britain as a whole, and these are clearly illustrated in the topography of the island. **In 2009, Anglesey became the second area in Wales (and the thirty third in Europe) to become a European Geopark. The Anglesey Geopark, known as GeoMôn, includes outstanding examples of Precambrian geology and is one of the finest places to study plate tectonic processes and features.** Extensive tree cover is generally scarce, although ancient semi-natural woodlands are found along the Menai Strait, and extensive plantations can be found around Mynydd Llwydiarth and Newborough Warren. The island shows a rich cultural history with evidence of man's actions extending over some 8000 years. There are over 200 Scheduled Ancient Monuments ranging from Bronze Age burial chambers to later medieval features. More recent landscape features include the planned landscapes of large estates, such as Plas Newydd, major transportation routes, industrial features including nuclear power and wind farms. The rich variation and quality in the coastal landscape is reflected in its designation as an Area of Outstanding Natural Beauty.
- 4.3 The coastal zone of Anglesey was designated as an AONB in 1966 and was confirmed in 1967. It was designated in order to protect the aesthetic appeal and variety of the island's coastal landscape and habitats from inappropriate development. Some of the main features of the Anglesey AONB are:
- low cliffs alternating with coves and pebble beaches
  - sheer limestone cliffs interspersed with fine sandy beaches
  - stretches of sand dunes with beaches
  - **Varied habitats, from marine heaths to mud-flats**
  - **Important historic landscapes**
- 4.4 The AONB covers most of Anglesey's 201 kilometre (125 miles) coastline but also encompasses Holyhead Mountain and Mynydd Bodafon. Substantial areas of other land protected by the AONB form the backdrop to the coast. The approximate coverage of the Anglesey AONB is 221sq kms (21,500 hectares), and it is the largest AONB in Wales covering as it does one third of the island. The AONB is home to approximately 7000 people and local employment is mainly based on agriculture and tourism.
- 4.5 The AONB also takes in three sections of open, undeveloped coastline which have been designated as Heritage Coast. These non-statutory designations complement the AONB and cover approximately 50kms (31 miles) of the coastline.

- 4.6 The Isle of Anglesey Coastal Path forms part of the All Wales Coastal Path. In fact the National Path was developed out of a desire to build on the economic success of the Pembroke Coast Path National Trail and the Anglesey Coastal Path, both of which are major contributors to the visitor economy of Wales. This also shows the importance of the coast to the landscape.
- 4.7 Approximately 2 million people visit the island each year attracting people from North Wales the North West of England and also visitors from overseas. The most popular forms of recreation include sailing, angling, cycling, walking, wind surfing and jet skiing.
- 4.8 Due to the lowland nature of the Island Ynys Môn has a settlement pattern that consists of many small centres and isolated clusters dispersed throughout the Island. Statistical Focus on Rural Wales (2008) states that the fact that two areas have similar number of people per square kilometre e.g. Ynys Môn and Denbighshire, can conceal significant differences between areas. In Ynys Môn most people live in small settlements that are quite evenly spaced across the Island.



## 5.0 Areas of Constraints

5.1 This section highlights the sensitive receptors (protected areas or species including humans) on the Island that needs to be considered with any application. The boundary of a designated area does not imply there should be a sharp barrier between conservation values within, and disregard of such values outside. Therefore, consideration also needs to be given towards its setting or in the case of biodiversity interests the potential impact of development outside the site e.g. flight paths, changes to the hydrology of wetland sites etc.

5.1.1 The section then uses the Best Practice Guidance published by the Welsh Government to map all of these constraints to produce a strategic, high level assessment of the accessible wind power potential for an area.

## 5.2 Areas of Outstanding Natural Beauty (AONB)

5.2.1 National Parks and Access to the Countryside Act provides the statutory basis for the designation of AONBs. The CRoW Act 2000 affords them the same protection as National Parks in terms of landscape and scenic beauty and gave a statutory duty to produce and publish an AONB Management Plan. There is a duty on any public body, under section 85 of the CRoW Act, to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. This is the primary objective although it will also be appropriate to have regard to the economic and social well-being of the area. The special qualities of Anglesey's AONB help define the designation.

5.2.2 The protection for AONBs and National Parks is highlighted within paragraph 8.4 of Annex D in TAN8 which states:

*“There is an implicit objective in TAN 8 to maintain the integrity and quality of the landscape within the National Parks/AONBs of Wales i.e. no change in landscape character from wind turbine development.”*

5.2.3 In accordance with National and Local Planning Policies (PPW para 5.3.5 to 5.3.7, 12.9.9, TAN 8 para 2.12, policy 30 Ynys Môn Local Plan and policy EN2 stopped UDP) Medium and Large wind turbines within the AONB will not be supported. Micro and small scale developments (up to 20m to tip height) will only be supported if they demonstrate they conserve and enhance the natural beauty of the AONB.

5.2.4 Outside the AONB no turbine proposal should cause significant harm to the setting of the designated landscape or National Park. A LVIA will need to be carried out to show any potential impact of a scheme to ensure no significant harm will occur as a result of the proposal.

5.2.5 The Isle of Anglesey County Council in partnership has produced a statutory and adopted AONB Management Plan that contains useful information on the designation. A copy of the AONB management plan is available on the Council's web site at: <http://www.anglesey.gov.uk/planning-and-waste/countryside/areas-of-outstanding-natural-beauty-aonbs/the-anglesey-aonb-management-plan-2009-2014/>

### 5.3 Historic Landscapes & Historic Parks and Gardens of Special Interest in Wales

5.3.1 Registers for Historic Landscapes, Parks and Gardens of Special Interest in Wales are a material consideration in the planning process. **There are two landscapes of outstanding historic interest in Anglesey namely Amlwch and Parys Mountain, and Penmon, as well as eight historic parks and gardens.** Information on the boundaries of these non-statutory designations can be found in Cadw's 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales **Part 1: Register of Parks and Gardens of Special Historic Interest – Conwy, Gwynedd and the Isle of Anglesey (1998); and Part 2.1: Register of Landscapes of Outstanding Historic Interest.**

5.3.2 ~~Reference should be given to Cadw's 'Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process' (2007). The document provides detailed guidance on the 'Assessment of the Significance of the Impact of Development on Historic Landscape Areas on the Register of Landscapes of Historic Interest in Wales' (ASIDOHL2).~~ **Information on the boundaries of these non-statutory designations can be found in Cadw's 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, Part 1: Register of Parks and Gardens of Special Historic Interest – Conwy, Gwynedd and the Isle of Anglesey; and Part 2.1: Register of Landscapes of Outstanding Historic Interest (for descriptions of the Amlwch and Parys Mountain, and the Penmon historic landscape areas).**

5.3.3 In accordance with the applicable development plan policies, proposals should not cause significant harm to the integrity of **registered historic parks, gardens and landscapes and other** important international sites, whether situated within or impacting upon the designation.

### 5.4 International Ecological Designations

5.4.1 Paragraph 5.3.9 of PPW states that the Government will ensure that internationally statutorily designated nature conservation sites will be protected from damage and deterioration, with their important features conserved by appropriate management. Detailed guidance in relation to development proposals that may affect an International Designated site is contained in Annex 3 of TAN 5. This should be referred to with any proposal that may affect such a site.

<b>Designation</b>	<b>Description</b>
Ramsar Sites	Wetland areas of international importance
Special Areas of Conservation (SAC)	Areas that contribute to the maintenance or restoration of favourable conservation status of habitats or species listed in Annexes I and II of the Habitats Directive.
Special Protection Areas (SPA)	Designated areas that help

Designation	Description
	conserve habitats for rare and vulnerable species and migratory species of birds.

5.4.2 In accordance with the applicable development plan policies, proposals should not cause significant harm to the integrity of important international sites, whether situated within or outside the designation and should compensate for losses where damage is unavoidable.

5.4.3 An appropriate 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 a European site as noted in paragraph 5.4.1. Developers must provide sufficient information about the proposed development so that an informed judgement can be made as to its likely effects. Those failing to do **both of the above** will be refused under regulation 61 of the Habitat and Species Regulation 2010 **under regulation 61 of the Habitat and Species Regulation 2010. Failure to provide this information would result in the refusal of the planning application.**

## 5.5 National Ecological Designations

5.5.1 With regard to SSSIs, which are of national importance, the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. Paragraph 5.5.8 of PPW states that there is a presumption against development likely to damage a SSSI.

Designation	Description
Sites of Special Scientific Interest (SSSI)	SSSIs are areas of land designated as being of national nature conservation interest.
National Nature Reserves (NNR)	Areas of national nature conservation importance are designated as NNRs.

5.5.2 In accordance with the applicable development plan policies, proposals should not significantly harm the conservation objectives of a site designated as being of national wildlife importance, whether situated within or outside the designation and should compensate for losses where damage is unavoidable.

## 5.6 Local Ecological Designations

Designation	Description
Local Nature Reserves (LNR)	Designated for local interest by the Council.

Candidate Wildlife Sites (CWS) / Wildlife Sites (WS)	Non-statutory sites deemed to be of special ecological value.
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5.6.1 Where a proposal is likely to have a significant harm on an LNR or CWS/WS, it should only be permitted if it can be demonstrated that there are reasons for the proposal that outweigh the need to safeguard the nature conservation value of the site and that impacts can be mitigated and compensated.

## 5.7 Surveys for Designated Ecological Sites

5.7.1 Concerning designated ecological sites, ecological surveys are most likely to be required for applications situated in close proximity to such sites.

## 5.8 Heritage Designations

5.8.1 Proposals should not cause significant harm to the character and appearance of Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, World Heritage Sites, ~~or Heritage Coasts~~ **or historic parks and gardens and historic landscapes** or their setting. A suitable assessment will need to be carried out to clearly demonstrate no significant harm will occur as a result of the proposal.

5.8.2 All screening opinion requests, scoping opinion requests and full applications for wind turbine schemes within one of these environmental designations or impacting upon its setting, views to/from or between should be referred to the Council's Building Conservation Officer and Cadw **and the Gwynedd Archaeological Planning Service.**

## 5.9 Aviation Interests

5.9.1 The movement of a wind turbine can interfere with radar as it may be interpreted as a moving object. This could cause it to be mistaken for an aircraft or reduce the ability to track aircraft by radar in the vicinity of a wind energy development.

5.9.2 Developers will need to consult with radar operators if a proposal falls within a 15km consultation zone, or the 30-32km advisory zone around both civil and military air traffic radar, respectively. Guidance is available to assist developers on the Civil Aviation Authority's web-site (<http://www.caa.co.uk/default.aspx?catid=1959>). **The MoD should also be consulted.**

5.9.3 National Air Traffic Services (NATS) has advised that it wishes to be consulted on all planning applications or 'Notice of Intent to Develop' proposals for wind turbine developments irrespective of scale.

5.9.4 On Anglesey there are two sites being RAF Valley and Mona. For the purpose of strategic assessment at the end of this section **their location has been identified on the maps.** ~~a 5km buffer has been used around these sites. This is in line with the Best Practice Guidance.~~

## 5.10 Broadcasting Installations

5.10.1 Wind turbines can interfere with electromagnetic transmissions by emitting an electromagnetic signal itself, interfering with electromagnetic signals.

5.10.2 Early consultation should be sought with the Office of Communications (OFCOM), who hold a central register of all civil radio communications operators in the UK and acts as a central point of contact for identifying specific consultees relevant to a site. **In addition early consultation should also be sought with Arqiva who operate the television network in the UK and the majority of radio transmission network.**

#### 5.11 Residential and Tourism Receptors

5.11.1 Section 7.0 of the SPG refers to a number of Key Issues that need to be evaluated in terms of the potential impact of proposals on residential and tourism receptors.

5.11.2 For the purpose of the exercise in section 5.12 below different buffers have been applied to every residential address point on the Island, which varies according to the height of the turbine.

#### 5.12 Wind Power Potential on Ynys Môn – Strategic Assessment

5.12.1 In line with the Welsh Government Best Practice Guidance – Planning for Renewable & Low Carbon Energy – A Toolkit for Planners (2010) a strategic high level assessment of the accessible wind power potential was undertaken. This involves using a Geographical Information System (GIS) to map numerous constraints to identify areas of land that are potentially suitable for wind development.

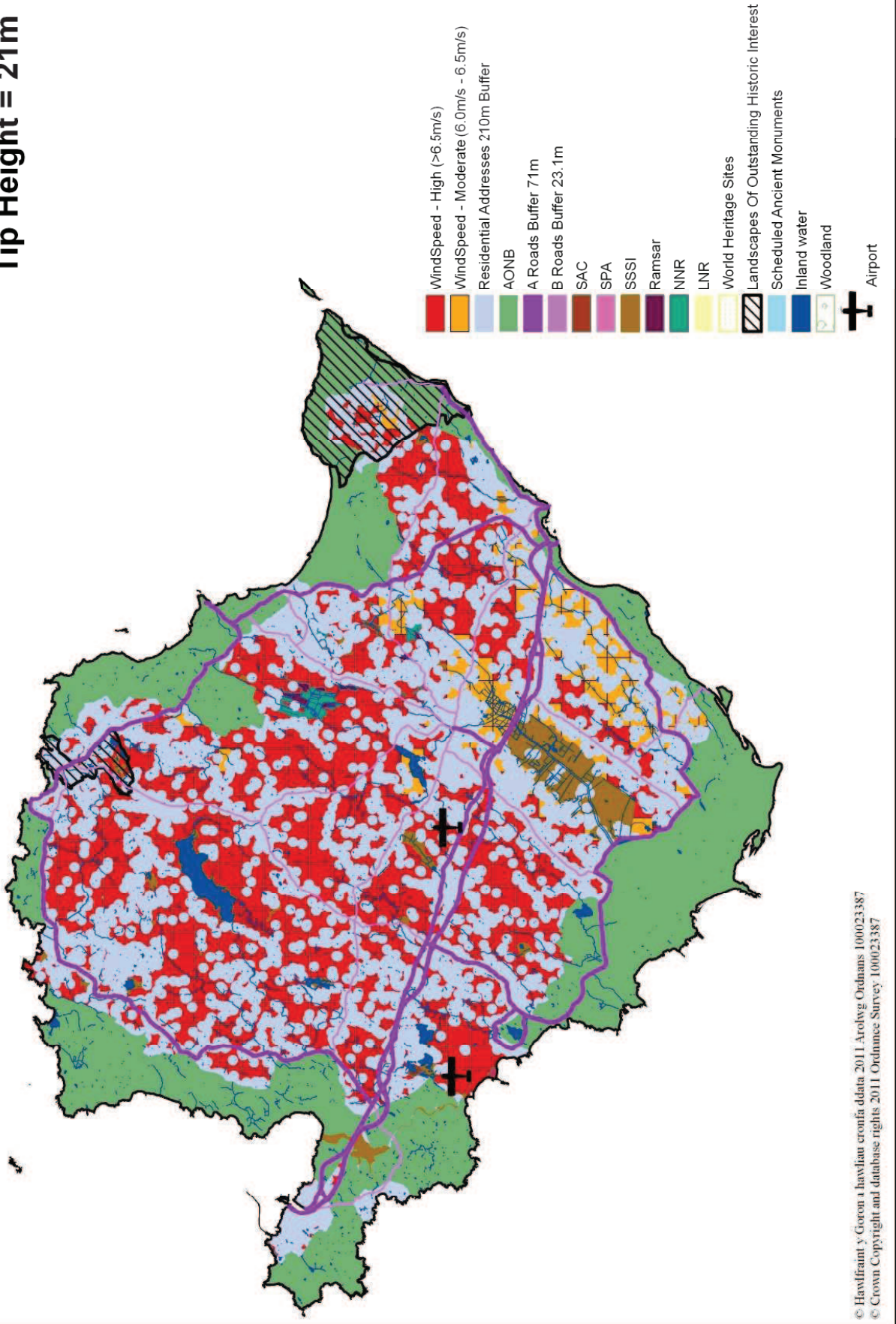
5.12.2 Regard must be given towards the strategic nature of this exercise and that issues such as existing features in the landscape e.g. landform, existing wind turbines, telecommunication masts etc., and their cumulative impact has not been evaluated.

5.12.3 The maps below are based upon turbines up to a tip height of 21m, 65m and 135m and serve to provide examples of potential opportunity areas for medium wind turbines (between 20.1m and 65m tip height) and large wind turbines (up to 135m tip height). The categorisation of different sizes of turbines can be seen in section 6.0 of the SPG.

5.12.4 The areas in red and orange are the areas of potential on the Island. Nonetheless **these maps are not intended to indicate support or acceptance of proposals in these areas. All proposals for wind turbine developments within these areas still require detailed assessment as set out in this Guidance, which interprets relevant local and national planning policy and guidance.** ~~against all the relevant national and local policies before they can be supported.~~

# Map 1 – Strategic Assessment 21m to tip height

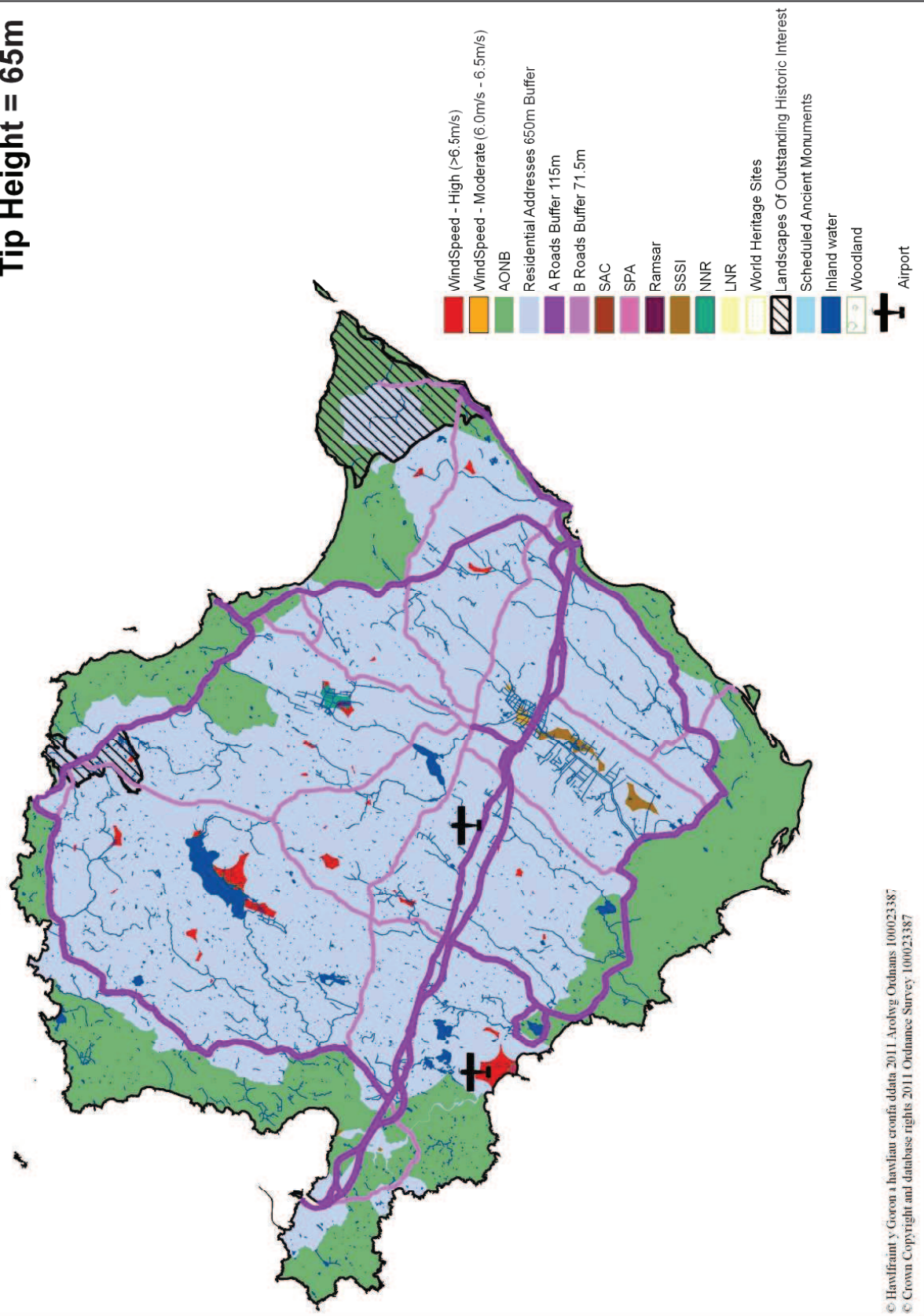
Tip Height = 21m



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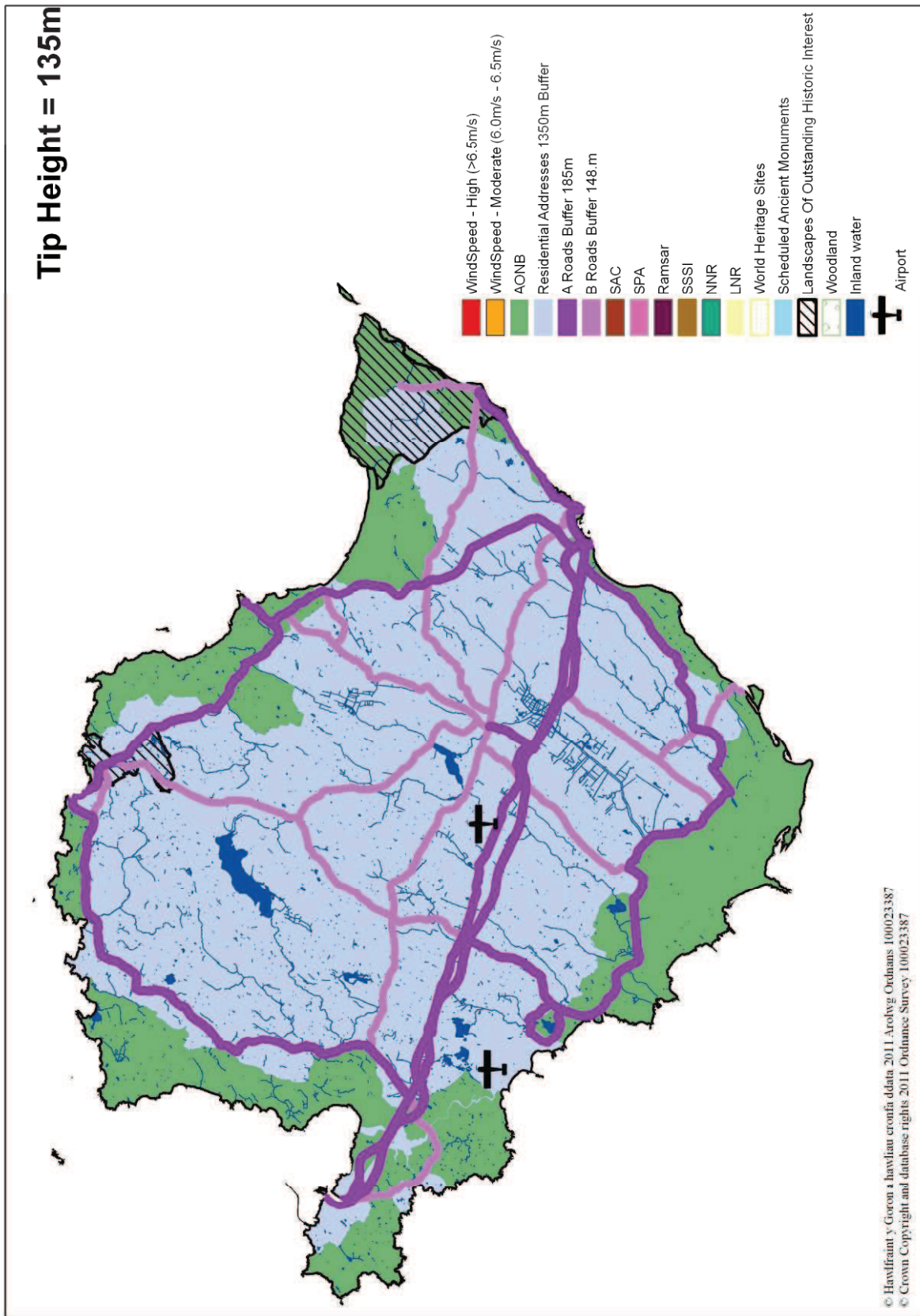
**Map 2 – Strategic Assessment 65m to tip height**

**Tip Height = 65m**



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### Map 3 – Strategic Assessment 135m to tip height



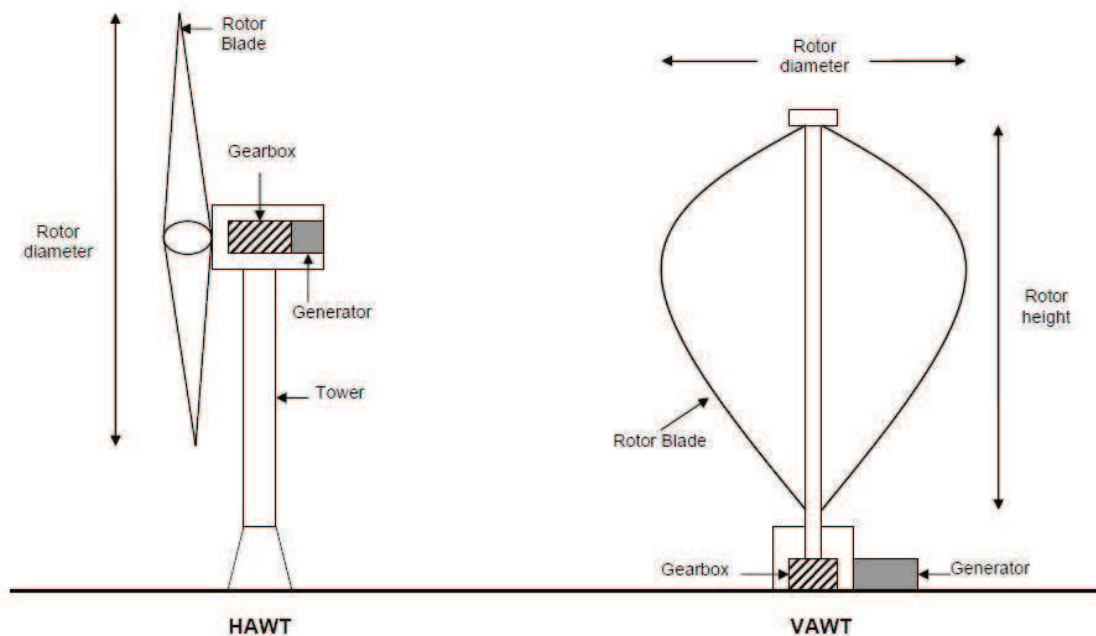


## 6.0 Types and Sizes of Wind Turbines

6.1 In this section the two main types of turbine technology is highlighted. It also provides a definition, for the purpose of this SPG, about what is a micro, small, medium and large development in terms of size of individual turbines, scale of windfarms and electrical output.

### Types of Wind Turbines

6.2 There are two main types of wind turbines – vertical axis wind turbines (VAWT) and horizontal axis wind turbines (HAWT) as demonstrated in the figure below:



### Vertical Axis Wind Turbines

6.3 Vertical axis wind turbines (VAWTs) have the main rotor shaft arranged vertically. With a vertical axis, the generator and other components can be placed near the ground so the tower does not need to support it, which also makes maintenance easier. The advantages of VAWTs include:

- Have less impact on landscape and may be built at locations where taller structures are prohibited
- They have a greater surface area for energy capture;
- Are more efficient in gusty winds;
- Can be located nearer the ground, making it easier to maintain the moving parts;
- Have lower start-up speeds than HAWTs;
- Situated close to the ground can take advantage of locations where rooftops, hilltops, ridgelines and passes funnel wind and increase wind velocity.

#### 6.4 The disadvantages of VAWTs include:

- Most VAWTs have an average decreased efficiency from a common HAWT, mainly because of the additional drag that they have as their blades rotate into the wind. Versions that reduce drag produce more energy, especially those that funnel wind into the collector area;
- Having rotors located close to the ground where wind speeds are lower do not take advantage of higher wind speeds above.

#### Horizontal Axis Wind Turbines

#### 6.5 Horizontal axis wind turbines (HAWT) are the most common style of wind turbines. They have a similar design to a windmill, and the blades look like a propeller that spin on the horizontal axis. HAWTs have the main rotor shaft and electrical generator at the top of the tower, and may be pointed into or out of the wind. The advantages of HAWTs include:

- Variable blade pitch which gives the turbine blades the optimum angle of attack;
- The tall tower base allows access to stronger wind in sites with wind shear. In some wind shear sites, every ten metres up, the wind speed can increase by 20% and the power output by 34%;
- High efficiency since the blades always move perpendicularly to the wind, receiving power through the whole rotation.

#### 6.6 The disadvantages of HAWTs are:

- Their height makes them obtrusively visible across large areas, disrupting the appearance of the landscape and sometimes creating local opposition;
- The tall towers and blades up to 90 meters long are difficult to transport. Transportation can now cost 20% of equipment costs;
- Tall HAWTs are difficult to install, needing very tall and expensive cranes and skilled operators;
- Massive tower construction is required to support the heavy blades, gearbox, and generator;
- Reflections from tall HAWTs may affect side lobes of radar installations creating signal clutter, although filtering can suppress it;
- Downwind variants suffer from fatigue and structural failure caused by turbulence when a blade passes through the tower's wind shadow (for this reason, the majority of HAWTs use an upwind design, with the rotor facing the wind in front of the tower);
- Require an additional yaw control mechanism to turn the blades toward the wind.

#### Size of Turbine – Height to blade tip

#### 6.7 The “Practice guidance: Planning implications of renewable and low carbon energy development” (February 2011), published by the Welsh Government, as well as guidance published by other national or local governments assist in providing a

definition of different scales of turbines. These guidelines have enabled the categorisation of turbines as illustrated in the table below.

- 6.8 Their relationship with their surroundings will be a key consideration with regards to the size of any proposed turbine(s).

	<b>Micro/ domestic</b>	<b>Small</b>	<b>Medium</b>	<b>Large</b>
<b>Typical height range of wind turbines</b>	Up to 11m to blade tip	Up to 20m to blade tip	Up to 65m to blade tip	Up to 135m to blade tip

- 6.9 For the purpose of clarity in relation to different types of applications the Council will use this height range categorisation to define small, medium and large turbines as a basis for dealing with onshore wind turbine applications. It is often difficult to judge the size of a turbine without something to **scale** it against. Table 1 shows the relative heights of elements found in the landscape which may be located near to proposed turbines.

**Table 1 – Height of Landscape elements**

<b>Landscape element</b>	<b>Height in metres</b>
Single storey house	5 metres
1.5 to 2 storey house	6 – 10 metres
Farmyard grain silo	10 metres
Telegraph pole	10.5 metres
Mature forest trees	20 metres
Pylon	Usually around 30 – 35 metres

**[An illustration will be provided in the Adopted SPG showing (to scale) the height of potential turbines against landscape features, which will include local features.]**

Size of Turbines – Electrical Output

- 6.10 Wind turbines are usually defined by the “rated capacity” which is measured in kilowatts (kW) or megawatts (MW). The “rated capacity” equates to the maximum electrical output. It is worth noting that:

- an increase in the rotor diameter of a wind turbine will result in a greater than proportional change in rated power.
- power output is proportional to the cube of the wind speed, and hence a doubling of wind speed will result in a roughly eight-fold increase in power output. A wind turbine on a site which has an annual mean wind speed of 6 m/s (m/s = meter per second) will typically produce only half as much energy as the same machine on a site where the annual mean wind speed is 8 m/s (TAN8).

- 6.11 The following table provides a broad indication of the power and the potential number of homes supplied by the different types of turbines outlined above.

<b>Typical scales of individual wind turbine technologies</b>			
<b>Scale</b>	<b>Power (kW)</b>	<b>Typical Turbine Rating</b>	<b>Potential No. of Homes Supplied</b>
<b>Micro</b>	Less than 2.5kW	2.5kW	0.7
<b>Small</b>	1.5 – 50kW	20kW	6
<b>Medium</b>	50kW – 750kW	500kW	205
<b>Large</b>	Above 750kW	2.5MW	1,536

Source: Practice Guidance: Planning implications of renewable and low carbon energy (February 2011) Welsh Assembly Government

### Scale of Wind farms

- 6.12 There is no clear definition of what constitutes a wind farm as opposed to multiple individual wind turbine applications in relative close proximity. However, the Table in Schedule 2 of the Environmental Impact Assessment Regulations (2008/2093) in relation to section 3 'Energy Industry in sub-section (i) refers to:

*“Installations for the harnessing wind power for energy production (wind farms)”.*

In the applicable threshold and criteria column reference is made to

*“(i) The development involves the installation of more than 2 turbines...”*

- 6.13 In order to ensure consistency when dealing with different types of applications the SPG will identify any proposal for more than 2 turbines to constitute a wind farm.
- 6.14 Large wind farm developments are expected to be located within SSAs identified in TAN 8. No SSA is identified on Ynys Môn. The potential from urban / industrial brownfield sites of up to 25MW proposals are encouraged in TAN 8. Due to the limited industrial heritage of Ynys Môn opportunities on such sites are considered to be scarce on the Island.
- 6.15 Paragraph 2.13 of TAN 8 states that for areas outside of SSAs and urban/industrial brownfield sites the Welsh Government would support a restriction on almost all wind energy developments larger than 5MW.
- 6.16 In light of this new wind farm developments should be limited to a maximum output of 5MW.
- 6.17 The exception to this would be proposals for repowering of existing wind farms on the Island which is supported in paragraph 2.14 of TAN8. Having regard to the approach in TAN 8 regarding the scale of development that could be supported on urban/ industrial brownfield sites such repowering wind farm developments should be limited up to 25MW.

- 6.18 Due to the significant variation in the size of turbines and electrical output the SPG does not include windfarm typologies. The detailed assessment work required with any scheme will determine whether the scale of a wind farm, within the above mentioned energy output thresholds, can be accommodated on the Island.

Cumulative energy output assessment

- 6.19 Over the past couple of years the vast majority of applications received on the Island have been for either individual or up to two turbines. Whilst other parts of this SPG ensures that the cumulative visual and noise impacts of adjacent proposals are taken into account, consideration needs to be given to the overall energy output of multiple individual applications. This is to ensure that a large wind farm i.e. wind energy developments larger than 5MW, is not created through individual applications.
- 6.20 An assessment of the density on the existing wind farms on the Island gives the following density levels:

Wind Farm	Total site Area (ha) (site planning area)	Number of Turbines	Density Level (Turbine per ha)
Rhyd y Groes	280	24	11.7ha
Trysglwyn	120	19	6.3ha
Llyn Alaw	500	34	14.7ha
Overall	900	77	11.6ha

- 6.21 The average density level will be applied to determine whether a cluster of adjacent planning applications (operational, permitted but not erected and live applications) can be described as ‘large wind farms’. Should adjacent turbines be categorised as a ‘large wind farm’ due to development density level, then their total electrical output will be calculated. If this calculation reveals that the total energy output exceeds 5MW the relevant proposals will be considered against the national planning guidance set out in TAN 8, which is referred to in 6.15 above.

Micro-generation – Permitted Development

- 6.22 From Monday the 18<sup>th</sup> June 2012 the Statutory Instrument ‘Town & Country Planning (General Permitted Development) (Amendment) (Wales) Order 2012 – Part 40 (Micro-generation)’ came into force. In relation to wind turbines it introduces new permitted development rights for householders wishing to install stand alone wind turbines (class H) (up to 11.1 metres in height) and temporary anemometer masts (class I) subject to certain conditions e.g. not in an AONB, Curtilage of a Listed Building, on a site designated as a Scheduled Monument etc. It is understood that this will be extended to non-domestic properties before the end of the year.

## 7.0 Key Issues

7.1 This section highlight specific issues that should be considered with an application:

### 7.2 Infrastructure

7.2.1 Paragraph 2.9 and 2.10 of Annex C in TAN 8 refers to infrastructure serving wind turbines. These could include adequate road access, on-site tracks, turbine foundations, crane hard-standings, anemometer masts, construction compound, electrical cabling, electrical sub-station and control building.

7.2.2 The main issues to consider are:

- i) Access Tracks – developers and their contractors, in consultation with the Council, will be required to produce a Traffic Management Plan where wind turbine developments will involve a significant increased load on public roads. These potential impacts will be less significant for individual wind turbines and micro turbines. Due to the size of the components being transported, there can also be issues in relation to the capacity of rural roads to cope with these loads. Developers should therefore, consult with Highway Department in respect of abnormal load deliveries to the development site.
- ii) Electricity Connection Cables – Cable routes should be carefully chosen to avoid sensitive areas. **Cables should be located underground wherever it is feasible to do so.** Where power lines from the turbines cannot be located underground, careful consideration should be given to the visual impact of transmission lines and other associated infrastructure.
- iii) Excavation including drainage works – consideration needs to be given to the impacts associated with the construction phase as well as the implications of any drainage works. The potential impact upon groundwater, ecology, topsoil removal, rate and quantity of rock to be excavated, **archaeological remains** should all be considered.
- iv) Control buildings, substations and external works – any proposed buildings and external works needed as part of the turbine development should be carefully sited to reduce their visual impact.
- v) Traditional Landscape Features – Development should avoid the loss of important / historic hedgerows, stone walls / cloddiau, protected and amenity trees and other traditional landscape features within the site boundary and for any off-site improvements to access or to serve the site.

7.2.3 Further guidance over access infrastructure matters are included in the checklist in Appendix 4, see sections 6 and 14.

7.2.4 Details over these matters will be required with any application and consideration will be given towards the potential impact of these in addition to the proposed turbine(s).

### 7.3 Noise

7.3.1 Technical Advice Note (TAN) 8: Renewable Energy (2005) states:

*“...’The Assessment and Rating of Noise from Wind Farms’ (ETSU-R-97) describes a framework for the measurement of wind farm noise and gives indicative noise levels calculated to offer a reasonable degree of protection to wind farm neighbours, without placing unreasonable restrictions on wind farm development or adding unduly to the costs and administrative burdens on wind farm developers or planning authorities. The report presents the findings of a cross-interest Noise Working Group and makes a series of recommendations that can be regarded as relevant guidance on good practice.”*

#### Medium or Large Wind Turbines (above 20m) and Wind Farm Developments

7.3.2 For larger turbines and wind farm developments which fall within the requirement for an Environmental Impact Assessment, a full noise assessment will be required and ETSU-R-97 is generally accepted as the criteria to apply noise conditions (both overall and tonal) to such wind turbine development. However, before any assessment can be made the developer would be required to commission a series of background noise surveys at the most sensitive receptors around the site. Usually based upon  $L_{A90, 10m}$  the background noise measurements should be correlated against derived (not measured) 10 metre height wind speeds at the proposed wind farm site.

7.3.3 Most wind turbine manufacturers specify wind turbine emission levels based upon standardised 10 metre height wind speeds. However, wind speeds vary with height (wind shear) from site to site dependent upon ground conditions. Unless specific site wind shear is taken into effect there can be a significant mismatch between predicted and actual noise levels.

7.3.4 Although not covered in ETSU-R-97 we are advised that to overcome the above problem background noise levels should be correlated with derived (not measured) 10 metre height wind speeds, calculated by taking into account site specific wind shear. In order to do this, wind speed would need to be measured at two heights on site for the duration of the baseline noise survey. We are advised that one height must be no less than 60% of the proposed hub height and the remaining height between 40-50%. The standard roughness length 0.05 metres must be used to derive the 10 metre height wind speeds.

7.3.5 The Octave Band Prediction method of International Standard ISO9613-2 should be used in order to predict wind turbine noise emission levels, using warranted turbine sound power levels supported by test data and allowing for uncertainty. Atmospheric conditions of 10°C and 70% RH together with a ground factor of  $G=0.5$  (with a 4 metre receptor height) should be assumed (the assumption of ‘soft’ ground ( $G=1$ ) should not be made). The barrier attenuation calculation using the method within ISO9613-2 should not be included within the predictions and

generally no account should be taken of barrier attenuation by the landform unless there is no line-of-sight between the receptor and the highest point on the rotor.

- 7.3.6 Following the standard outlined in ETSU-R-97 and the additional supplementary details outlined above, the noise from the wind turbines shall not exceed an overall level of 35dB(A) or 5dB(A) (measured as  $L_{A90, 10 \text{ min}}$ ) above the background, whichever the greater, up to wind speeds of 12m/s at 10m height. For the purpose of this document  $LA90=L_{Aeq} - 2\text{dB}$ . An example of a planning condition based upon this assessment criteria is included in Appendix 1.

#### Small or Single Turbine Developments (up to 20m)

- 7.3.7 ETSU-R-97 offers a simplified method which could be considered appropriate for small or single turbine developments. The simplified method suggests that where noise can be limited to below 35dB  $L_{A90, 10\text{m}}$  up to wind speeds of 10m/s at 10m height, then this condition alone would offer sufficient protection of amenity.
- 7.3.8 However, in reality, unless larger single turbines are located further than 400-500 metres from residential properties (not including those associated with the development), it is unlikely they would be able to comply with this simplified method and the full ETSU-R-97 methodology would need to be used instead.
- 7.3.9 The Local Authority will require the applicant to undertake noise tests, at his own expense, to demonstrate compliance with any noise condition, should a justifiable complaint of noise nuisance regarding the wind Turbine be received. The methodology used to determine compliance shall be agreed with the Environmental Health Section of the Local Authority.”

#### Micro - Domestic Wind Turbines

- 7.3.10 Domestic wind turbines are turbines erected to supplement the electricity consumption of an individual house. The lower power output allows these turbines to have smaller blade diameters and shorter masts than larger models. In many instances this brings about significant noise reductions which can allow these turbines to be located closer to neighbouring properties than suggested above. It is recommended that the following guidance should be followed when considering installing such an appliance:-

- The site of the wind turbine should only be determined after the property has been professionally surveyed by the turbine manufacturer/installer.
- Applications will not normally be considered unless the specific turbine make and model is specified and is accompanied by the manufacturer's information on predicted noise levels, supported by test data.
- In order to reduce the possibility of noise nuisance, turbines should be located away from boundaries and windows of other noise sensitive premises. It is worth remembering that a neighbour's property could change hands and despite an agreement with the previous resident, the new occupants are not prevented from making a complaint of noise nuisance to the Council.



- The turbine should be installed by a suitably qualified person, in accordance with the manufacturer's instructions and the site survey.
- The wind turbines shall be serviced in accordance with the manufacturer's recommendations.

7.3.11 In addition to the above, the following noise condition would also be applied to the development:-

*"The noise from the turbine shall not exceed the greater of 40dB L<sub>aeq</sub> (5 min) or 5dB(A) above the L<sub>90</sub> background noise 3.5m from the façade of any occupied neighbouring property not in the ownership of the applicant. Where the nearest part of any adjacent premises is above ground level, the monitoring location shall be 1m from the façade and a façade correction of -3dB(A) applied."*

#### Blade swish or Amplitude Modulation

7.3.12 The technical term for blade swish is Amplitude Modulation [AM] and the Document "Wind Farm Noise Statutory Nuisance Complaint Methodology" – produced by DEFRA in 2011 states:-

*"Whilst all the causes are not known, it appears that AM tends to occur under certain meteorological conditions and the limited evidence available suggests this effect is likely to be manifest at a minority of wind farms. Moreover, it is a highly technical area, which despite research by numerous investigators over the last 20 years; there is to date no universally accepted explanation as to the causes of AM or means to predict its occurrence."*

7.3.13 The Planning Inspector in the Denbrook Inquiry (APP/Q1153/A/06/2017162) in 2009, adopted the following methodology for measuring Amplitude Modulation:-

*"Amplitude modulation is the modulation of the level of broadband noise emitted by a turbine at blade passing frequency. These will be deemed greater than expected if the following characteristics apply:*

- a) A change in the measured LAeq,125 milliseconds turbine noise level of*
- b) more than 3 dB (represented as a rise and fall in sound energy levels each of more than 3 dB) occurring within a 2 second period.*
- c) The change identified in (a) above shall not occur less than 5 times in any*
- d) one minute period provided the LAeq,1 minute turbine sound energy level for that minute is not below 28 dB.*
- e) The changes identified in (a) and (b) above shall not occur for fewer than 6 minutes in any hour. Noise emissions at the complainant's dwelling shall be measured not further than 35m from the relevant building, and not closer than within 3.5m of any reflective building or surface, or within 1.2m of the ground."*

7.3.14 However, the DEFRA report has the following to say about this condition:-

*"It is suggested that the above method, whilst not simple or easy to implement, may provide a starting point in trying to quantify AM by direct measurement, although it does not represent a validated method of assessing the significance of any impact or effect on amenity, and does not constitute a threshold for Statutory Nuisance."*

At the time of writing this Supplementary Planning Guidance, a Noise Working Group (formed under the direction of the Institute of Acoustics) was preparing to issue its final consultation document on a review of technical matters associated with wind turbine noise assessment. It is anticipated that this document will include discussion on amplitude modulation. Once published, developers are advised to contact the Environmental Health Section, for the Local Authority's interpretation of this guidance.

### Tonality

- 7.3.15 The Isle of Anglesey County Council discourages the use of turbines which have been identified as tonal. The Local Authority will consider noise reports conducted using either the "BWEA Small Wind Turbine performance and Safety Standard (Feb 2008)" or BS EN 61400-11:2003 "Wind turbine generator systems – Part 11: Acoustic noise measurement techniques" as appropriate assessments of turbine tonality. However, the planning condition example contained in Appendix 2 is based upon the method outlined in ETSU-R-97.

### Cumulative Noise Impact

- 7.3.16 It is possible that the siting of additional wind turbines near to existing sites could an increase in noise levels to nearby properties. ETSU-R-97 refers to the issue of cumulative impact as follows:-

*"The Noise working group is of the opinion that absolute noise limits and margins above background should relate to the cumulative effect of all wind turbines in the area which contribute to the noise received at the properties in question. It is clearly unreasonable to suggest that, because a wind farm was constructed in the vicinity in the past which resulted in increased noise levels at some properties, the residents of those properties are now able to tolerate still higher noise levels. The existing wind farm should not be considered as part of the prevailing background noise."*

- 7.3.17 Where it is proposed to erect a wind turbine within or close to the zone of predicted noise influence of another turbine, wind farm or a group of wind farms, a cumulative noise assessment should be undertaken. The boundary of the "Zone of Predicted Noise Influence" shall equate to the 35dB LA90 contour based upon a wind speed of 10m/s at 10m height. The Applicant shall consult with the Local Authority on the precise interpretation and location of this contour.
- 7.3.18 The cumulative noise assessment will need to demonstrate that the combined noise level from all wind turbine/s will not exceed an overall level of 35dB(A) or 5dB(A) above background up to wind speeds of 12m/s at 10m height. The background noise levels and noise assessment shall adopt the same methodology as outlined in that for "Larger turbines and wind farm developments" mentioned above and the applicant shall make every endeavour to ensure that the quiet day-time and night-time periods, used for the background noise assessment, are not influenced by any nearby wind turbines.

## 7.4 Safety

7.4.1 Paragraph 2.20 of TAN 8 states that the minimum desirable distance from a turbine and occupied buildings will usually be greater than that required to meet safety requirements.

7.4.2 Information will be required with an application that shows regard has been given over the position of any proposed turbine in relation to the proximity of any surrounding development and the risk of injury to humans through catastrophic equipment failure or ice throw and possible effects of visual distraction to road safety. Section 6 of the checklist in Appendix 4 deals with this matter.

## 7.5 Landscape & Visual Impact

7.5.1 This is a key consideration for proposals for wind turbines on Ynys Môn due to the high value of the environment reflected in the number of designations on the Island which include the AONB, Conservation Areas, Scheduled Ancient Monuments, Listed Buildings, Heritage Coast, Historic Landscapes/Gardens and World Heritage Site.

7.5.2 The level of LVIA required will depend on the proposal, its location, and proximity to sensitive receptors. Guidance is provided within section 11 of the checklist contained in Appendix 4 over the level of detail required with different types of applications.

7.5.3 Tools such as LANDMAP, developed by the Countryside Council for Wales, **or ASUDOHL 2, promoted by CCW and Cadw,** should be used to assist in assessing the visual impacts of wind turbines and their associated infrastructure such as access roads and grid connections. LANDMAP, the Welsh approach to landscape assessment, is a GIS (Geographical Information System) based landscape resource where landscape characteristics, qualities and influences on the landscapes are recorded and evaluated into a nationally consistent data set. The following link takes you to the LANDMAP page on CCW's web-site: <http://www.ccw.gov.uk/LANDMAP>

7.5.4 The Isle of Anglesey County Council's 'Landscape Strategy Update (2011)' has been produced using LANDMAP. The applicable character area(s) must be referred to in the assessment of new schemes. A copy can be viewed at: <http://www.anglesey.gov.uk/planning-and-waste/planning-policy/landscape-strategy?tab=downloads>

7.5.5 'Guidelines for Landscape and Visual Impact Appraisal' by the Landscape Institute and the Institute of Environmental Assessment 2<sup>nd</sup> edition and the Countryside Council for Wales document 'LANDMAP Information Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Appraisal of Onshore Wind Turbines' also provide useful information. These must be used in the preparation of LVIAs for medium to large turbines. The methodology can be adapted as appropriate for micro and small turbine proposals.

- 7.5.6 Please see Appendix 3 - 'LANDMAP 2011 Overall Landscape Evaluation for maps on the following themes: Visual and Sensory, Cultural Landscapes, Historic Landscapes, Geological Landscapes and Landscape Habitats.

**ASIDOHL2 is non-statutory and advisory only. It is intended to assist local planning authorities to decide how much weight to give to information in the Register when determining planning applications. It is also intended to assist others involved in the planning and development process in Wales, particularly developers preparing Environmental Impact Assessment statements, to bring forward plans and proposals that are likely to have the least possible adverse impact on historic landscape areas on the Register of Landscapes of Historic Interest, of which there are two on Anglesey.**

- 7.5.7 In accordance with National and Local Planning Policies (PPW para 12.9.9, TAN 8 para 2.12, policy 30 Ynys Môn Local Plan and policy EN2 stopped UDP) Medium and Large wind turbines within the AONB will not be supported. Micro and small scale developments (up to 20m to tip height) will only be supported if they demonstrate they conserve and enhance the natural beauty of the AONB.
- 7.5.8 Outside the AONB no turbine proposal should cause significant harm to the setting of the designated landscape or National Park. A LVIA will need to be carried out to show any potential impact of a scheme to ensure no significant harm will occur as a result of the proposal.
- 7.5.9 The figure of 20m to blade tip is a maximum and should not be viewed as a target for turbines at these locations. Applications within this parameter having an unacceptable impact will be refused. Proposals will be evaluated against the relevant issues highlighted within this SPG, including the cumulative impact upon the AONB.
- 7.5.10 In the majority of cases a LVIA will be required, applicants should contact the Built Environment and Landscape Section of the Council to establish and agree the extent of the assessment including choice of viewpoints. The ZTV is to be agreed at the outset and follow the recommended distances within section 11 of the checklist in Appendix 4.

## 7.6 Cumulative Landscape and Visual Impacts

- 7.6.1 The inter-relationship between individual turbines can have a key impact on the landscape. It can lead to massing and the visual impression of a concentration of wind farms / turbines even when they are in fact distant from each other. This is known as cumulative impact, which is a material consideration in decision-making.
- 7.6.2 Cumulative impact is becoming increasingly relevant to the assessment of wind turbine developments as more applications come forward. This phenomenon can arise where there is existing wind energy development and an extension is proposed to that development or where there are proposals for other wind energy developments within the same area. Cumulative impacts may or may not be adverse, depending on the proposals and the landscape setting in question. The

capacity of the landscape to accept each turbine and the cumulative effect of a group of turbines must therefore be evaluated.

7.6.3 The degree of cumulative impact is a product of the number of and distance between individual windfarms / turbines, the inter-relationship between their Zones of Visual Influence (ZVI), the overall character of the landscape and its sensitivity to windfarms / turbines, the relationship with other built structures and the siting and design of the windfarms / turbines themselves. **The overall impact of transmission lines and associated infrastructure are also important considerations when assessing cumulative impact of wind turbine developments.** It is important to recognise that cumulative impact effects upon visual amenity as well as the landscape.

7.6.4 Cumulative effects on visual amenity consist of combined visibility and sequential effects.

- Combined visibility occurs where the observer is able to see two or more developments from one viewpoint. When considering the cumulative effects arising from combined visibility, it is necessary to consider, for each of the viewpoints within the ZVI of the windfarm / turbines concerned, the combined effect of all windfarms / turbines which are (or would be) visible from these viewpoints. Combined visibility may either be in combination (where several windfarms / turbines are within the observer's arc of vision at the same time) or in succession (where the observer has to turn to see the various windfarms /turbines).
- Sequential effects occur when the observer has to move to another viewpoint to see different developments. Sequential effects should be assessed for travel along regularly-used routes like major roads or popular paths.

7.6.5 The occurrence of sequential effects may range from *frequently sequential* (the features appear regularly and with short time lapses between, depending on speed of travel and distance between the viewpoints) to *occasionally sequential* (long time lapses between appearances, because the observer is moving very slowly and / or the there are large distances between the viewpoints.)

7.6.6 Cumulative visual effects will vary in degree with

- the number and sensitivity of visual receptors;
- the duration, frequency and nature of combined and sequential views (glimpses or more prolonged views; oblique, filtered or more direct views; time separation between sequential views);
- the relative impact of each individual windfarm / turbine, with regard to visual amenity; and
- the presence of other built structures.

7.6.7 Cumulative landscape impacts affect the physical fabric or character of the landscape, or any special values attached to the landscape.

- Cumulative effects on the *physical fabric* of the landscape arise when two or more developments affect landscape components such as woodlands and

hedgerows. Although this may not significantly affect the landscape character, the cumulative effect on these components may be significant.

- Cumulative effects on *landscape character* can arise from two or more wind turbine or windfarm developments as well as existing infrastructure such as electric pylons or masts. Wind turbine or windfarm developments introduce new features into the landscape. In this way, a change in the landscape character can create a different landscape character type, in a similar way to large scale afforestation. That change may be adverse to the character of a specific landscape; in some instances the change may not be adverse; some derelict or industrialised landscapes may be enhanced as a result of such a change in landscape character. The cumulative effects on landscape character may include other changes, for example trends or pressures for change over long time periods, which should form part of any consideration of a particular project.

7.6.8 There are general points that should be considered when assessing the significance of cumulative landscape effects. These are the effects on landscape designations, designed landscapes, landscape character, sense of scale, sense of distance, existing focal points in the landscape, sky lining, sense of remoteness or wilderness and other special landscape interests.

7.6.9 The landscape and visual effects of wind turbines will vary on a case by case basis according to the type of wind turbine (model and height), its location, the landscape setting of the proposed development and impacts on sensitive areas and /or receptors. Cumulative impact should take into account existing windfarms / turbines, those which have permission but have not been erected and those that are the subject of valid but undetermined applications.

7.6.10 The potential cumulative effects upon sensitive receptors of adjacent local authorities should also be considered.

7.6.11 In an area where the cumulative impacts of wind turbines are considered to be significant a Landscape and Visual Impact Appraisal is likely to be required. Section 11 of the checklist in Appendix 4 gives further information of what is required as part of a Landscape and Visual Impact Appraisal. The Council maintains an up to date list of all submitted wind energy applications.

7.6.12 As part of the LVIA procedure for wind turbine applications, developers will need to obtain a list of existing, permitted, live and imminent applications. For guidance purposes it is recommended that for small turbines the cumulative LVIA should consider applications up to 5km maximum whilst for medium to large between 15 to 30Km.

## 7.7 Ecology and Ornithology

7.7.1 The main ecological impacts resulting from wind turbines are associated with the site infrastructure. Effects on ecological features can take place during the construction, operation or decommissioning phases of a wind energy scheme, e.g. habitat loss, noise disturbance and direct and indirect impacts of wind turbine operation on ecological receptors e.g. bat and bird strikes.

- 7.7.2 The impact on bats and especially birds is particularly relevant to wind energy development. All bats and some birds are protected species that need to be considered when developing a wind energy scheme. Wind turbines can impact upon bird populations in a number of ways including, direct loss of habitats, displacement of birds due to disturbance to feeding and breeding grounds and the potential mortality due to collisions with turbine blades. **In the event that an EIA is required, then the environmental statement should provide sufficient information, including information on any ancillary development, such as grid connections, substations, access routes etc., for the Authority (as the competent authority) to carry out any HRA.**
- 7.7.3 All proposals will be assessed for their impact on biodiversity, including protected species, ornithology and habitats. **Although adverse effects on species, habitats or protected sites arising from a single wind energy development may be acceptable, cumulative impacts arising from further developments may be unacceptable and will require assessment. Existing windfarms which have permission and those that are the subject of valid but undetermined applications will be taken into account when assessing the cumulative impact of a proposal.** The potential cumulative impacts on biodiversity should also be considered where appropriate. ~~The potential cumulative impacts on biodiversity should also be considered where appropriate.~~ Site-specific assessments will be required to identify the biodiversity risks together with any on-site mitigations or off-site compensatory measures.
- 7.7.4 Some wind energy schemes will need to be subject to an EIA to look in detail at nature conservation interests both on and off site. The EIA should identify the nature conservation interests likely to be affected by a development at an early stage. With respect to birds, the EIA should include information relating to roosts, flight lines, feeding areas, and breeding areas.
- 7.7.5 Where a proposal is not EIA development, applicants should prepare and submit one or more of the following as appropriate:

**Geological Survey: techniques including traditional walk-over survey, studying outcrops and landforms, to intrusive methods, such as machine driven boreholes, to the use of geophysical techniques and remote sensing methods, such as aerial photography.**

Geological/Geomorphological/Hydrological/Hydrogeological Report: addressing relevant issues on the site or features directly or indirectly affected by the proposed development including survey, analysis, avoidance, mitigation, ~~compensation~~ measures and any proposals for enhancement;

Soils Report: demonstrating how and when the soils that may be affected by the development proposals will be moved, stored, used and conserved;

Protected Species Report: including survey method, timing, results, any limitations in the survey, analysis of potential harm to the species and any avoidance or mitigation measures proposed<sup>22</sup>;

An Ecological Appraisal: An ecological survey and assessment will be required for proposals that are likely to have a significant effect on local, national or international wildlife and nature conservation. Although this will often be in close proximity to designated sites, because of the different features of sites, a number of which are notified for their species and bird interest, impacts on site features can be experienced some distance away from the designated site. 7.7.6—In particular, a survey may be 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 opportunities. In order to minimise the impact on wildlife, it is advisable that turbines should be a minimum of 50 metres away from these types of habitat features. Applicants may contact the Council's Ecological and Environmental Adviser for advice, at the pre-screening stage. Early consultations with the Countryside Council for Wales and RSPB should also be undertaken. The Anglesey Local Biodiversity Action Plan may be referred to for background biodiversity context on the Island.

Nature Conservation Enhancement Proposals: showing how the development will conserve natural heritage features on the site and provide net benefits for nature conservation interests;

A Nature Conservation Management Plan: describing how the site will be managed to conserve and enhance nature conservation on and off-site including who will manage different parts or elements, how management will be funded, reviewed and adapted over time.

- 7.7.7 Where a scheme, alone or in combination with other plans or projects, could have an impact on an internationally designated site, ~~developers must carry out an assessment of the likely significant effect of the scheme in accordance with the Habitats Regulations. A habitat survey and impact assessment under the requirements of the Conservation (Natural Habitat, etc.) Regulations 1994 may be required for proposals affecting sites designated for nature conservation (e.g. SPA, SAC, SSSI and candidate Wildlife Sites) or because the proposed site contains priority habitats (those listed by the Welsh Government under section 42 of the NERC Act 2006). A habitat survey should cover: the site of the turbine, the access tracks, maintenance tracks and any habitat removal for road widening to allow for delivery to the site.~~ **IoACC must before deciding to give permission for a proposal carry out an assessment of likely significant effect of that scheme in view of the sites conservation objectives. A habitat or species survey might be required to inform such an assessment. Equally a habitat or species survey might be required to inform impact assessments on SSSI, Candidate Wildlife Sites and priority habitat and species listed by Welsh Government under section 42 of the NERC Act 2006. The scope of the survey should be agreed with the Local Authority Environmental & Ecological Adviser. In general the species/habitat survey should cover: the site of the turbine, the access tracks, maintenance tracks and any habitat removal for road widening to allow for delivery to the site**The habitat survey should be a Phase 1 habitat survey. **The timing of any survey should be considered early in the process. The Phase 1 habitat classification and survey procedure are described in the**



**Handbook for Phase 1 habitat survey – a technique for environmental audit (Joint Nature Conservation Committee, 2003).**

- 7.7.8 Where possible, developers should mitigate for any potential ecological damage. Mitigation is best considered at an early stage and should be included in the scoping report as part of an EIA. **The exact mitigation measures adopted will vary on a case by case basis.** Mitigation measures could include:
- Redesign / micrositing to eliminate collision risks or displacement effects.
  - Restoration of habitat edges adjacent to infrastructure and covering excavation works
  - A potentially significant effect can be reduced by shutting down the operation of the turbines during peak periods of flight activity, again either for individual or clusters of turbines.
- 7.7.9 **Once the assessment process is completed,** consideration should also be given to the opportunities for enhancing nature conservation with a site and its surroundings such as providing new habitats or habitat features on adjacent land. In some case, compensatory habitats should be considered necessary ~~to mitigate any potential loss cause by development.~~ Relevant guidance is provided in section 12 of the checklist in Appendix 4 over ecological issues.
- 7.8 Archaeology
- 7.8.1 Wind turbines can have a significant impact on archaeological features. This can include the loss or direct impact of identified features, or indirect impacts on the character or appearance and setting of features.
- 7.8.2 Sufficient distance needs to be given between turbines and archaeological features to ensure that the possibility of damage is minimised such as in the case of potential damage or destruction from collapse of the supporting tower or a sheared turbine blade. Where archaeological features are or may be present, an assessment may need to be undertaken prior and during the construction phase to ensure no below ground archaeological features are damaged or destroyed and any undiscovered archaeology is appropriately recorded.
- 7.8.3 Where nationally important archaeological remains (whether scheduled or not) and their settings are likely to be affected by a wind turbine development, there should be a presumption in favour of their physical preservation in situ. In cases of lesser archaeological remains, the Local Planning Authority will need to determine the relative importance of the archaeological feature against the benefits and need of the proposed development. **Information relating to non-designated archaeological features can be obtained from the Gwynedd Archaeological Planning Service.** Guidance is provided in section 13 of the checklist in Appendix 4 about heritage evaluation issues.
- 7.9 Proximity
- 7.9.1 This section deals with proximity of proposed turbines to highways and railways, power lines, aviation, housing, tourism sites and other sensitive receptors

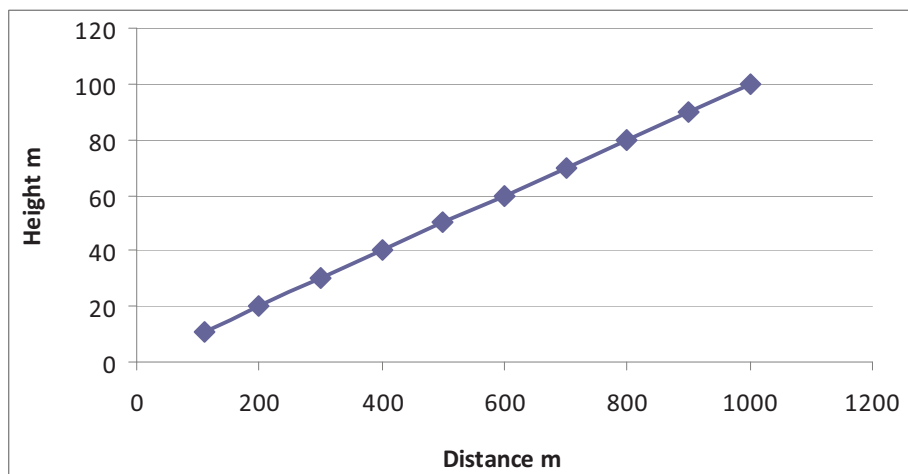
- 7.9.2 Anglesey is a predominantly rural area with a dispersed pattern of development. Due to the fact that few areas are far from existing settlements or individual dwellings, the amenity impacts of wind development are likely to be significant in many parts of the area.
- 7.9.3 It is important to distinguish between impacts on residential amenity and other impacts arising from wind proposals such as landscape and wider visual and safety issues. Separation distances can be used to minimise impacts.
- 7.9.4 This section provides guidance regarding the living conditions of neighbouring residents with particular reference to visual amenity. It should be noted that 'visual amenity' is just one aspect of 'residential amenity' – impacts on other aspects of residential amenity (noise, shadow flicker etc) are covered in separate parts of this SPG.
- 7.9.5 It is a long established planning principle that there is no right to retain an unchanged view from a private property. However it can be in the public interest to safeguard the 'outlook' from such a property in respect of unacceptably overbearing or dominating development. Outlook is the visual amenity afforded accommodation by a dwelling's immediate surroundings, which can be adversely affected by the close siting of another structure or the incompatible treatment of adjoining land. For the purpose of this guidance consideration is also given to the impact on properties occupied as tourist accommodation.
- 7.9.6 It is recognised that, due to the scale of turbines and movement of the blades there is the potential for these structures to have an unacceptable impact upon residential visual amenity/ outlook. Examination of a number of planning appeal decisions regarding wind turbine/ farm development reveals that inspectors have deemed resident's visual amenity to have been adversely affected in those instances where the visual effects of scheme proposals are oppressive, overwhelming and/ or overbearing. In such circumstances living at that property will become unpleasant or undesirable. Assessing this requires as far as possible an objective approach but is ultimately a matter of judgement based on land use planning matters. As previously mentioned living conditions are influenced by factors other than visual amenity/ outlook, such as noise. This section only addresses the visual amenity aspect of living conditions.
- 7.9.7 The likelihood of visual amenity/ outlook from residential properties or tourism properties being unacceptably adversely affected by wind turbine(s) depends on a number of factors. One of these factors is the proximity of the development to a residential property or a tourism property. There is limited guidance regarding separation distances between wind turbines and settlements or individual dwellings or tourism properties.
- 7.9.8 In the absence of guidance, this document presents the local approach to be taken towards wind turbine development in Anglesey. It is known that as the distance between an object and a viewer increases, the contrast between the object and its background decreases (i.e. aerial perspective). Also as objects become more distant they appear smaller because their visual angle decreases (i.e. linear

perspective). The visual angle of an object is the angle subtended at the eye by a triangle with the object at its base. The greater the distance of the object from the eye, the greater the height of this triangle, and the less is the visual angle. Applying this mathematical system (i.e.  $h=1/d*a$ )<sup>1</sup> provides a series of ~~minimum~~ separation distances, which enables the Council to take a precautionary approach in order to try to avoid adversely affecting the visual amenity of residential or tourism properties. Table 4 and diagram 1 below set out the ~~minimum~~ separation distances that will be applied to wind turbine developments:

**Table 4**

Typology of turbine	<del>Minimum</del> Separation distance
Small (i.e. between 11.1m – 20m tip height)	111m – 200m
Medium (i.e. between 20.1m – 65m tip height)	201m – 650m
Large (i.e. between 65.1m – 135m + tip height)	651m – 1,350+m

**Diagram 1**



7.9.9 The separation distances are not precise determinant of impacts. The exact distance will depend on scientific locational circumstances. Development within the ~~minimum~~ separation distances set out in Table 4 above will need to be accompanied by Residential Amenity Assessment (RAA). A RAA goes beyond the assessment on views and wider visual amenity as carried out in the LVIA. It is required to determine the effects on living conditions. Analysis of appeal decisions indicate that the following factors will need to be considered:

- the tip height of turbine(s),
- bulk of the structure(s)

<sup>1</sup> Where h = perceived height, d = distance, and a = actual height)

- proximity to the wind turbine(s)
- whether the full length of the turbine(s) would be visible
- orientation of dwellings/ tourist accommodation – the property is taken to include the house (main rooms) and those areas of a garden/ patio where residents would sit out
- whether the relationship of the property is oblique or directly facing
- extent to which intervening vegetation provides screening
- extent of intervening built form, including outbuildings or house extensions
- whether views from the building would be partially, substantially or wholly obscured by intervening landform
- whether existing principal views include some prominent visual detractors
- whether there are any notable and visually dominant detractors in close proximity to the property,
- the potential number and extent of turbines visible, their position within the overall context of the views from the property i.e. whether sited on the skyline, at the edge of the view or within a key focal point
- the proportion of the views from the property which will be occupied by the development and whether turbines would be visible on more than one side of the property
- the likely presence of other ancillary elements in the views from the property for example, access tracks or the construction compound
- the potential presence of lighting on the turbines

7.9.10 A judgement will have to be made as to whether the effect would be one of unacceptable dominance, oppressive, overwhelming or overbearing. As such each proposal will be considered on a case by case basis.

7.9.11 Favourable consideration may be given to proposals where evidence is presented to demonstrate that all properties within a specific minimum separation distance support the proposal or other significant material considerations are found to be in favour of the proposal e.g. a community led scheme.

7.9.12 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.

7.9.13 National planning policy states that wind turbines should be separated from overhead power lines in accordance with the Electricity Council Standard 44-8 “Overhead Line Clearances”.

7.9.14 In terms of the proximity to aviation interests, developments within a specified radius of major airports and aerodromes are subject to consultation with the Civil Aviation Authority (CAA), the Ministry of Defence (MoD) and the National Air Traffic Services. Section 5.0 of the SPG refers to protected areas including Aircraft and Aerodromes.

7.9.15 In terms of tourism, all proposals will be assessed for their impact on the interests of tourism and recreation. Developers should identify any significant adverse affects on tourism and recreational interests and on the underlying factors which contribute to the appeal of such destinations to visitors and recreational users.

Tourism is an important element of the local economy and therefore any detrimental impacts on this economic sector resulting from wind energy developments should be minimised. In assessing proposals the relative scale of existing recreation and tourism facilities in the area should be taken into account. Wind turbine developments should not have a significant negative effect on the local economy. Further guidance is provided in part of section 17 of the checklist in Appendix 4.

## 7.10 Electromagnetic Production and Interference

7.10.1 Wind turbines can interfere with electromagnetic transmissions by emitting an electromagnetic signal itself, interfering with electromagnetic signals. This includes television, radio and micro wave links and systems used by the police and emergency services. These interference effects can be reduced through changes to turbine siting and consultation with operators. Provided careful attention is paid to siting, wind turbines should not cause any significant adverse effects on communication systems which use electromagnetic waves as the transmission medium (e.g. television, radio and microwave links). Typically a 100m clearance either side of a line of sight link from the swept area of turbine blades is required, though individual consultations would be necessary to identify each organisation's safeguarding distance. Early consultation should be sought with the Office of Communications (OFCOM), who hold a central register of all civil radio communications operators in the UK and acts as a central point of contact for identifying specific consultees relevant to a site.

7.10.2 It is often possible to mitigate impacts by careful siting of individual turbines within a site so that turbine blades avoid a buffer zone, typically 100m either side of the signal path.

7.10.3 Further guidance regarding Electro magnetic assessment is provided in section 15 of the checklist in Appendix 4.

## 7.11 Shadow Flicker and Reflected Light

7.11.1 Shadow flicker is the strobe effect of light flashing through the moving blades casting a moving shadow over nearby properties within 130° either side of north. Shadow flicker can cause a disturbance for affected residents of nearby properties and can have potentially harmful impacts on sufferers of photo-sensitive epilepsy.

7.11.2 The likelihood of shadow flicker occurring and its severity depends on:

- The direction of the dwelling relative to the turbine(s);
- The distance from the turbine(s);
- The turbine height;
- The time of year (the effect is greater when the sun is brightest);
- The proportion of daylight hours in which the turbine(s) operate;
- The frequency of bright sunshine and cloudless skies (particularly at low elevations above the horizon);
- The prevailing wind speed and direction.

7.11.3 Based on an analysis of appeal decisions, to avoid shadow flicker a separation distance of 10 rotor diameters between the wind turbines and the nearest dwelling should be adequate in most cases, although the local topography and the position of the turbine in relation to the dwelling(s) should be taken into consideration during any assessment. It has also been proven that within this 10 rotor diameter, shadow flicker will only occur in some conditions for some of the time and will only affect nearby properties within 130° either side of north.

7.11.4 Within this 10 rotor diameter distance, investigations should be undertaken by the applicant to identify any properties likely to be affected by shadow flicker. The results of the assessment should be presented with the planning application. If unacceptable shadow flicker impacts are established, mitigation measures should be taken including moving the position of the turbine, using technology to stop turbines during episodes of shadow flicker, or, as a last resort, using tree planting and fitting window blinds to ameliorate the effect.

**The proximity of wind turbines to road and rail networks should also be considered. Shadow flicker can affect the users of these networks by affecting visibility.**

7.11.5 Turbines can also cause flashes of reflected light, which can be visible for some distance. It is possible to ameliorate the flashing but it is not possible to eliminate it. Careful choice of blade colour and surface finish can help reduce the effect.

7.11.6 Further guidance regarding the assessment of shadow flicker is provided in section 8 of the checklist in Appendix 4.

## 7.12 Groundwater and surface water

7.12.1 Wind energy developments tend to have little or no effect on water resources or the water environment once they are operational. However, the construction and decommissioning of wind turbines, either individually or as larger groups, can have potential impacts on local watercourses, water bodies, groundwater and water supplies due to pollution, erosion, sedimentation and impediments to flow resulting from construction activity. The effects of developments during the construction phase needs to be carefully considered and monitored, in order to avoid pollution of watercourses and avoid adverse impacts on groundwater and the ecological status of water bodies. In such cases, details of mitigation measures may need to be submitted with a full application.

7.12.2 An assessment of the risks to water quality will be required for each medium to large scale wind energy developments and the Environment Agency will be consulted where appropriate. In addition, any potential adverse impact to the hydrological regime or water quality on statutory designations should be assessed. The preparation of an Environmental Management Plan prior to construction / decommissioning can mitigate any potential risk to ground and surface water.

### 7.13 Community Engagement

- 7.13.1 Developers, in consultation with the local planning authority, should take an active role in engaging with the local community **at the earliest possible opportunity when formulating** on-wind energy proposals. This should include pre-application discussion and provision of background information on the renewable energy technology that is proposed.
- 7.13.2 Early engagement with the local community at the pre-application stage can result in a better understanding of a scheme and its benefits. Applicants should engage with members of the public as well as Town and Community Councils.
- 7.13.3 Applications will need to be supported by a community engagement statement setting out how the applicant has carried out pre-application consultation. Applicants should provide evidence of the methods used e.g. public meetings, exhibitions, surveys, leaflets. Applications should demonstrate that they have notified those who would be affected by the proposal i.e. close neighbours. Applicants should also demonstrate that they have consulted local recreational groups such as orienteering clubs, ramblers and hand-gliding clubs, where possible. Section 10 of the checklist in Appendix 4 provides further information of what is required in the community engagement statement.

### 7.14 Minerals and Soils

- 7.14.1 Sites containing valuable mineral resources should not be sterilised by inappropriate development. Where a proposal is situated near to such a site details of mitigation measures, which should be discussed with the North Wales Shared Service for Minerals and Waste, may need to be submitted with an application.
- 7.14.2 Appendix 9 in the stopped Ynys Môn Unitary Development Plan identifies mineral sites and a 400m buffer around these sites.
- 7.14.3 The potential for soil resources to be contaminated due to wind turbine developments, especially during the construction phase, should be avoided and mitigated.

### 7.15 Limited Planning Consent

- 7.15.1 Section 91 of the Town and Country Planning Act 1990 provides local planning authorities with a means of limiting the life of a planning consent in specific circumstances. It is considered that the need to consider the cumulative impact, in terms of noise, visual and energy output, of wind turbine / wind farm proposals in a location justify the use of a condition to restrict the duration of the permission. The assessment of cumulative impact would take into account existing erected schemes, those permitted but not implemented and all full applications submitted prior to a specific scheme being evaluated. If there is a genuine need for the development, i.e. the scheme isn't a speculative one, it is argued that the turbine(s) will be built soon after it is approved. The early development of sites will also assist towards achieving national targets for energy from renewable sources.

7.15.2 The limited planning consent period should still allow sufficient time for the developer to discharge any conditions and sort out matters to progress the development e.g. finance.

7.15.3 In light of this permissions granted for wind turbine / wind farm proposals will normally only be granted planning permission for a period of 2 years to ensure that the development is implemented within a suitable timeframe. Consideration will be given to longer period subject to the Local Planning Authority being satisfied that there are justifiable reasons for this.



## 8.0 Siting and Design

8.1 The siting and design of wind turbines are important considerations and will be based on a number of factors including access, wind speed, and grid connection. A number of factors associated with turbines such as the size, colour and their distribution will all play their part in determining whether the development appears to recede into or stand out from the landscape.

8.2 All wind turbine proposals will be assessed for their impact on the landscape and visual amenity in relation to their design in terms of siting, impact on landscape character, turbine type, colour, spacing and ancillary infrastructure.

### 8.3 Location and Siting

8.3.1 Wind turbines should be carefully sited and consideration should be given to the following landscape issues:

- How turbines relate to the visual horizon;
- The sensitivity of the locations from which they are visible;
- The impact on the amenity of the surrounding area taking the area's historic, cultural and recreational significance into consideration;
- The existing features in the landscape.

8.3.2 Section 6 of the checklist in Appendix 4 identifies the information required with all applications with respect to the location of proposals for wind turbines

### 8.4 Layout and landscape character

8.4.1 Proposals for wind turbines should take account of the overall landscape context and character of the area in terms of its general appearance, pattern of land cover, openness / closure, character of vertical elements and existing landscape features. Alternative layouts should be explored in relation to the most sensitive viewpoints.

### 8.5 Turbine form and design

8.5.1 Technological advances have led to a wide range of wind turbines. These different models provide different options in terms of size, proportions of turbine tower to blade length and rotation speeds. The height and design of turbines should be in scale with the locality and the suitability of a particular design will depend on the landscape sensitivity of the area.

### 8.6 Turbine Colour

8.6.1 The colour of wind turbines is also an important consideration when assessing the potential impact of such developments. It is important to choose a colour that relates positively to the immediate landscape backdrop against which the turbines will be viewed. A matt finish is considered to be essential.

## 8.7 Turbine Spacing

8.7.1 Wind turbines need to be positioned so that the distance between them is around 3-10 rotor diameters (this would equate to 180-600 metres for a development using 60m diameter rotors, 1.3MW turbines) (example taken from TAN8).

## 8.8 Ancillary infrastructure

8.8.1 In addition to wind turbines, the required infrastructure of a wind farm may include adequate road access, on-site tracks, turbine foundations, crane hard-standings, anemometer masts, a construction compound, electrical cabling and an electricity sub-station and control building. Consideration should be given to the following issues when considering the location and siting of ancillary development. See section 7.2 of this SPG over detailed consideration required for ancillary infrastructure.

8.8.2 With any ancillary buildings required on site, given the rural nature of the majority of locations for turbines, such buildings should be agricultural in appearance either modern or traditional dependent upon the character of a specific location.

**8.8.3 Further guidance on the siting and design of wind turbines in relation to landscapes is available in: “Siting and Designing windfarms in the landscape”, Version 1, December 2009, SNH**

**<http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=1434>**

## 9. Decommissioning and Reinstating Land

- 9.1 Paragraph 6.4 of TAN 8 states that Local Planning Authorities should consider appropriate conditions for the decommissioning of wind turbines and the restoration of affected land. In addition, operators may be required to ensure that sufficient finance is set aside to enable them to meet full restoration obligations.
- 9.2 A suitable mechanism may be required, e.g. a bond, in order to ensure that sufficient resources would be available for dismantling and remediation. This is to ensure adequate measures are in place to ensure the site is restored in an appropriate manner.
- 9.3 Full restoration requires the removal of turbines, ancillary structures and tracks and the restoration of appropriate vegetation. In certain cases the removal of tracks could lead to more damage than leaving them in situ **due to damage to adjacent land during works associated with the process.** Subject to the satisfaction of the Local Planning Authority over visual impact of such tracks and the impact over their removal there may be instances where their removal of tracks will not be required. It should be ensured that the nature of the restoration integrates positively with the existing landscape. Opportunities to enhance the special qualities of the landscape are also to be encouraged.
- 9.4 Operators are encouraged to re-use or recycle turbine components and other materials associated with wind turbines following decommissioning.

## **10.0 Repowering**

- 10.1 There may be occasions when existing, older wind turbines need to be replaced by more efficient modern ones and this should be encouraged provided that the environmental and landscape impacts are acceptable. A screening opinion may be required to assess whether an Environmental Impact Assessment will be necessary to accompany a new application.
- 10.2 TAN 8 in paragraph 2.13 states that support would be given to local planning authorities that restrict almost all wind energy developments larger than 5MW to within Strategic Search Areas (SSAs) other than for schemes on urban / industrial brownfield sites of up to 25MW. The exception to this rule is the repowering and/or extension to existing windfarms (paragraph 2.14 TAN8).
- 10.3 In light of the fact that Ynys Môn has not been recognised as a SSA and that schemes on urban / industrial brownfield sites are encouraged up to 25MW any repowering proposal involving an existing wind farm on Ynys Môn should be limited to a maximum of 25MW. Any such proposal would also be expected to satisfy the other assessment requirements contained within this SPG.
- 10.4 Any such repowering proposal of an existing wind farm should have regard to providing an improved layout to lessen potential visual impact from sensitive receptors. It is likely that a LVIA will be required for all repowering proposals.

## **11.0 Requirements with an Application**

- 11.1 In the first instance we would recommend that all potential wind turbine applicants should be subject to pre application discussions with the Planning Service to establish whether the site in question is situated within or in close proximity to residential units, any environmental or landscape designations, any protected buildings or structures, any relevant features of ecological interest, or any statutory consultation zones.
- 11.2 The Council's Planning Service maintains an up to date and extensive geographic catalogue of all important designations, protected buildings and structures, and statutory consultation zones. In the first instance, the Planning Service should be contacted to establish whether any such issues are relevant to the site.
- 11.3 Early engagement with the Council's Planning Service and other relevant internal departments and external organisations is strongly recommended for all wind turbine proposals, regardless of location or scale.
- 11.4 Such discussions enable the scope of information which should be supplied to be agreed with the planning authority and enables the developer to commission necessary studies in a timely manner. This is particularly true of applications which will require an Environmental Impact Assessment where the relevant regulations allow for the authority to provide a 'scoping opinion' to inform the content of that study. Pre-application discussions should, where appropriate, include neighbouring authorities where there will be cross-boundary viewing and potential long distance cumulative effects.
- 11.5 Early engagement with local communities should be undertaken to ensure that local residents have a full understanding of a scheme, including its potential community benefits.
- 11.6 The contacts included in the next section can also provide advice and guidance on wind turbine development.
- 11.7 The publications included in the 'Further Reading' section provide useful advice and guidance which should be given reference to in new applications.
- 11.8 The planning service has produced a 'Wind Turbine Application – Checklist' to provide clarity over the information required to support an application.
- 11.9 A copy of the checklist is provided in Appendix 4 and should be referred to in addition to the issues highlighted within this SPG.

## 12.0 Community Benefit and Developer Contributions

12.1 Developers or landowners are encouraged to engage directly with local communities regarding possible associated community benefits rather than with the Council. The absence or presence of any contribution to local communities is not an issue which will be considered by the Council in its determination of whether planning permission should be given.

**It is unlawful for a planning obligation to be taken into account when determining a planning application for a development, or any part of a development that is capable of being charged the levy, whether there is a local levy in operation or not, if the obligation does not meet all of the following tests:**

- **necessary to make the development acceptable in planning terms;**
- **directly related to the proposed development; and**
- **fairly and reasonably related in scale and kind to the development.**

12.2 Examples of benefits that could be offered to local communities include the construction of a community facility, a financial payment that benefits the community, annual payments to the community, improving education, skills and training to the local population or a commitment from the developer to use local labour wherever possible.

12.3 If developers offer community benefits that are not directly related to the planning process, then, this cannot be used as a consideration in the determination of any planning application. Annex B of TAN 8 provides further details of this.

12.4 Details should be provided on the form of developer contributions required as a result of the proposed wind energy development. The need for developer contributions will be assessed in relation to the impact of the proposed development in the locality, such as visual and road infrastructure impacts (e.g. the need for new footpaths or road widening), or socio-economic impacts.

12.5 Applicants and developers will be expected to discuss the means of alleviating such impacts with the relevant case office, preferably at the pre-application stage.

12.6 Monetary benefits, such as the establishment of a community trust fund, will not be treated as a material consideration unless it meets the test set out in the Welsh Office Circular 13/97 – Planning Obligations.

12.7 Wind energy developments can potentially offer opportunities to provide community benefits through the planning process e.g. highway infrastructure improvements or wildlife habitat management.

12.8 The Council will expect all Medium and Large (over 20m tip height) wind energy developments with a power capacity of over 50kW per turbine to make a contribution (financial or otherwise) to affected local communities. **The value of the contribution should relate to the size and scale of the development.** These

contributions may be secured by a Section 106 Agreement if offered unilaterally by the developer or they could be undertaken as a separate exercise.

## 13.0 Contacts

13.1 The contacts provided, other than the Isle of Anglesey County Council and Gwynedd Council, are independent organisations and are not affiliated with the publication of this document in any way.

<p>Isle of Anglesey County Council          Planning Service          Development Management Section          Council Offices          Llangefni          LL77 7TW  <a href="http://www.anglesey.gov.uk">www.anglesey.gov.uk</a></p>	<p><u>Anglesey and Gwynedd Joint          Planning Policy Unit,          Town Hall          Bangor          Gwynedd          LL57 1DT</u>  <a href="http://www.gwynedd.gov.uk">www.gwynedd.gov.uk</a></p>
<p>Renewable UK          Greencoat House          Francis Street          London          SW1P 1DH  <a href="http://www.britishwindenergy.co.uk">www.britishwindenergy.co.uk</a></p>	<p><u>RSPB          Southerland House          Castlebridge          Cowbridge Road East          Cardiff          CF11 9AB</u>  <a href="http://www.rspb.org.uk">www.rspb.org.uk</a></p>
<p>Cadw          Plas Carew          Unit 5/7, Cefn Coed          Parc Nantgarw          Cardiff          CF15 7QQ  <a href="http://www.cadw.wales.gov.uk">www.cadw.wales.gov.uk</a></p>	<p>Carbon Trust Wales          Albion House          Oxford Street          Nantgarw          Cardiff          CF15 7TR  <a href="http://www.carbontrust.co.uk">www.carbontrust.co.uk</a></p>
<p>Civil Aviation Authority          CAA House          45-49, Kingsway          London          WC2B 6TE  <a href="http://www.caa.co.uk">www.caa.co.uk</a></p>	<p><u>Countryside Council for Wales          Plas Penrhos          Ffordd Penrhos          Bangor          LL57 2BX</u>  <a href="http://www.ccw.gov.uk">www.ccw.gov.uk</a></p>
<p>Energy Saving Trust Wales          1, Caspian Point          Caspian Way          Cardiff          CF10 4DQ  <a href="http://www.energysavingtrust.org.uk">www.energysavingtrust.org.uk</a></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>Gwynedd Archaeological Trust          Craig Beuno          Garth Road          Bangor          LL57 2RT  <a href="http://www.heneb.co.uk">www.heneb.co.uk</a></p>	<p>OFCOM          Riverside House          2a, Southwark Bridge Road          London          SE1 9HA  <a href="http://www.ofcom.org.uk">www.ofcom.org.uk</a></p>
<p>Ministry of Defence          Kingston Road          Sutton Coldfield          West Midlands          B75 7RL  <a href="http://www.mod.uk">www.mod.uk</a></p>	<p>Welsh Government          Crown Buildings          Cathays Park          Cardiff          CF10 3NQ  <a href="http://www.wales.gov.uk">www.wales.gov.uk</a></p>
<p><b><u>Argiva Ltd</u></b>  <b><u>Black Hill</u></b>  <b><u>Transmitting Station</u></b></p>	



<p><u>Salsburgh</u> <u>Shotts</u> <u>North Lanarkshire</u> <u>ML7 4NZ</u> <a href="http://www.arqiva.com/">http://www.arqiva.com/</a></p>	
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## 14.0 Further Reading

- Bat Conservation Trust – Bat Surveys: Best Practice Guidance – Surveying for Onshore Wind Farms (Various dates)
- Bat Conservation Trust – Bat Surveys: Good Practice Guidance (2012)
- Cadw – Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales – Conwy, Gwynedd and the Isle of Anglesey (1998)
- **Cadw – Guide to good practice to using the Register of landscapes of historic interest in Wales in the planning and development process (2007)**
- Cadw – Renewable Energy and Your Historic Building: Installing Microgeneration Systems: A Guide to Best Practice (2010)
- Countryside Council for Wales, Cadw and Welsh Assembly Government – Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process (2007)
- Countryside Council for Wales – LANDMAP Information Guidance Note 1: LANDMAP and Special Landscape Areas (2008)
- Countryside Council for Wales – LANDMAP Information Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Appraisal of Onshore Wind Turbines (2010)
- Countryside Council for Wales (2009) Seascape Assessment of Wales
- Countryside Council for Wales (2010). Guidance Note. Assessing the impact of Windfarm Developments on Peatlands in Wales
- Countryside Council for Wales (June 2010) LANDMAP Guidance Notes
- Civil Aviation Authority: CAP 764 ‘CAA Policy and Guidelines on Wind Turbines (2012)
- DECC National Policy Statement (NPS) EN1 Overarching Energy (2011)
- DECC NPS EN3 Renewable Energy Infrastructure (2011)
- Department of Energy and Climate Change – Update of UK Shadow Flicker Evidence Base (2011)
- Department of Trade and Industry – ETSU W/14/00533/00/00: The Influence of Colour on the Aesthetics of Wind Turbine Generators
- Department of Trade and Industry – ETSU-R-97: The Assessment and Rating of Noise from Wind Farms – Final Report (1996)
- Department of Trade and Industry – Wind Energy and Aviation Interests: Interim Guidelines (2002)

- **Department for Business, Enterprise and Regulatory Reform – Review of Guidance on the assessment of Cumulative Impacts of Onshore windfarms (2008).**

<https://www.oq.decc.gov.uk/EIP/pages/windfarm-cumulative-impacts-report.pdf>

- Electricity Council – Standard 44-8: Overhead Line Clearances
- (Former) Gwynedd County Council – Gwynedd Structure Plan (1993)
- Isle of Anglesey County Council – AONB Management Plan (2009)
- Isle of Anglesey County Council – World Heritage Site Management Plan
- Isle of Anglesey County Council – Local Plan (1996)
- Isle of Anglesey County Council – Supplementary Planning Guidance: Design Guide for the Urban and Rural Environment (2008)
- Isle of Anglesey County Council – Unitary Development Plan
- Isle of Anglesey County Council – Updated Landscape Strategy (2011)
- Landscape Institute and the Institute of Environmental **Management and Assessment – Guidelines for Landscape and Visual Impact Appraisal (2<sup>nd</sup> edition, 2002 or 3<sup>rd</sup> edition from 2013).**
- Natural England – Technical Information Note TIN051 (First Edition, 11<sup>th</sup> February 2009): Bats and Onshore Wind Turbines – Interim Guidance
- Natural England – Technical Information Note 059: Bats and Single Large Wind Turbines: Joint Agencies Interim guidance (2011)
- Natural England, Scottish Natural Heritage & CCW – Bats and Wind Turbines (Jan 2012)
- **Ofcom - Tall structures and their impact on broadcast and other wireless services (2009)**
- Renewables Advisory Board & Department of Trade and Industry – Delivering Community Benefits from Wind Energy Development – A Toolkit (2007)
- Rhos Garn Whilgarn, Talgarreg (Appeal Ref: APP/D6820/A/07/1200875)
- Scottish Natural Heritage – Guidance: Cumulative Effect of Wind Farms (Version 2 – Revised 13.04.05)
- Scottish Natural Heritage – Siting and Designing Wind Farms in the Landscape (Version 1 – December 2009)
- Scottish Natural Heritage – Visual representation of wind farms: Good Practice Guidance (2006)
- Scottish Natural Heritage guidance on “Cumulative effects of windfarms” (2005)

- Scottish Natural Heritage: “Natural Heritage Assessment of wind energy projects which do not require formal EIA (2008)
- **Scottish Natural Heritage - Siting and design of small scale wind turbines of between 15 and 50 metres in height, March 2012 Link: [www.snh.gov.uk/docs/A719295.pdf](http://www.snh.gov.uk/docs/A719295.pdf)**
- **Scottish Natural Heritage - Assessing the cumulative impact of onshore wind energy developments, March 2012, (this replaces your existing reference to cumulative of 2005). Link: [www.snh.gov.uk/docs/A675503.pdf](http://www.snh.gov.uk/docs/A675503.pdf)**
- **Scottish Natural Heritage – Visual Representation of Winfarms: Good Practice Guidance, 2007. <http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=846>**
- Welsh Government (published by the ‘Welsh Assembly Government’) – Generating Your Own Energy: The Current Planning Regulations (2011)
- Welsh Government (published as the ‘Welsh Assembly Government’) – Generating Your Own Energy: Wind – A Planning Guide for Householders, Communities and Businesses (2011)
- Welsh Government (published as the ‘Welsh Assembly Government’) – One Wales: One Planet – The Sustainable Development Scheme of the Welsh Assembly Government (2009)
- Welsh Government (published as the ‘Welsh Assembly Government’) – Planning Policy Wales (4<sup>th</sup> Ed, 2011)
- Welsh Government (published as the ‘Welsh Assembly Government’) – Technical Advice Note 5: Nature Conservation and Planning (2009)
- Welsh Government (published as the ‘Welsh Assembly Government’) – Technical Advice Note 8: Planning for Renewable Energy (2005)
- Welsh Government – Practics Guidance: Planning Implications of renewable and low Carbon Energy Development (2011)
- Welsh Government’s *Policy Statement on National Parks and National Park Authorities in Wales (2007)*
- Welsh Office – Circular 60/96: Archaeology and Planning
- Welsh Office – Circular 1/98: Planning and the Historic Environment: Directions by the Secretary of State for Wales
- Welsh Office – Circular 61/96: Planning and the Historic Environment: Historic Buildings and Conservation Areas
- Welsh Office – Circular 13/97: Planning Obligations

## 15. Glossary

Term	Explanation
<b>Abnormal Indivisible Load (AIL)</b>	Any load that cannot be broken down into smaller loads without undue expense or risk of damage e.g. wind turbines.
<b>Amplitude Modulation (AM)</b>	A technique used in electronic communication via a radio carrier wave.
<b>Area of Outstanding Natural Beauty (AONB)</b>	Statutory designation designed to protect nationally important natural landscapes.
<b>Blade Swish</b>	The rhythmic modulation of aerodynamic noise caused by the rotation of a wind turbine.
<b>Candidate Wildlife Sites (CWS)</b>	Non-statutory sites deemed to be of special ecological value.
<b>Carbon Footprint</b>	The amount of carbon dioxide or other carbon compounds emitted into the atmosphere by the activities of an individual, company, country, etc.
<b>Civil Aviation Authority (CAA)</b>	The Civil Aviation Authority (CAA) is the <u>public corporation which oversees and regulates all aspects of aviation in the United Kingdom.</u>
<b>Climate Change</b>	A process of changes to weather patterns and temperatures largely caused by the emission of certain 'greenhouse gases' from the earth, principally associated with the burning of fossil fuels.
<b>Conservation Area</b>	Conservation Areas are designated for their special architectural and historic interest.
<b>Cumulative Impacts</b>	This is the result of more than one scheme being constructed and is the combined effects of all developments, taken together. This may be in terms of their effect on the landscape and visual amenity, bird populations, other wildlife, the local economy, tourism etc.
<b>Design and Access Statement</b>	<b><u>A design and access (DAS) statement is a short report accompanying and supporting a planning application. A DAS should explain the design principles and concepts that have been applied to particular aspects of the proposal – these are the amount, layout, scale, landscaping and appearance of the development.</u></b>
<b>Environmental Impact Assessment (EIA)</b>	The process used for describing, analysing and evaluating the range of environmental effects that are caused by a wind energy proposal.
<b>Environmental Statement (ES)</b>	The document supporting a planning application that sets out the findings of the EIA.
<b>ETSU-R-97</b>	A methodology in the assessment and rating of noise from wind turbines.
<b>Greenhouse Gases</b>	The six main gases contributing to climate change found in the upper atmosphere. They prevent some energy

Term	Explanation
	being re-transmitted into space. The gases include carbon dioxide , methane, nitrous oxide, hydroflourocarbons, perfluorocarbons and sulphur hexafluoride.
<b>Heritage Coast</b>	A Heritage Coast is a strip of <u>coastline</u> designated by the <u>Countryside Council for Wales</u> as having notable natural beauty or scientific significance.
<b>LA90 10m</b>	ESTU-R-97 in accordance with common practice BS4142 uses LA90 to define background noise. This is the level exceeded for 90% of the time, so in a ten minute period the noise level is more than the LA90 for an aggregate of 9 minutes.
<b>Land Cover</b>	The observed (bio) physical cover on the earth's surface which includes vegetation and man-made structures.
<b>LANDMAP</b>	A GIS (Geographical Information System) based landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a nationally consistent data set.
<b>Landscape</b>	An area, as perceived by people, whose character <b><u>results from the actions and interactions of natural and/or human factors</u></b> <del>type or area is able to accommodate change without unacceptable adverse effects on its character. Capacity is likely to vary according to the type and nature of change being proposed.</del>
<b>Landscape Character</b>	The distinct pattern or combination of elements that occurs consistently in a particular landscape and how this is perceived by people.
<b>Landscape and Visual Impact Appraisal (LVIA)</b>	<del>It specifically aims to ensure that all possible effects of change and development both on the landscape itself and on views and visual amenity, are taken into account in decision-making.</del> <b><u>It is a process that provides baseline information on landscape and visual resources, and makes judgments upon it in relation to the nature of resources and nature of impacts, to inform decision-making, but it is not a way of “ensuring” decision-makers “take account” of this topic.</u></b>
<b>Listed Building</b>	The National Assembly for Wales is required by law to compile lists of buildings of special architectural or historic interest. As well as providing a ready reference of buildings of importance to the nation's heritage, listing provides an added level of legal protection.
<b>Local Planning Authority (LPA)</b>	A local planning authority is the <u>local authority</u> or <u>council</u> that is empowered by law to exercise statutory <u>town planning</u> functions for a particular area
<b>Local Nature Reserves (LNR)</b>	Designated for local interest by the Council.

<b>Term</b>	<b>Explanation</b>
<b>Megawatt (MW)</b>	A watt is an electrical unit of power. A megawatt is a million watt.
<b>Microgeneration</b>	Very small scale power generation schemes, typically providing energy to a single household/office.
<b>Mitigation</b>	Measures, including any process, activity or design to avoid, reduce or remedy adverse effects of a development proposal.
<b>National Nature Reserves (NNR)</b>	Areas of national nature conservation importance are designated as NNRs.
<b>National Air Traffic Services (NATS)</b>	The United Kingdom's National Air Traffic Services (NATS) is a company set up in 2001 to run air traffic control services. This means that NATS makes sure aircraft can fly safely across Britain, and that aircraft can take-off and land safely at British airports.
<b>Octave Band Prediction</b>	This is the most accurate prediction method, but requires the most detailed noise measurement and involves the most complicated method of calculating the LAeq at the ear.
<b>Office of Communications (OFCOM)</b>	The Office of Communications is the government-approved regulatory and competition authority for the <u>broadcasting</u> , <u>telecommunications</u> and <u>postal</u> industries of the United Kingdom.
<b>Phase I Habitat Survey</b>	The Phase 1 Habitat Classification and associated field survey technique provide a standardised system to record semi-natural vegetation and other wildlife habitats.
<b>Ramsar Sites</b>	Wetland areas of international importance.
<b>Registered Historic Landscape</b>	<b><u>An area of landscape identified as being of either 'outstanding' or "special historic interest in Wales on the Cadw 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales'.</u></b>
<b>Renewable Energy</b>	Collective term for energy flows that occur naturally and repeatedly in the environment. It includes energy derived from wind, by the sun, hydropower, wave, tidal, biomass, biofuels and from geothermal sources.
<b>Scheduled Ancient Monument (SAM)</b>	The term is applied to a very wide range of archaeological sites. These sites are legally protected and referred to as scheduled ancient monuments.
<b>Scoping</b>	The process of deciding the scope and level of detail of an EIA, including the environmental effects which need to be considered, the assessment methods to be used, and the structure and contents of the Environmental Report.
<b>Screening</b>	The process of deciding whether a plan or programme requires EIA.
<b>Section 106</b>	A legal condition that allows a local planning authority (LPA) to enter into a legally-binding agreement or planning obligation with a landowner in association with

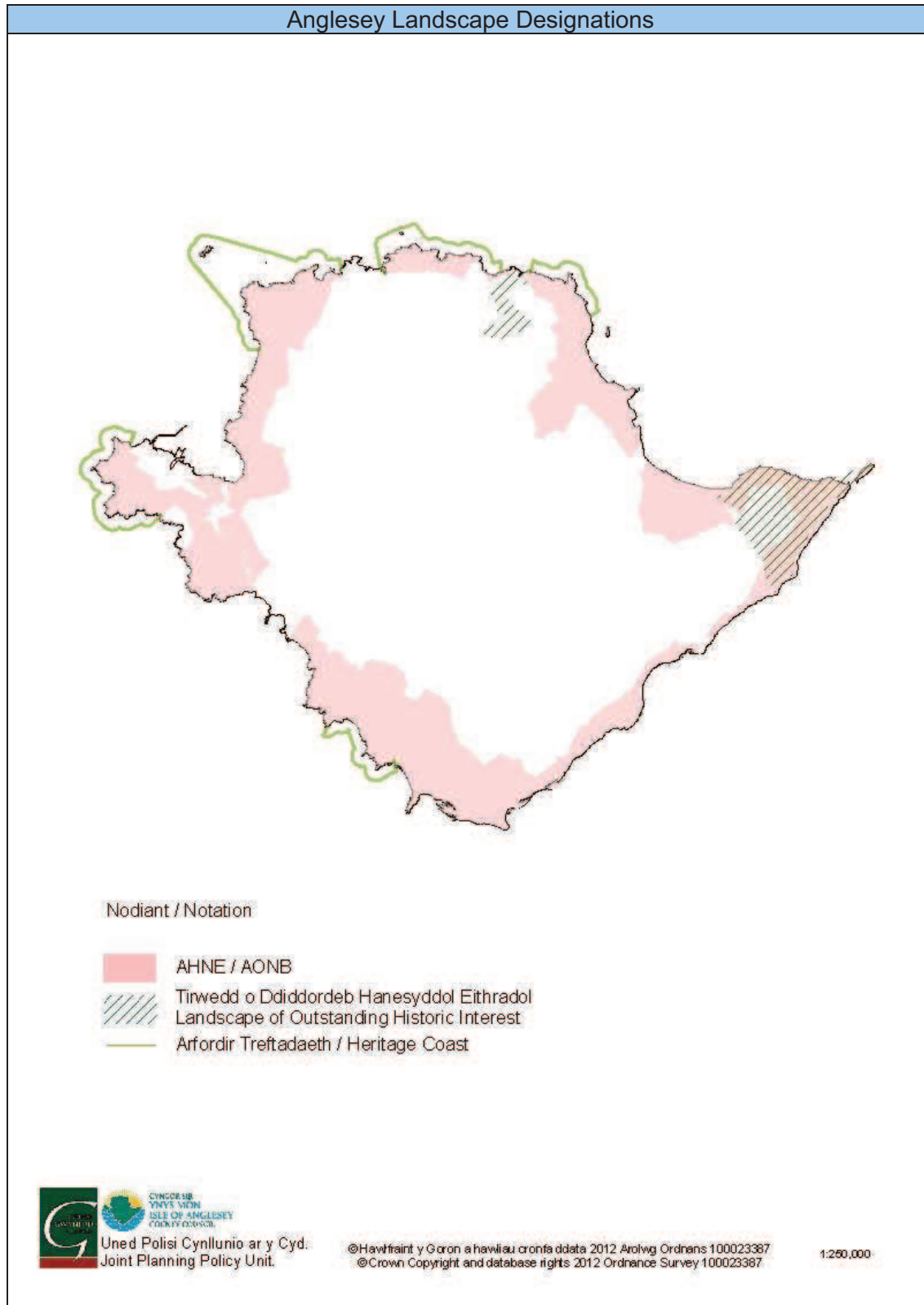
Term	Explanation
	the granting of planning permission.
<b>Separation Distance</b>	The distance between wind turbines and settlements or individual dwellings.
<b>Site of Special Scientific Interest (SSSI)</b>	SSSIs are areas of land designated as being of national nature conservation interest.
<b>Special Area of Conservation (SAC)</b>	Areas that contribute to the maintenance or restoration of favourable conservation status of habitats or species listed in Annexes I and II of the Habitats Directive.
<b>Special Protection Area (SPA)</b>	Designated areas that help conserve habitats for rare and vulnerable species and migratory species of birds.
<b>Strategic Search Areas (SSA)</b>	An area that has been identified at a strategic level as having the general characteristics that lend themselves to the accommodation of large wind farms.
<b>Sustainable Development</b>	Development which maintains or improves the quality of life of the present generation while conserving the environment and resources to meet the needs of future generations.
<b>Technical Advice Note (TAN)</b>	Provide technical advice and guidance on certain planning policy areas.
<b>Tonality</b>	Tonal sound is defined as sound at discrete frequencies. It is caused by components such as meshing gears, non-aerodynamic instabilities interacting with a rotor blade surface, or unstable flows over holes or slits or a blunt trailing edge.
<b>Wind Shear</b>	Wind shear is a difference in <u>wind speed</u> and <u>direction</u> over a relatively short distance in the <u>atmosphere</u> . Wind shear can be broken down into vertical and horizontal components, with horizontal wind shear seen across <u>fronts</u> and near the coast, and vertical shear typically near the surface, though also at higher levels in the atmosphere near upper level jets and frontal zones aloft.
<b>World Heritage Site</b>	A United Nations designation relating to land of particular historical or cultural importance on an international level. In the case of <b>Anglesey</b> Blaenafon this relates <b><u>to Beaumaris and Caernarfon Castles and their settings</u></b> to its key importance to the industrial revolution.
<b>Zone of Theoretical Visibility (ZTV)</b>	ZTV analysis is the process of determining the visibility of an object in the surrounding landscape. The process is objective in which areas of visibility or non-visibility are determined by computer software using a digital elevation dataset. The output from the analysis is used to create a map of visibility. <b><u>This is the area from which the development is theoretically visible. (It is not part of the definition that it is determined with computer software, this is just established practice to increase detail and consistency in studies, and is recommended in</u></b>



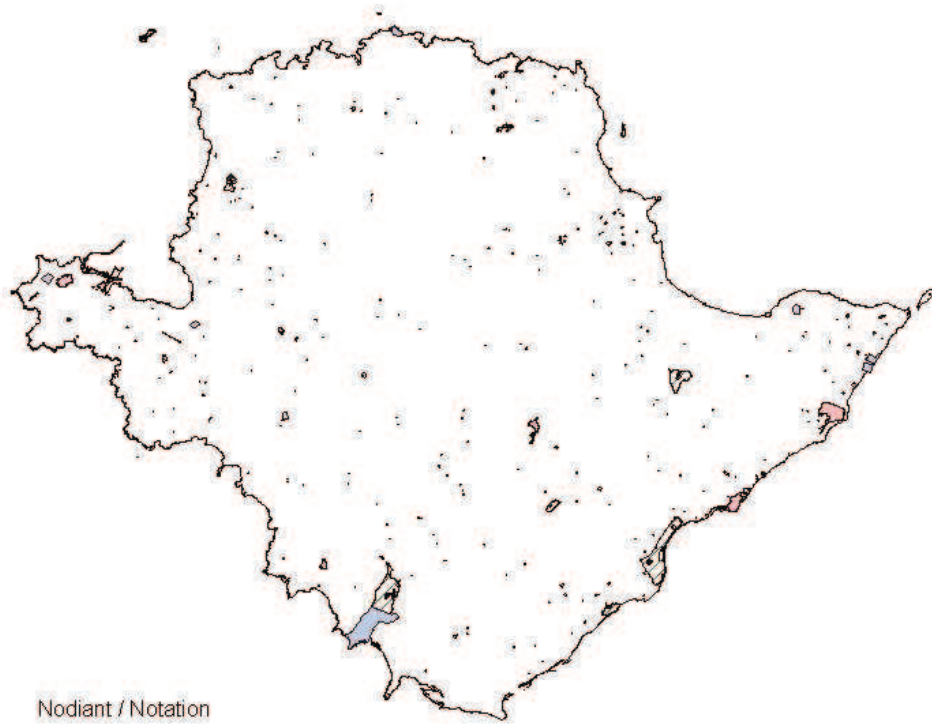
Term	Explanation
	<u>preference to 'eyeing it up' on site, which can be very subjective and generalized).</u>
<b>Zone of Visual Influence</b>	The area from which a development is theoretically visible. <del>Zones of Visual Influence are used to identify the parts of a landscape that will be affected by a development.</del>

## Appendix 1 – Designations & Consultation Zones on Ynys Môn

These maps should only be used for indicative purposes as the designations may be subject to boundary changes in the future. See the Glossary in Section 15.0 regarding full titles of the designations.



## Anglesey Heritage Designations



Nodiant / Notation

-  Ardaloedd Cadwraeth / Conservation Areas
-  Adeiladau Rhestredig / Listed Buildings
-  Henebion Rhestredig / Schedule Ancient Monuments
-  Safle Treftadaeth y Byd / World Heritage Site
-  Parciau a Gerddi o Ddiddordeb Arbennig yng Nghymru  
Parks & Gardens of Special Interest in Wales



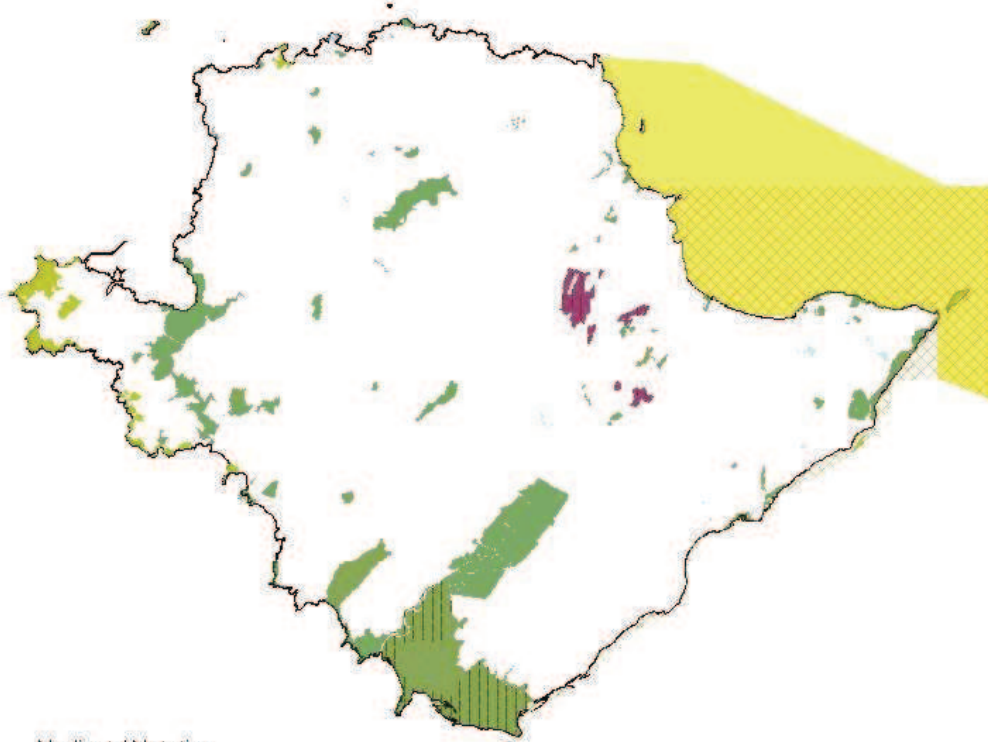
Uned Polisi Cynllunio ar y Cyd.  
Joint Planning Policy Unit.

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1:250,000

The Built Environment Section should be contacted regarding detailed maps for the location of these designations. There will be a charge for this service under Planning Fees Research Inquiry

## Anglesey Nature Conservation Designations\*



Nodiant / Notation

-  Ramsar / Ramsar
-  ACA / SAC
-  AGA / SPA
-  SoDdGA / SSSIs
-  GNG / NNR
-  GNL / LNR



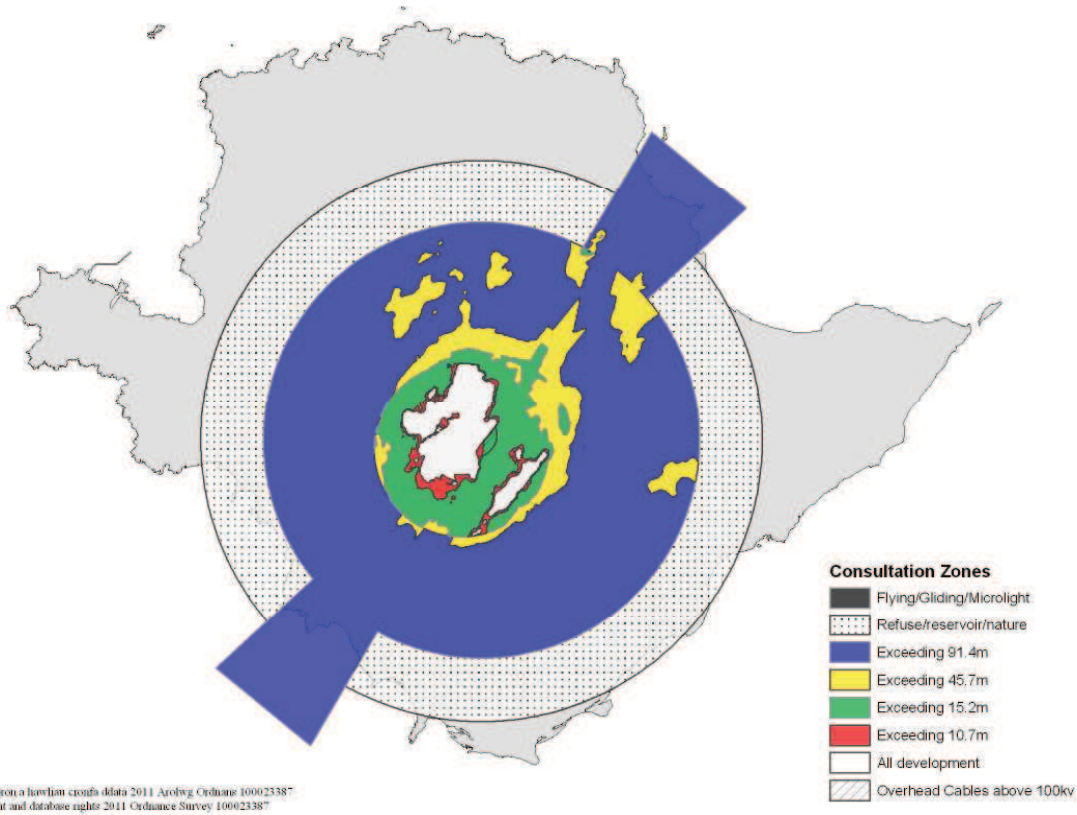
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\* Maps showing the Candidate Wildlife Sites / Wildlife Sites are not currently available. This map will be updated when this information is available. Detailed maps for International and National designations can be viewed on the Countryside Council for Wales' (CCW) web site <http://www.ccw.gov.uk/interactive-maps.aspx>

### Mona Airfield Consultation Zone



### RAF Valley Airfield Consultation Zone

Awaiting relevant information from the MoD

## **Appendix 2 – Noise Assessment Methodology**

1. The level of noise emissions from the development hereby approved shall be measured in accordance and shall not exceed the levels set out in the noise emission scheme as set out in paragraphs 2 to 10 below:-
2. The level of noise emissions resulting from the wind farm shall be assessed using the procedures described in 'The Assessment and Rating of Noise from Wind Farms' (ETSU-R-97), published by ETSU for the Department of Trade and Industry, specifically the section entitled 'Supplementary Guidance Notes to the Planning Obligation'.
3. The level of noise emissions from the combined effects of the wind turbine generators at XXX Wind Farm shall not exceed:-
  - a. As to the dwellings listed in Table 1 of Schedule 1 the levels set for those properties in that table (at the wind speeds indicated within the table).
  - b. As to the dwellings listed in Table 2 of Schedule 1 the levels set for those properties in that table (at the wind speeds indicated within the table).
  - c. As to all other dwellings lawfully existing at the time of the planning consent, the noise level shall be a maximum of 43dBL<sub>A90</sub> at a 10 metre wind speed of 8m/s.
4. The level of noise emissions referred to in paragraph 3 above shall be measured using an LA90 index over a minimum of 20 periods each of 10 minutes duration, using a sound level meter of at least Class 1 quality (incorporating best current practice) incorporating a ½ inch diameter microphone in free field conditions 1.2 metres above ground level and at least 3.5 metres from any wall, hedge or reflective surface (using a fast time weighted response).
5. If the level of noise emissions measured in accordance with paragraph 4 exceeds the relevant levels referred to or specified in paragraph 3 above or Schedule 1 attached, then the contribution of background noise to the level of noise emission shall be measured.
  - a. Such background noise levels shall be measured using an LA90 index over a minimum of 6 periods each of 10 minutes durations in accordance with the requirements of paragraph 4.
  - b. Such measurements shall be made during a period of measurements of noise from the combined effects of the wind turbine generators at XXX Wind Farm (made in accordance with the requirements of paragraph 4).
  - c. A correction using best current practice shall be applied to the measured noise level to determine the contribution of background noise to the overall levels measured when the wind turbines are operating.
6. The measurements made in accordance with paragraphs 4 and 5 shall be correlated with wind speeds measured at 10 metres over the periods referred to in paragraphs 4 and 5. The LA90 noise level shall be derived using a best fit curve of the measured noise levels for data points corresponding to 10 metre wind speeds between 0 and 12 metres per second.
7. Compliance with paragraph 3(a) and 3(b) using the methods defined in paragraph 4 to 6 shall be demonstrated to the satisfaction of the local planning authority and at the expense of the developer within 3 months following the first generation of electricity or at any time at the written request of the local planning authority and, thereafter, at least once every 20 calendar months. Compliance with the noise emissions scheme shall be demonstrated to and approved in writing by the local planning authority by the submission of a written report. The local planning authority may require that any breaches of the noise emissions scheme are addressed within a set timetable which shall be submitted to and agreed in writing by the local planning authority before the development commences and written confirmation of having

implemented such proposals to address any breaches shall be sent to the local planning authority before the development commences. The requirements of the noise emissions scheme shall apply throughout the life of the development.

8. Tonal noise shall be measured by the operator of the wind farm at its expense at the reasonable request of the local planning authority in accordance with the procedures described in 'The Assessment and Rating of Noise from Wind Farms, ETSU-R-97' published by ETSU for the Department of Trade and Industry.
9. If, at any dwelling lawfully existing at the time of the planning consent, tonal noise from the combined effect of the wind turbines at XXX Wind Farm exceeds the threshold of audibility:-
  - a). by more than 2.0dB but less than 6.5dB a penalty of  $((5/6.5) \times \text{Audibility})\text{dB}$  shall be added to the noise level derived for the property in accordance with the ETSU-R-97 tonal assessment procedure;
  - b). by more than 6.5dB a penalty of 5dB shall be added to the noise level derived for that property in accordance with the ETSU-R-97 tonal assessment procedure.
10. The developer shall supply wind speed and direction data to the local planning authority on its request to enable the Council to check compliance by the developer with the provisions of paragraphs 1 to 9 above.
11. Interpretation of some of the terms used within this condition are outlined in Schedule 2 attached.

Schedule 1

Table 1: Dwellings Associated with Development

Property A (Enter Grid Reference)																
Wind Speed at 10m height (m/s)																
4	4.5	5	5.5	6	6.5	7	7.5	8	8.5	9	9.5	10	10.5	11	11.5	12
Noise Limit L <sub>A90</sub> dB																

Table 2: Dwellings not Associated with Development.

Property 1 (Enter Grid Reference)																
Wind Speed at 10m height (m/s)																
4	4.5	5	5.5	6	6.5	7	7.5	8	8.5	9	9.5	10	10.5	11	11.5	12
Noise Limit L <sub>A90</sub> dB																

Property 2 (Enter Grid Reference)																
Wind Speed at 10m height (m/s)																
4	4.5	5	5.5	6	6.5	7	7.5	8	8.5	9	9.5	10	10.5	11	11.5	12
Noise Limit L <sub>A90</sub> dB																

Schedule 2

Interpretation

‘Audibility’ means the audibility of the Tonal Noise as defined in (and to be measured in accordance with) the recommended method in ‘The Assessment and Rating of Noise from Wind Farm’ (ETSU-R-97) published by ETSU for the Department of Trade and Industry, specifically paragraph 2.1 of the section titled ‘Supplementary Guidance Notes to the Planning Obligation’.

‘Background Noise Level’ means the ambient noise level present within the environment in the absence of noise generated by the development.

‘Best fit curve’ means a best fit linear regression curve expressing the noise level as a function of wind speed derived from measured noise levels for data extracted in accordance with the recommendations of section 1.2 of the section titled ‘Supplementary Guidance Notes to the Planning Obligation’ in ETSU-R-97.

‘dB(A) L<sub>A90 10min</sub>’ means the dB(A) level exceeded 90% of the time and measured over a period of 10 minutes.

‘ETSU-R-97’ means ‘The Assessment and Rating of Noise from Wind Farms’ (ETSU-R-97) published by the ETSU for the Department of Trade and Industry (Final Report September 1996).

‘Free-field Conditions’ means an environment in which there are no reflective surfaces (except the ground) affecting the measurements within the frequency range being measured.

‘Reasonable Request’ means following a complaint to the Council relating to noise emission from the wind farm.

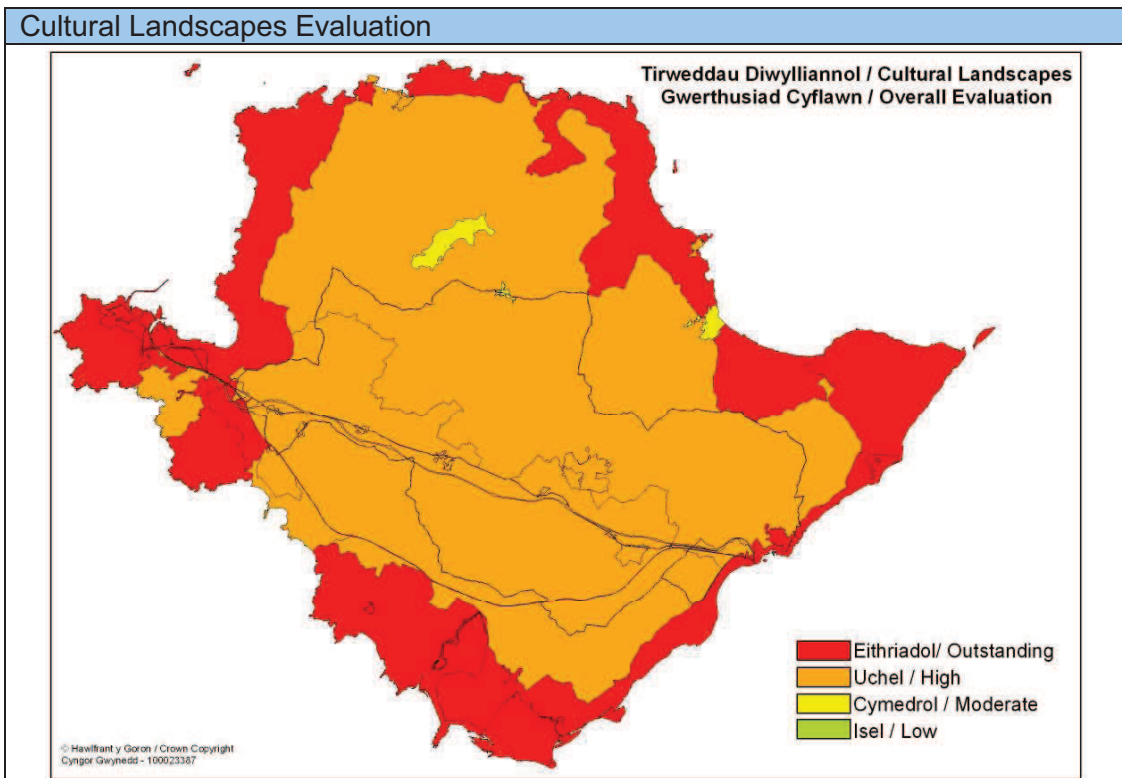
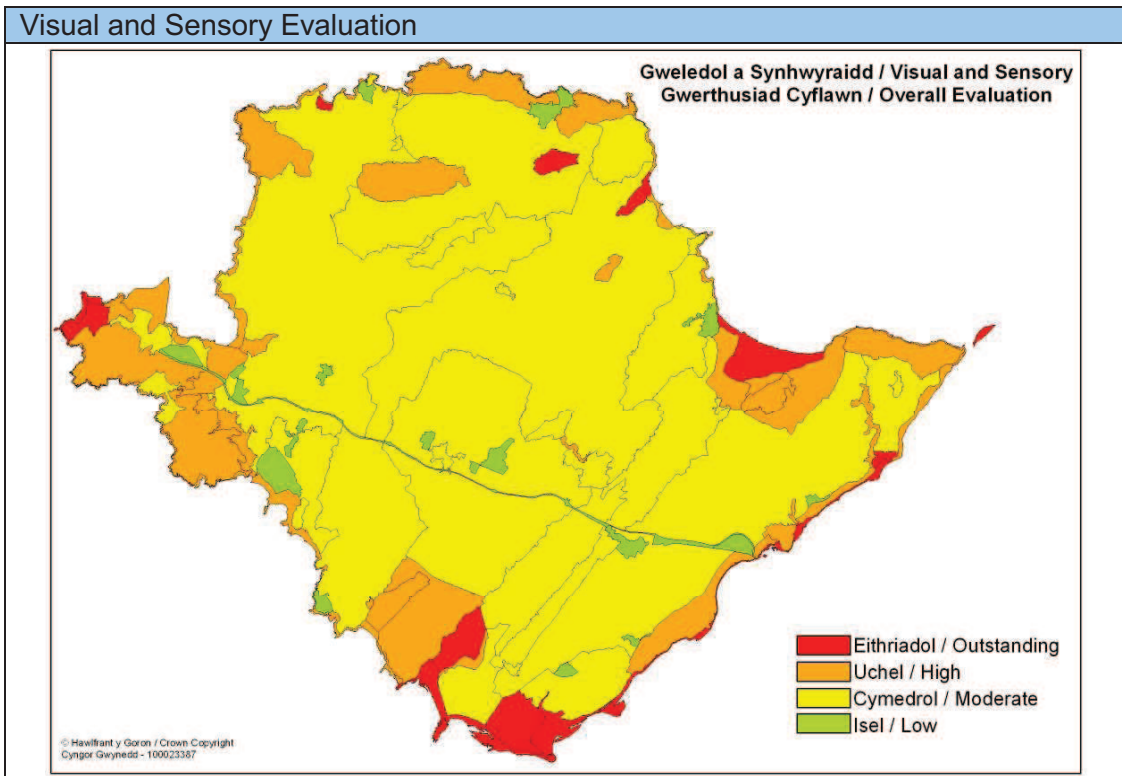


'Tonal Noise' means noise containing a discrete frequency component.

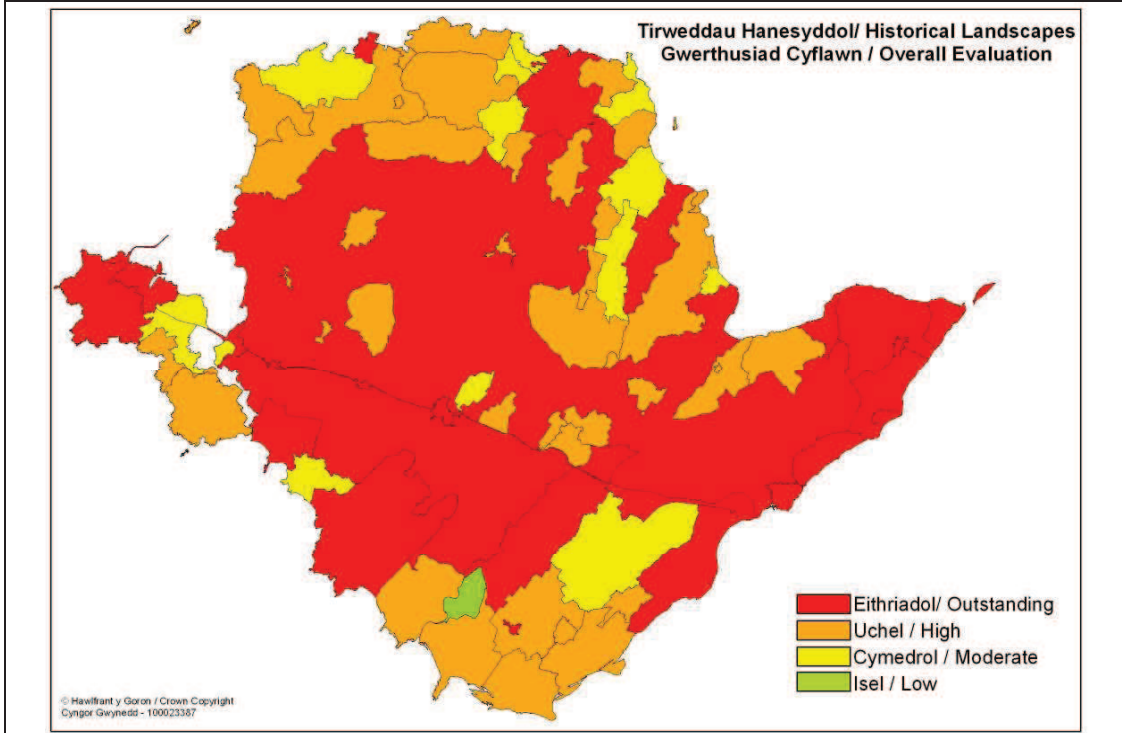
'10 metre wind speed' means (unless the context otherwise demands) wind speeds measured at a height of 10 metres above the ground level.

'Wind Turbines' means the wind turbine generators proposed to be erected as part of the development.

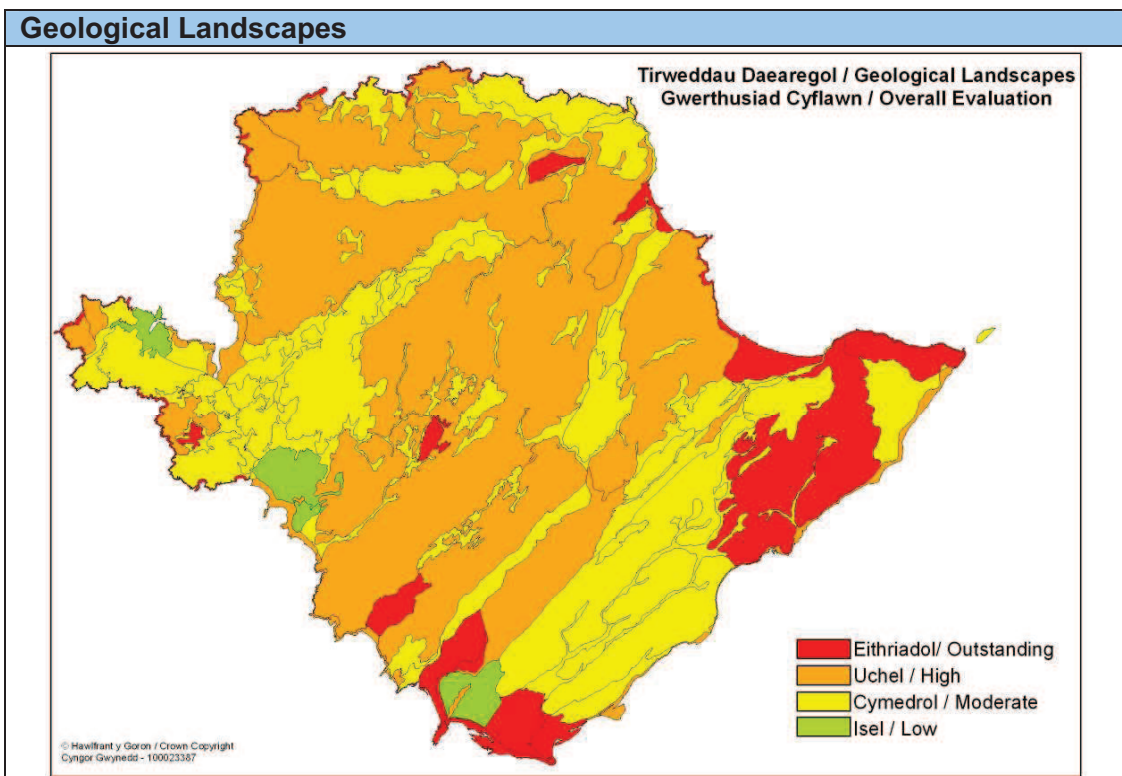
## Appendix 3 – LANDMAP 2011 (Quality Assured Update) Survey Results



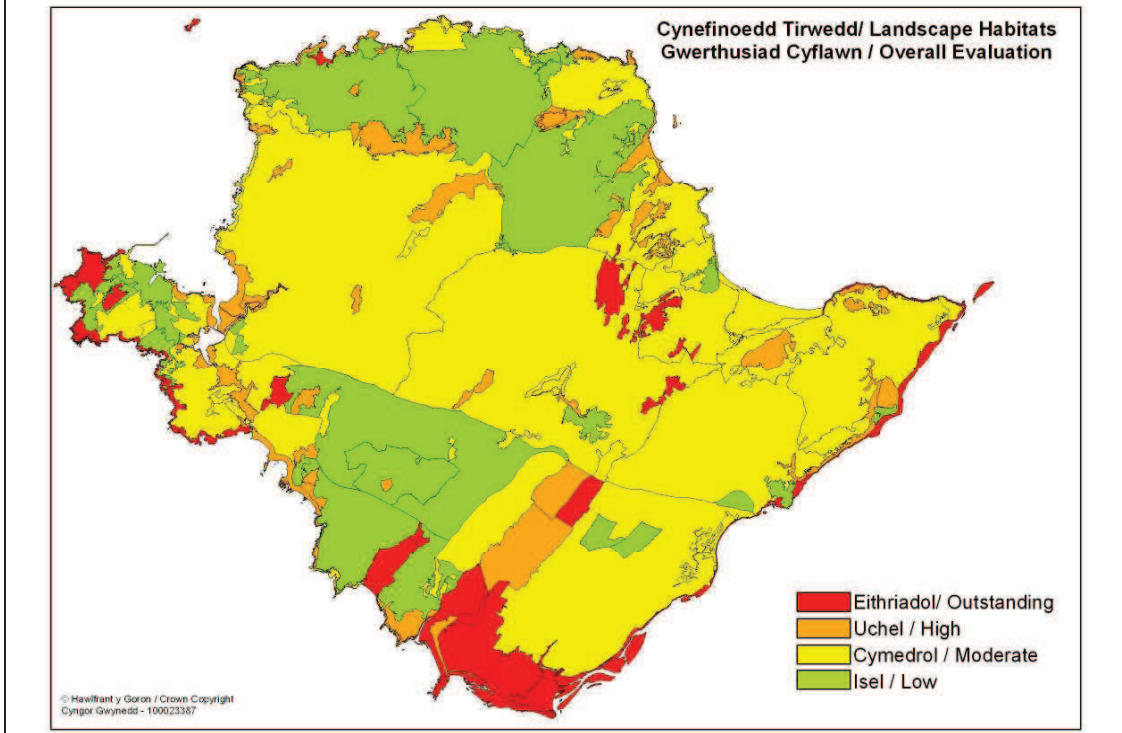
## Historic Landscapes



## Geological Landscapes



## Landscape Habitats



# **WIND TURBINE APPLICATIONS – CHECKLIST**

## WIND TURBINE APPLICATIONS – CHECKLIST

### Introduction

<b>Stages for Determining Wind Turbine Applications</b>	
<b>(Stages 4 to 6 Not Applicable if an Environmental Impact Assessment is not Required)</b>	
<b>1</b>	<b>Request to Council for Screening Opinion</b> <ul style="list-style-type: none"> <li><b>Request from applicant to the Council</b> - The broad intention of requesting a screening opinion is that the applicant can obtain a clear view from the Council on the need for Environmental Statement (ES) well before they reach the stage of lodging a formal planning application (step 7 below). This should minimise the possibility of delay or uncertainty. If an ES is deemed to be required, no action will be taken on the planning application until the developer has prepared an ES and submitted it to the planning authority.</li> </ul>
<b>2</b>	<b>Request for Screening Opinion registered with Development Management</b> <ul style="list-style-type: none"> <li><b>Council has 3 weeks to provide a Screening Opinion</b></li> </ul>
<b>3</b>	<b>Council provides Screening Opinion</b> <ul style="list-style-type: none"> <li><b>Establish if ES is required</b></li> </ul>
<b>4</b>	<b>Request to Council for Scoping Opinion</b> <ul style="list-style-type: none"> <li>If the Council determines that an ES is required the applicants can seek advice on the contents of the ES by requesting a 'Scoping Opinion'.</li> </ul>
<b>5</b>	<b>Request for Scoping Opinion registered with Development Management</b> <ul style="list-style-type: none"> <li><b>Council has 5 weeks to provide a Scoping Opinion</b></li> </ul>
<b>6</b>	<b>Council provides Scoping Opinion</b> <ul style="list-style-type: none"> <li><b>Issues to be covered in ES</b></li> </ul>
<b>7</b>	<b>Full application submitted to local planning authority</b> <ul style="list-style-type: none"> <li><b>All supporting evidence, including an ES (if required), submitted with full application</b></li> </ul>
<b>8</b>	<b>Application processed and consultee comments provided</b> <ul style="list-style-type: none"> <li><b>Committee or delegated officer considers application</b></li> <li><b>Welsh Minister considers 'called-in' application</b></li> </ul>
<b>9</b>	<b>Decision on full application</b> <ul style="list-style-type: none"> <li><b>Decision made by committee or delegated officer</b></li> <li><b>Welsh Minister decides 'called-in' application</b></li> </ul>

- 1 Different types of planning applications require different kinds of background information in order for the Local Planning Authority (LPA) to be able to validate them as well as make an informed decision about them.
- 2 Applying for permission requires the applicant to supply a variety of plans, statements and other documentation before the LPA can begin to process it as a valid application. Some of the required information will depend on the nature and type of application or the nature of the character of the area within which the application site is situated.

- 3 **If this information is not provided then the LPA may not be able to register and validate the application and may be unable to process it and issue a decision on the proposals.**
- 4 This 'tick box' approach to validation offers clarity for applicants in setting out which documents and information items are required. The documents and information required to make a valid planning application consists of mandatory national information requirements as well as local information requirements
- 5 Applications for schemes that are likely to have significant impacts on the surrounding area (or further away) should involve engagement in pre-application discussions so that applicants are clear about the level of detail that the LPA will need in order to understand the anticipated impacts of the application.
- 6 Applications and related statements should be prepared by competent bodies or individuals, with regard to the particular issue being addressed. The level of detail required will vary according to each scheme and early consultation with the Council's Development Management Service is necessary to ensure that all relevant assessments/ statements are fit for purpose.
- 7 These notes are to help assist you when submitting your application for on shore wind turbines.

For any further information:

Please write to us at:  
Development Management Service  
Isle of Anglesey County Council  
Rovacabin  
Llangefni  
Anglesey  
LL77 7TW

Contact us on:  
01248 752428

Email us at:  
[planning@anglesey.gov.uk](mailto:planning@anglesey.gov.uk)

The checklist can be viewed and downloaded from the Council's website  
[www.anglesey.gov.uk/](http://www.anglesey.gov.uk/)

### **Checklist**

- 8 The following table provides a schedule of documents and information that are required:

### Checklist

	Document or information required (basis for requirement included in brackets)	Description	✓ or ✗ or n/a
1.	Application Form/Certificates (Statutory national requirement)	<p>Complete the 'Application for Planning Permission' form.</p> <p>The proposal should be described as follows: "Erection of (number of turbines) wind turbines with a maximum hub height of up to (hub height metres), rotor diameter of up to (diameter metres) and a maximum upright vertical tip height of up to (height metres) together with the erection of (include associated structures) and provision of new access and access road on land at (address)."</p> <ul style="list-style-type: none"> <li>• Check all questions have been completed, even if not applicable put N/A for the avoidance of doubt so we know you haven't missed the question by mistake.</li> <li>• Check the declaration has been signed and dated.</li> <li>• Check the correct certificates are completed signed and dated, including the agricultural certificate.</li> <li>• Check anything referred to on the form corresponds with any plans and further documents submitted, such as plan numbers quoted.</li> </ul>	
2.	Location Plan (Statutory national requirement)	<p>The location plan needs to be to a scale of 1:2500 or 1:1250 and have a north point. <b><u>It is also recommended that a 1:25000 or 1:50000 scale plan is submitted for contextual purposes.</u></b></p> <p>The wind turbine/s and all development relating to a wind turbine(s) must be within a red edge shown on the site location plan. No development can be permitted outside the red edge, and this includes, but is not limited to:</p>	



# APPENDIX 4

## Checklist

Checklist		✓ or ✗ or n/a
Document or information required (basis for requirement included in brackets)	Description	
	<ul style="list-style-type: none"> <li>• Any area that could potentially be covered by the rotating blades of a turbine</li> <li>• Access tracks, roads or paths</li> <li>• Cable trenches</li> <li>• Control rooms, substations, transformers</li> <li>• Meteorological masts</li> <li>• Any other engineering works, buildings, or structure ancillary to the turbine(s)</li> <li>• Any gates or fencing proposed</li> </ul> <p>The red edge need not be contiguous as it is not necessary to include land between turbines or ancillary development where no development is proposed</p> <p>Any other land owned/controlled by the applicant needs to be outlined in blue.</p> <p>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.</p> <p>Bridleways within 200m of proposed turbines should be shown.</p> <p>Transmission lines within 3 times the wind turbine's rotor diameter should be shown or within the turbine's topple distance + 10% should be shown.</p>	
3. Site plan/ block plan	The site plan needs to be to a scale of 1:500 or 1:200.	
(Statutory national requirement)	The site plan needs to show to scale the position of the wind turbine/s and the position of the	

## APPENDIX 4

### Checklist

	Document or information required for requirement (basis included in brackets)	Description	✓ or ✗ or n/a
		<p>ancillary equipment such as cabinets and transformers, access roads, hard standings and fencing, lighting for compounds – basically anything that is proposed to go on site.</p> <p>A six figure easting and six figure northing grid reference should be provided for each turbine.</p> <p>Show the position of any trees or hedges on site or within 50 metres of the site, highlighting those that are proposed to be removed (usually by a dashed line).</p> <p>Show any proposed demolitions on the site plan (usually by a dashed line).</p>	
4.	Elevation plans (Statutory national requirement)	The elevation plans need to be to a scale of 1:100 or 1:50. Elevation drawings are required for the turbines and any ancillary equipment such as cabinetry and fencing if applicable. Details are also required of any new/ altered access and access roads.	
5.	The correct fee (Statutory national requirement)	<p>The correct fee should accompany the application when submitted by post or if handed in, or be paid over the phone ((01248)752015 or (01248)752669) on weekdays during normal office hours.</p> <p>Cheques should be made payable to Anglesey County Council.</p> <p>The Circular that deals with planning fees states that Wind Turbines are to be treated as Category 5 – Plant and Machinery, except small scale domestic turbines installed within the curtilage of an existing completed dwellinghouse which should be treated as Category 6 or 7(a). Category 5 application fees are based on site area. The site area must be accurately stated on the application form and the area given here must match the site area covered by</p>	

## APPENDIX 4

### Checklist

	Document or information required for requirement included in brackets)	Description	✓ or ✗ or n/a
		the red edge shown on the site location plan (see 2 above). The minimum fee currently chargeable under Category 5 is £335 for a site area up to 0.1 hectares (1000 square meters). As fencing (see 2 above) is a Category 2 structure that creates no floorspace, the rules for mixed category applications are applied and no fee is due for the area covered by the fencing.	
6.	Design and Access Statement (Statutory national requirement)  Policies 1 and 45, Ynys Mon Local Plan – residential amenity	<p>A 'Design and Access Statement' is required. The Statement is required to show the 'thinking' behind the application. <b>Developers are encouraged to demonstrate how siting and design in relation to landscape setting has influenced the proposal.</b> There are 8 things to consider - 'use', 'amount', 'layout', 'scale', 'landscaping', 'appearance', 'access' and 'inclusive access' in relation to relevant national and local planning policy and guidance.</p> <p><u>Use</u> - explain why you have chosen this particular site for the proposed wind turbines/s.</p> <p><u>Amount</u> – explain why you have chosen the quantity of turbines you have applied for.</p> <p><u>Layout</u> – explain why you have chosen to position the wind turbine/s and ancillary buildings as shown in the application. Applicants should assess the potential for a proposal to have an impact on the outlook from inhabited buildings. Provide details of measures taken, if required, to avoid or minimise significant detrimental impact on the outlook from inhabited properties.</p> <p>A Residential Amenity Assessment should accompany or be incorporated within the Design and Access Statement for wind turbines of 11.1 metres (tip height) or higher located within the minimum separation distances that equates to 10 times the turbine's tip height.</p> <p>Provide details of the distance between the proposed wind turbine/s and the closest existing or proposed wind turbine/s. The Planning Service will be able to provide details of the</p>	

# APPENDIX 4

## Checklist

	Document or information required (basis for requirement included in brackets)	Description	✓ or ✗ or n/a
		<p>position and known status of other turbines. Demonstrate that the position of the wind turbine/s has taken account of the proximity of any surrounding development and risk of injury to humans through catastrophic equipment failure or ice throw and possible effects of visual distraction to road safety.</p> <p><u>Scale</u> – detail the wind turbine/s hub height, blade length (in metres) and number of blades and explain the reason for this. Provide details of the generation capacity of each turbine in either kW or MW. Provide details of the proposed connection to the transmission network. Include details of the proposed foundations. On the basis that there are no Strategic Search Areas on Anglesey it is expected that wind turbines/ wind farm schemes should not exceed 5 MW, or 25MW for repowering proposals on existing wind farms, and that consideration is given to the cumulative impact of small schemes and repowering proposals in areas outside the SSAs.</p> <p><u>Landscaping</u> – explain what landscaping has been provided and why.</p> <p><u>Appearance</u> – explain why you have chosen a particular appearance such as colour of the wind turbine/s. Provide details of any on-site or secondary/ off-site mitigation measures proposed.</p> <p><u>Access</u> – provide details on the chosen access route in order to construct, service or dismantle turbines. Provide details of the nature and degree of permanency of modifications to accesses and/ or roads.</p> <p><u>Inclusive access</u> – if public access to the site is to be encouraged, provide details on how the</p>	

## APPENDIX 4

### Checklist

	Document or information required for requirement (basis included in brackets)	Description	✓ or ✗ or n/a
		<p>application site is inclusive to all, regardless of any disability they may have.</p> <p><b><u>Proximity to Railway – provide confirmation that consultation with Network Rail has taken place where there may be concern as to proximity to a railway.</u></b></p>	
7.	Environmental Impact Statement (Statutory national requirement)	<p>The Town and Country Planning (Environmental Impact Assessment) Regulations 1999 set out the circumstances in which an Environmental Impact Assessment (EIA) is required. An applicant may request a 'screening opinion' from the LPA before submitting a planning application to determine whether an EIA is required. <b><u>Subject to the likelihood of significant effects, projects which fall below the Schedule 2 thresholds (of the EIA Regulations) may also require EIA.</u></b></p> <p>Where an EIA is required, an Environmental Statement must be provided (see steps 1 to 6 in table 1 above) .</p> <p>Where an EIA is not required the LPA may still require environmental information to be provided. Section 9 and Sections 11 to 16 of this checklist outlines the scope of information required. Applicants are encouraged to discuss the requirements with the Council's Development Management Services at the pre-application stage.</p> <p>Where an application for planning consent for a development that requires to be screened under Schedule 2 of the Regulations is received without a prior request for a screening opinion (step 1 in Table 1 above), a request for a screening opinion will be registered concurrently with the planning application. The Council's decision at this late stage that a EIA</p>	

# APPENDIX 4

## Checklist

	Document or information required (basis included in brackets)	Description	✓ or ✗ or n/a
		is required will inevitably impact on the application and the timescale for reaching a decision. Applicants are encouraged to make their applications for screening opinion before submitting an application for planning consent.	
8.	Shadow flicker/ throw assessment  (PPW Sections 3.17 & 12.10; Policies 1 and 45, Ynys Mon Local Plan – residential amenity)	Account has to be taken of the impact on occupiers of dwellings in nearby settlements and properties around the proposed development. An assessment of potential shadow flicker and shadow throw throughout the year, should be provided for all dwellings within a 10 rotor diameter distance of the proposed location of each wind turbine. Details of each dwelling affected together with photographs, orientation, position of principal windows, etc. need to be included together with monitoring proposals and details of mitigation measures.	
9.	Noise Impact Assessment  (PPW Sections 3.17, 12.10 & 13.15; Policies 1 and 45, Ynys Mon Local Plan – residential amenity/ noise)	On the basis that a wind turbine is potentially a noise sensitive development, proposals must be supported by a Noise Impact Assessment prepared by a suitably qualified acoustician.  When considering a proposal, developers should identify any noise sensitive receptors, such as residences, quiet leisure based businesses, quiet places and other areas that are particularly valued for their acoustic environment or landscape quality or designated sites where noise may have an adverse impact on protected species or other wildlife.  Applications for large turbines and wind farms will normally require an EIA and will be accompanied by a full noise impact assessment conducted and assessed in accordance with ETSU-R-97. There should be evidence that the location and duration of background monitoring has been agreed with the Council's Environmental Health Section and information is presented in the manner and standard expected of such reports. This will include photographs of sound measurement equipment at their field-monitoring locations, specific details of equipment including calibration and details relating to the	

# APPENDIX 4

## Checklist

	Document or information required for requirement (basis included in brackets)	Description	✓ or ✗ or n/a
		<p>competency/training of the individual setting-up the equipment.</p> <p>For smaller developments not requiring an EIA, the Council will expect all applications to be accompanied by a test report prepared either using International Standard IEC61400 "Wind turbine generator systems – Part 11" or alternatively, the British Wind Energy Association's "Small Wind Turbine Performance and Safety Standard". The test report shall include 1/3 Octave frequency analysis in order to enable the local authority to validate claims regarding turbine tonality.</p> <p>The Applicant shall demonstrate that the information contained in the noise report has been applied to determine the precise location of the turbine (identified using a six figure easting and six figure northing grid reference) and separation distance from nearby residential properties. Where the predicted noise level is greater than 35dB(A) at 10m/s at 10m height at any nearby property not in the ownership of the applicant and no background noise measurements have been included, the applicant shall include justification as to the non inclusion of such data.</p> <p>One of the most complex scenarios in respect of noise impact from wind turbines occurs when there are multiple turbines in a location. In respect of cumulative impact ETSU-R-97 states that:-  <i>'Noise limits and margins above background should relate to the cumulative effect of all wind turbines in the area contributing to the noise received at the properties in question.'</i></p> <p>In situations where it is proposed to erect a turbine within or close to a zone of predicted noise influence of another turbine or a group of turbines a cumulative noise impact</p>	

**APPENDIX 4**

**Checklist**

	Document or information required for requirement included in brackets)	Description	✓ or ✗ or n/a
		<p>assessment will be required. The boundary of the "Zone of Predicted Noise Influence" shall equate to the 35dB LA90 contour based upon a wind speed of 10m/s at 10m height. The applicant should consult with the Local Authority on the precise interpretation and location of this contour.</p> <p>The cumulative noise assessment will need to demonstrate that the combined noise level from all wind turbine/s will not exceed an overall level of 35dB(A) or 5dB(A) above background up to wind speeds of 12m/s at 10m height. The background noise levels and noise assessment shall adopt a methodology that makes every endeavour to ensure that the quiet day-time and night-time periods used for the background noise assessment, are not influenced by any nearby wind turbines.</p> <p>Pre-application discussion between applicants and the Council's Environmental Health Section is very important in ensuring that the correct data, baseline noise assessment and an appropriate assessment is submitted with any application.</p>	
10.	Community Engagement Statement (PPW Sections 3.1.7 & 2.2; Protocol for public engagement with proposed wind energy developments in Wales (2007))	Applications will need to be supported by a statement (a) setting out how the applicant has carried out pre-application consultation, e.g. public meeting, exhibition, surveys, leaflets/ mailshots, and (b) demonstrating that the views of neighbours/ local community have been sought and taken into account in the formulation of the development proposal. The coverage and detail of the Statement should reflect the scale of the development and the extent of the development's implications. As a minimum, the Community Engagement Statement should set out how the local community has been involved, what their views are, and how these views have been taken into account.	



**APPENDIX 4**

**Checklist**

	Document or information required (basis for requirement included in brackets)	Description	✓ or ✗ or n/a
11.	Landscape and Visual Impact Appraisal (PPW Section 5 & 12.10; TAN 12; Policies 1, 30, 3, 36, 39, 40, 41, 42 and 45, Ynys Mon Local Plan – landscape quality/ character)	<p>A key consideration of proposals for wind turbines will be impacts on landscape character and visual amenity. The landscape and visual effects of wind turbines will vary on a case by case basis according to the type of wind turbine (model and height), its location, the landscape setting of the proposed development and impacts on sensitive areas and or receptors. Cumulative impact assessments may also be required. In this context, references to landscape should be taken as covering seascape and townscape where appropriate. Sensitive areas include <b>(although not limited to)</b> National Parks, AONB's, Conservation Areas, Heritage Coast, <b>Registered Historic Landscapes /Gardens, World Heritage sites areas classed as high and outstanding in the Visual and Sensory category in LANDMAP</b> etc. Sensitive receptors include public footpaths, dwellings, protected species etc. In all cases Impacts on Residential Amenity should be assessed separately to the landscape and public visual impact assessment. Assessments should be carried out by a Chartered Landscape Architect or suitably qualified professional with appropriate experience. Relevant Guidance / Documents include the following :</p> <p>Anglesey Landscape Strategy 2011 Update  AONB Management Plan 2009 - 2014  Guidelines for Landscape and Visual Impact Appraisals 2002  LANDMAP  CCW LANDMAP Guidance Note 3  <b>Visual Representation of Windfarms – best practice guidance (2007) SNH</b>  <b>Siting and Designing windfarms in the landscape (2009) SNH</b></p> <p>The following requirements will apply:</p>	

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## Checklist

	Document or information required for requirement (basis included in brackets)	Description	✓ or ✗ or n/a
		<p>(i) <u>Turbines of up to 20m in height.</u></p> <p>For small turbines of less than 20m (blade tip), a formal visual impact assessment is less likely to be required dependant on location, context and presence of sensitive areas and or receptors. Zone of Theoretical Visibility studies, Photomontages and/or wireframe / line drawings may be helpful in certain more sensitive locations. A cumulative impact assessment may be required. For guidance purposes it is recommended that the cumulative LVIA should consider planning applications and development within 5km. However, a detailed site plan containing information on, topographical features, visual impact upon dwellings <del>within a range of 500m to 1km</del>, designated sites (e.g. SAC, SPA, SSSI, <u>the SNP</u> Local Wildlife Site), and sensitive areas (<u>e.g. Registered Historic Landscapes</u>), receptors (e.g. listed buildings, conservation areas, SAMs, Public footpaths etc), likely protected habitats, protected species potential and possibly background data search results depending on scale of potential impacts as well as detailed drawings showing the design of the proposal should be provided to the Local Planning Authority. It is a matter for the Local Planning Authority to determine whether any additional supporting information for the planning application is necessary.</p>	
		<p>(ii) <u>Turbines of between 20m and 65m height</u></p> <p>The application should include a detailed site plan containing information on, topographical features, likely visual impacts upon dwellings <del>within range of 1 to 5km</del>, designated sites (e.g. SAC, SPA, SSSI, <u>the SNP</u>, Local Wildlife Site), and sensitive areas (<u>e.g. Registered Historic Landscapes</u>), receptors and (e.g. listed buildings, conservation areas, SAMs), likely protected habitats, protected species potential and possibly background data search results</p>	

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**Checklist**

	Document or information required for requirement included in brackets)	Description	✓ or ✗ or n/a
		<p>depending on scale of potential impacts, as well as detailed drawings showing the design of the proposal. A Landscape and Visual Impact Appraisal is likely to be required. This should include, as a minimum, a Zone of Theoretical Visibility map covering an area up to 15km (radius) from the turbine and wireframe /line drawings and/ or photomontages from a limited number of key viewpoints. Where the turbine(s) are located in a <b>Registered</b> Historic Landscape Area, or landscapes designated <b>classified</b> as either 'Outstanding', 'High' or 'Medium' quality on LANDMAP, the applicant should consult the Local Planning Authority on the level of assessment required for a specific proposal. A cumulative impact assessment may also be required. For guidance purposes it is recommended that the cumulative LVIA should consider planning applications and development <u>up to 15km</u> to 30km.</p> <p>(iii) <u>Turbines over 65m in height</u></p> <p>As above, the application should include a detailed site plan containing information on, topographical features, likely visual impacts upon dwellings <u>within 2km</u>, designated sites (e.g. SAC, SPA, SSSI, Local Wildlife Site) and visually sensitive receptors (e.g. listed buildings, conservation areas, SAMs, <b>Registered Historic Landscapes</b>), likely protected habitats, protected species potential and possibly background data search results depending on scale of potential impacts, as well as detailed drawings showing the design of the proposal. A more detailed Landscape and Visual Impact Appraisal will be required, depending on location.</p> <p>At this scale of development, the LVIA would be likely to, as a minimum, require:</p> <ul style="list-style-type: none"> <li>i. A ZTV map up to 30km;</li> <li>ii. Visualisations and photomontages, focusing on key viewpoints.</li> </ul>	

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	Document or information required (basis for requirement included in brackets)	Description	✓ or ✗ or n/a
		<p>iii. An assessment of the sensitivity of the landscape (Outstanding, 'High' or 'Medium' quality on LANDMAP), magnitude of change and residual impacts;</p> <p>iv. A baseplan map of all wind turbine proposals in the public domain to 60km;</p> <p>v. A focussed assessment of all applied, consented or constructed proposals within 30km radius of the application proposal.</p> <p>The individual or cumulative effect of turbines in the countryside shall be assessed so as not to create unacceptable visual or landscape impacts. Cumulative effects may present an eventual limit to the extent of wind energy development in particular areas. For guidance purposes it is recommended that the cumulative LVIA should consider planning applications and development <del>up within 15km</del> to 30km.</p> <p>The number and location of viewpoints should be proportional to the scale of the development and the sensitivity of the location and should be agreed with the Council's Built Environment and Landscape Section. As a guide, view point locations should be informed with reference to:</p> <ul style="list-style-type: none"> <li>a) the zone of theoretical visibility (i.e. where the turbines would appear in views),</li> <li>b) the height of the turbine(s) and distance from the view point location (i.e. how large the turbines would appear in the views)</li> <li>c) the character and sensitivity of the landscape (i.e. the setting context of those views) and</li> <li>d) the importance of those views (i.e. what value society places on those views from the those landscapes)</li> </ul>	

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### Checklist

	Document or information required (basis for requirement included in brackets)	Description	✓ or ✗ or n/a
		<p>The landscape and visual assessment should include reference to the Council's landscape character assessment as a means of assessing landscape impacts relevant to the proposed project. It should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character.</p> <p>National Parks and AONBs have been confirmed by the Government (Section 85 (AONB) CRoW Act) as having the highest status of protection in relation to landscape and scenic beauty. The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them.</p> <p>Applicants should consult with Gwynedd Council, Conwy County Borough Council or the Snowdonia National Park Authority where a proposed wind turbine development will be visible from one or more of these Authority areas.</p> <p>Applicants should contact the Council's Built Environment and Landscape Section for further advice</p>	
12.	<p>Ecological Survey            (PPW Section 5 &amp; 12.10; TANs 5 &amp; 12; Policies 1, 32, 32, 34, 35 and 45, Ynys Mon Local Plan – landscape and ecological feature)</p>	<p>Applicants should consider the potential for a proposal to have an impact on any designated site within 20km of the site location, including an SPA, SAC or SSSI. Issues relating to connectivity of birds between designated sites and the wider countryside will need to be examined and addressed. Where appropriate, the planning application should demonstrate how these factors have been addressed.</p> <p>Direct impacts on the turbine site need to be considered, including protected species and</p>	

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	Document or information required (basis included in brackets)	Description	✓ or ✗ or n/a
		<p>habitats. An ecological survey may be required if an application is near to a site of known importance for bats or birds, or if a site is proposed within 50 metres from relevant habitat features that offer foraging/ commuting/ roosting opportunities, e.g. buildings, hedgerows, woodland edges, streams. In order to minimize the impact on wildlife, it is advisable that turbines should be a minimum of 50 metres away from these types of habitat features.</p> <p>The survey would involve classification and evaluation of the natural habitat and species, agricultural context, hydrological impact, determination of the zone of influence of the proposal, evaluation of impacts, and the scope of mitigation of those impacts.</p> <p>Applicants should contact the Council's Ecological and Environmental Adviser for advice.</p>	
13.	Heritage Evaluation (desk or field based) (PPW Section 6.5 & 12.10; TAN 12; Policies 1, 40, 41, 42 and 45, Ynys Mon Local Plan – cultural heritage)	<p>Anglesey has significant areas of historic interest, above and below ground. It may be necessary for applicants to commission a heritage evaluation of the implications of development on features of historic interest either through direct loss of a feature or visual impact on the setting of features of historic interest. <b><u>There are two Registered Historic Landscapes in Anglesey. Applicants may be required to apply the ASIDOHL process (Assessment of direct and indirect physical effects on an area's historical features) in order to assess the impact on areas included in the Register of Historic Landscapes.</u></b></p> <p>Applicants should contact the Built Environment and Landscape Section for further advice.</p>	
14.	Traffic and Transport Assessments	A Construction Traffic Management Plan is required with all applications, which should	

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**Checklist**

	Document or information required for requirement included in brackets)	Description	✓ or ✗ or n/a
	<p>(PPW Section 8; Policy FF11 Gwynedd Structure Plan; Policies I &amp; 45, Ynys Mon Local Plan)</p>	<p>demonstrate that consideration has been given to as many of the following factors as possible:</p> <ul style="list-style-type: none"> <li>• the proposed transport route from the factory and for larger parts for any abnormal indivisible load vehicles (AIL);</li> <li>• the proposed dimensions of the individual turbine sections, and the corresponding dimensions of the AIL vehicles and cranes;</li> <li>• the number, frequency, type and maximum gross weight of all other construction vehicles which will be generated by the development; and their proposed routes to and from the site;</li> <li>• details of the proposed improvements to the local highways network to facilitate the movements of the AIL traffic and construction traffic;</li> <li>• details of the proposed site access arrangements off the local highway network;</li> <li>• details of means of connection to the transmission network which may be required as part of the proposed development;</li> <li>• details of any stone borrow pits which are proposed as part of the proposed development.</li> <li>• details of any construction traffic management proposals to mitigate conflict and disruption to existing highway users.</li> </ul> <p>It is appreciated that some of this information may not be available at the early stage of project management. The highways implications of a project, must, however, have early consideration to enable appropriate input to be made from both the local and trunk road highways perspective. Long term planning is also essential for AIL movements and the notification requirements.</p>	

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	Document or information required (basis included in brackets)	Description	✓ or ✗ or n/a
15.	Electro magnetic assessment (Policy 45 Ynys Mon Local Plan)	Developers will need to consult with radar operators if a proposal falls within a 15km consultation zone, or the 30-32km advisory zone around both civil and military air traffic radar, respectively. Guidance is available to assist developers on the Civil Aviation Authority's web-site ( <a href="http://www.caa.co.uk/default.aspx?catid=1959">http://www.caa.co.uk/default.aspx?catid=1959</a> ). Developers should use this. <b><u>Developers will also need to consult with OFCOM at the pre-application stage in addition early consultation should also be sought with Arqiva who operate the television network in the UK and the majority of radio transmission network.</u></b> National Air Traffic Services (NATS) has advised that it wishes to be consulted on all planning applications or 'Notice of Intent to Develop' proposals for wind turbine developments irrespective of scale. Details of possible adverse effects and appropriate measures to alleviate effects should be submitted.	
16.	Groundwater and surface water (Policy 1 Ynys Mon Local Plan)	An assessment of the risks to water resources and the water environment, i.e. local watercourses, water bodies, groundwater and water supplies, during the construction phase will be required, particularly development that could have a direct or indirect adverse impact on the hydrological regime that underpin statutory sites. The Environment Agency will be consulted where appropriate.	
17.	Tourism and leisure activities (Policies 30, 31 and 32 – landscape conservation and enhancement; Policy 36 – protection of the coastal zone; Policy 39 – protection of archaeological features Ynys Mon Local Plan)	Impacts on tourism and leisure activities will depend on the nature of the activity and the type of visual and other impacts on significant receptors (e.g. visitors, local residents or communities). Particular attention should be paid to impacts on the users of roads, paths, country parks and open-access countryside which are important for everyday life, leisure and visitors, and have a significant effect on the image or quality of life of a location or area.  For local residents, the presence of turbines could have a significant effect on the enjoyment	



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### Checklist

Checklist		✓ or ✗ or n/a
Document or information required (basis for requirement included in brackets)	Description	
	<p>of the local and wider landscape when viewed from footpaths, parks and areas of open access land. Visitors and tourists visiting an area or location as a result of its scenic or townscape quality or character could also be significantly affected. This could result in a loss of visitors and consequential socio-economic impacts.</p> <p>Sections 11 and 13 of this checklist set out the issues relating to impacts on landscape character and visual amenity and historic/ cultural assets. The judgment of acceptability of a development based on landscape and public visual amenity protection should provide adequate protection for tourism interests.</p>	
18. Legal Agreements (PPW Sections 3.6 & 3.7)	<p>The need for developer contributions required as a result of the proposed wind turbine/s, e.g. visual and road infrastructure impacts (i.e. need for new footpaths, road widening). Planning or other legal agreements may be needed to deal with any such issues. It will be useful to discuss such matters and prepare draft head of terms at an early stage in the process, preferably at the pre-application stage.</p> <p>A suitable mechanism may be required, e.g. a bond, in order to ensure that sufficient resources would be available for dismantling and remediation. This is to ensure adequate measures are in place to ensure the site is restored in an appropriate manner.</p>	
19. Other issues (TAN 8)	<p>Associated community benefits – the developer/land owner may wish to play an active role in the community. Developers or landowners are encouraged to engage directly with communities rather than with the Council on this issue. The absence or presence of any contribution to local communities is not an issue which will be considered by the LPA in its determination of whether planning permission should be given.</p>	



# APPENDIX 4

## SEA COMMENTS

Commentator	Section	Comments	Council's Response / Amendments
CCW	Section 2.2	The aim of the SEA process is 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.	<p>Agree</p> <p><i>SEA Document:</i></p> <p>2.2 Strategic Environmental Assessment (SEA) on the other hand is a process <b>that aims to ensure that the significant environmental effects arising from plans and programmes are identified, assessed, mitigated, communicated to decision-makers and monitored. The aim of the SEA process is 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.</b></p>
CCW	Section 2.6	CCW agrees that the SA and SEA processes can be integrated however; care must be taken to ensure that the requirements of the SEA Directive and its implementing Regulations are met regarding the omission of the formal consultation at the scoping stage of this SEA process.	<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</p>

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Commentator	Section	Comments	Council's Response / Amendments
CCW			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.
CCW	Section 2.8	Reference should be made to TAN 5 which includes guidance on the SEA and Habitats Regulations Assessment process.	No change. Reference to TAN5 is made in the HIRA of the SPG. Including a reference in this document would add unnecessary detail.
CCW	Section 2.10	CCW would suggest that an additional aim be added in respect of the need to promote sustainable development within environmental capacities and limits. Reference should also be made to NEF.	Agree SEA Document (para 2.10) & SPG (para 2.8): <ul style="list-style-type: none"> <li>• <b><u>Promote sustainable development within environmental capacities and limits.</u></b></li> </ul>
CCW	Section 2.13	In its communication regarding the need for SEA for this SPG, CCW also suggested that the Environment Agency and Cadw would need to be consulted regarding the need for SEA.	No change. The Environment Agency and CADW have been consulted with regards to this SEA.
CCW	Section 2.14	See comments above regarding the need, as part of the SEA process, for formal consultation at the SEA scoping stage. The lack of consultation with CCW (Cadw and the EA) means that the SEA process has not been followed.	No change. See comment above.

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Commentator	Section	Comments	Council's Response / Amendments
CCW	Section 3.2-3.5	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. as while much of the baseline data is likely to be relevant the environmental objectives and indicators are not specific to the supplementary planning guidance under scrutiny.	No change. See comments above.
CCW	Table 3.1	<p><b>Objective 1:</b> Maintain and enhance biodiversity interests and connectivity.</p> <p>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. Please clarify what is meant by green infrastructure.</p> <p><b>Objective 2:</b> Some of the sub objectives are not directly relevant to the guidance under scrutiny i.e. promoting social inclusion and recreating opportunities for people to live healthier lifestyles by promoting exercise etc.</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><b>Objectives 7 and 10</b> CCW would suggest that this objective is not relevant to or reactive to the plan under scrutiny.</p>	<p>With regard to Objective 1, it is considered that the sub-objectives are adequate in addressing ecological enhancement, whilst objective 9 addresses the need to protect soil quality. Suggested amendment to objective 1:</p> <ul style="list-style-type: none"> <li>• Maintain and improve the provision of green infrastructure <b><u>e.g. open spaces, parks.</u></b></li> </ul> <p>It is acknowledged that some of the objectives are not directly relevant to the SPG. This is stated where relevant in the appraisal. The objectives that constitute the SA Framework have been derived from a robust baseline analysis of the current situation in Anglesey. Amending objectives as suggested would mean they would not be based upon robust evidence. Overall, it is considered that the objectives are adequate for the purposes of assessing the SPG.</p>

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Commentator	Section	Comments	Council's Response / Amendments
CCW	Section 4.1	<p>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.</p>	<p>It is considered that the pre-existing SPG on wind turbine developments represents a reasonable alternative against which to assess the SPG. 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.</p>
CCW	Section 4.8	<p>See comments above on 4.1.</p>	<p>See above</p>
CCW	Section 4.9	<p>CCW welcomes the provision of a summary appraisal matrix however, in the absence of details on the policies assessed and mitigation/avoidance measures recommended, it is difficult to comment further.</p>	<p>Comment accepted.</p>
CCW	Section 4.10	<p>CCW notes the acknowledgement that the 'appraisal has highlighted a number of weaknesses and flaws in the 1994 Wind Energy Development SPG which was assessed in the context of its being an 'alternative'.</p>	<p>Comment accepted</p>

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Commentator	Section	Comments	Council's Response / Amendments
CCW	Section 4.11	With regard to the suggestion that the SPG Onshore Wind Energy 2012 scores better against 'most' SEA objectives, CCW would suggest that the aim of the SEA process is not to consider/identify improvements between two documents but to assess the potential environmental effects of a plan/programme against an established environmental baseline. The reference to mitigation and protection measures is welcomed however, without further information and detail on proposed mitigation measures, it is difficult to consider whether the 'alleviation of impacts' can be demonstrated with any confidence.	Agree  <i>SEA Document:</i>  4.11 Overall, the assessment of both options has shown that its predecessor, the 1994 'Wind Energy Development' SPG
CCW	Section 4.13	Clarification would be welcomed regarding the nature of the amendments made to the 2nd draft SPG	It is considered that the 2 <sup>nd</sup> column in table 4.2 provides sufficient justification for any amendments made.
CCW	Table 7 Point 1	CCW welcomes the proposed addition of a reference to the need for consideration of cumulative effects on biodiversity at the project level. However, it is suggested that the requirement to undertake assessment of the effects of onshore wind development at the project level does not necessarily equate to avoidance of and/or mitigation of potential adverse effects. It is therefore suggested that in order for 7.7.3 of the SPG to demonstrate a clear commitment to the avoidance of adverse effects on biodiversity and ecological functions, additional caveats need to be included to the effect that proposed wind turbine development should not have (either alone or cumulatively) a significant adverse	Paragraph 1: Agree  <i>SEA Document: Table 7 Point 1</i>  <b><u>Proposed wind turbine developments should not have (either alone or cumulatively) a significant effect on Anglesey's biodiversity systems and function.</u></b> All proposals will be assessed for their impact on biodiversity, including protected species, ornithology and habitats. The potential cumulative impacts on biodiversity should also be considered <del>where appropriate</del> . Site-specific assessments will be required to identify the biodiversity risks together with any on-site

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Commentator	Section	Comments	Council's Response / Amendments
		<p>effect on Anglesey's biodiversity and ecological systems and function. It is further suggested that the phrase 'where appropriate' should be removed.</p> <p>As stated previously the aim of the SEA process is not to consider/identify improvements between two documents but to assess the potential environmental effects of a plan/programme against an established environmental baseline. Given this it is not clear how no adverse effects anticipated in relation to biodiversity by the application of the SPG can equate to the overall impact on the objective as being positive as the application of the SPG would be neutral. If further elaboration could be given in relation to the positive impact that the scheme would have on climate change and/or that the SPG included a recommendation that restoration measures should be encouraged that would benefit biodiversity as well as the landscape then there may be potential to show that the application of the SPG could potentially benefit biodiversity.</p>	<p>mitigations or off-site compensatory measures.</p> <p>Paragraph 2: Agree</p> <p>Change + to 0 in table 7 point 1 (Biodiversity Objective)</p>
CCW	Table 7 point 8 and 11	See comment above relating to Table 7 Point 1 that no adverse effects on the landscape and water quality would equate to a neutral effect rather than a positive one.	<p>Accept</p> <p>SEA Document:</p> <p>Change + symbol to 0 for table 7 point 8 and 11.</p>
CCW	Table 9 point 1	Clarification is required as to what is meant by 'appropriate vegetation'. Clarification is also required regarding the premise that the 'removal of tracks could	<p>Agree</p> <p>SEA Document: Table 9 point 1</p>



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Commentator	Section	Comments	Council's Response / Amendments
		lead to more damage than leaving them in situ'.	<p>The actual removal of turbines should benefit biodiversity in a number of ways. The occurrence of bird strikes would be reduced and disturbance of wildlife caused by noise would also be alleviated. In addition, decommissioning and reinstating land, will mean full restoration of <u>appropriate</u>—vegetation <b>appropriate to the site</b> which will impact positively on local biodiversity by the enhancement of habitats and by increasing feeding opportunities. These positive effects may very well be cumulative as an increase in habitat areas will create further stepping stones and ultimately increase species populations.</p>
Damian Woodford	Table 4.1	This table is extremely biased towards positive outcomes. In addition the complexity of sustainable development is not captured in the objectives.	Table 4.1 represents a summary of the appraisal of the SPG against a series of objectives. These objectives have been derived from a scoping exercise which analysed the baseline characteristics and issues currently facing Anglesey. It is considered that the table accurately reflects the performance of the SPG against the objectives.
Damian Woodford	Para 4.11	"Sustainable renewable energy development". It is the community that we are trying to make sustainable, not the technology. The wind turbines will wear and need replacing making them unsustainable.	The promotion of renewable energy is just one aspect of sustainable development. It is generally recognised that in order to achieve sustainable communities, renewable energy developments should be promoted.
Damian Woodford		The report is based around minimising its negative impact.	The SEA Regulation stipulate that mitigation measures should be identified as part of the

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Commentator	Section	Comments	Council's Response / Amendments
NWWT	Appendix 1 page 18	We disagree with the conclusion of the comments against SAO1 (2012) i.e. that "no adverse effects are anticipated", and that therefore "the overall impact upon this objectives is considered to be positive". We would suggest that the correct conclusion is that there are "a range of possible positive and negative outcomes".	Agree. See response to CCW comment above. However, the overall score should be neutral for the reasons given by the commentator.
Elsbeth Wagstaff	Table 4.2	"Wind energy has an important role to play in contributing to reducing or adapting to the harmful impacts of climate change. It can also bring about social, and economic benefits through job creation in the manufacturing, construction and maintenance industries."	It is universally accepted that wind energy is a form of clean energy which does not produce greenhouse gases or damaging pollutants, therefore contributing towards reducing the harmful impacts of climate change. The social and economic benefits of wind turbine developments are referred to and justified in chapter 12.
CADW		SA Objective 5 should include reference to Historic Parks, Gardens and Landscapes .	It is considered that the detail included in this objective and its sub-objectives is sufficient in addressing cultural and historic resources which include Historic Parks and Gardens and Landscapes in the area. Identifying all assets would add unnecessary detail to the objective.

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## HRA COMMENTS

Commentator	Section	Comments	Council's Response /Amendments
CCW	5.4.3	Amend the final sentence in section 5.4.3 to make it clear that if a proposal can not rule out adverse effects on a European or international site then it will not be granted consent, as well as if insufficient information is provided to carry out the assessment.	<p>Agree</p> <p><i>HRA Document and SPG:</i></p> <p>5.4.3 An appropriate 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 a European site as noted in paragraph 5.4.1. Developers must provide sufficient information about the proposed development so that an informed judgement can be made as to its likely effects. Those failing to do <b>both of the above</b>, will be refused under regulation 61 of the Habitat and Species Regulation 2010.</p>
CCW	7.7.2	It may also be worth clarifying the advice on EIA requirements later in the document (7.7.2) to make it clear that in the event that an EIA is required, then the environmental statement should provide sufficient information, including information on any ancillary	<p>Agree</p> <p><i>HRA Document and SPG:</i></p> <p>7.7.2....the EIA should include information relating to</p>

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Commentator	Section	Comments	Council's Response /Amendments
CCW	7.7.6	development, such as grid connections, substations, access routes etc., for the Authority (as the competent authority) to carry out any HRA that may also be required.	roosts, flight lines, feeding areas, and breeding areas. <u>In the event that an EIA is required, then the environmental statement should provide sufficient information, including information on any ancillary development, such as grid connections, substations, access routes etc., for the Authority (as the competent authority) to carry out any HRA.</u>
CCW	7.7.6	It may be worth making it clear that these are examples of avoidance and mitigation measures and additional measures may need to be considered/required depending on the outcome of the HRA process.	Agree <i>HRA Document and SPG:</i> 7.7.6....Mitigation is best considered at an early stage and should be included in the scoping report as part of an EIA. <u>The exact mitigation measures adopted will vary on a case by case basis.</u> Mitigation measures could include...
CCW	7.7.5	While not incorrect, the statement in section 7.7.5 relating to the potential requirement to carry out habitat survey or impact assessment under the Habitats Regulations, should be clarified to make it clear that nationally and locally protected site designations are covered under different legislation.	Agree <i>HRA Document and SPG</i> <u>7.7.5 Where a scheme, alone or in combination with other plans or projects, could have an impact on an internationally designated site, Anglesey County Council must before deciding to give permission for a proposal carry out an assessment of the likely significant effect of that scheme in view of</u>

## APPENDIX 4

Commentator	Section	Comments	Council's Response /Amendments
CCW	7.7.3 & 7.7.6	Consider clarifying or removing the reference to compensatory habitats in the second paragraph of section 7.7.3 and the final paragraph of section 7.7.6. 'Compensation measures' have a specific meaning in terms of the Habitats Regulations and should not be confused with 'avoidance and mitigation' measures which are intended to prevent adverse effects from occurring. Compensation measures can only be considered after the assessment process is completed	<p><u>the site's conservation objectives. A habitat or species survey might be required to inform such an assessment. Equally a habitat or species survey might be required to inform impact assessments on sites designated</u> as SSSI and candidate Wildlife Sites or because the proposed site contains priority habitats (those listed by the Welsh Government under section 42 of the NERC Act 2006). <u>The scope of the survey should be agreed with the local Planning Authority Ecologist. In general the species/ habitat survey should cover: the site of the turbine, the access tracks, maintenance tracks and any habitat removal for road widening to allow for delivery to the site. The habitat survey should be a Phase 1 habitat survey.</u></p>
			<p>Agree</p> <p><i>HRA Document and SPG:</i></p> <p>7.7.3 Geological/ Geomorphological /Hydrological / Hydrogeological Report: addressing relevant issues on the site or features directly or indirectly affected by the proposed development including survey, analysis, avoidance, mitigation, compensation measures and</p>

# APPENDIX 4

Commentator	Section	Comments	Council's Response /Amendments
		<p>and subject to the requirements of Regulation 62.</p>	<p>any proposals for enhancement:</p> <p>7.7.6 <b>Once the assessment process is completed,</b> consideration should <del>also</del> be given to the opportunities for enhancing nature conservation with a site and its surroundings such as providing new habitats or habitat features on adjacent land. In some cases, compensatory habitats should be considered <del>necessary to mitigate any potential loss-caused by</del> <b>development.</b></p>

<b>ISLE OF ANGLESEY COUNTY COUNCIL</b>	
<b>Report to</b>	<b>County Council</b>
<b>Date</b>	<b>24.1.2013</b>
<b>Subject</b>	<b>The Joint LDP Consultation draft Preferred Strategy Document</b>
<b>Portfolio Holder(s)</b>	<b>Cllr. Robert Ll. Hughes</b>
<b>Lead Officer(s)</b>	<b>Jim Woodcock</b>
<b>Contact Officer</b>	<b>Nia H Davies 01286 679890</b>
<b>Nature and reason for reporting</b>	
<p>To request that the County Council approves the draft Preferred Strategy Document for public consultation as required by the Local Development Plan Regulations.</p>	

<b>A - Introduction / Background / Issues</b>
<ul style="list-style-type: none"> <li>➤ <b>The Preferred Strategy is a vital stage in the long journey to prepare the Local Development Plan (LDP) with Gwynedd. The Strategy has been drawn-up following a number of opportunities for full participation by Ynys Mon Councillors</b></li> <li>➤ <b>At this stage the Council is being asked to adopt the Strategy for the purposes of public consultation. Views expressed during the public consultation period will help inform the preparation of a more detailed plan called the Deposit Plan which will set out the strategy, including strategic policies, as well as detailed planning policies. The Deposit Plan is due to be considered by Council later on in 2013.</b></li> </ul> <p><b>Introduction</b></p> <p>The Planning and Compulsory Purchase Act 2004 requires the Council to prepare a Local Development Plan (LDP) for the development and use of land over the plan period and its policies to implement them. This Council has decided to work with Gwynedd Council to prepare a Joint LDP.</p> <p>Regulation 15 of the Local Development Plan Regulations requires that, before finally determining the content of its Local Development Plan (LDP) for deposit, a Council must publish its pre-deposit proposals for public inspection and comment.</p> <p>The pre-deposit proposals, included in a Preferred Strategy document, should include the vision, strategic options, preferred strategy, key policies and the initial</p>

sustainability appraisal report, and must be publicized over a six week period.

In November 2011, both Councils agreed a Delivery Agreement for the Joint LDP with the Welsh Government. That Agreement identifies pre-deposit consultation being undertaken during September – October 2012. This proved unachievable for a range of reasons, including some that were identified as risks in the Risks Assessment section of the Delivery Agreement. The delay was considered by the Joint Planning Policy Committee in July 2012 and a revised timetable was approved. The Welsh Government has been informally advised of the slight slippage. Following publication of the Preferred Strategy Document, the Councils will revise the Delivery Agreement in negotiation with the Welsh Government.

The draft Preferred Strategy document was presented to the Executive Committee when it met on the 14<sup>th</sup> January 2013, which supported its release to the Council for consideration and decision when it meets on the 24<sup>th</sup> January 2013. The document will be presented to Gwynedd Council's Cabinet for its approval on the 22<sup>nd</sup> January 2013.

Appendix 1 includes a chart, which sets out the timetable agreed to by the Joint Planning Policy Committee for progressing through the key stages in the process of preparing the Joint LDP.

## **Background**

The Joint LDP will be the Council's key land use planning document. It will set out policies and proposals for the future development and use of land in Anglesey and Gwynedd (excluding the Snowdonia National Park) up to 2026, in line with legislative requirements.. When adopted it will replace the existing structure and local plan for Anglesey as well as the stopped UDP, which is a material planning consideration. It will form the basis for decisions on individual planning applications. The Joint LDP will therefore provide a measure of certainty about what kinds of development will be permitted and where during the plan period.

The Joint LDP will support the vision for the Plan area, set out in the Single Integrated Plans Strategy. It will identify opportunities for continuing investment and regeneration including provision for the new homes, jobs, community facilities and infrastructure that will be needed over the next 15 years. The Plan will also identify land that needs to be protected for its conservation importance and other measures necessary if our environment is to be safeguarded.

To date, a number of key tasks have been undertaken which have contributed to the development of the Draft Preferred Strategy Document.

- Opened the Candidate Sites Register and commencement of first stages of the assessment process;



- Public engagement about, and approval of Joint LDP vision and objectives by both Councils - March & May 2012;
- Strategic Growth and Distribution Options public engagement and approval by both Councils – March & May 2012;
- Building up a robust evidence base to inform the plan - continuous;
- Undertaking numerous assessments to inform proposed Preferred Strategy document's content - continuous;
- Approval of draft Preferred Strategy Document by the Joint Planning Policy Committee subject to consideration of the wording of the policy regarding the Welsh language and delegated powers to make minor amendments and corrections – November 2012;
- Support for draft Preferred Strategy Document by the Environment and Technical Scrutiny Committee – December 2012;
- Reported to the Executive Committee – 14<sup>th</sup> January 2013

The process has also been supported by input from a series of Members' Seminars.

## **B - Considerations**

Appendix 2 includes a copy of the draft Preferred Strategy Document. It is understood that Members were advised to retain a copy of the document distributed in connection with the Executive Committee's meeting. The relevant link to the website is included. An executive summary is provided in Appendix 3 to facilitate discussion in this Committee only and should be read in conjunction with the draft Preferred Strategy Document.

The draft Preferred Strategy document is not the full draft plan but sets out the key issues and options and the Councils' broad proposals for addressing these. It includes the proposed vision, strategic options, preferred strategy and key policies. It shows how key current environmental, economic and social issues and trends affecting the Plan area will be addressed and how the development needs of the Plan area will be met for new housing, employment and other strategic requirements.

The following provides an overview of the structure of the draft Preferred Strategy document:

- introduction and background (Chapter 1)
- overview of assessments undertaken, e.g. SA (Chapter 2)
- the national, regional and local policy framework within which the Preferred Strategy has been prepared (Chapter 3);
- general review of baseline social, economic and environmental information and issues that the Joint LDP needs to address (Chapter 4);
- the vision for the future development of the Plan area and its objectives for delivering sustainable development and for addressing the key trends (Chapter 5);
- the key strategic growth and spatial options that the Councils and

stakeholders have considered in determining the Preferred Strategy (Chapter 6);

- the Preferred Strategy including Key Diagram and key strategic policies for implementing the strategy (Chapter 7);
- overview of the Deposit Draft Plan structure (Chapter 8).

Under the umbrella of a number of overarching Strategic Policies, the draft Preferred Strategy seeks to achieve the Joint LDP vision by delivering 4 outcomes:

- Maximizing Economic Development Opportunities - Meeting the future need for jobs, by providing a range and choice of land and opportunities on different types of sites relating to different types of jobs. Safeguarding existing employment sites which perform an important economic role in the Plan area and beyond its boundaries
- Houses to Meet Local Needs – Meeting the future need for homes by facilitating residential development that will provide 7,665 new housing units over the 15 year plan period. Facilitating a range and choice of new housing opportunities with different dwelling sizes, tenures and locations including provision for affordable housing together with providing for Gypsy and Traveller needs.
- Strengthening our Communities, both Rural and Urban - Ensuring that new homes and jobs form part of well planned communities which have the right range of facilities provided at the right time and in the right location.
- Enhancing the Area's Environmental Assets - The strategy has been developed to minimize impact upon the Plan area's environmental assets. The need to sustainably manage waste, reduce emissions and maximizing renewable solutions are also highlighted.

The overarching Strategic Policies set out the framework for promoting sustainable development, and alleviating and adapting to the effects of climate change, and expands on the Plan's Spatial Strategy.

The broad Spatial Strategy proposed in the draft Preferred Strategy document involves recognizing the role of the Plan area's main towns and strengthening them, acknowledging the important role that the more rural areas also have in terms of providing employment opportunities and homes for the Plan area's residents. With a higher proportion of the Plan area's residents living in the rural areas it was clear that improving the sustainability of these existing local communities is important. The best means of achieving the objectives of maintaining sustainable communities, the vitality of the Welsh language and improving access to services is to facilitate rural entrepreneurship and encouraging a range of basic services at locations close to the rural population. This basic principle underpins the Strategy.

The broad spatial strategy therefore aims to improve sustainability by:

- 1) focusing the main developments and regeneration in Primary Settlements and the

strategic sites there

ii) supporting development that reflects the size, functions and environmental and cultural capacity of the network of different Key Settlements and Key Villages

iii) supporting minor development, in Defined Small Villages and in rural areas, which helps to support services and facilities for local communities.

A Settlement Strategy has been prepared to assist the delivery of the broad Spatial Strategy. The Settlement Strategy sets out the overall approach for the provision of new homes, jobs, infrastructure and community facilities over the plan period for the Plan Area. It sets the context for the Strategic Policies in the draft Preferred Strategy document and outlines how the Vision and Objectives will be achieved.

The Settlement Strategy sets out those settlements where growth and investment will be focused. The following Hierarchy is proposed:

- Sub-Regional Centre – performs a cross boundary role in terms of employment, higher and further education and retailing. Good public transport links within and cross boundary.
- Urban Service Centres – fulfill the role of both a local centre for the basic range of services for settlements within their catchment area as well as a role for providing higher level services meeting the needs which cannot realistically be met within the lower order centres or villages. As such they serve large geographic areas..
- Local Service Centres – settlements have been identified, which, by reason of their relative size, range and quality of services and facilities, functional link with higher order centres lend themselves to being designated as Local Service Centres. By identifying these settlements and concentrating rural development within them the Joint LDP Strategy seeks to strengthen their role in the network of settlements to optimize the prospects for rural communities to meet their own basic needs
- Villages – have at least one community facility and sustainable link to a higher order centre. In order to manage development within this category the following sub categories are proposed: Service Villages, Local Villages and Coastal/ Rural Villages
- Clusters – cohesive groups of dwellings in the countryside with a functional link to a village or a higher order centre.
- Countryside – rest of the Plan area

The Joint LDP must be subject to a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) as required by the Planning and Compulsory Purchase Act 2004 and the SEA Regulations The Initial Sustainability Appraisal Report, which must also be subject to public consultation, identifies the social, economic and environmental implications of the Preferred Strategy options and proposals.

The Councils must also undertake a Habitats Regulations Assessment (HRA) of the Joint LDP. The HRA must determine the likely significant effects of the plan on European Sites of nature conservation importance and, if applicable, scope what needs “appropriate assessment” (AA) and how it will be undertaken. A Scoping Report for Habitats Regulations Assessment of the Joint LDP will be available as a background document on request during the public consultation period as well as a number of other documents. This suite of background documents will include a document that sets out the first stage assessment of the “Candidate Sites Register”, which will provide a schedule of candidate Strategic Sites.

<b>C - Implications and Impacts</b>		
<b>1</b>	<b>Finance / Section 151</b>	None
<b>2</b>	<b>Legal / Monitoring Officer</b>	Adoption of a Preferred Strategy is a milestone towards the preparation and adoption of a Local Development Plan as required of the Council by the 2004 Act. This report prepares the way to the adoption of such a Preferred Strategy
<b>3</b>	<b>Human Resources</b>	None
<b>4</b>	<b>Property Services</b> (see notes – separate document)	Property Services will take note of the approved Strategy Document in due course when considering developments affecting Council owned property
<b>5</b>	<b>Information and Communications Technology (ICT)</b>	None
<b>6</b>	<b>Equality</b> (see notes – separate document)	None
<b>7</b>	<b>Anti-poverty and Social</b> (see notes – separate document)	None
<b>8</b>	<b>Communication</b> (see notes – separate document)	None
<b>9</b>	<b>Consultation</b> (see notes – separate document)	Yes – the draft Preferred Strategy Document has been informed by engaging with stakeholders, including communities, as well as engagement

<b>C - Implications and Impacts</b>		
		with Members and officers.
<b>10</b>	<b>Economic</b>	None
<b>11</b>	<b>Environmental</b> (see notes – separate document)	None
<b>12</b>	<b>Crime and Disorder</b> (see notes – separate document)	None
<b>13</b>	<b>Outcome Agreements</b>	None

<b>CH - Summary</b>
<p>The draft Preferred Strategy document shows how key current environmental, economic and social issues and trends affecting the Plan area will be addressed. It also looks at how the development needs of the area will be met, including the proposed broad locations for new housing, employment and other strategic requirements.</p> <p>Following approval by both Councils the document will be made available for public consultation. A six weeks period will be set aside during which interested parties will be given an opportunity to submit views about the Preferred Strategy and the Initial Sustainability Appraisal Report. Views expressed will help inform the preparation of a more detailed plan called the Deposit Plan which is due to be considered by Council later on in 2013.</p>

<b>D - Recommendation</b>
<ul style="list-style-type: none"> <li>➤ That the County Council approves the draft Preferred Strategy document for public consultation</li> <li>➤ That the County Council delegates the right to make minor corrections to the Preferred Strategy document before it is released for public consultation to the Head of Planning and Public Protection Services.</li> </ul>

**Name of author of report:**

**Nia H Davies**

**Job Title:**

**Planning Manager (Policy)**

**Joint Planning Policy Unit**

**Date:**

**14<sup>th</sup> January 2013**

**Appendices:**

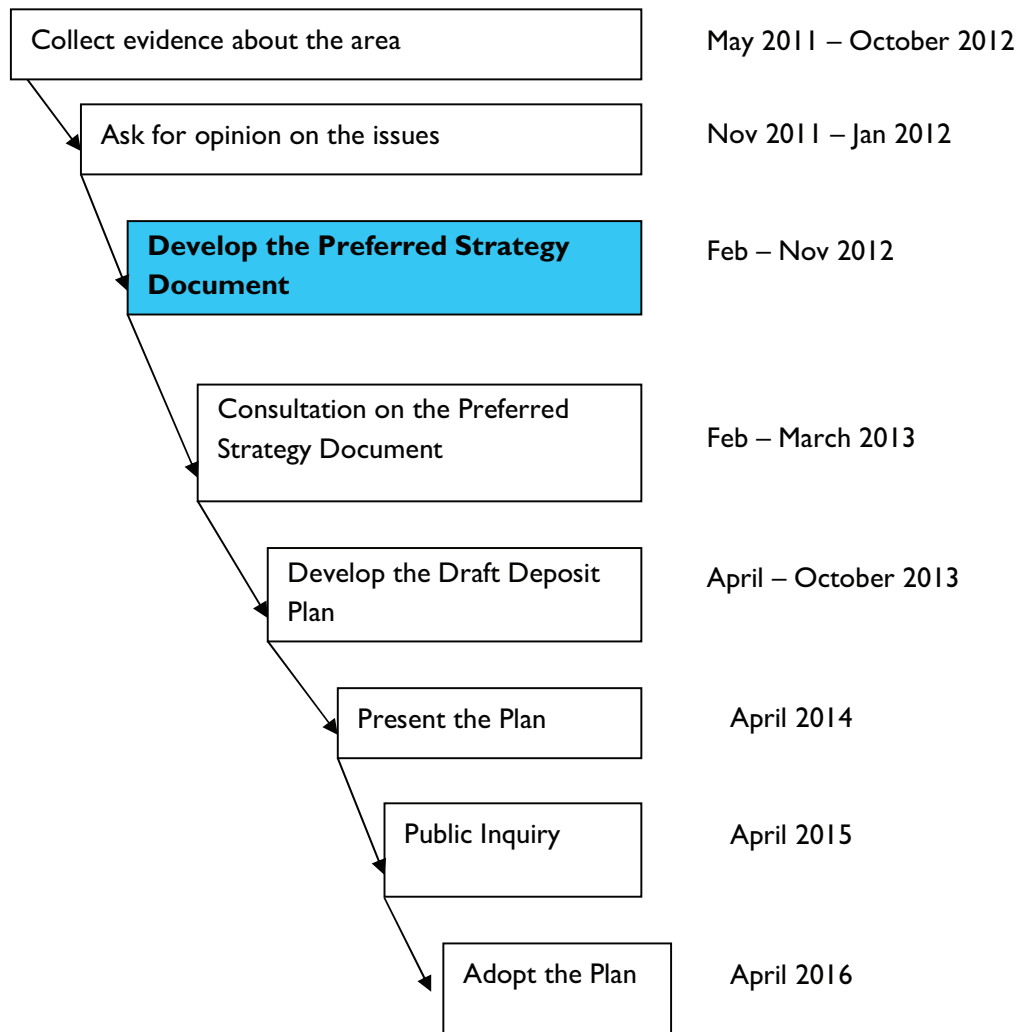
Appendix 1: Joint LDP preparation stages and timetable

Appendix 2: draft Preferred Strategy document

<http://democracy.anglesey.gov.uk/documents/s1478/Local%20Government%20Plan%20Preferred%20Strategy.pdf?LLL=0>

Appendix 3: Executive Summary of the Joint LDP draft Preferred Strategy document

## APPENDIX 1: JOINT LDP PREPARATION STAGES AND TIMETABLE





CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL

# **Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026**

## **Summary of Draft Public Consultation Preferred Strategy**

January 2013



## Introduction

The Isle of Anglesey County Council working with Gwynedd Council is drawing up a new planning framework - '**the Anglesey and Gwynedd Local Development Plan**' - to guide future growth and development in Anglesey and Gwynedd (excluding the Snowdonia National Park) up to 2026. We need to plan for where people will live, work, play and how they'll get around. Once adopted, the Council will use the Plan to decide whether planning permission should be granted or refused.

The Plan will be prepared in two stages.

**Stage 1:** The current stage in the Plan preparation process is the '**Preferred Strategy**', which provides a basis for meeting the economic, social and environmental needs of the area. It sets out for public consultation purposes:

- the key issues;
- the vision and key objectives for the Joint Local Development Plan;
- how much housing and employment development is needed;
- which towns and villages will grow and which will stay the same;
- the strategic policies, which are the most important planning policies to address the key issues; and
- the key diagram, showing the areas in the Plan area that will be affected.

This is the first stage of formal public dialogue to **test** whether the draft Preferred Strategy is right.

**Stage 2:** we shall use the comments we receive during the public consultation about the Preferred Strategy and any other evidence to prepare the full Plan, - the **Deposit Plan**. This version of the Plan will include land allocations and detailed planning policies. The Joint Planning Committee and the individual Councils will advise and decide on the Deposit Plan, before submitting it to the Welsh Government.

This leaflet summarises the key elements of the draft public consultation Preferred Strategy.

**APPENDIX 3: OVERVIEW OF THE JOINT LDP DRAFT PREFERRED STRATEGY DOCUMENT**

**• MAXIMISING ECONOMIC DEVELOPMENT OPPORTUNITIES**

- Infrastructure and Developer Contributions PS5
- Proposals for Large Infrastructure Projects PS6
- Nuclear related Development at Wylfa PS7
- Providing Opportunity for a Flourishing Economy PS8
- The Visitor Economy PS9
- Town Centres and Retail PS10

**• HOUSING TO MEET LOCAL NEEDS**

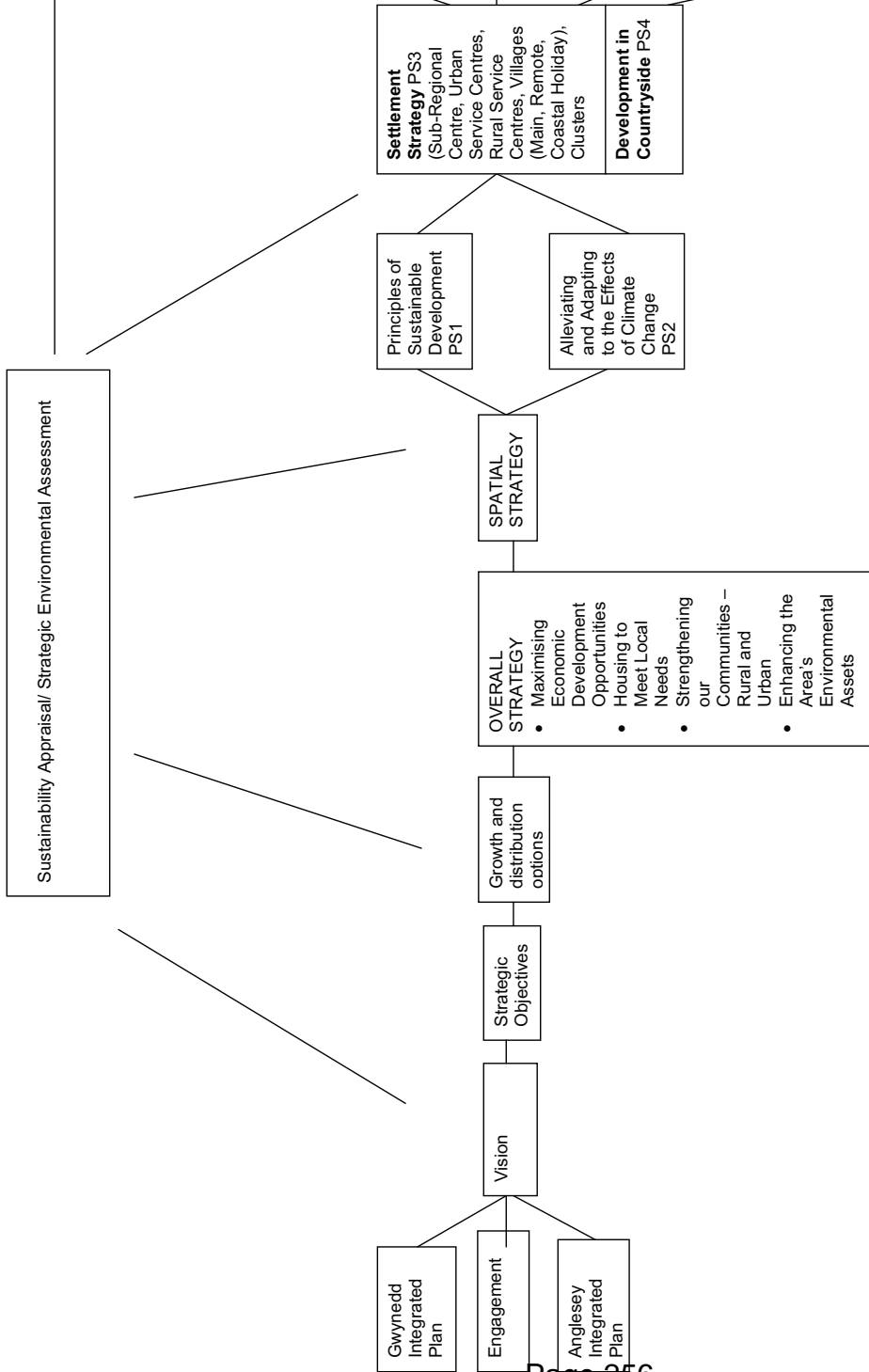
- Balanced Housing Provision PS11
- Affordable Housing PS12
- Gypsy and Traveller Accommodation PS13

**• ENHANCING THE AREA'S ENVIRONMENTAL ASSETS**

- Conserving and Enhancing the Natural Environment PS14
- Protecting and Enhancing Culture and Heritage Assets PS15
- Renewable and Low Carbon Technology PS16
- Waste Management PS17
- Minerals PS18

**• STRENGTHENING OUR COMMUNITIES – RURAL AND URBAN**

- Welsh Language and Culture PS19
- Community Infrastructure PS20
- Information and Communications Technology PS21
- Sustainable transport, development and accessibility PS22



- EMPLOYMENT LAND REVIEW;
- RETAIL STUDY;
- AFFORDABLE HOUSING
- VIABILITY STUDY;
- CANDIDATE SITES REGISTER & ASSESSMENT OF SITES;
- STRATEGIC FLOOD RISK ASSESSMENT – LEVEL 1;
- URBAN CAPACITY STUDY;
- SPECIAL LANDSCAPE STUDY;
- SETTLEMENT STUDY;
- GYPSY & TRAVELLERS ACCOMMODATION NEEDS ASSESSMENT

## Developing the Preferred Strategy

<p><b>Key issues</b> – set of 38 (see Chapter 4 in the draft Preferred Strategy Document)</p>	✓	
<p style="text-align: center;"><u>Vision</u></p> <p>By 2026, Anglesey and Gwynedd will be recognised for their <b>vibrant and prosperous communities</b> that celebrate their unique <b>culture, heritage</b> and <b>environment</b> and will be a <b>place of choice</b>. This means that the Joint Local Development Plan area will be one:</p> <ul style="list-style-type: none"> <li>• where the housing needs of local communities in the area are better addressed in terms of supply, type, quality, energy efficiency, location and affordability</li> <li>• where its residents and businesses are able to grasp new economic opportunities in order to thrive and prosper</li> <li>• which boasts an appropriately skilled workforce and has a varied, well connected, sustainable and broad economic base that makes the best use of local strengths and opportunities where the benefits deriving from them are kept local</li> <li>• that is home to vibrant networks of inclusive communities where residents enjoy good health and well-being</li> <li>• where the Welsh language is an integral part of communities</li> <li>• which adapts and responds positively to the challenges of climate change</li> <li>• where the unique character of its built and cultural heritage, its countryside and landscape, and its environment is valued, protected and enhanced</li> <li>• where people want to live, work and visit</li> </ul>	✓	
<p><b>Strategic objectives</b> – set of 26 (see Chapter 5 in the draft Preferred Strategy Document and pages 5 – 9) in this leaflet</p>	✓	
<p><b>How much housing development?</b></p> <p>7,665 housing units in the Plan area between 2011 and 2026 (could equate to about 3,375 housing units in Anglesey)</p>	✓	
<p><b>Where will development go?</b></p> <p>i) the main developments and regeneration will be focussed in the Sub-Regional Centre and the Urban Service Centres and the strategic sites there;</p> <p>ii) development that reflects the size, functions and environmental and cultural capacity of the network of different Local Service Centres and Service Villages will be supported;</p> <p>iii) minor development, in Local Villages, Rural/ Coastal Villages, Clusters and the Countryside, which helps to support services and facilities for local communities will be supported.</p>	✓	

AGREED TO BY THE COUNCIL IN MAY 2012

## Developing the Preferred Strategy

### THE OVERALL STRATEGY

To deliver the Vision we need to deliver four outcomes:

#### **Outcome I: Maximising economic development opportunities: an overview**

- providing a land use planning policy framework to address the strengths and opportunities in the Plan area related to a number of key sectors: environmental goods and services, marine technology, tourism, public sector, manufacturing, renewable and low carbon energy, retailing, health and care.
- safeguarding 168ha of land in the Plan area (84ha in Anglesey) in business parks and industrial estates.
- facilitate a range of initiatives to achieve higher skills.
- support appropriate small scale employment opportunities in and around Villages, Clusters and the Countryside.
- secure delivery on the Council's key priorities in relation to Major Infrastructure Projects, including a proposed new nuclear power station at Wylfa.
- facilitate an all year tourism offer.
- facilitate development that creates vibrant town centres for shopping, leisure and entertainment.

<b>Some of the strategic objectives linked to this outcome:</b>	<b>Strategic Policies</b>
<p><u>SO7</u> - ensure that an adequate supply of land and premises is safeguarded and allocated in sustainable locations to attract investment, retain and increase the number of indigenous jobs, support the development of economic activity in higher value sectors, secure opportunities for improving the skills and education of the workforce, and promoting working from home where appropriate</p> <p><u>SO8</u> - diversify the rural and urban economic base of the JLDP area to enable a prosperous mixed economy that builds on opportunities, including those presented by the low-carbon and renewable energy sectors and knowledge-based industries</p> <p><u>SO9</u> - ensure appropriate infrastructure is in place or can be provided (e.g. through developer contributions) to accommodate all new development</p> <p><u>SO10</u> - promote vital and vibrant town centres that have rediscovered their purpose as centres for work and services, and that are vibrant and attractive places for residents and visitors</p> <p><u>SO11</u> - manage the area as an alternative and sustainable destination for tourists</p>	<p><b>PS8 Providing opportunity for a flourishing economy</b></p> <p><b>PS6 Proposals for large infrastructure projects</b></p> <p><b>PS7 Nuclear Related Development at Wylfa</b></p> <p><b>PS5 Infrastructure and developer contributions</b></p> <p><b>PS10 Town Centres and retail</b></p> <p><b>PS9 The Visitor Economy</b></p>

## Developing the Preferred Strategy

### Outcome 2: Housing to meet local needs: an overview

- providing a land use planning policy framework to facilitate development that delivers 7,665 housing units in the Plan area, which equates to an average of 511 housing units per annum. This could mean about 225 housing units per annum in Anglesey.
- facilitating the right type of housing (i.e. in terms of price, tenure, size) in the right location (e.g. accessible to work opportunities, educational facilities, digital hot spots).
- requiring a proportion of new homes will be 'affordable housing', either intermediate or social rented homes, subject to an assessment of viability issues.
- addressing the needs of specific households, e.g. the elderly, students, Gypsies and Travellers.

<b>Some of the strategic objectives linked to this outcome:</b>	<b>Strategic Policies</b>
<p><u>SO1</u> - ensure an adequate and appropriate range of housing sites is available in sustainable locations,</p> <p><u>SO2</u> - enable a balanced housing supply ensuring that all housing is of good quality, affordable, covers a range of types and tenures to meet the housing requirements of all sections of the population</p> <p><u>SO3</u> - secure a stable and balanced population within communities</p>	<p><b>PS11 Balanced housing provision</b></p> <p><b>PS12 Affordable housing</b></p> <p><b>PS13 Gypsy and Traveller Accommodation</b></p>

## Developing the Preferred Strategy

### Outcome 3: Strengthening our communities – rural and urban: an overview

- distributing development to strengthen the network of different types of settlements in the Plan area.
- maintaining the Plan area’s special mixed urban/ rural character.
- maintaining a distinctive linguistic and cultural character.
- if a community is going to be able to survive and grow into the future, it needs a wide range of services and facilities such as education, health and social care, open space, leisure and shopping facilities.

Some of the strategic objectives linked to this outcome:	Strategic Policies
<p><u>SO5</u> - ensure that settlements are sustainable, accessible and meet the range of needs of their communities</p> <p><u>SO6</u> - ensure that all new development is well designed and has regard for its surroundings in order to reduce the opportunity for crime to occur</p> <p><u>SO24</u> - safeguard and strengthen the Welsh language and culture and promote its use as an essential part of community life</p> <p><u>SO21</u> - improve and maintain safe, efficient, high quality, modern and integrated transport networks to employment, services and education/ training facilities particularly by foot, bicycle and public transport, thus reducing where possible the number of journeys in private cars</p> <p><u>SO22</u> - ensure that new development is supported by an adequate or planned supply of digital and mobile phone infrastructure</p> <p><u>SO23</u> - maximise the opportunities of Holyhead as a major international gateway and the A55, E22 Trans European network route and A487/ A470 as key transportation corridors.</p>	<p><b>PS20 Community infrastructure</b></p> <p><b>PS19 Welsh language and culture</b></p> <p><b>PS22 Sustainable transport, development and accessibility</b></p> <p><b>PS21 Information and communications technology</b></p>

## Developing the Preferred Strategy

### Outcome 4: Enhancing the area’s environmental assets: an overview

- valuing our countryside and coastlines as a valuable resource, supporting local recreation and leisure activities and the agricultural economy.
- meeting local and national objectives or statutory duties in terms of designated landscapes and biodiversity
- duty to conserve and enhance the significance, character and appearance of the Plan area’s cultural and historic environment

<b>Some of the strategic objectives linked to this outcome:</b>	<b>Strategic Policies</b>
<p><u>SO12</u> - meet the needs of minerals locally and regionally in a sustainable manner</p> <p><u>SO16</u> reduce the need for energy and other resources in developments</p> <p><u>SO17</u> - encourage waste management based on the hierarchy of re-use, recovery and safe disposal</p> <p><u>SO18</u> - promote renewable and low carbon energy production within the area</p> <p><u>SO20</u> - conserve and enhance biodiversity, strengthening and improving the connectivity throughout the area, and improving communities’ ability to enjoy and appreciate biodiversity</p> <p><u>SO25</u> - identify, protect and where possible enhance places, landscapes and buildings of historical, cultural and archaeological importance and their settings</p>	<p><b>PS18 Minerals</b></p> <p><b>PS17 Waste management</b></p> <p><b>PS16 Renewable energy technology</b></p> <p><b>PS14 Conserving and enhancing the natural environment</b></p> <p><b>PS15 Protecting and enhancing cultural and heritage assets</b></p>

## Developing the Preferred Strategy

### SPATIAL STRATEGY

We know that the developments we plan to build today have a long-term effect on Anglesey and Gwynedd and that they do not only have an impact on the local environment but the global one too.

To deliver the Vision we need to have regard to:

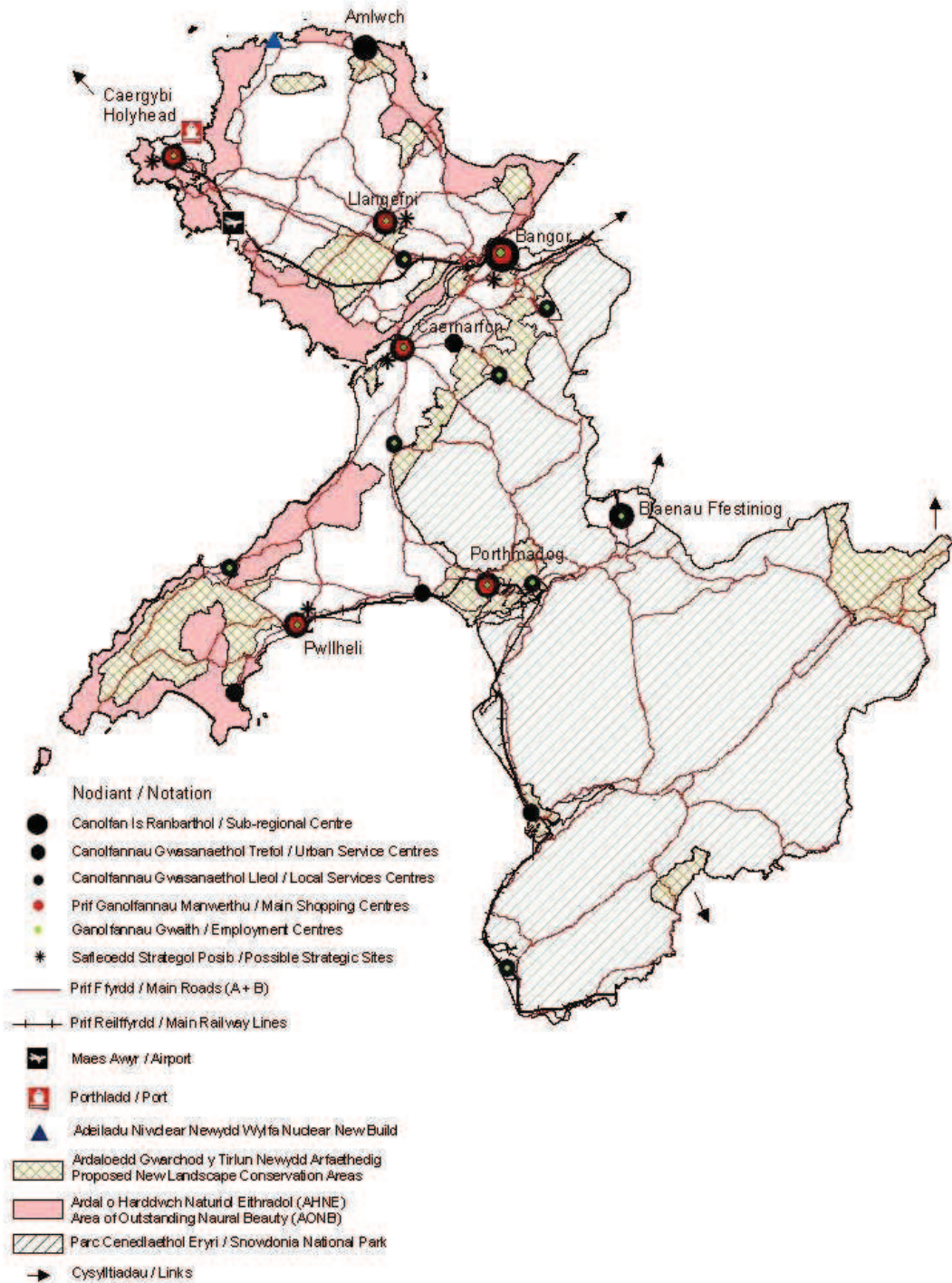
- the need to promote sustainable development;
- alleviate and adapt to the effects of climate change;
- functional and spatial relationships between settlements in the Plan area and beyond.

<b>Some of the strategic objectives linked to the spatial strategy:</b>	<b>Strategic Policies</b>
<p><u>SO26</u> - ensure that all new development meets high standards in terms of quality of design, energy efficiency, safety, security and accessibility, relates well to existing development, enhances public realm and develops locally distinctive quality places</p> <p><u>SO19</u> make use of suitable previously developed land and unoccupied buildings or ones that are not used to their full capacity, where available</p> <p><u>SO13</u> minimize, adapt and mitigate the impacts of climate change</p> <p><u>SO14</u> manage, protect and enhance the quality and quantity of the water environment and reduce water consumption</p> <p><u>SO15</u> reduce the impact of flooding by ensuring that highly vulnerable development is directed away from areas of risk wherever possible</p> <p><u>SO5</u> - ensure that settlements are sustainable, accessible and meet the range of needs of their communities</p>	<p><b>PS1 Sustainable development</b></p>           <p><b>PS2 Climate change</b></p>           <p><b>PS3 Settlement strategy</b> <b>PS4 Countryside</b></p>

The Key Diagram on page 10 provides a diagrammatic interpretation of the draft Joint LDP Preferred Strategy at a Plan area-wide scale. This diagram outlines the broad spatial principles of the Strategy and are not intended to be detailed or site specific. The preferred policy directions are reflected in the diagram to facilitate community consultation and sustainability appraisal.



# Developing the Preferred Strategy



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Uned Polisi Cynllunio ar y Cyd, Adran Rheoleiddio - Cyngor Gwynedd  
 Joint Planning Policy Unit, Regulatory Department - Gwynedd Council

1:500,000

Key Diagram

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<b>ISLE OF ANGLESEY COUNTY COUNCIL</b>	
<b>Report to:</b>	<b>County Council</b>
<b>Date:</b>	<b>24 January 2013</b>
<b>Subject:</b>	<b>Council Tax Support Scheme</b>
<b>Lead Officer(s)</b>	<b>Clare Williams Head of Function (Resources)</b>
<b>Contact Officer</b>	<b>Einir Wyn Thomas (Ext. 2605)</b>
<b>Action :</b>	<b>To adopt the Council Tax Support Scheme</b>

## 1. Purpose of the report

- 1.1 The report explains the change from Council Tax Benefit to Council Tax Support, addresses the funding implications and the requirement to adopt a scheme by 31 January 2013.

## 2. Background Information

- 2.1 The current Council Tax Benefit Scheme is to be replaced from April 2013 with a Council Tax Support Scheme. In Wales, there will be a national scheme (in contrast to England, where schemes are local to each billing authority.)
- 2.2 The Council Tax Reduction Scheme in Wales is set by Regulations made under Schedule 1B of the Local Government Finance Act 1992 (as inserted by the Local Government Finance Act 2012). On 19 December 2012, the Welsh Assembly approved two sets of regulations: the Council Tax Reduction Schemes (Default Schemes) (Wales) Regulations 2012 ("the Default Scheme Regulations") and the Council Tax Reduction Schemes and Prescribed Requirements (Wales) Regulations 2012 ("the Prescribed Requirements Regulations"). These Regulations prescribe the main features of the Scheme to be adopted by all Councils in Wales.
- 2.3 Although the Act had given the Welsh Ministers discretion to allow Welsh local authorities to determine the contents of schemes themselves, the Government took a decision to establish a national framework for the provision of Council Tax Support in Wales and so avoid what has been termed a "postcode lottery" whereby eligibility for a Council Tax reduction and the size of the Council Tax reduction for particular groups could be different in different council areas.
- 2.4 Although a national scheme has been approved, within the Prescribed Requirements Regulations, there is limited discretion given to the Council to apply additional discretionary elements that are more generous than the national scheme and which provide for additional administrative flexibility. These are:
  - 2.4.1 The ability to increase the standard extended reduction period of 4 weeks given to persons after they return to work where they have previously been receiving a council tax reduction that is to end as a result of their return to work;

- 2.4.2** Discretion to increase the amount of War Disablement Pensions and War Widows Pensions which is to be disregarded when calculating income of the claimant;
- 2.4.3** Discretion to enhance the process for notification of decisions above the minimum requirements; and
- 2.4.4** The ability to backdate the application of council tax reduction with regard to late claims prior to the new standard period of three months before the claim.
- 2.5** It is required by the Prescribed Requirements Regulations that the Council adopts a Council Tax Reduction Scheme by 31 January 2013, regardless of whether it applies any of the discretionary elements. If the Council fails to make a scheme, then a default scheme shall apply under the provisions of the Default Scheme Regulations. The Council can only apply discretion if it makes its own scheme under the Prescribed Requirements Regulations.
- 2.6** The Council has undertaken consultation on the adoption of the scheme. Even without the application of any of the discretionary elements, the Council would have been obliged to carry out consultation on the adoption of a scheme, even though the provisions were set by the Welsh Government. Because of the tight timescales between the making of the Prescribed Requirements Regulations and 31 January 2013 (by which date the scheme has to be adopted), consultation has been truncated to a period between 10 December 2012 and 11 January 2013. The consultation exercise has been applied by all Welsh Councils and has been based upon the best information available at the time (even though the Local Government Revenue and Capital Settlement 2013/14 and the precise amount of funding for Council Tax support were not known at the time).
- 2.7** The Welsh Government undertook consultation on Providing Support for Council Tax between February and April 2012. A technical consultation was carried out between 21 September and 19 October on the draft Default Scheme Regulations. No specific consultation has been carried out nationally on the Prescribed Requirements Regulations. An Equality Impact Assessment has been carried out and was submitted to the Minister for Local Government and Communities for consideration alongside the draft regulations.

### **3. Main Issues**

- 3.1** The Council is obliged to make a scheme under the requirements of the Prescribed Requirements Regulations notwithstanding the fact that a default scheme would come into effect even if the Council failed to make a scheme. The obligation is a statutory duty and applies even if the Council chose not to apply any of the discretions available to it.
- 3.2** The Council's recommended approach to the available local discretions is to continue to apply for Council Tax Reduction Scheme the same local discretion that apply for the current Council Tax Benefit:-
- The existing 4 week standard extended payment after people return to work remains unaltered with no local discretion being applied;
  - For War Pension and War Disablement pensions when calculating income the Council will continue to disregard income as it currently does for Council Tax Benefit. The on-going annual cost to the Council is estimated to be approximately £7,000 per year;
  - That the maximum backdate available remains at the statutory 3 months for pensioner and working age claimants with no local discretion being applied.

It should be noted that there are no additional monies available from the Welsh Government to fund the discretionary elements.

- 3.3** The Welsh Government has made available the sum of £4.6m by way of support in this financial year to help with the costs of introducing the new scheme and to help mitigate the wider impact of welfare reforms on the most disadvantaged groups in Wales. The distribution formula allocating a specific sum to each Welsh Council has yet to be decided. This will be applied towards committed spend on upgrade to the revenues and benefits processing system; financial modelling; impact assessment; administration costs of the change. The prioritisation of funding of local activities relating to welfare reform is still at an early stage.
- 3.4** The Council continues to have powers to support hardship on an individual basis or in respect of a defined group. Such arrangements cannot, however, form part of the Council Tax Reduction Scheme itself.

#### **4. Financial Implications**

- 4.1** The financial implications have been outlined in the budget reports to the Executive. The estimated cost of the proposed scheme had it been in place in the current year is £4.6m. Applying an increase to Council Tax of 5% takes this to £4.8m. Therefore the projected cost of the proposed scheme in 2013/14 is between £4.80m and £4.95m, which is £150k to £300k more than the grant of £4.65m. The main area of uncertainty and volatility is the case load. In recent years, benefit claimants case load has increased by up to 6% in any year (the average for the last five years being 3%). Whilst this rate has now stabilised it is still reasonable to expect an increase in case load in the current economic circumstances. Each 1% increase is £46k.
- 4.2** This shortfall will be treated as a corporate risk on Council budgets and monitored in budget monitoring reports to the Executive.
- 4.3** The Council Tax collection rates are expected to fall as a result of this change. This risk has been included in the calculation of the tax base and this area will be monitored in the same way.

#### **5. Legal Implications**

- 5.1** The Council is obliged to make a Council Tax Reduction Scheme under the Prescribed Requirements Regulations. Although the legislation provides for a default scheme to apply in the absence of the Council making a scheme, the Council is nevertheless under a statutory duty to adopt its own scheme, even if it chooses not to apply any of the discretionary elements.

#### **6. Risk Implications**

- 6.1** The Council needs to manage the cost of the Council Tax Reduction Scheme within its budget. The amount of government support is limited to £4,646,691 for 2013/2014 and is provided on a fixed basis rather than the demand-led basis of support to council tax benefit. The Council needs to recognise also that as well as receiving a reduced amount of government support, it is anticipated that there will be an increase in non-collection rates as a result of the increased burden on claimants. This has been factored into the tax base calculation for 2013/14 and the expected collection rate reduced by 1%.
- 6.2** The extension of council tax to a group of benefit claimants who have not paid council tax in the past required a review of current policies. That exercise will be undertaken over the next few months.

## **7. Equalities Implications**

- 7.1** The replacement of Council Tax Benefit with the national support scheme will impact upon many of our low income residents including those in vulnerable groups.
- 7.2** The Council has undertaken a consultation exercise in the limited time available and allowing for the fact that the full financial impact was not known at the time, such having only been determined by the Welsh Government in the Local Government Revenue and Capital Settlement on 11 December 2012. The consultation assists the Council in satisfying the public sector equality duty in the Equality Act.
- 7.3** The Welsh Government has compiled an equalities impact assessment following its consultation. A local equalities impact assessment has been carried out on behalf of the Council in joint arrangements across Wales and a copy is available by application to the Finance Department.

### **Background Documents**

The Council Tax Reduction Scheme and Prescribed Requirements (Wales) Regulations 2012 No 3144 (W316).

The Council Tax Reduction Schemes (Default Scheme) (Wales) Regulations 2012 No 3145 (W317).

Consultation Paper published – December 2012.

### **Summary of main issues**

1. Council Tax Benefit is to be replaced in April 2013 by a Council Tax Support Scheme.
2. Government funding for the scheme will be reduced by approximately 10% compared to Government funding for the current Council Tax Benefit Scheme.
3. The Welsh Government has made regulations to introduce a national scheme for Council Tax support. However, the obligation remains upon the Council to adopt a scheme.
4. The Council is required to adopt a Council Tax Support Scheme by 31 January 2013.
5. A summary scheme is set out in Appendix A in this report. The costs of the scheme will exceed the Government's funding. The additional funding requirement is taken into account as part of the 2013/14 budget.

### **Recommendation**

1. To note the making of the Council Tax Reduction Scheme and Prescribed Requirements (Wales) Regulations ("the Prescribed Requirements Regulations") by the Welsh Assembly on 19 December 2012.
2. To note the outcome of the consultation exercise undertaken by the Council on the introduction of the Council Tax Support Scheme outlined in Appendix B.
3. To adopt the Scheme as set out in Appendix A.

**EINIR W THOMAS  
HEAD OF SERVICE (FINANCE)**

**9 JANUARY 2013**



# **Isle of Anglesey County Council**

## **Council Tax Reduction Scheme 2013 - 2014**

### **Prescribed Scheme for Pensioner and Non Pensioner Claimants**

## Introduction

On 1<sup>st</sup> April 2013, Council Tax Benefit, the current method of supporting low income households with their Council Tax, will be abolished. It will be replaced by a Council Tax Reduction Scheme. Government funding for the scheme will be reduced by approximately 10% compared to the Government funding for the current Council Tax Benefit Scheme. Claimants will be required to contribute up to 10% of their Council Tax liability but it is likely that the real cost of the Council Tax Reduction Scheme will exceed the combined amount of claimant contribution and government funding; any shortfall will have to be borne by the Council.

The Welsh Government has made regulations to introduce a national scheme for Wales, “The Council Tax Reduction Scheme and Prescribed Requirements (Wales) Regulations 2012 No. 3144 (W.316)” (**Prescribed Regulations**) and “The Council Tax Reduction Schemes (Default Scheme) (Wales) Regulations 2012 No. 3145 (W.317)” (**Default Regulations**) – these can be accessed:-

### Prescribed Regulations –

<http://www.legislation.gov.uk/wsi/2012/3144/contents/made>

### Default Regulations –

<http://www.legislation.gov.uk/wsi/2012/3145/contents/made>

These regulations prescribe the main features of the scheme to be adopted by all Councils in Wales. An obligation therefore remains upon the Isle of Anglesey County Council to adopt a scheme. The Isle of Anglesey County Council is required to adopt a Council Tax Reduction Scheme by 31<sup>st</sup> January 2013.

The Isle of Anglesey County Council’s Local Council Tax Reduction Scheme will be based on the Welsh Government’s Prescribed Regulations. These Prescribed Regulations also permit the Isle of Anglesey County Council to adopt a scheme which incorporates a limited range of discretionary elements to provide further support for Council Tax. Where the Isle of Anglesey County Council has adopted additional discretionary elements these discretionary elements are set out within this document.

If the Isle of Anglesey County Council fails to make a scheme by 31<sup>st</sup> January 2013, then the default scheme shall apply under the provisions of the Default Regulations. The Isle of Anglesey County Council can however, only apply discretion if it adopts its own scheme under the Prescribed Regulations.

A number of matters do not seem to be accounted for in the Prescribed Regulations as they stand. The Welsh Local Government Association has advised that a further set of regulations relevant to the Council Tax Reduction Scheme will be issued by the Welsh Government before the end of March 2013. The additional regulations will give detailed guidance on matters including the transfer of existing Council Tax Benefit claims to the Council Tax Reduction Scheme, appeals and fraud. It has been established that existing Council Tax Benefit claims should be automatically transferred to the Council Tax Reduction Scheme without the need for a new claim form to be completed.



## **Local Council Tax Reduction Scheme Requirements**

The full Council of the Isle of Anglesey County Council approved its Local Council Tax Reduction Scheme on 24<sup>th</sup> January 2013 relating to the year beginning 1<sup>st</sup> April 2013. It specifies, in accordance with the Prescribed Regulations:-

- Classes of persons who are entitled or not entitled to a reduction
- The reductions which persons in each class are to be entitled
- Scheme procedural requirements:-
  1. the procedure by which a person may apply for a reduction under the scheme.
  2. the procedure by which a person may appeal against a decision of an authority with respect to a person's entitlement to a reduction under the scheme or the amount of any reduction to which the person is entitled.
  3. the procedure by which a person may apply to an authority for a reduction under section 13A(1)(c) of the Local Government Finance Act 1992.
- Discretionary elements agreed by the full Council of the Isle of Anglesey County Council to provide further Council Tax support,

## **Isle of Anglesey County Council's Local Council Tax Reduction Scheme**

The Isle of Anglesey County Council formally adopted its Local Council Tax Reduction Scheme based on requirements as detailed in the Welsh Government's "The Council Tax Reduction Schemes and Prescribed Requirements (Wales) Regulations 2012 No.3144 (W.316)(Prescribed Regulations) and any further regulations made by the Welsh Government with regard to requirements to be contained in its Local Council Tax Reduction Scheme. The Prescribed Regulations can be accessed at:-

<http://www.legislation.gov.uk/wsi/2012/3144/contents/made>

In summary:-

### **Part 1 of the Prescribed Regulations:**

Contain introductory provisions and definitions of key words and phrases used in this scheme.

### **Part 2 of the Prescribed Regulations: scheme requirements in relation to billing authorities in Wales**

What the scheme adopted by the Isle of Anglesey County Council must include – classes of persons, reductions and scheme procedural requirements.

### **Part 3 of the Prescribed Regulations: Classes of persons entitled to a reduction under this scheme**

**Pensioners** who fall within Classes A to B

**Non-pensioners** who fall within Classes C to D

#### **Part 4 of the Prescribed Regulations: Classes of persons who must not be included under this scheme**

Classes of persons prescribed to be excluded from this scheme, including persons treated as not being in Great Britain and persons subject to immigration control.

Persons whose capital exceeds £16,000

Persons who are absent for a period from a dwelling

#### **Part 5 and Schedules 1 to 5 of the Prescribed Regulations: matters that must be included in this scheme in relation to pensioners**

Schedules 1 to 5 set out the rules relevant to determine the eligibility of pensioners for a reduction and the amount of reduction under this scheme and the amount of maximum Council Tax Reduction under this scheme. They also set out how income and capital for pensioners is treated in calculating eligibility for a reduction under this scheme.

#### **Part 5 and Schedules 6 to 10 of the Prescribed Regulations: matters that must be included in this scheme in relation to non-pensioners**

Schedules 6 to 10 set out the rules relevant to determine the eligibility of non-pensioners for a reduction and the amount of reduction under this scheme and the amount of maximum Council Tax Reduction under this scheme. They also set out how income and capital for non-pensioners is treated in calculating eligibility for a reduction under this scheme, including in cases where a non-pensioner or partner has been awarded universal credit.

#### **Schedule 11 of the Prescribed Regulations**

This provides for the application of this scheme to students.

#### **Part 5 and Schedules 12 to 14 of the Prescribed Regulations: matters that must be included in this scheme in respect of all applicants i.e. pensioner and non-pensioner**

Schedule 12 concerns procedural matters that must be included in this scheme. It describes the procedure by which a person can apply for a reduction in Council Tax under this scheme. Appendix 1 of this scheme provides details of how a person can apply to the Isle of Anglesey County Council for a reduction in Council Tax.

Schedule 12 also describes how a person may make an appeal against certain decisions of the Isle of Anglesey County Council under this scheme. Schedule 12 also deals with a circumstance where an authority has made a determination under Section 13A(1)(c) of the Local Government Finance Act 1992 in relation to a class of case in which Council Tax liability is reduced and the person in that class would otherwise be entitled to a reduction under this scheme. The Isle of Anglesey County Council has never designated such a class of case under Section 13A (1) (c) preferring to deal with each case individually.

As the Isle of Anglesey County Council uses electronic communication in connection with making an application and award of a reduction, Schedule 12 details matters that must be included under this scheme.

Schedules 13 and 14 describes who may make an application under this scheme, the date on which an application is made, backdating of applications for pensioners and non-pensioners, amendment and withdrawal of applications and evidence and information required with the application. Schedules 13 and 14 also provide the requirements under this scheme for the information required to be provided by the Isle of Anglesey County Council when notifying the applicant of the decision and what must be included in the decision notice.

**Discretionary elements agreed by the Isle of Anglesey County Council to provide Council Tax support in addition to the statutory requirements detailed in the Prescribed Regulations adopted by the Council**

The Isle of Anglesey County Council has decided to adopt a Local War Disablement Pension and War Widow's or Widower's Pension Discretionary Scheme. This is detailed in Appendix 2 which provides the elements of such pensions that will be disregarded as income. This is additional Council Tax support to that statutorily required in the Prescribed Regulations. This Local War Disablement Pension and War Widow's or Widower's Pension Discretionary Scheme is identical to the scheme that applied under Council Tax Benefit.

This will be the only local discretion applied by the Isle of Anglesey under its Local Council Tax Reduction Scheme.

**Details the following procedure by which a person can apply for a reduction under the scheme**

All persons must apply for a Council Tax Reduction, unless further Welsh Government regulations state otherwise. This will be an electronic or a paper Council Tax Reduction Application Form delivered to the following designated offices.

**A. An electronic application can be made by the following methods:-**

- i.** By appointment to attend to complete the form at the Revenues and Benefits Section Offices, Finance Department, County Offices, Llangefni, LL77 7TW (Telephone 01248 752658/752226) or for vulnerable clients to attend at their home to complete the application form;
- ii.** By appointment to complete the form over the telephone to the Revenues and Benefits Section Offices, Finance Department, County Offices, Llangefni, LL77 7TW (Telephone 01248 752658/752226);
- iii.** By appointment to complete the form at the J E O'Toole Centre, Trearddur Square, Holyhead, LL65 1NB (Telephone 01407 760208);
- iv.** Electronically via the Isle of Anglesey County Council's web site
- v.** Electronically in some other format as the Isle of Anglesey County Council may decide in the future.

**B. A paper application can be made by the following methods:-**

By approved application form received by the Isle of Anglesey Finance Service, Revenues and Benefits Section at its designated offices at Council Offices, Llangefni, LL77 7TW or the Benefits Office, Room 3, 2<sup>nd</sup> Floor, Town Hall, Newry Street, Holyhead, LL65 1HU.

**LOCAL SCHEME – WAR PENSION DISREGARDS****Schedule 4, Regulation 30 – Pensioners****Schedule 9, Regulation 31 – Non Pensioners**

INDIVIDUAL ELEMENTS	INCOME DISREGARDED
War Disablement Pension	Yes (£10 statutory, 100% Local)
War Widows or War Widower's Pension	Yes (£10 statutory, 100% Local)
War Widow Pension (Pre 1973 – SPAL)	Yes (2013-14 100% statutory, £ subject to annual uprating)
Unemployability Supplement	No
Additional Allowance for Wife (paid with Unemployability Supplement)	No
Constant Attendance Allowance	Yes (statutory)
Invalidity Allowance	No
Comforts Allowance	No
Age Allowance	No
Allowance for Lower Standard of Occupation	No
War Pensioners Mobility Supplement	Yes (statutory)
Exceptionally Severe Disablement Allowance	Yes (statutory)
Severe Disablement Occupational Allowance	Yes
Child Allowance	No



# **Isle of Anglesey County Council**

## **Response to the public consultation on the Council Tax Reduction Scheme 2013 – 2014**

## Introduction and reason for consulting

The Isle of Anglesey County Council (the Council) conducted a consultation between 10<sup>th</sup> December 2012 and 11<sup>th</sup> January 2013 on the Welsh Government's new Wales Council Tax Reduction Scheme which replaces the current Council Tax Benefit scheme from 1<sup>st</sup> April 2013. The new scheme will impact upon many low income residents including those in vulnerable groups.

The Council has undertaken a consultation exercise in the limited time available before it has to adopt its local Council Tax Reduction Scheme by 31<sup>st</sup> January 2012, (the Welsh Assembly did not approve the Welsh Government's regulations until 19<sup>th</sup> December 2012). A local equalities impact assessment has been carried out on behalf of the Council in joint arrangements across Wales. The consultation and the impact assessment assist the Council in satisfying the public sector equality duty in the Equality Act.

## The consultation

The consultation was made available on the Council's website (with hard copies available at Revenues and Benefits Offices) and was publicised among relevant stakeholder groups. It was also available on the Council's Twitter and Facebook accounts and a press release was issued to 2 local papers. Approximately 1,600 Council Tax payers were also directly contacted by e-mail (the Council holding e-mail addresses for these people). The consultation was primarily aimed at Council Tax payers and relevant stakeholder groups. A detailed consultation document along with a more user friendly summary consultation document was provided for people to respond.

## Summary of responses

In total there were 4 responses to the consultation. 1 was from a registered charity, 2 were from members of the public and 1 from a national elected representative.

The consultation asked for views about the following issues (replies to Questions 1 to 6 will be forwarded to the Welsh and Westminster Governments as they relate to matters dealt by them). The responses included a combination of direct answers to the questions set with a few additional comments.

As the number of responses is limited it is possible to provide a detail of the responses given. Where necessary, we have included a response from the Council on the responses to the consultation.

1. Do you understand how the changes to the Council Tax Reduction Scheme have been introduced by the devolution of responsibility to Welsh Government?

**3 responded that they did. 1 made no comment.**

2. Do you understand that there is reduced funding available?

**3 responded that they did. 1 held a view that the Welsh Government should have made up the shortfall, at least for one year. 1 did not comment.**

3. Welsh Government have laid out proposals in the draft regulations for a national scheme, the rules for entitlement are broadly similar to Council Tax Benefit, apart from the issues mentioned in points 4 & 5 below. What are your views on this?

**One agreed that it should be similar as the current system essentially works. One stated that due to the complexity of the regulations, the "sunset clause" in the regulations would enable a more considered view to be undertaken. 2 made no comment.**

4. The draft regulations issued for consultation by Welsh Governments indicate that an award of Council Tax Reduction would be based upon a maximum percentage of the council tax liability. This means that all recipients of Council Tax Reduction Scheme awards will be expected to pay an amount towards their Council Tax. What are your views on this?

**2 responded by stating that these changes were in addition to other welfare payment changes which would place a burden on those less well off. One responded by stating that as everyone uses services they should contribute towards them. One made no comment.**

5. The draft regulations indicate that second adult rebate will be removed from the new scheme. The removal of this reduction would mean that 22 customers would no longer be entitled to support from April 2013. What are your views on this?

**One responded by not agreeing. 2 expressed views as to the unintended consequences of the removal of the second adult rebate and therefore the unfairness of its removal. One made no comment.**

6. Do you have any views on any other aspects of the proposed Council Tax Reduction scheme, proposed by Welsh Government?

**One responded that further comments would be made when the “sunset clause” became effective. One responded that there should be a cap on benefits paid out, a detailed review of the benefits system and the comparison between the income received whilst in the benefit system as against those working on low income. One reiterated that the second adult rebate should remain. One made no comment.**

#### **Areas of Local Discretion (to Isle of Anglesey County Council)**

- a) The ability to increase the standard extended payment period of 4 weeks given to people after they return to work, when they have been in receipt of a relevant qualifying benefit for at least 26 weeks.

The Council proposes that the existing 4 week standard extended payment should remain unaltered

Do you think this is reasonable?

Yes/No

If you have indicated no, please outline what you consider what period this should be.

**3 agreed with the Council’s proposal. One added however, that each case should be dealt with on its merit and a longer extended period awarded if merited. One made no comment.**

- b) Discretion to disregard part or the whole amount of War Disablement pensions and War Widows Pensions when calculating income.

The Council proposes to continue to disregard this income, as it currently does for Council Tax Benefit. Please see Appendix 2 for the details of the income disregarded under the current scheme operated by the Isle of Anglesey County Council

Do you think this is reasonable?

Yes/No



If no, please indicate which additional individual elements you feel the Council should disregard and why.

**All 4 agreed that the current scheme that applied to Council Tax Benefit should continue. One commented that its name should be changed to reflect widows and widowers.**

- c) Discretion to enable other organisations to accept and verify claims on a local authority's behalf.

Currently no organisations have been designated to accept and verify claims on the Authority's behalf. Do you think other organisations should be able to accept claims on behalf of the Authority?

Yes/No

If yes, what organisation would you suggest the Council considers.

**3 said no to another organisation designated to accept and verify claims. One made no comment.** (In the final regulations passed by the Assembly on 19<sup>th</sup> December 2012, this discretion was not included)

- ch) the ability to backdate the application of Council Tax Reduction awards for working age customers more than the standard period of 3 months prior to the claim.

The Council proposes to keep the maximum backdate available to the 3 months statutory period.

Do you think this is reasonable?

Yes/No

If you have answered No, what period do you think is reasonable and why?

6 months                      12 months                      other (please specify)

**One agreed with the Council's proposal. One stated each person should be dealt with on an individual basis. One did not agree with the Council's proposal and that the minimum backdating should be up to 6 months, but gave no reason why. One made no comment.**

The final regulations passed by the Assembly on 19<sup>th</sup> December 2012 allowed a further discretion to local authorities in Wales – to provide additional information on the decision notice to that prescribed in regulations. Due to the timescale involved this local discretion was not included in the consultation document.

## Council's Responses

In the limited areas of local discretion the Council is mindful that there is no additional funding available to meet the cost of additional local reductions agreed. The grant paid by the Welsh Government does not meet in full the cost of the statutory scheme, the shortfall, to be met by the Council is expected to be between £150,000 and £300,000 in 2013 – 2014. Applying local discretion would add further costs to be met by the Council.

- The Council has calculated that the increase costs associated with extending the standard statutory extended payments under the Council Tax Reduction Scheme will be as follows –

Period of increase	Increased cost to the Council
No increase	£0
2 weeks	£6,000
4 weeks	£12,000
6 weeks	£18,000

Under current Council Tax Benefit provisions there are no special provisions to extend beyond 4 weeks.

- The Council is committed to continuing with its current local discretionary scheme in respect of War Disablement and War Widow or War Widower's Pension Income Disregard. There are currently 45 claims with incidences of allowances in respect of War Disablement and War Widow or War Widower pensions with a total value of Council Tax Benefit paid of £33,000. The current cost to the Council in disregarding additional income under the current local policy is approximately £7,000. The cost under the Council Tax Reduction Scheme is expected to be between £7,000 and £8,000 for what is an identical scheme to that currently in existence under Council Tax Benefit. The Council agrees to change the name of its local policy to reflect widowers.
- Backdating of claims under the current Council Tax Benefit Scheme differs between pensioners and non-pensioners. Pensioners have a right of up to 3 months to have their claim back dated, commonly called "time to claim rule" but non-pensioners have to show "good cause" why a claim can be backdated and if proven, this can be up to 6 months. There are no special provisions to extend beyond these limits. The Welsh Government's statutory prescribed Council Tax Reduction Scheme essentially replicates this position but for pensioners and non-pensioners, the cost of applying discretion beyond 3 months will fall on the Council.

In 2011/12, the total value of backdating under the current Council Tax Benefit scheme for non-pensioner claimants was £20,000. Not all cases were for periods in excess of 3 months; indeed, these were in the minority and the estimated cost to the Council if non-pensioners, having shown "good cause" where backdated over 3 months and up to 6 months is £5,000. There are no costs figures available if the discretion over 3 months was applied for pensioners. There is therefore a great deal of uncertainty about the likely cost if such a local scheme was applied.

Since October 2008 Pensioner "time for claiming" has been limited to 3 months (down from 12 months) with no local discretion and the Council does not propose to use its new local discretion to extend this for pensioners and equivalent back dating for non-pensioners.

- With regard to providing additional information to that statutorily required under the Welsh Government's regulations for decision notices, the Council at present prefers to improve current notices to make them more easily understood by claimants.

## **Conclusion**

1. The number of responses to the consultation was disappointing. The fact that the period where it was possible to undertake the consultation was very short and the very limited local discretion allowed under the Welsh Government's scheme may be factors. Also, the Welsh Government had consulted on its scheme in the first half of 2012.

Despite considerable media interest on the replacement scheme to Council Tax Benefit during the passage of the legislation through the Assembly, this did not seem to have generated sufficient interest to warrant a better response to the consultation.

2. Funding for the new Council Tax Reduction Scheme will not meet its full cost. Even though approximately 5,000 Council Taxpayers will now have to contribute up to 10% of their Council Tax bill, where previously they paid nothing and a further 2,000 will have to pay more or lose any support, these contributions and the Welsh Government's grant will still leave a shortfall of between £150,000 and £300,000 to be met by the Council. The cost of applying local discretions allowed under the regulations also have to be met by the Council i.e. there is no additional funding for local discretions.
3. In addition to the funding shortfall for the statutory scheme, the Council may well face a shortfall in collection as a result of the new Council Tax Reduction Scheme. The Council has already reflected this in its calculation of the Tax Base of 2013 – 2014.

## **Next steps**

1. On the 24<sup>th</sup> January 2013 the full Council will formally adopt its Local Council Tax Reduction Scheme
2. The Revenues and Benefits section of the Finance Service will, before the full Council adopts its budget and sets its Council Tax on 5<sup>th</sup> March 2013 in respect of the financial year 2013-2014, be contacting approximately 5,000 new Council Tax payers advising them of their anticipated payment in respect of Council Tax for 2013 – 2014. They will be advised of payments methods and advice with any financial difficulty they may face.
3. The Revenues and Benefits section of the Finance Service will, liaise with other Council services and external stakeholders to identify vulnerable persons and those likely not to be able to manage their finances appropriately.
4. The Finance Service will closely monitor collection performance reporting on a quarterly basis during the 2013 – 2014 financial year and review its collection processes (if need be) in respect of the new Council Tax payers.

**GERAINT H JONES**  
**REVENUES AND BENEFITS MANAGER**

**17 JANUARY 2013**

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