

## Consultation: Wind Turbine Development – Landscape and Visual Impact Assessment Requirements

We want your views on the draft planning guidance prepared by Gillespies LLP for Heads of the Valleys Landscape Officers and Planners.

Please submit your comments by **19<sup>th</sup> December 2014**

If you have any queries on this consultation please

email: [planningpolicy@blaenau-gwent.gov.uk](mailto:planningpolicy@blaenau-gwent.gov.uk)

or telephone: 01495 354740 or 01633 644852

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### Confidentiality

Responses to consultations will be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

### Note

Please complete the questions that you feel are relevant to your area of expertise/interest.

You are not required to complete all of the questions.

<b>Q1</b>	Do you agree that guidance is required to ensure landscape and visual impacts of wind turbines are addressed in a consistent manner? If you agree please indicate below what status should the guidance have, should it be Supplementary Planning Guidance, a Planning Advisory Note or simply for information?	Please indicate with a x
	Agree	x
	Neither Agree nor Disagree	
	Disagree	
<b>Q1</b>	<b>Further Comments</b>	
	<ul style="list-style-type: none"> <li>Optional to each planning authority, they may use as guidance or adopt as SPG.</li> </ul>	

<b>Q2</b>	<b>Introduction</b> Do you agree with the typologies being proposed in the guidance (pages 0.3 and 0.5)?	Please indicate with a x
	Agree	
	Neither Agree nor Disagree	x Agree with additional information to be included
	Disagree	
<b>Q2</b>	<b>Further Comments</b>	
	<ul style="list-style-type: none"> <li>We would prefer to have typologies that also refer to power output in addition to heights. An example of this multi faceted typology is evident in the recently adopted Conwy LDP, elements copied below*.</li> <li>Align the terminology used in Table 1 to be consistent with the thresholds used for SSAs and NSIPs to provide clarity.</li> <li>State the range in all typologies rather than 'or less'. For example, small to medium with range 50-79m</li> <li>Identify the size of turbines and range of cluster sizes separately to give multiple contexts to the scale of development in the note at the bottom of the table. There is a considerable difference between 6 or more small scale turbines and 6 or more very large turbines. For example, could a medium class be either 51-80 m OR comprising of 4 turbines?</li> </ul>	

- Any modifications in the typologies may need to be reflected in updated study area distances and the document updated accordingly.
- It would be important to link any changes to the typology & study areas with any Natural Resources Wales Turbine and Vertical Structures guidance for consistency. Natural Resources Wales would welcome engaging in any discussion relating to any proposed amendments/additional information to be included in the typology.

\*We would prefer to have typologies that also refer to power output in addition to heights, example from Conwy.

**Micro Under 50kW**

- Single or twin turbine applications.
- Turbine below 20m to blade tip.

**Small Under 5MW**

- Turbines up to 3 in number.
- Turbines below 50m to blade tip.
- Viewed as a small group.

**Medium Over 5MW but below 25MW**

- Turbines up to 9 in number.
- Turbines below 80m to blade tip.
- Viewed as a large group.

**Large Over 25MW**

- Turbines over 10 in number.
- Turbines over 80m to blade tip.
- Viewed as a large-scale wind farm.
- Located within the SSA.

**Very Large Over 25MW**

- Turbines over 10 in number.
- Turbines over 110m to blade tip.
- Viewed as a very large-scale wind farm.
- Located within the SSA.

**Strategic Over 50MW**

- Typically over 15 in number
- Turbines typically over 100m to blade tip.
- Viewed as nationally strategic
- Located within the SSA
- Applications for which are determined by National Infrastructure Planning delivered through PINS.

Q3	Part 1 Do you agree with the size of study areas being proposed for each typology (page 1.1: Table 2)?	Please indicate with a x
	Agree	x
	Neither Agree nor Disagree	
	Disagree	

Q3	Further Comments
	<ul style="list-style-type: none"> <li>• NRW has provided comments previously on the size of the study areas proposed. The study area distances have been slightly increased following these discussions so we are happy with the current relationship of height to study area. If there are any changes to the height classes in the typology then</li> </ul>

the study area distances would require appropriate amendment based on the agreed parameters to redefine the study and search areas.

<b>Q4</b>	<b>Part 1</b> Do you agree with the minimum requirements for submission of an EIA screening opinion for each typology (pages 1.2-1.5)?	<b>Please indicate with a x</b>
	Agree	
	Neither Agree nor Disagree	
	Disagree	
<b>Q4</b>	<b>Further Comments</b>	

<b>Q5</b>	<b>Part 2</b> Do you agree with the methodology for EIA Screening (page 2.1)?	<b>Please indicate with a x</b>
	Agree	
	Neither Agree nor Disagree	
	Disagree	x
<b>Q5</b>	<b>Further Comments</b>	
<ul style="list-style-type: none"> <li>The assessment for whether a project requires an Environmental Statement (ES) should be based on whether a project is a schedule 2 project and then meets the thresholds as set out in Circular 11/99. The criteria in figure 2 in assessing whether an ES is required are misleading and removes the judgement from the decision maker as to whether significant effects are likely.</li> <li>The figure 2 methodology should take on board the comments in question 2 on definitions of turbine class. The Environment Circular 11/99 Indicative Criteria/ Thresholds states ‘the likelihood of significant effects will generally depend upon the scale of the development, and its visual impact, as well as potential noise impacts. EIA is more likely to be required for commercial developments of 5 or more turbines, or more than 5 MW of new generating capacity’.</li> <li>Figure 2 requires a reconsideration to take this point on board. As an example, if a scheme consists of 5 turbines or more it does not automatically mean an ES is required. All it means is that an ES is more likely to be required and this is where an assessment of the significance of effects is important.</li> </ul>		

<b>Q6</b>	<b>Part 2</b> Do you agree with the approach to cumulative effects and the proposed search area distances (page 2.3 and Table 3)?	<b>Please indicate with a x</b>
	Agree	x
	Neither Agree nor Disagree	

Disagree		
<b>Q6</b>	<b>Further Comments</b>	
<ul style="list-style-type: none"> <li>As with Q3, NRW has provided comments previously on the size of the study areas proposed. The study area distances have been slightly increased following these discussions so we are happy with the current relationship of height to study area. If there are any changes to the height classes in the typology then the study area distances would require appropriate amendment based on the agreed parameters to redefine the study and search areas.</li> </ul>		

<b>Q7</b>	<b>Part 2</b> Do you agree with the proposed cumulative thresholds for Other Infrastructure (page 2.3 Table 4)?	<b>Please indicate with a x</b>
Agree		
Neither Agree nor Disagree		x
Disagree		

<b>Q7</b>	<b>Further Comments</b>	
<ul style="list-style-type: none"> <li>P.2.3 Table 4 – do the distances in Table 3 apply? E.g. more than 15 medium (80m) turbines within 12km would be a threshold for EIA? 15 seems like quite a lot – significant effects could potentially result from less than this if they were close to a sensitive asset?</li> <li>Table 4 sets out cumulative thresholds. Whilst this may be useful as a guide, it should always be based on a case by case assessment depending on the topography, landscape, setting and so on.</li> </ul>		

<b>Q8</b>	<b>Part 3</b> Do you agree with the general minimum requirements of information to be provided for Landscape Visual Impact Assessments (LVIA) (page 3.1)?	<b>Please indicate with a x</b>
Agree		
Neither Agree nor Disagree		
Disagree		

<b>Q8</b>	<b>Further Comments</b>	

<b>Q9</b>	<b>Part 3</b>	<b>Please indicate</b>
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	Do you agree with the proposed specific requirements for Landscape Visual Impact Assessment (page 3.3)?	with a x
	Agree x	
	Neither Agree nor Disagree	
	Disagree	
Q9	Further Comments	

Q10	Part 3 Do you agree with the proposed use of LANDMAP as part of the Landscape Visual Impact Assessment (Page 3.6 and Table 6)?	Please indicate with a x
	Agree x	
	Neither Agree nor Disagree	
	Disagree	
Q10	Further Comments	
<p>Under initial consideration</p> <ul style="list-style-type: none"> <li>The first sentence 'all aspect layers' should be changed to 'all aspect areas'</li> <li>Second paragraph, add 'regardless of their overall evaluation' at the end (so that it is clear that if the turbine is located within an aspect area it is considered fully even if it is not outstanding or high)</li> </ul> <p>Under detailed consideration</p> <ul style="list-style-type: none"> <li>The first sentence 'all aspect layers' should be changed to 'all aspect areas'</li> </ul>		

Q11	<b>Any other comments</b>  If you have any comments, please use this space to report them.	
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**Natural Resources Wales welcomes this guidance and the collaborative approach that has been instrumental in developing it.**

**We have engaged in providing feedback on this document on previous occasions whilst it was still in draft form, notably on 5<sup>th</sup> March, 6<sup>th</sup> March, 4 June, 9 June and 1 July 2014. Our comments have been considered and included at all stages and where they have not been included – satisfactory explanations have been given. Therefore only additional comments are included in this document.**

**An officer has recently used this draft guidance in a live case as a test and found it to be a very logical process that will help in deciding on EIA requirements. Previously a ZTV would have been requested for the extent of visibility in order to inform their decision, but as the flow chart in figure 2 follows a logical process based on distances from more sensitive landscape areas, they felt it would make the screening process much simpler.**

**Natural Resources Wales would be very pleased to work with you to arrange an event to launch and communicate the Guidance to Local Planning Authorities, Natural Resources Wales staff, consultants and developers.**

**Additional comments on the draft document follow:**

0.1 Suggest replace 'Environmental assessment is a procedure that ensures that the environmental implications of proposals are taken into account before decisions are made. An Environmental Impact Assessment (EIA) assesses the possible impact that a proposed project may have on the environment and this information is submitted to the Local Planning Authority (LPA) or the Welsh Government in the form of an Environmental Statement (ES)'.

With:

'Environmental Impact Assessment (EIA) is a process by which information about the likely environmental effects of certain projects is collected, assessed and taken into account both by the applicant, as part of project design, and by the decision making body (Local Planning Authority or if called in, by Welsh Government) in deciding whether permission should be granted. Thus EIA has two roles – improving decision making and project planning.'

Introduction p.2 - CLVIA – should this say that other development as well as wind turbines should be considered (as referenced on p.4 Part 2)?

P.1.2 a8 – it would be helpful if the site plan showed features such as mature trees/woodland/hedgerows as well as contour lines/spot heights.

P1.3 b4 –Include sensitive seascapes?

P.1.5 – the screening distances e.g. 3km from the National Park for medium, there could be significant effects within the 5km study area?

## **Wind Turbine Development – Landscape Sensitivity & Capacity Study – Final Report**

Table 2 – Low-Medium-High seems a broad brush criteria range, there are 5 categories in the maps? Use of terms- sensitivity & susceptibility – are they the same?

Table 3 VS4 – rugged, dramatic landforms are likely to be more susceptible but high hills are classed as medium?

Table 3 Built Environment – should the presence/nature of roads & tracks/transport pattern be incorporated into the Built Environment criteria or be separate criteria?

Table 3 Skylines & Settings – the criteria doesn't say a lot about settings?

Table 3 Movement criteria – tranquillity is not just about movement? Should this also be about remoteness/lack of development & human activity – perceptual qualities of remoteness/tranquillity are dealt with separately?

Table 3 VS24 – safe & wild don't necessarily equate to high sensitivity – very settled areas often feel safe and wild ones not?

P.21 – title should read 'Stage Three'

P.22 – objective 3 – has anyone defined 'immediately adjacent' to SSAs?

P.24 – sp.Heads of the Valleys road is A465

VS9 Enclosure & intervisibility e.g. unit 1 – in relation to views in & out – trees do not provide enclosure for large scale turbines viewed from outside the area, only from within so whilst it might be enclosed from the human perspective within, it is not in views.

### How to respond

Please submit your comments by **19<sup>th</sup> December 2014** in either of the following ways:

Email	Post
Please complete the consultation form and send it to : <a href="mailto:planningpolicy@blaenau-gwent.gov.uk">planningpolicy@blaenau-gwent.gov.uk</a>	Please complete the consultation form and send it to: <b>Wind Turbine Development – Landscape and Visual Impact Assessment Requirements</b> European & Planning Policy Blaenau Gwent County Borough Council Council Offices High Street Blaina NP13 3XD