

# BRIDGEND COUNTY BOROUGH COUNCIL

## REPORT TO COUNCIL

16 DECEMBER 2015

### REPORT OF THE CORPORATE DIRECTOR – COMMUNITIES

#### RENEWABLES IN THE LANDSCAPE SUPPLEMENTARY PLANNING GUIDANCE (SPG)

##### 1. Purpose of Report

- 1.1 To seek approval to adopt Renewables in the Landscape –SPG 20 as Supplementary Planning Guidance (SPG) to the adopted Local Development Plan (LDP). The document can be viewed at the following link:

<https://democratic.bridgend.gov.uk/documents/s7522/SPG20%20Renewables%20in%20the%20Landscape%20FINAL%20VERSION%20FOR%20COMMITTEE.pdf>

A hard copy of the document can be viewed in the Members Lounge.

##### 2. Connection to Corporate Improvement Plan / Other Corporate Priorities

- 2.1 The adoption of this Supplementary Planning Guidance will assist in the implementation of policies within the adopted Bridgend Local Development Plan the Council's statutory land-use planning document.

##### 3. Background

- 3.1 The purpose of the Renewables in the Landscape SPG is to provide a strategic-level assessment of the relative sensitivities of the County Borough's landscapes to different scales of wind and solar energy developments. It includes general guidance for developers to follow as well as information tailored to each of Bridgend's 15 Landscape Character Areas. It also acts as a 'first-step' in helping to direct developments, strategically to the least sensitive landscapes.
- 3.2 On the 16<sup>th</sup> October 2014 the Development Control Committee resolved to approve draft SPG20 – Renewables in the Landscape, as the basis for public consultation; authorised officers to make appropriate arrangements for public consultation; and to await a further report on the outcome of the consultation process.
- 3.3 A 6 week period of public consultation was held between 23 October 2014 and 4 December 2014. The consultation was advertised in the following ways:
- A Statutory notice placed in the Glamorgan Gazette on 23 October 2014;
  - Consultation documents were available for inspection with representation forms at every library in the County Borough and at the Civic Offices, Angel Street, Bridgend;
  - A press release was issued at the start of the consultation;
  - Information on the consultation, including all the documentation, representation forms and the facility to make representations electronically was placed on the Council's website; and

- An electronic access link to the documentation was sent to approximately 400 targeted consultees, including Community Councils, planning consultants/energy operators with details on how to respond.

#### **4. Current Situation**

- 4.1 By the end of the consultation period 6 individuals and external organisations submitted comments. Two additional organisations (NRW and Suncredit) submitted responses after the close of the consultation period. All of the representations received have been considered and responses to each have been prepared. These are attached as Appendix1. The original representations can be viewed by members at the Planning Department.
- 4.2 A number of comments received were 'non-specific' drawing to the Council's attention good practice in properly considering material planning issues, in particular with respect to environmental risk and impact on heritage assets. Such matters are considered to be more appropriately dealt with at any future planning application stage of development.
- 4.3 A large number of comments from one objector related to specific wording and alternative descriptions. These are considered not to be justified, given the evidence, strategic-level nature of the assessment and the fact that the comments are also open to interpretation.
- 4.4 Other representations, question the fundamental 'role' of the SPG and argue that it should be broadened to include other energy sources and other locational determinants for energy proposals. These objections misinterpret what is the primary purpose of the SPG which is to focus on the relative landscape sensitivities of the County Borough.
- 4.5 As such it is was considered that the representations received should not result in any amendments to the document.
- 4.6 On the 15<sup>th</sup> October 2015, the Development Control Committee considered each of the representations received, endorsed the suggested reasoned responses, approved the decisions and actions (not to amend the document as a result of the consultation) and recommended that Council adopts the document for publication.
- 4.7 Following this recommendation from Development Control Committee, the Council is now formally requested to adopt the document as Supplementary Planning Guidance to the LDP.

#### **5. Effect upon Policy Framework & Procedure Rules**

- 5.1 This SPG expands upon the existing land-use planning policy framework contained within the adopted Local Development Plan providing officers and developers more guidance with respect to proposals for wind and solar energy development.
- 5.2 The SPG will represent a material consideration in the determination of future planning applications.

## **6. Equality Impact Assessment.**

- 6.1 An Equalities Impact Assessment Screening has been undertaken and the proposed recommendations are unlikely to have an impact on equality issues.

## **7. Financial Implications**

- 7.1 None.

## **8. Recommendations**

- 8.1 That Council adopts SPG20 – Renewables in the Landscape as Supplementary Planning Guidance to the adopted Bridgend Local Development Plan.

**Mark Shephard**  
**Corporate Director Communities**  
**December 2015**

### **Contact Officer**

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### **Background documents**

Renewables in the Landscape SPG

**APPENDIX 1 –  
RENEWABLES IN THE LANDSCAPE  
CONSULTATION RESPONSES**

## Renewables in the Landscape Supplementary Planning Guidance Consultation Responses

Organisation	Section No.	Page No.	Representation	Reasoned response	Decision and Action
1 The Coal Authority			<p><b><u>Background on The Coal Authority</u></b>                      The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.</p> <p>The main areas of planning interest to the Coal Authority in terms of policy making relate to:</p> <ul style="list-style-type: none"> <li>• the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales;</li> <li>• the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; and</li> <li>• ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales and MTAN2 in Wales.</li> </ul> <p><b><u>Background on Coal Mining Issues in Bridgend</u></b>  <u>Coal Mining Legacy</u>                      As you will be aware, the Bridgend area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be</p>	<p>The Council welcomes the comments from the Coal Authority however the principle function of the SPG is to provide guidance in the assessment of impacts for wind turbines and solar farms within the different landscapes of the County Borough. The Council is aware of the significant issues of mining legacy within the County Borough and these will be taken account of as material considerations as part of the planning application process, with appropriate consultation with the Coal Authority at that stage. This is reinforced in paragraph 1.8 of the SPG which states that "...when considering planning applications for renewable energy developments the LPA will consider all material considerations relevant to the determination of the planning application."</p> <p>The Council will take into account the advice provided by the Coal Authority and the need to provide a Coal Mining Risk Assessments as part of the planning application process where necessary.</p>	No change.

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			<p>triggered and uncovered by development activities.</p> <p>Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.</p> <p>Within the Council area there are approximately 1,814 recorded mine entries and around 159 coal mining related hazards have been reported to The Coal Authority. A range of other mining legacy features are present, in total The Coal Authority High Risk Development Area covers approximately 15% of the Council area.</p> <p>Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. No development should take place over mine entries even when treated.</p> <p>Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p><u>Surface Coal Resources, Deep Coal Resources, Development and Prior Extraction</u></p> <p>As you will be aware, the Bridgend area contains coal resources which are capable of extraction by surface mining operations. In addition there are deep coal resources which are licenced for extraction by underground methods.</p> <p>Whilst renewable energy is classified as temporary</p>		

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			<p>development it can have an impact on the sterilisation of mineral resources. Although it is not necessary to consider the impact on the sterilisation of surface coal resources due to national policy in MTAN2, consideration does need to be had to the potential relationship between wind turbines and any operational or proposed underground coal workings. Care needs to be taken to prevent operational sterilisation of the actual or planned underground workings due to the costs associated with potential subsidence liability that may arise with wind turbines. This is because wind turbines by their very nature are structures which require absolute stability.</p> <p><b><u>Specific Comments on the Bridgend Supplementary Planning Guidance - Renewables in the Landscape (Draft)</u></b></p> <p>The comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:</p> <p><b>Representation No.1</b></p> <p><b>Site/Policy/Paragraph/Proposal – Wind Turbines</b></p> <p><b>Comment –</b> The Coal Authority would like to see the following wording included:  <i>“Coal mining legacy exists in areas of Bridgend, The Coal Authority has defined ‘Development High Risk Areas’ within these areas in accordance with the requirements of the Welsh National Validation List it will be necessary for a planning application to be accompanied by a Coal Mining Risk Assessment. Wind turbines should not be located directly over mine entries or within their zones of influence, this should be considered in the detailed site layout. It may be necessary to incorporate remedial measures to ensure that the ground is safe and stable where other mining legacy features are present. Consideration also needs to be had to the potential relationship between wind turbines and any operational or proposed licenced underground coal workings. Care needs to be taken to prevent operational sterilisation of the actual or planned licenced underground workings due to the costs associated with potential subsidence liability that may arise with wind turbines sited over underground workings.”</i></p> <p><b>Representation No.2</b></p>		

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				<p><b>Site/Policy/Paragraph/Proposal – Solar PV</b></p> <p><b>Comment</b> – The Coal Authority would like to see the following wording included:  <i>“Coal mining legacy exists in areas of Bridgend, The Coal Authority has defined ‘Development High Risk Areas’ within these areas in accordance with the requirements of the Welsh National Validation List it will be necessary for a planning application to be accompanied by a Coal Mining Risk Assessment. Solar PV farms should not propose to site and panels directly over mine entries or within their zones of influence, this should be considered in the detailed site layout. Detailed layouts should propose to fence off the zones of influence of mine entries to prevent public safety issues arising from delivery plant accidentally traversing over the mine entries.”</i></p> <p><b>CONCLUSION</b>  The Coal Authority welcomes the opportunity to make these comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of our concerns.</p>		
2	Glamorgan Gwent Archaeological Trust			<p>Thank you for consulting us on this. We welcome the SPG for this type of energy provision, as both wind turbines and solar farms have both a direct physical impact on buried and upstanding archaeological remains, and also an indirect visual impact.</p> <p>We make the following comments regarding detailed points in the document:</p> <p>1.3: Archaeological and Historical Sites: there are hundreds of sites on the Bridgend Historic Environment Record curated by GGAT. Less than 2% of these are on average Scheduled Ancient Monuments: Cadw have responsibility for the SAMs and must be consulted if any development is proposed that may impact them. For sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that development complies with Planning Policy Wales Chapter 6: Conserving the Historic Environment, and the Welsh Office Circulars 60/96 and 61/96. Early consultation with GGAT Archaeological Planning, as the advisors to Bridgend County Borough Council, is advisable.</p>	<p>The Council welcomes the comments from Glamorgan Gwent Archaeological Trust (GGAT) and the advice provided regarding the protection of and potential impacts of renewable energy development on the County Borough’s many varied heritage assets. Any potential impact will be properly considered as a material consideration at the pre-application and planning application stage of development through early engagement and appropriate consultation with CADW, GGAT and the Council’s conservation officers to understand the issues and/or mitigate any adverse effects of development. This will ensure compliance with policies in the LDP, PPW, Welsh Office circulars and the forthcoming Heritage Act.</p> <p>In addition figure 2.3 and location maps within the SPG identifies the extent and location of a number of significant historic designations and heritage assets in the</p>	No change.



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				<p>2.1 Landscape. This should not be confused with a Registered Historic Landscape, or Registered Parks and Gardens. The Register is compiled by Cadw, ICOMOS and NRW and any developments of a large scale within a Registered area may need an ASIDOHL report undertaken and submitted (Assessment of the Impact of a Development on a Historic Landscape: guidance is available online from Cadw's website which details methodology <a href="http://cadw.wales.gov.uk/docs/cadw/publications/LandscapeRegisterGoodPractice_EN.pdf">http://cadw.wales.gov.uk/docs/cadw/publications/LandscapeRegisterGoodPractice_EN.pdf</a>). The landscape assessment quoted in the document dates from the Landmap exercise and whilst it is comprehensive and includes aspects of historic landscape, does not relate solely to Registered Landscapes.</p> <p>The impact of a development on the setting of Scheduled Ancient Monuments, Listed Buildings and archaeological features without statutory designations also has to be taken into consideration, and Cadw have produced Conservation Principles, to provide further detailed guidance when dealing with such issues, details at: <a href="http://cadw.wales.gov.uk/docs/cadw/publications/Conservation_Principles_EN.pdf">http://cadw.wales.gov.uk/docs/cadw/publications/Conservation_Principles_EN.pdf</a>.</p> <p>It should also be noted that archaeological features and finds exist outside Registered and Scheduled areas and may require pre-planning and conditioned archaeological mitigation. All archaeological work undertaken in relation to planning issues should be undertaken to the Standards and Guidance of the Institute for Archaeologists and it is our policy to recommend that either a Registered Organisation with the IfA or a member with MIfA level membership should undertake the work. Thank you for the opportunity to comment, please do not hesitate to contact us if you require further advice or information.</p>	<p>County Borough within each Landscape Character Area and as such these are taken account of in the sensitivity assessments.</p>	
3	South Wales Police			In relation to the SPG I have no observations to make.		
4	Suzy Davies, AM			<p>I will not be submitting a detailed response to the consultation but I would be grateful if the following points might be taken into account when the responses are being considered.</p> <ol style="list-style-type: none"> <li>1. Supplementary guidance specific to exploratory applications for gas extraction. Clearly not a renewable source of energy, but should the guidance on renewable energy</li> </ol>	<p>The Council welcomes the comments received. With respect to the issue of exploratory proposals for gas extraction it should be noted that this SPG provides guidance and a consistent approach to the assessment of the visual impact of proposed developments for wind turbines and solar farms, within the context of the different and varied landscapes of the</p>	No change.

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				<p>cover the balance a Council may need to strike between different sources, not lease between different renewable sources? Essentially, TAN 8 is also just guidance and the 93/7% split in favour of on-shore wind and can be overcome by a greater local preference for other renewably sourced energy.</p> <p>2. Heritage landscape. There is already guidance on this but Welsh Government will be bringing forward its draft Heritage Act soon. That will have implications for scatter sites and sites which contribute to specific sense of place. Although the new legislation will not be available before your work is completed, how will the new guidance provide for potential strengthening of protection of sites of heritage interest.</p>	<p>County Borough. It is not the function of this SPG to explore the balance or preference for different energy sources, including for gas extraction.</p> <p>With respect to the protection of heritage landscapes and all other heritage assets within the context of the emerging Heritage Act, any impact of renewable energy developments will be properly considered as a material consideration as part of the planning application process. This will be achieved through early engagement and appropriate consultation with the Council's conservation officers and will ensure compliance with policies in the LDP, PPW, Welsh Office circular and the forthcoming Heritage Act. Please also see GGAT response above.</p>	
5	WYG Group			<p>The following comments relate to <b>LCA 8: Ogmere Forest and Surrounding Uplands (pages 100-105 of the draft SPG)</b>.</p> <p><b>LCA8: Key Landscape Characteristics</b></p> <ol style="list-style-type: none"> <li>1. (Second bullet) The hill summits referred to are outside the character area and within the forestry plantations on Mynydd Williams Meyrick and Mynydd Ton (which are located in Rhondda Cynon Taf).</li> <li>2. (Tenth and eleventh bullets) In our opinion, the Daren y Dimbath SSSI and the Bwlch y Clawdd Dyke (which is at the very northern tip of LCA 8) cannot be regarded as key landscape characteristics of LCA 8.</li> <li>3. The evidence of the coal mining heritage in the area is much more characteristic than isolated heritage or ecological features.</li> <li>4. (Thirteenth bullet) "The only settlements are occasional small villages ..." In our opinion, occasional or scattered farms are a key characteristic of the LCA and not villages. The only 'villages' in the LCA are Glynogwr and other small clusters of properties along the A4093, which defines the southern boundary</li> </ol>	<p>LCA8: Key Landscape Characteristics</p> <ol style="list-style-type: none"> <li>1. Mynydd William Meyrick trig point is on the boundary line of Bridgend and Rhondda Cynon Taf and is considered as being within BCB. There are also extensive tracts of mountain top areas well in excess of 500m and above the prominent ridgeline and escarpment within the north-eastern part of the LCA.</li> <li>2. Disagree.</li> <li>3. Coal mining heritage as evidenced in the landscape is noted in bullet point 12 of the Key Landscape Characteristics.</li> <li>4. Disagree – the description acknowledges the existence of scattered farmsteads as a key characteristic.</li> <li>5. Disagree – this is an accurate description in this context of conveying a sense of</li> </ol>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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			<p>of the LCA.</p> <p>5. (Fifteenth bullet) “A largely unsettled and inaccessible landscape...” Large swathes of the LCA are open access land, especially the upland; those parts of the LCA that are not access land are generally the lower level enclosed agricultural land, which are crossed by public footpaths and the bridleways.</p> <p>6. There is no mention in the Key Landscape Characteristics section of the existing wind turbines at Pant-y-wal and Fforch Nest. Do these not contribute to these characteristics? Please note that the front cover of the final report on <i>Landscape Character Assessment for Bridgend County Borough</i> (LUC, July 2013) is of these existing wind farms. It seems odd, therefore, that they should not be mentioned in this section.</p> <p><b>LCA8: Landscape Sensitivity Assessment for Wind Energy Development</b></p> <p>7. Skylines: This refers to the “turbines featuring prominently” (that is, “easily seen without the need for close examination of the landscape”). Given this, it is more surprising that they are not mentioned at all in as a “key landscape characteristic”.</p> <p>8. Scenic and special qualities: The reference “...these could be affected to a degree by wind energy development...” infers, correctly, that these effects are not significant.</p> <p>9. Summary of landscape sensitivity: This refers to the “remote character” of the LCA. Although there is a sense of remoteness, the “human influences” extend beyond those quoted: the mining remains, conifer forestry, etc extend to the northern part of the area, which seems to be identified in the LCA as less affected by human influences.</p> <p>10. Summary of landscape sensitivity: This says: “Human influence is greater in the southern half of the LCA.” In fact, the existing Pant-y-wal and Fforch Nest wind farms are located in the centre of the LCA not its southern half.</p>	<p>‘inaccessibility’ due to elevation, remoteness and wildness, unrelated to ‘access’ in the traditional sense via networks of footpaths and bridleways.</p> <p>6. The descriptors focus on the key ‘inherent’ qualities of the landscape rather than acknowledging whether it is influenced by the presence of existing or proposed renewable energy developments (refer to paragraph 2.23 of the SPG). The existence of recent wind farms of Fforch Nest and Pant y Wal is however acknowledged under the ‘skyline’ assessment criteria within the eastern part of the LCA, as a landscape attribute.</p> <p>LCA8: Landscape Sensitivity Assessment for Wind Energy Development</p> <p>7. The descriptors focus on the key ‘inherent’ qualities of the landscape rather than acknowledging whether it is influenced by the presence of existing or proposed renewable energy developments (refer to paragraph 2.23 of the SPG). The existence of recent wind farms of Fforch Nest and Pant y Wal is however acknowledged under the ‘skyline’ assessment criteria within the eastern part of the LCA, as a landscape attribute.</p> <p>8. Comment noted – however it is not ‘inferred’ in the statement that effect on scenic and special qualities are not going to be significant as this can only be determined on a case by case basis.</p> <p>9. The existing wording adequately</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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			<p>11. Summary of landscape sensitivity: The statement “complex undulating landform and variation in scale”, occurs only on the side slopes of the area, but seems to have been applied to the <u>whole</u> area. The existing wind turbines at Pant-y-wal and Fforch Nest are on an upland plateau.</p> <p>12. Sensitivity to different turbine heights: The assessment of very large (111-150m) turbines in this LCA as M-H (red) is disputed. The existing turbines are 115m and therefore fall in this category: nowhere in this assessment is the change regarded as “significant”.</p> <p>13. Commentary on different cluster sizes: The conclusion of “highly sensitive” is disputed. The existing turbines “fit” with the landscape.</p> <p><b>Overall strategy for wind energy development (outside the SSA)</b></p> <p>14. The reference to the overall strategy being “in line with TAN 8” is inappropriate. TAN8 identified a much larger SSA than the “refined” SSA now included in the LDP. Moreover, TAN8 Annex D paragraph 8.4 notes that: “Within and immediately adjacent to the SSAs, the implicit objective is to <u>accept</u> landscape change <u>i.e. significant change in landscape character</u> from wind turbine development” (underlining added). LDP Policy ENV18 expressly allows for wind farm developments outside the refined SSA.</p> <p><b>LCA-specific guidance for development</b></p> <p>15. (First bullet) In our opinion, no part of the LCA could be described as “remote from human influences”; even the northernmost part is bounded by the Bwlch road, with popular car park, aside from the extensive conifer plantations, evidence of past mining, views of urban settlements in the valleys, etc.</p> <p>16. (Third bullet) “The panoramic views from summits...”: as noted above, the summits are within the forestry plantations on Mynydd William Meyrick and Mynydd Ton (in Rhondda</p>	<p>addresses the point of human influences on the landscape including within the northern part of the LCA.</p> <p>10. Paragraph 2.23 makes it clear that the results of the sensitivity assessment are not influenced by the presence of existing or proposed renewable energy developments in the landscape, it focuses on the inherent landscape sensitivity. As such the Council consider the ‘summary’ is accurate in its overall assessment.</p> <p>11. The Council consider the ‘summary’ is accurate in its overall assessment. The existence of plateau areas within the landscape is recognised in the first bullet point in the LCA8: Key Landscape Characteristics:-</p> <ul style="list-style-type: none"> <li>• “Highly undulating plateau and ridge landscape of the Upper Coal measures...”</li> </ul> <p>12. Paragraph 2.23 makes it clear that the results of the sensitivity assessments are not influenced by the presence of existing or proposed renewable energy developments in the landscape, including the very large operational and proposed turbines within LCA8.</p> <p>13. The Council agree with the commentary conclusion, that the landscape of LCA8 is likely be highly sensitive to ‘very large’ clusters of wind turbines (more than 25).</p> <p>14. The reference to the overall strategy being ‘in line with TAN8’ is not inappropriate. TAN8 makes it explicit (Paragraph 2.4</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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			<p>Cynon Taf); the views are available from the ridge-tops and plateaux.</p> <p><b>Guidance for siting multiple developments with the LCA</b></p> <p>17. The guidance seeks wind turbines of “similar” scale etc, but note that wind turbines of different scales are already seen together at Taf Ely/Mynydd Portref and it is not apparent in the views available – and as consented development, “acceptable”.</p>	<p>refers) that the, 7 SSAs across Wales were ‘broad brush’ and that the subsequent refinement exercise was a matter for LPAs to undertake in a robust manner. This has resulted in refined SSA boundaries which are delineated on the adopted Bridgend LDP Proposals Map. Outside of these areas the TAN8 objective is to maintain the landscape character i.e. no significant change to landscape character from wind turbine development, (as is stated in the SPG’s overall strategy for LCA8 by maintaining the key landscape characteristics). The strategy notes that it is accepted that change to landscape character could result from wind energy development within the ‘refined’ Northern Uplands SSA, where wind energy developments are already present (or consented).</p> <p>15. Remote from human influence is a relative term to describe varying levels and different aspects of human influence across the LCA. As noted in the Landscape Sensitivity Assessment, a large part (42%) of the LCA falls within the Northern Uplands Special Landscape Area, as identified by Policy ENV3(2) of the adopted LDP. This SLA, especially away from valley settlements has an exposed and wild character, where intrinsically human influence is less evident than other parts of the LCA outside of the SLA.</p> <p>16. Disagree. The summit of Mynydd William Meyrick is adjacent to the forestry area and therefore views are extensive.</p>	<p>No change.</p> <p>No change.</p>

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					17. Disagree – General guidance for the siting of multiple developments, in seeking wind turbines be of similar scale and design when seen together is considered to represent sound advice. Such guidance is also recognised by other similar design guidance relating to the siting of windfarms in the landscape. The existence of different scales of wind turbines as seen in Taff Ely and elsewhere maybe considered 'acceptable' on a case-by-case basis, but their existence should not be allowed to dilute this SPG's overall strategy guidance.	
6	RWE			<p>This response is made on behalf of RWE Innogy UK Ltd to Bridgend County Borough Council's consultation on the Renewables in the Landscape Supplementary Planning Guidance.</p> <p>RWE Innogy UK is a leading developer and operator of renewable electricity generation projects in Wales. We currently operate a wide portfolio of projects in Wales and the UK including onshore and offshore wind farms, hydroelectric projects and biomass generation.</p> <p>Generally, the SPG prepared by BCBC is a well written and well-structured document. The SPG provides useful, evidenced guidance on matters which are expected to be considered by developers of renewable energy projects and, equally, by the Local Planning Authority in making decisions on such projects. The objective nature of the SPG is welcomed and it is made clear throughout that each project will be dealt with on a case-by-case basis.</p>	The Council welcomes the comments from RWE Innogy UK.	No change.
7	Natural Resources Wales			<p>A few interim comments on this SPG:</p> <p>a) How does the study relate to the Gillespies LLP guidance on LVIA requirements and Landscape Sensitivity and Capacity? The assessment criteria are slightly different to the Gillespies study?</p> <p>b) Do the assessment criteria relate to</p>	The purposes of the SPG and Gillespies Guidance on LVIA requirements are very different. The primary purpose of the SPG is to provide a strategic-level assessment of the relative sensitivities of the County Borough's landscapes to wind (and solar) energy developments and act as a 'first step' in helping to direct developments, strategically to the least sensitive	No change. However the Council will investigate to improve map resolution in the final document as they appear on the Councils website.

	Organisation	Section No.	Page No.	Representation	Reasoned response	Decision and Action
				<p>LANDMAP and if so how? It is assumed that this is through the Bridgend Landscape Character Assessment.</p> <p>It would be helpful if the scale parameters for wind turbines matched the LLP Gillespies (&amp; NRW draft guidance) for the small, medium, large, very large categories, rather than used slightly different parameters.</p> <p>c) Para. 3.30 could refer to the Gillespies LLP guidance on appropriate ZTVs?</p> <p>d) The maps for each LCA and keys are not easy to read – could be the resolution?</p>	<p>landscapes. The SPG is 'indicative' and is not intended to replace site-level assessments i.e. LVIA or be used in isolation to make decisions on individual applications or to decide whether an EIA is required or not.</p> <p>The primary function of the Gillespies guidance is to help LPAs determine whether an EIA will be required for a particular development. However the Gillespies document is usefully cross referenced in the SPG in paragraph 3.14, with respect to what is required when submitting a planning application.</p> <p>Because the documents have very different primary purposes it would be of no benefit to use common 'scale' and 'cluster' parameters, as any number of combinations of proposal could occur between the two.</p> <p>With respect to the assessment criteria's relationship with LANDMAP it is confirmed that this formed the basis for the desktop study to determine the Landscape Character Area boundaries.</p> <p>It is noted that the quality of the maps within the document make the key difficult to read and the Council will endeavour to improve the resolution of the maps before final publication of the document.</p>	
8	Suncredit			<p>The SPG is an admirable, welcome and proactive step by BCBC to help developers such as ourselves select the most suitable sites for solar farms and ensure that their site design and layout are well thought out and fit into the landscape. However, we believe that the SPG is one dimensional as is it founded entirely on landscape sensitivity analysis and ignores many other real world drivers that dictate where and how solar farms can be sited and developed. Consequently, if the flawed foundation of the SPG is not appropriately and adequately addressed it will preclude many potentially good solar sites from coming forward and being developed to the detriment of the many Council policies</p>	<p>The primary purpose of this SPG is to provide guidance and a consistent approach to the assessment of the visual impact of proposed developments for wind turbines and solar farms within the context of the different and varied landscapes of the County Borough.</p> <p>It is not a primary function of the document to identify suitable areas for development although the guidance can act as a 'final step' in helping to direct developments, strategically to the least sensitive</p>	No change.

Organisation	Section No.	Page No.	Representation	Reasoned response	Decision and Action
			<p>designed to promote, maximise and encourage the rapid growth of renewable energy.</p> <p>Our biggest concern is that the SPG has failed to recognise, reflect and accommodate the reality of the size and scale of current UK solar farm developments. The SPG effectively imposes a maximum size for a solar farm of 15ha = @ 5MW as the landscape sensitivity analysis suggest that there is no area, location or site within BCBC that is acceptable from a landscape sensitivity perspective for any larger schemes. The attached SolarBuzz pie chart shows that only 6% of the solar farms developed in Q4 2013 and Q1 2014 were below 5MW. So, blind adherence to the SPG would effectively reject 94% of the UK's recent solar farm developments. The SPG clearly does not accord with reality especially as the BCBC planning officers have recommended that the 28ha 15MW Court Colman solar farm be approved when compliance to the SPG would result in it being considered a totally inappropriate site for a solar farm.</p> <p>Most responsible solar farm developers adhere and comply to the 4 stage development process set out on p51 of the SPG:</p> <p>Stage 1 Policy context  Stage 2 Landscape sensitivity  Stage 3 Detailed siting and design considerations  Stage 4 Cumulative impacts</p> <p>So, it is extremely frustrating that the SPG does not provide any assistance to solar farm developers in identifying suitable areas or sites for development. The SPG is essentially a negative guide as it entirely focuses on excluding areas from solar development rather than trying to identify suitable locations for development. In the context of BCBC's renewable energy policies this is not helpful and must be addressed.</p> <p>The SPG completely ignores the biggest key driver and constraint to the siting and development of solar farms – grid availability and capacity. The location and availability of a cost effective grid connection will inevitably drive and require compromises in the location, siting, design, layout and visibility within the landscape of any solar farm development. The SPG fails to recognise that such compromises are inevitable and so must be accommodated by any planning guidance if</p>	<p>landscapes.</p> <p>It is not the intention of the SPG to entirely exclude areas from solar development and the document makes it clear throughout that each proposal will be dealt with on its merit and on a case-by-case basis.</p>	



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			<p>commercial solar projects are to be forthcoming.</p> <p>For your information, we attach a GoogleEarth constraints analysis that shows that there is no fear of BCBC being submerged under a sea of solar panels as it clear that there are only a very limited number of viable locations and sites for commercial scale solar farm projects. Unfortunately, these potential “real world” sites do not accord or overlap very well with the “theoretical” siting guidance of the SPG. The mismatch between our “real world” constraints analysis and the SPG preferential areas is that we have taken into consideration some of the key solar drivers and constraints that have been completely ignored by the one dimensional SPG analysis:</p> <ol style="list-style-type: none"> <li>1 Steep slopes</li> <li>2 North facing slopes</li> <li>3 Agricultural land grade classifications</li> <li>4 Forestry and woodland areas</li> </ol> <p>Of particular note in the SPG is that the land identified and designated as being most suitable for even small scale solar projects is largely Grade 2 agricultural land and as such would not be considered or put forward for development by any responsible solar developer.</p> <p>In short, the SPG is fundamentally and inherently flawed as strict adherence to its guidelines would result in no commercial scale solar farms planning applications ever being consented. It is a NIMBY’s charter! We are certain that this is not what BCBC envisaged when it was drawn up. Consequently, we request that BCBC rethink the SPG to develop some more practical and pragmatic guidance founded upon the “real world” solar constraints and overlaying and interweaving these with the landscape sensitivity analysis to arrive at some pragmatic and useful guidance. The object and intent of the SPG must surely be to facilitate commercial solar farm schemes to ensure BCBC’s renewable energy policies and targets are attained whilst ensuring that they are well sited, well designed and not too obtrusive in the landscape. To achieve this will entail compromises that are not envisaged or considered acceptable under the current draft SPG.</p>		

## Late Representations Received

Organisation	Section No.	Page No.	Summary of Representations	Reasoned response	Decision and Action