

Denbighshire County Council

Final Draft  
Supplementary  
Planning Guidance:  
Renewable Energy

**Consultation Report**

Strategic Planning & Housing

April 2016

# **SUPPLEMENTARY PLANNING GUIDANCE: Renewable Energy (final draft)**

## **CONSULTATION REPORT (April 2016)**

### **1. CONSULTATION UNDERTAKEN**

1.1 Consultation on the draft Renewable Energy Supplementary Planning Guidance, ran for 8 weeks from the 5<sup>th</sup> October to 30<sup>th</sup> November 2015. This was a public consultation and was open for anyone to respond. The consultation included the following:

- Letters / emails were sent to contacts on the LDP database; public bodies; local, regional and national organisations with an interest in the LDP; plus agents /developers, statutory consultees (e.g. NRW, WG), others who have expressed an interest in the topic.
- All County Councillors notified
- All Denbighshire City, Town & Community Councils notified, together with neighbouring Counties, Town & Community Councils
- Town & Community Councils received copies of the consultation documents and response forms
- Local Council libraries and One-Stop-Shops also received hard copies of the consultation documents and response forms
- 2 drop-in events were held – one in St Asaph Youth Centre (Tuesday 20<sup>th</sup> October 2pm – 7pm) and one in Corwen library (Tuesday 27<sup>th</sup> October 2pm-7pm). Drop-ins were attended by officers from planning policy and development managers. Attendees had the opportunity to put comments to officers and discuss the content of the Guidance.
- The draft Supplementary Planning Guidance was published on the Council's website, with electronic versions of the response form available to download. Consultation events details were also publicised on the Denbighshire County Council website.
- A press release was issued before the consultation period.

1.2 A total of 16 written responses were received and 4 people attended the events. Representations included comments from Denbigh Town Council, Clocaenog, Cyffylliog, Derwen, Henllan, Llanbedr Dyffryn Clwyd, Llanrhaeadr yng Nghinmerich, Llanynys Community Councils, Dwr Cymru Welsh Water. Natural Resources Wales, Cadw, Campaign for the Protection of Rural Wales Conwy Branch, Campaign for the Protection of Rural Wales Clwyd Branch, Clwydian Range and Dee Valley AONB Joint Advisory Committee, RWE Innology UK Ltd. All comments received have been logged, acknowledged and scanned. They

are available to view from the Strategic Planning & Housing Team in Caledfryn. The key issues raised are summarised in Section 2 below and summaries of each comment received together with individual responses are set out in the table attached which follows below.

## 2. SUMMARY OF KEY ISSUES RAISED

**Key issue: Return to agricultural land / brownfield status post decommissioning**

Concern expressed post decommissioning of the technology that the land cannot be returned to pre development condition and that it could be classed as brownfield land or previously developed

- 2.1 The concern expressed that once development had taken place, returning the land to its former agricultural / semi natural condition was impossible (CPRW – Clwyd branch). It was suggested the SPG is at variance with guidance in Welsh Government document TAN 6 (2010). Concern was also expressed that following decommissioning of the technology, how the Local Planning Authority will ensure protection is given to the land from being classed as brownfield land / previously developed.
- 2.2 TAN 6 states that returning to the best and most versatile agricultural land (Grade 1, 2, 3a) is seldom practicable. Planning Policy Wales, para 4.10.1 also advises against development on such high grade land unless there is an overriding public interest. This will be tested on applications for solar array technology and biomass plants in low land areas. A decision would be made on its merits.
- 2.3 Advice can be found in Figure 4.4 of Planning Policy Wales (version 8 2016) with regard to the definition of previously developed land. It states that land currently used for agriculture and/or forestry is excluded from being classed as previously developed/brownfield. Changing the wording within the SPG would direct the restored land to its former use. A planning condition would be included to permissions to control the quality and management of site restoration following the decommissioning of the technology.

**Key issue: Grid Connection**

Concern expressed that the SPG is not clear on the level of information required from the developers.

- 2.4 Joint Advisory Committee for the Dee Valley AONB & WHS express their concern that the full implications of any renewable energy development cannot be assessed if details of the connection route are not show at initial application stage.

2.5 The Council acknowledge that the potential impact of such connection is significant, particularly on landscape and visual amenity, however currently there is no policy hook at national level to require the information prior to determination of an application for the technology.

2.6 It is also the case that new electricity lines are governed by a separate consents procedure and the local planning authority is not the decision making body for overhead electricity lines. The final grid connection route is unlikely to be considered by the Distribution Network Operator until planning permission has been secured.

2.7 The SPG has been amended to provide additional background and reduce contradiction.

**Key issue: Consistency in seeking landscape sensitivity assessments**

Suggestion is made that the SPG follows the work of south Wales authorities with regards to Landscape and Visual Impact Assessment (LVIA).

2.8 For consistency, Natural Resources Wales suggest that the SPG consider referencing the work of consultants Gillespies LLP on behalf of The Heads of The Valleys landscape officers and planners. This study was commissioned by a Landscape Liaison Group in south Wales following concerns about the consistency of information provided at planning application stage. The Welsh Government funded the project with the intention for it to be used as good practice across Wales. The study title is *Planning Guidance for Smaller Scale Wind Turbine Development Landscape and Visual Impact Assessment Requirement (April 2015)*. The guidance is intended for anyone considering submitting a planning application for smaller scale turbines and those who are dealing with the planning applications.

2.9 The guidance is a very useful reference document. It is appropriate the Council makes attempts at being consistent with other local authorities particularly if the study has been adopted regionally. The guidance is only concerned with landscape and visual issues and does not address other potential environmental impacts.

2.10 Paragraphs have been amended to reference this study document.

**Key issue: Residential Amenity / Community Outlook**

Differentiate between residential visual amenity and community outlook in the SPG.

2.11 Cyfoeth Naturiol Cymru / Natural Resource Wales welcome and support the preparation of the SPG and suggest a simplified change to the paragraph layout. The suggestion is made to introduce clarification of the different types of assessment required to determine the impact on amenity. The term 'Community Outlook' is used by landscape professionals when referring to the

impact assessment within a Landscape and Visual Impact Assessment (LVIA). Residential amenity is the term used to when considering the impact development may have on the enjoyment of the private inhabited buildings and their curtilage.

**Key issue: Operational life of the technology – Temporary?**

2.12 CPRW – Clwyd branch comment on the use of the word of ‘temporary’ when referring to renewable energy technologies. They argue that the human generation is suggested to be 30 years and question the use of the term ‘temporary’ when the expected operational life of a renewable energy technology is 25-30 years. Reference to temporary has been removed from the paragraph (5.1.19).

**Key issue: Cumulative Noise**

Request to delete reference to Appendix 3 – Wind Farm Cumulative Noise Impact Assessment

2.13 Representation was made by RWE Innology UK Ltd requesting that Appendix 3 of the consultation draft SPG was deleted (report prepared by Bowdler for DCC). At the Clocaenog Forest Examination in Public the company disputed the approach taken by Bowdler and the examining authority accepted RWE’s proposed cumulative noise limits.

2.14 However, DCC’s preferred approach for assessing cumulative noise impact for onshore wind energy schemes is based on Appendix 3 (Appendix 4 in the final draft SPG) a report prepared by Dick Bowdler, Acoustic Consultant (20 December 2012) and the other by New Acoustics (12 September 2007). It is still our preferred reference document.

**Key issue: Separation distance**

Request that separation distances to residential dwellings are noted in the SPG.

2.15 National planning policy does not advocate setting arbitrary minimum separation distances. It is preferable for applications to be assessed on a case by case basis, taking into account the proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site.

Draft Renewable Energy Supplementary  
Planning Guidance - Consultation Report :  
Summaries of representations received & Council's responses

Organisation	Comment (summary)	Council's response	Changes proposed
Conwy County Borough Council	Check a few references. Links are broken.	Links to reference documents will be amended as necessary	Check and update links.
Denbigh Town Council	The town council at its meeting (26/10/2015) agreed to support the document.	Support welcomed	No change proposed.
Joint comment from the following Community Councils: Clocaenog, Cyffylliog, Derwen, Henllan, Llanbedr Dyffryn Clwyd, Llanrhaeadr yng Nghinmeirch, Llanynys	Common agreement in all seven (7) Community Councils was that developments requiring electricity lines should be buried underground.	It is proposed to add an additional paragraph 6.4.4 to refer to the routing of electricity lines and the undergrounding of cables.	Add paragraph 6.4.4 as follows: Whilst the routing of such lines by the Distribution Network Operator is usually dealt with separate to the planning application for the renewable energy technology, developers are encouraged to provide details of indicative routes at the application submission stage. The Council encourages the undergrounding of cables as the first approach.
Campaign for the Protection of rural Wales – Conwy Branch	<b>Para 7.1.6</b> no reference is made to whether this applies both to schemes for individual and multiple numbers of turbines.	In response to the comment made by Cyfoeth Naturiol Cymru / Natural Resources Wales paragraphs 7.1.6 – 7.1.X have been changed – see CNC/NRW comments & response below.	Changes made to para 7.1.6 as follows: The Council have decided to adopt the minimum requirements and standards of information to be submitted with a Landscape and Visual Impact Assessment (LVIA) as guided by the Gillespies LLP (2015) Planning Guidance for Smaller Scale Wind Turbine Development: Landscape and Visual Impact Assessment Requirements. The document is attached as Appendix 5.

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	<p><b>Para 7.1.6</b> consider that the very valuable Zone of Theoretical Visibility (ZVT) plans should be a requirement for <u>all</u> schemes, including those with turbine heights of below 20m.</p>	<p>In response to the comment made by Cyfoeth Naturiol Cymru / Natural Resources Wales paragraphs 7.1.6 – 7.1.X have been changed – see CNC/NRW comments &amp; response below.</p>	<p>Changes made to para 7.1.6 as follows: The Council have decided to adopt the minimum requirements and standards of information to be submitted with a Landscape and Visual Impact Assessment (LVIA) as guided by the Gillespies LLP (2015) Planning Guidance for Smaller Scale Wind Turbine Development: Landscape and Visual Impact Assessment Requirements. The document is attached as Appendix 5.</p>
	<p><u>All</u> applications should include a plan showing the existing, consented and applied for wind turbine proposals within a specified radius, the extent of which could perhaps vary depending on the number of turbines being applied for and/or their height. This information would be of great value to members of the public, community councils and other community groups when they are viewing the application.</p>	<p><b>Para 7.3.5</b> supports this comment and the information will be requested at the application stage.</p>	<p>Amend paragraph <b>7.3.56</b> to read like the following: The Local Planning Authority Council can supply a spreadsheet of consented, operational and in planning wind turbine development information by request. Information can also be found in the Landscape Sensitivity &amp; Capacity Assessment for Wind Energy Development (Appendix 3). Applicants will be expected to submit a map/plan of the existing consented, operational and in planning turbine proposals in relation to their proposal.</p>
	<p><b>Para 8.2</b> Similarities between ground based solar schemes with those for wind energy. Consequently the assessment criteria should reflect this. In particular it is felt that it is essential that all ground based schemes (perhaps above a certain size) should include a ZVT plan. The appreciation of</p>	<p>Comment noted. Whilst solar array schemes are not explicitly listed within Schedule 2 of EIA Regulations 45, para 6.33 of the SPG notes that they are likely to give rise to</p>	<p>Include new paragraph 8.2.5: It will be important to consider views to the site, including widely recognised iconic views and acknowledged important views to, from, or between heritage</p>

Organisation	Comment (summary)	Council's response	Changes proposed
	<p>the visual impact of a scheme currently being constructed in Conwy is such that outcome of the application may well have been different had such a plan been available.</p>	<p>significant effects therefore requiring a landscape and visual impact assessment. As part of the assessment a ZVT would be expected.</p>	<p>assets. The need for ZTV should be discussed with the Council, depending on the scale of the development and its location (e.g. in the context of any landscape designations).</p> <ul style="list-style-type: none"> <li>• <b>ZTV indicating the extent of visibility</b> (including the proportion of the site which will be theoretically visible if possible, and clearly indicating distance radii from the site);</li> <li>• <b>A map showing viewpoint locations overlaid onto the ZTV</b> (this may be combined with the above map if relevant);</li> <li>• <b>ZTV overlaid onto Denbighshire's Landscape Character Areas and any landscape designations</b> (if considered useful) see Appendix 3;</li> <li>• <b>Photographs and visualisations</b> for viewpoints to illustrate the location and extent of development in the landscape, provided and reproduced at a viewing distance of 40-50cm (this could comprise a photograph of the site and shading of field(s) to be affected by panels).</li> </ul>

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	<p>All applications should include a plan showing the existing, consented and applied for ground based solar scheme proposals within a specified radius,</p>	<p>Comment noted. It is proposed to add additional text to paragraph 8.2.4 (now 8.2.5) to address this comment.</p>	<p>Add sentence to paragraph <b>8.2.6</b>  When designing a solar PV development it is important to consider how the scheme fits with other existing, consented and proposed schemes (including within neighbouring planning authorities) to minimise cumulative effects. The Local Planning Authority can supply a spreadsheet of consented, operational and in planning solar array developments. Applicants will be expected to submit a map/plan of the existing consented, operational and in planning turbine proposals in relation to their proposal.  The Local Planning Authority can supply a spreadsheet of consented, operational and in planning solar array developments. Applicants will be expected to submit a map/plan of the existing consented, operational and in planning turbine proposals in relation to their proposal.</p>
	<p>Refer to barrier fencing around ground based solar schemes.</p>	<p>Paragraph 8.8 refers to site security and consideration of potential impacts on the landscape and visual amenity.</p>	<p>No change proposed</p>
	<p><b>Section 9: Hydro</b> consider the lack of guidance with regard to hydro a serious shortcoming. Suggest that this needs to be remedied because of the significant potential for micro-hydro schemes in Denbighshire.</p>	<p>Guidance on planning considerations is available in the Welsh Government document quoted in para 9.2. Acknowledge that there is</p>	<p>Delete para 9.3 – 9.10.</p>

Organisation	Comment (summary)	Council's response	Changes proposed
		inconsistency in the type of information provided within paragraphs 9.3 - Hydro, 9.6 – Biomass plants and 9.9 – Energy from Waste. Sufficient planning guidance to enable an application to be submitted and determined is available in the Welsh Government document and it is therefore proposed to delete paragraphs 9.3 – 9.10	
Campaign for the Protection of Rural Wales – Clwyd branch	<b>Para 4.1</b> please clarify if 50m is to hub or to blade tip.	Paragraph will be amended to clarify this text.	Paragraph 4.1 to be amended as follows: The Council commissioned this study to address concerns regarding an increased cumulative impact of 50 metre turbines (to blade tip) in the landscape.
	<b>Para 5.1.17</b> delete reference to 'temporary'. Consider it to be inappropriate because a human generation is defined as being of 30 years. With technology advances the operational life of the technology could extend beyond 25-30 years. <b>Para 5.1.17 &amp; Para 6.7.1</b> mention is made of agricultural land being returned to its pre-development condition. Such guidance is at variance with what is contained in TAN 6 (2010) and information from DEFRA	Agree. The reference to 'temporary' in para 5.1.17 (now para 5.1.19) will be deleted. TAN 6, para 6.2 states that once agricultural land is developed its return to agricultural land as best and most versatile is seldom practicable.	Amend 5.1.17 (now para <b>5.1.19</b> ) to align with TAN6 as follows: Where development is proposed on higher grade agricultural land it should be demonstrated to be temporary capable of removal and restoration (i.e. evidenced that at the end of the life of the development the land can be returned as a minimum to its pre-development use condition) Change <b>para 6.7.1</b> to refer to 'former use' rather than 'former quality'
	<b>Para 6.7.1</b> express concern that following decommissioning and restoration, protection is given to protect the land from being classed as previously developed brownfield land.	Agree. The wording in paragraph <b>6.7.1</b> will be strengthened.	Amend <b>para 6.7.1</b> as follows: The Council will consider using planning conditions to ensure that redundant development (eg turbines, solar arrays, biomass plant) are

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			removed when <del>no longer in use</del> the operation of electricity generation ceases. It will expected that the technology will be permanently removed from the land and the land/site restored to <del>an appropriate use,</del> usually restoration to its former use and (where appropriate) greenfield status <del>quality</del> .
	Separation distances to residential dwellings should be noted in this SPG.	National planning policy does not advocate setting arbitrary minimum separation distances. It is preferable for applications to be assessed on a case by case basis, taking into account the proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site.	No change proposed
	Separation distance from topographical features should be noted in this SPG.	National planning policy does not advocate setting arbitrary minimum separation distances. It is preferable for applications to be assessed on a case by case basis, taking into account the proximity of sensitive topographical feature, the size and scale of the turbine and the topography of the site	No change proposed
	<b>Para 8.9.2</b> reference should be made to railway operators with regard to glint and glare being potential issue where solar arrays are sited near rail network.	Agree. Reference to railways will be included in paragraph 8.9.2	Insert the words (Including railways) into <b>para 8.9.2</b>
	<b>Para 9.4</b> consultation should extend to those with riparian rights along water courses and other groups using the river for leisure.	Guidance on planning considerations is available in the Welsh Government document quoted in para 9.2. This provides sufficient	Paragraphs 9.3 – 9.10 will be deleted

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		planning guidance to enable an application to be submitted and determined and it is therefore proposed to delete paragraphs 9.3 – 9.10	
	<b>Glossary of Terms, page 41, 1<sup>st</sup> bullet point</b> (b/p) - propose amendment to read: 'Capability of viable grid connection and proximity to proposed site'.	Agree.	Change 1 <sup>st</sup> b/p on page 46 to read: <b>Capability of viable grid connection and proximity to proposed site'</b>
Clwydian Range and Dee Valley AONB Joint Advisory Committee	The Joint Committee strongly supports the need for an SPG to provide further advice and guidance in this increasingly significant and potentially controversial development sector. In general, the committee considers the SPG to offer sound advice and guidance for both developers and the planning authority in relation to renewable energy projects. Adoption of the Conwy and Denbighshire Landscape Sensitivity and Capacity Assessment as a material planning consideration is also fully supported.	Support welcomed	No change proposed.
	<b>Para 5.1.11 – 5.1.14</b> should include reference to nationally protected landscapes such as AONB's and help set the context by explaining that a significant part of Denbighshire is covered by the Clwydian Range and Dee Valley AONB.	Agree. Additional wording will be inserted to refer to Denbighshire's landscape designations.	Add the following wording as new <b>para 5.1.13:</b> A significant part of Denbighshire is designated for landscape of international and national importance. The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty spans the ridge of hills to the east of the County and the significant parts of the Dee valley is designated a World Heritage Site Alter subsequent para numbering.
	<b>Para 6.3.6</b> Recognition of AONB's as a 'sensitive area' under EIA Regulations is welcomed	Support welcomed.	No change proposed.

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	<p><b>Para 6.4</b> potential impact of grid connections cannot be divorced from an application for a new energy source if the full implications of any development are to be understood and assessed prior to determination. In this context, the section on Grid Connections (Section 6.4) should make clear the need for developers to provide details of the connection at initial application stage. This would be consistent with the statement in para 7.1.7.</p>	<p>Agree there is ambiguity between paragraphs. Welsh Government guidance does not give us direct rights to ask for this information as part of a planning application. Text will be reworded to clarify the process.</p>	<p>Insert <b>new paragraphs to 6.4</b> clarifying the process and the Council's expectations. Remove reference to grid connection in para 7.1.7 (now <b>7.1.8</b>).</p>
	<p><b>Para 7.1.6</b> need additional supporting information for turbines with a blade tip height of less than 20m in or within the setting of sensitive areas, including the AONB.</p>	<p>Comments notes.</p>	<p>Changes made to para 7.1.6 as follows: The Council have decided to adopt the minimum requirements and standards of information to be submitted with a Landscape and Visual Impact Assessment (LVIA) as guided by the Gillespies LLP (2015) Planning Guidance for Smaller Scale Wind Turbine Development: Landscape and Visual Impact Assessment Requirements. The document is attached as Appendix 5.</p>
<p>Cyfoeth Naturiol Cymru / Natural Resources Wales</p>	<p>Welcome and support the efforts made in preparing the document.</p>	<p>Support welcomed</p>	<p>No change proposed.</p>
	<p>Confirm whether it was considered that there were likely to be any significant environmental effects arising from this guidance document.</p>	<p>Strategic Environmental Assessment was considered at the higher level plan (Local Development Plan).</p>	<p>No change proposed.</p>
	<p><b>Para 5.1.14:</b>The factors used for assessing Landscape Sensitivity strategically are also useful in undertaking preliminary assessments of the appropriateness of a development and its site within a local context.</p>	<p>Comments noted</p>	<p>No change proposed</p>

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	<p><b>Para 7.1.6 – 7.1.9</b> Useful paragraphs for setting out what level of information is appropriate to the scale of the development and sensitivity of the locality. Please consider referencing Gillespies work in south Wales for consistency across Wales (even if the categories used for the turbine typology are different)</p>	<p>Agree. Consider the work carried out by Gillespies (2015) on behalf of The Heads of the Valleys Landscape Officers and Planners to be a good reference point and a guide which should be adopted across Wales for consistency.</p>	<p>Amend text to include reference to Gillespies work (new <b>paras 6.3.6. &amp; 7.1.6</b>):  With regard to determining whether a particular development is likely to have a significant effect on the landscape or on visual amenity that forms part of the EIA assessment, the Council will use guidance contained in the Gillespies LLP (2015) Planning Guidance for Smaller Scale Wind Turbine Development: Landscape and Visual Impact Assessment Requirements The document is written with regards to wind energy, however the Council feel it is a useful guide to adopt there.</p>
	<p><b>Para 7.1.8</b> Please state the current version of the guidance GLVIA 3<sup>rd</sup> edition.</p>	<p>Agree. The text will be amended to refer to the current version of the guidance.</p>	<p>Amend text (new <b>para 7.1.3</b>) to include full reference: Landscape and Visual Impact Assessment (LVIA) is a standard process for examining the landscape and visual impacts of a development in an EIA. The formal methodology for this is set out in the 'Guidelines for Landscape and Visual Assessment (GLVIA 3<sup>rd</sup> Edition), produced by the Landscape Institute and the Institute of Environmental Management and Assessment.</p>
	<p><b>Para 7.3.5</b> It is common practice to include consented, operational and in planning wind development within a cumulative impact assessment. Please add reference to this.</p>	<p><b>Para 7.3.5</b> supports this comment and the information will be requested at the application stage.</p>	<p>Amend paragraph <b>7.3.56</b> to read like the following:  The Local Planning Authority Council can supply a spreadsheet of</p>

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			<p>consented, operational and in planning wind turbine development information by request. Information can also be found in the Landscape Sensitivity &amp; Capacity Assessment for Wind Energy Development (Appendix 3). Applicants will be expected to submit a map/plan of the existing consented, operational and in planning turbine proposals in relation to their proposal.</p>
	<p><b>Para 7.4</b> Suggest slight change in approach. Suggest it is useful to differentiate between Community Outlook and Residential Visual Amenity: Change 7.4 to Effects upon residential views</p>	<p>Agree. Title of paragraph will be amended to refer to effects upon residential views.</p>	<p>Change para 7.4 <b>Effects upon residential views</b> and delete <del>Residential Visual Amenity</del></p>
	<p>Delete current 7.4.1 - 7.4.6 and replace with new 7.4.1 as suggested.</p>	<p>Agree. These paragraphs will be replaced.</p>	<p>Ament text to para 7.4.1 as follows:  <del>Views from private inhabited buildings and their curtilage have to be considered as these are regarded as a sensitive visual receptor.</del>            Planning Policy Wales 8 states that proposals should be considered in terms of their effect on the amenity and existing use of land and buildings in the public interest. As such the LPA will advise on a case by case basis as to how the effects upon private residential views will need to be considered. One or both of the following approaches may be necessary:</p> <p><b>Assessment of effects upon Community Outlook</b>, where views</p>

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			<p>which contribute to the landscape setting enjoyed by residents in the area are to be included within the LVIA.</p> <p><b>Assessment of effects upon Residential Amenity</b>, where the proximity/ scale of development has the potential to be visually overbearing or overwhelming from a private inhabited building and its curtilage making it unpleasant to occupy. This assessment may also include other aspects such as noise and flicker effect, is a separate assessment to the LVIA, although LVIA techniques are commonly used.</p>
	<p><b>Para 7.7 Historic Environment</b> – Please include reference to ASIDHOL2 assessment.</p>	<p>Agree. Additional text referring to ASIDHOL2 will be included.</p>	<p>Paragraph 7.7.3 to be reworded as follows: Consideration should be given to the assessment process for registered historic landscape: The Assessment of the Significance of Impacts of Development on Historic Landscape (ASIDHOL2). This can be required independently to other heritage assessment tools. When the landscape or visual effects upon registered historic landscapes are likely to be of 'more than local' in effect.</p>

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	<p><b>Para 8.3 Land Management</b> – propose more succinct wording</p>	<p>Agree. Paragraph will be reworded</p>	<p>Paragraph 8.3.1 to be reworded as follows:..... The Council is keen to ensure that the post construction site is maintained to avoid the spread of non-native plant species and native weeds. In addition, post construction, when access is more infrequent and by smaller plant, the reinstatement of small field entrances and gateways would both help reduce views of the development and maintain traditional roadside rural characteristics. Remaining text to be deleted</p>
	<p><b>Para 7.5 &amp; 8.5 Protected Species</b> – please ensure reference is made to proposals not resulting in impact on Favourable Conservation Status of protected species.</p>	<p>Agree. These paragraphs will be amended to include reference impact on Favourable Conservation Status of protected species.</p>	<p>Add text to paragraphs <b>7.5 &amp; 8.5</b> as follows: Any planning application will need to demonstrate that the proposal will not impact on the Favourable Conservation Status of protected species (including bats). We would expect any planning application to include surveys and/or assessments of protected species.</p>
<p>Dwr Cymru Welsh Water</p>	<p><b>Para 7.12.3</b> states that the Local Authority may request a hydrological/geological report to be submitted to accompany a planning application. We would encourage pre-application discussions with developers/Council's Public Protection department to ensure that any hydrological report contains the information required to make a full assessment of the planning proposals (for example there may be instances where DCWW would require pre-development monitoring of the surrounding raw water quality).</p>	<p>Agree. Additional text will be included regarding pre-application monitoring to inform report.</p>	<p>Add text to paragraph <b>7.12.3</b> as follows: The local planning authority may request a hydrological and / or a geological report to be submitted and a scheme of works to be drawn up to ensure hydrological / geological assets are safeguarded during the construction, operation and decommissioning of the turbine(s). This would mean pre-development monitoring to inform the report.</p>

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RWE Innology UK Ltd	<p><b>Para 5.1.9</b> The reference to Technical Advice Note 8 Planning for Renewable Energy (TAN8) capacity is to the 800MW target specified in the original 2005 document, rather than the higher limits set out in the Garrad Hassan report and in the TAN8 clarification letter issued by John Griffith AM (July 2011).</p>	<p>Agree. Text will be added to include reference to TAN 8 clarification.</p>	<p>Insert new paragraph <b>5.1.10</b> as follows:  The letter issued by John Griffith AM (July 2011) is a material planning consideration which increased the 800MW target in TAN8 to 1666MW and increased the capacity of SSA A 'Clocaenog Forest' from 140MW to 212MW.</p> <p>Alter remaining numbering.</p>
	<p><b>Appendix 3</b> 'Clocaenog Forest – Cumulative Noise Assessment' (12 September 2007) also refers to the lower figure at paragraph 1.2.</p>	<p>Comment noted, however, reference in this document cannot be changed as this was a one off piece of consultancy work</p>	<p>No change proposed</p>
	<p><b>Para 5.2.2</b> The inclusion of 'number of turbines' and 'blade tip heights' as 'Supplementary Criteria' introduces considerations which potentially conflict with the categories for defining 'Scale' which are already set out in local and Welsh policy. Remove 'Supplementary Criteria' column from the table at paragraph 5.2.2 of the Draft Renewable Energy SPG.</p>	<p>No change proposed as a result of the comment. However, propose changes to the supplementary criteria to reflect the DCC Gillespies (2013) landscape study and the Gillespies (2015) Heads of the Valleys landscape study.</p>	<p>No change proposed</p>
	<p><b>Para 6.3.6</b> The requirements in terms of detail to accompany a request for an EIA Screening Opinion exceeds the legislative requirements set out in the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended) (the 1999 Regs), however it is noted that the wording states "<i>should</i>" rather than "<i>must</i>". The main anomaly between the legislation and this Draft Renewable Energy SPG is that DCC are requesting "<i>a detailed description of the proposal</i>" whereas the 1999 Regs require "<i>a brief description of the nature and purpose of the development</i>". Given that the onshore wind projects developed by RWE are invariably EIA developments, this</p>	<p>This is the Council's preference as experience shows that this information is needed.</p>	<p>No change proposed.</p>

Organisation	Comment (summary)	Council's response	Changes proposed
	anomaly isn't of significant relevance to our work but is highlighted for information.		
	<b>Para 7.1.11</b> Delete reference to "Circular 8/20072" as it relates to Scottish Natural Heritage guidance.	Agree. Reference will be deleted	Reference will be deleted
	<b>Para 7.8.8</b> Delete reference to Appendix 3 (Dick Bowdler and New Acoustics reports) and insert reference to ESTU-R-97 (and any successor or supplementary guidance to it as endorsed by the UK and/or Welsh Government. The reason stated was examination of details for the Clocaenog Forest Wind Farm.	Disagree. The Council acknowledges the use of ESTU-R-97 and companion guide (IOA) in paragraph 7.8.1-7.8.4. Still, the Council's preferred reference document for cumulative noise is Appendix 4 (Bowdler 2012).	No change proposed.
	<b>Appendix 2:</b> Please append the full document and not just the Executive Summary.	Agree. The full Landscape Sensitivity report will be appended to final document	Append full Landscape Sensitivity report to final document.
Welsh Government - Historic Environment Service (Cadw)	<b>Para: 6.3.5</b> highlights the importance of 'setting' but describes it as 'visual setting'. Whilst setting is considered primarily a visual concept it is not entirely so and other aspects such as noise may also be relevant.	Agree. The word 'visual' will be deleted from para 6.3.5.	Remove the word 'visual' in <b>para 6.3.5</b> .
	<b>Para 7.7.3</b> Whilst consultation with the County Archaeologist and the regional Welsh Archaeological Trust is highlighted there is no discussion of the circumstances in which Cadw might be consulted.	Agree. Reference to Welsh Historic Environment Service (Cadw) will be added at the end of <b>para 7.7.4</b> .	Additional text will be added to the end of <b>para 7.7.4</b> . as follows: Applicants are also advised to contact the regional archaeological trust - Clwyd Powys Archaeological Trust and Wales Historic Environment Service (Cadw).
	<b>Para 7.7 &amp; 8.6</b> neither paragraphs include any reference to the assessment process for registered historic landscapes ASIDHOL which can be required independently to other heritage assessment tools.	Agree. Additional text referring to ASIDHOL2 will be included.	Paragraph 7.7.3 to be reworded as follows: Consideration should be given to the assessment process for registered historic landscape: The Assessment of the Significance of Impacts of Development on Historic Landscape (ASIDHOL2). This can be required independently to other

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			heritage assessment tools. When the landscape or visual effects upon registered historic landscapes are likely to be of 'more than local' in effect.
	<b>Para 7.7</b> does not highlight the importance of undesignated assets (though these are mentioned in 8.6) which might be recorded on the regional Historic Environment Records. Nor does it highlight the potential for as yet unrecorded archaeology to be identified – the nature of archaeological enquiry being a dynamic knowledge base.	Agree. Additional text to be included to refer to Denbighshire's rich heritage of undesignated sites.	Additional text to be added to para 7.7.4 as follows: In addition Denbighshire has a rich heritage of undesignated sites. Applicants are advised to contact the Council's Conservation Section and County Archaeologist during the pre-application stages.
	<b>Para 7.7.2</b> should mention views to and from monuments.	Agree. Reference is made to 'setting' which includes 'views' to and from a monument.	No change proposed.