

Appendix 1: Detailed consultation responses

	Representor	Summary of Comment	Council Response
1.	RenewableUK Cymru.	The link to our report at the bottom of Page 12 will no longer function, the correct link is: http://www.renewableuk.com/en/publications/index.cfm/Onshore-Wind-A-Community-Commitment	Comment Noted. Web link will be updated
2.	Design Commission for Wales	Please would you replace the earlier version of Designing Wind Farms in Wales with this one (see link), including any reference to it which you may have made in other documents. Sections of the document have been revised to take into account a fuller recognition of the planning policy background to this area of development. http://dcfw.org/publications/view/wind_farm_design/	Comment Noted. Web link will be updated
3.	Conwy County Council	Question if this document is more like a validation/checklist document rather than a Planning Guide similar to an SPG with links to LDP policy. Wonder whether it's better to call it just a guidance document. Our DC section is now keen to use the checklist so long as we don't call it a "validation checklist" so we're proposing to get it in use as a guidance document shortly. This new feel gives a better steer through pre-app and getting the right information submitted.	Accept point on whether this is an IPG or just a guidance document, however there is no specific definition of an IPG, so not sure if there is any benefit in amending the title - We can't call it a validation checklist as Welsh Government Guidance (as set out in 1APP Guidance and Welsh Circular 02/12) only allows for local validation checklists to be introduced for major development proposals.
3.		Introduction: WG planning policy doesn't really set out guidance for under 25MW rather than 5MW. PPW now Edition 5 2012.	Comment noted. Corrections made to document.

3.		2.1 "wider farming picture"- I know what you mean but it doesn't sound right.	2.1 'wider farming picture' – this is the phrase used in TAN6, therefore used same terminology in IPG (TAN6 par. 3.10 refers to farm plans as a mechanism to support applications for farm diversification proposals – its states such plans should demonstrate how the diversified activity fits into the wider farming picture) . No change proposed.
3.		2.2 Box 1- are these scales in PPW or are they yours. Perhaps include over 50MW just for continuity.	2.2 Box 1 – scales referred to in Box 1 are consistent with PPW. PPW categorises all windfarm development over 25MW as strategic scale, but does not go on to distinguish between schemes over 50MW as major infrastructure projects. However, in the interests of clarity, we could insert an additional category: Strategic Major Infrastructure Projects (determined by the Secretary of State) – onshore wind over 50MW.
4.	Ramblers Cymru.	Document describes only what information is required, but does not define what is and is not acceptable. E.g. i) no specific guidance for development in AONB. Should be explicit that large turbines are unacceptable in AONB, and that turbines, over 15 – 20m will be refused. ii) council should set out minimum separation distances from houses and roads. Guidance should specify that applications within 500m of a house will be refused. iii) More consideration should be paid to inter-visibility of single turbines. Guidance should be included to make clear distinction between a single turbine and a cluster of turbines, regardless of ownership. Should be a presumption against applications for turbines that are inter-visible with others proposed or erected.	This is an interim guidance document, use to guide the applicant and decision maker. Policy on the acceptability of on shore wind energy development will be set out in the Local Development Plan. The findings of the Examination in Public are imminent. It is the intention to revise this document once the policy is in place and name it a Supplementary Planning Guide. National planning policy does not advocate setting arbitrary minimum separation distances; there may be instances where a turbine within 500m of a residential property is acceptable in planning terms, and similarly there may be instances where turbines > 500m from a residential property would still give rise to unacceptable impacts on residential amenity, therefore 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.

			Inter-visibility with other turbines is taken into consideration when planning applications are assessed, and where unacceptable cumulative visual impacts are likely to occur, planning permission would be refused. However, there would be instances where the landscape can tolerate more than 1 wind energy development, and as such inter-visibility is not in itself a reason to refuse an application.
4.		Section 4 deals with farm diversification schemes. Turbines should not be considered as a valid farm diversification. All turbines should be treated as commercial ventures and assessed on their own merits. All turbines should be treated equally and farm diversification schemes should not be approved even though the landscape and other constraints are such that it would be refused if it were not a farm diversification.	TAN6 states LPAs should support the diversification of the rural economy and specifically refers to small scale renewable energy technologies being an acceptable form of farm diversification. Therefore the farm diversification merits of a scheme are material to planning decisions, but they need to be weighed against other planning considerations. This section does not imply that the farm diversification merits would automatically outweigh adverse landscape impacts, but rather it seeks to clarify the approach the Council will take when assessing whether a wind turbine proposal constitutes as an acceptable form of farm diversification, and clarifies the information required to be submitted with planning applications, should applicants wish weight to be attributed to the farm diversification merits of the scheme.
4.		As above. Community venture is not a valid matter. Either the landscape can accept the turbine or it cannot, irrespective of the people behind the scheme. It should be made clear that this requirement takes precedence over the community aspects of the application.	Planning Policy Wales sets out general support for community driven renewable energy projects. The purpose of this section of the IPG is to provide a local interpretation of 'community driven energy projects' to avoid any ambiguity on this issue. Where genuine, direct and tangible benefits to the local community can be identified, it may be reasonable to attribute weight to those benefits when making planning decisions, however the IPG does not imply that community schemes would be granted planning permission where other unacceptable adverse impacts have been identified.
4.		6. Since Community Benefits is outside of the planning system, suggest this section of the Guidance is removed and dealt with elsewhere.	IPG clearly states that community benefit schemes are not material planning considerations. However as they are common place with windfarm developments, the IPG seeks to provide information to

			applicants and local communities on how schemes can be set up and administered.
5.	Mr G Palmer, Pwllglas, Ruthin.	<p>Council should adopt minimum separation distances from residential properties depending on height of turbines - similar to English authorities. Suggest Council adopts distances proposed in a Private Members Bill (initiated by Lord Reay) i.e.:</p> <ul style="list-style-type: none"> • 25m – 50m high turbine = 1000m separation distance • 50m – 100m high turbine = 1500m separation distance • 100m – 150m high turbine = 2000m separation distance • > 150m high turbine = 3000m separation distance 	Private Members Bill is being progressed by a Member of the House of Lords and as such is not a Government backed initiative, and is unlikely to be successful. Please see response above regarding minimum separation distances (response to No 4).
6.	Hefina Roberts, Cynwyd, Corwen.	Supports small wind, providing there isn't too many in same area. Large windfarms such as proposed Mynydd Mynyllod windfarm are too big and will spoil the view and natural beauty of area. Should listen to local people. Would prefer to see more clusters of small turbines spread across countryside so that every farmer can benefit, instead of 1 or 2 big windfarms.	Comment noted. Landscape and visual impact considerations are assessed on a case by case basis. No changes proposed.
7.	Karen Roden, Cynwyd, Corwen.	<p>Points raised in letter: <u>Separation distances between turbines and dwellings.</u> – Whilst guidance advises applicants seek to minimise significant detrimental visual impacts from dwellings within 500m, Council should recognise that this 'buffer zone' is being challenged by many other councils around the UK as being inadequate. E.g. Milton Keynes attempted to create separation distance of 2km, which is being challenged in court by RWE. Famous case of June and Julian Davis who settled out of Court due to no longer being able to live in their home after turbines erected 800m from their home. Denmark operates a compensation scheme for nearby properties and Germany applies separation distances based</p>	Please see response above (No.4 & 5) regarding minimum separation distances.

		on noise level protection of the area.	
7.		<u>ETSU-R-97 Noise guidance</u> – Guidance is out of date and no longer fit for purpose. DCC should err on the side of caution and ensure turbines are more than 500m from dwellings to protect against noise and shadow flicker.	ETSU-R-97 is still Government endorsed guidance which is referred to in TAN8. DECC commissioned Hayes McKenzie in 2011 to review the current wind turbine noise guidance. It concluded that the ESTU guidance is still relevant but advised that further best practice guidance is developed to ensure consistent interpretation of ESTU recommendations. Therefore, in the absence of any new guidance, the Council should continue to have regard to the ESTU guidance when assessing noise impact.
7.		<u>Economic impact on an area.</u> Community Benefits – aware that they are not a material planning consideration, but must be difficult for Councillors to not be aware that money is available when determining applications. Turbines have detrimental impact on tourism economy. DCC need to be aware that indiscriminate pin cushioning of turbines could lead to a drop in visitor numbers. Especially a concern in Upper Dee Valley which is heavily dependent on tourism. Relatively small amounts of community benefit cannot repay detrimental impact on property values, threat to jobs and businesses, destruction of landscape and harm caused to health and wellbeing of residents.	Comment noted.
7.		Points raised in comments form: <u>Page 4</u> - Agree that domestic 11.1m turbines are acceptable in certain areas. Concern expressed with regards to the >40m turbines.	Noted.
7.		<u>Page 7</u> – Full financial information for farm income and precisely why the turbine is needed should be supplied with application. Access is a major concern for neighbours.	TAN6 states that farm plans may usefully support applications relating to farm diversification proposals, but they should not be made a requirement of applicants. The IPG states that the onus will be on the applicant to put forward an acceptable farm diversification justification in accordance with the suggested criteria against which applications will be assessed.
7.		<u>Page 7</u> – 500m is too close. Evidence to suggest noise	Please see response above regarding minimum separation distances.

		nuisance, shadow flicker, loss of property value. Health and welfare of residents should be given greater consideration.	
7.		<u>Page 8</u> – EIA should be required for all turbines over 11.1m	Disagree. The EIA regulations require turbines over 15m to be screened for EIA, however EIA should only be required where significant environmental effects are likely. This can only be assessed on a case by case basis, and there is no justification for requiring all wind turbine development to be subject to EIA.
7.		<u>Page 8</u> – Farm diversification is a sensitive issue – large turbines are money making schemes. More weight should be given to the impact on neighbours, local environment and tourism.	Farm diversification merits would always be balanced against other planning considerations, including the impact of the turbine on neighbours and the local environment.
7.		<u>Page 9</u> – ‘Farm diversification’ turbines would rarely meet the requirements set out in guidance - Gwyddelwern (50kW) turbines each yield £38,000 in feed-in tariff payments a year. They dominate the skyline and are out of scale. Such mistakes should be avoided in the future.	IPG seeks to provide clarity on what the Council considers to be an acceptable form of farm diversification. The aim is to introduce criteria which would enable consistent planning decisions to be made on on-farm wind turbine applications.
7.		<u>Page 10</u> – ‘community based’ turbines – companies trying to mislead / convince people they can have clean energy. Whole concept needs greater scrutiny – wind energy companies are businesses, not green charities.	IPG seeks to provide clarity on what the Council considers to be a ‘community driven energy scheme’. Any scheme driven by a commercial business would be treated as a commercial venture.
7.		<u>Page 12</u> – Community benefits are legalised bribes. Too often seen to be a planning consideration when this should not be the case.	IPG clearly states the community benefit schemes are not a material planning consideration, and as such no weight is apportioned to the presence, or lack of, a community benefit scheme when windfarm planning applications are determined.
7.		<u>Page 14</u> – EIA should be required for all turbines over 11.1m	Disagree. The EIA regulations require turbines over 15m to be screened for EIA, however EIA should only be required where significant environmental effects are likely. This can only be assessed on a case by case basis, and there is no justification for re requiring all wind turbine development to be subject to EIA.
7.		<u>Page 16</u> – Landscape should be major consideration. Photomontages often not reflective and look smaller than	IPG Appendix 2 provides guidance on the supporting information to be submitted with a planning application. Aim is to ensure landscape

		in reality.	and visual impact assessments (incl. photomontages) are produced in accordance with professional best practice guidance.
7.		<u>Page 17</u> – cumulative impact should be given greater consideration, especially in Upper Dee Valley.	Noted. Cumulative impact is a material planning consideration.
7.		<u>Page 19</u> – Desk based ornithological and ecological studies should not be acceptable.	Disagree. Supporting information provided should be proportional to the scale of the development and the environmental sensitivity of the site. The Council would always consult with the County's Biodiversity Team and the Countryside Council for Wales on wind turbine planning applications, and they would advise on the nature of ecological assessments that are required.
7.		<u>Page 21</u> – Noise subjective. ESTU guidance out of date. Noise travels through Upper Dee Valley. Noise impact on camping / caravan sites needs to also be considered.	Please see response above regarding ESTU guidance. Agree that tourism businesses are also noise sensitive receptors.
7.		<u>Page 23</u> – A5 could be severely impacted in all windfarm proposals go ahead.	The Council would consult with the highways department on wind turbine developments and the impact on local road network would be considered as part of the planning application assessment. Equally the Council consult with neighbouring Local Authorities.
7.		<u>Page 23</u> – Shadow flicker can be felt if turbines too close (i.e. 500m). Should be 2km separation distance for taller turbines.	Shadow flicker should be considered on a case by case basis, taking into account the position of the turbine in relation to the nearby dwelling as well as topography of the land, existing screening and orientation of windows. No basis for setting arbitrary minimum separation distances.
7.		<u>Page 25</u> – Hydrology important. Danger of seepage from degrading concrete into River Dee and increased flooding from run-off.	Noted. Hydrological impact is a material planning consideration which can be taken into consideration when planning applications are assessed.
7.		<u>Page 25</u> – Upper Dee Valley is MOD low fly zone. Aviation lights on turbines would ruin dark skies.	The Ministry of Defence (MOD) is consulted on all wind turbine planning applications, and significant weight would be given to an objection from the MOD. Current guidance from the Civil Aviation

			Authority is that aviation lighting is only required on structures over 150m. No windfarm development in the county to date has exceeded 150m in height (proposed Clocaenog Forest turbines have a tip height of 145m)
8.	Dr Christine Simmons, Nantglyn, Denbigh.	An aspect no-one seems to consider in the discussions about wind turbines is the gross destruction of the beautiful landscape of north Wales, not just of the turbines themselves, but even more so by the pylons required to carry the power from the turbines to sub-stations. (Reference is made to the Scottish Power Energy Networks North Wales windfarms overhead lines major infrastructure project which is proposing to erect new high voltage overhead lines from Clocaenog Forest to St Asaph)	The impact of wind turbine development on the landscape is a key material planning consideration when a planning applications is determined, which is explained in the IPG. Whilst we appreciate the respondent's concern regarding the impact of new grid connection infrastructure required in association with wind energy development, this often cannot be considered as part of wind energy planning applications, as new overhead electricity lines are governed by a separate consents procedure and the local planning authority is not the decision making body for overhead electricity lines. New overhead lines with a nominal voltage over 132kV are classed as major infrastructure projects and are subject to the Planning Act 2008 consents regime; applications for development consent are therefore submitted to the Planning Inspectorate and determined by the Secretary of State. New overhead lines with a nominal voltage of less than 132kV are subject to the Electricity Act 1989 regime and are submitted to and determined by DECC. Typically it is the electricity undertaker rather than the wind developer who would seek consent for new overhead lines. The local planning authority is a statutory consultee, and when responding to consultation requests, the local planning authority would always have regard to the impact the proposed overhead lines would have on visual amenity and the local landscape, which would be reflected in the Council's consultation response to the relevant decision making body.
9.	Countryside Council for Wales.	Support and welcome the intention to introduce this interim planning guidance in advance of producing a Wind Energy Supplementary Planning Guide.	Comment noted.
		Document should be screened to ascertain whether or not it requires a Strategic Environmental Assessment (SEA)	Comment noted. Screening undertaken and sent to statutory consultees (Countryside Council for Wales, Environment Agency and

		and/or a Habitat Regulations Assessment (HRA).	Cadw).
9.		CCW would appreciate an indication of timescale in terms of interim use of this document in advance of the preparation and adoption of a Wind Energy SPG.	Revisions and new Supplementary Planning Guidance document are timetabled following the outcome of the Denbighshire Local Development Plan examination.
9.		Welcome that the guide is for small turbine developments as well as larger windfarms and single large turbines. Agrees with differentiating between the scale of impact, infrastructure and the difference in information required at the planning application stage.	Comment noted.
9.		Suggest an additional section between current Introduction and Section 1 to outline the policy context (national and local) in relation to Renewable Energy and Low Carbon Energy. This would put the document in context. Also suggest giving details of the consenting process in Wales, identifying the process is dependant on the scale of development.	Agree. Paragraph altered. Section included.
9.		Suggest, before giving detail of the permitted development rights, details should be included on: areas of constraints for wind energy development and details of the types, scale and sizes of turbines and how they differentiate. This would help clarify between different application types and the degree of information required to support such planning applications.	This is an interim guidance document, used to guide the applicant and decision maker. Policy on the acceptability of on shore wind energy development will be set out in the Local Development Plan. The findings of the Examination in Public are imminent. It is the intention to revise this document once the policy is in place and name it a Supplementary Planning Guide.
9.		Suggest that document as currently read lacks reference to the statutory involvement of CCW and EAW in particular with regards to pre -application and application advice.	Noted. Consider review.
9.		Section 1.2 – Question whether this section would be better formatted as a checklist or table? Part F (DAS) – suggest it is important that details are included for the following: <ul style="list-style-type: none"> any excavation works including drainage works and the implications on ground water, ecology and soil 	Disagree no additional benefit. Keep to same format. Agree to incorporate recommendations into text.

		<p>removal;</p> <ul style="list-style-type: none"> any ancillary equipment and how their visual impacts have been reduced; detail any traditional landscape features and how development has avoided loss or minimised the impact on such features; any details of decommissioning and reinstatement of land; and any community engagement that has taken place. 	
9.		Appendix 1 – suggest reference to relevant legislation is made with regard to need for EIA. Suggest the paragraph is reworded to say that subject to the likelihood of significant effects that an EIA may be required, particularly in defined 'sensitive areas' such as AONB's.	Agree. Paragraph altered.
9.		Appendix 2 (A2.1) – Welcome the inclusion of this detailed section. Suggest reference to areas classed in LANDMAP as being of Outstanding value.	Agree. Paragraph altered.
9.		As part of the Landscape and Visual Assessment a number of view points should be selected in order to assess the existing visual resource. Suggest that the choice of viewpoint locations should be informed by the following; Zone of Theoretical Visibility; Height of turbine(s) and distance from them; character and sensitivity of the landscape; and the importance of those views.	Additional text added to the relevant bullet point in b) Turbine with blade tip between 20 and 50m in height and c) Turbine with blade tip between over 50m in height.
9.		Suggest the following cumulative impact radius is considered; small turbine development within 5km radius and medium and large turbine development should extend the radius to between 15km and 30km.	Comment noted. Landscape and visual impact considerations are assessed on a case by case basis. No changes proposed.
9.		Suggest that developers should contact the Local Authority to obtain a list of existing, permitted, live and imminent planning applications for wind turbine and wind farm development for consideration as part of any Landscape	Agree. Additional paragraph added.

		and Visual Assessment.	
10.	Denbigh Town Council.	The town council concluded that the document was complete and thorough and accepted in its entirety without further comment.	Comment noted.
11.	Ian Gardner, Waen, Nantglyn, Denbigh.	Would like to see a revision to the opening paragraph of the IPG to reflect more neutral language.	Agree. Introductory paragraph amended.
11.		Would like 500m distance, page 7, to be considered as a minimum rather than an absolute distance.	Please see response above (No.4) regarding minimum separation distances between turbines and habitable dwellings. Consider deleting the reference to 500m distance in Section 1.2 (F) as a number of threshold distances are referred to in Appendix 2.
11.		Definition of Community Driven Energy Projects, page 11, to be more precise and worded specifically to exclude the possibility of minority shareholdings joint ventures.	IPG seeks to provide clarity on what the Council considers to be a 'community driven energy scheme'. Any scheme driven by a commercial business would be treated as a commercial venture.
11.		Suggest the IPG is worded so as to prevent reference being made by the developer for Community Benefit Schemes during the planning process because they can sometimes read more like adverts than technical assessments.	IPG clearly states the community benefit schemes are not a material planning consideration, and as such no weight is apportioned to the presence, or lack or, a community benefit scheme when windfarm planning applications are determined.
11.		Suggest that 'Industry Best Practice' guideline of £1,000 per MWH is a dated benchmark and should be updated to reflect the yield possible from onshore wind. Suggest the Council should challenge this figure. Suggest payments should be increased in line with inflation.	Comment noted. Relocate the paragraph into the Appendix and pass comment on the Regeneration Section.
11.		Suggests the Council should be clear in its role in determining the suitability of bodies established to distribute Community Benefit funds. IPG should describe the minimum standards it would expect in terms of governance.	Comment noted. Relocate the paragraph into the Appendix and pass comment on the Regeneration Section.
11.		Note that other Local Development Plans have a buffer zone for wind energy development. Would like to see the	Please see response above (No.4) regarding minimum separation distances between turbines and habitable dwellings.

		IPG introduce its own buffer zone of 1km from each turbine (> 20m) to a residential property.	
11.		Suggest that IPG is reworded to make reference only to ESTU 97 as a possible means rather than the prescribed means of determining the noise impact of windfarms. Also have specific mention to low frequency noise.	ETSU-R-97 is still Government endorsed guidance which is referred to in TAN8. DECC commissioned Hayes McKenzie in 2011 to review the current wind turbine noise guidance. It concluded that the ESTU guidance is still relevant but advised that further best practice guidance is developed to ensure consistent interpretation of ESTU recommendations. Therefore, in the absence of any new guidance, the Council should continue to have regard to the ESTU guidance when assessing noise impact.
12.	Darren Miller AM	I share with the local authority's view that the interim guidance on this issue will be helpful for all with an interest in the development of Wind Energy. My constituents have asked me to make the following points:	Noted.
12.		Local Authority to define minimum distance from turbines to residential properties to mitigate against noise pollution. Such distances to have regard to scientific research and updated on a regular basis.	Please see response above (No.4) regarding minimum separation distances between turbines and habitable dwellings
12.		Community Benefit Scheme: suggest a legal obligation for the delivery of such a scheme if a development is granted planning permission.	Comment noted. Relocate the paragraph into the Appendix and pass comment on the Regeneration Section.
12.		Environmental Impact Assessment: Suggest all schemes involving turbines over 11.1m in height should require an EIA.	Disagree. The EIA regulations require turbines over 15m to be screened for EIA, however EIA should only be required where significant environmental effects are likely. This can only be assessed on a case by case basis, and there is no justification for re requiring all wind turbine development to be subject to EIA.
12.		Farm Diversification: Suggest a financial need test to prevent the unnecessary development of wind energy schemes.	TAN6 states that farm plans may usefully support applications relating to farm diversification proposals, but they should not be made a requirement of applicants. The IPG states that the onus will be on the applicant to put forward an acceptable farm diversification justification in accordance with the suggested criteria against which applications will be assessed.

12.		Para A2.10: Fully support the proposal for a bond.	Comment noted.
13.	MOD – Defence Infrastructure Organisation	Para A2.1 (page 18) Add new section entitled ‘Aviation Lighting’. Add sentence – ‘There may be a requirement for turbines to be fitted with lighting for aviation safety purposes’.	Comment noted, paragraph changed.
13.		Para A2.9 (page25) Change ‘15m’ to ‘11m’ or insert new sentence stating ‘The local planning authority will consult the Ministry of Defence (Defence Infrastructure Organisation) on all wind turbine applications 11m or above in height to blade tip and/or rotor diameter of 2m or above’	Comment noted, paragraph changed.
13.		Para A2.9 (page 26) Under ‘Further Information’ add sentence ‘Defence Infrastructure Organisation Safeguarding’ and add hyperlink to DIO Safeguarding webpage – https://www.gov.uk/MOD-safeguarding	Comment noted, paragraph change d.
13.		Para A2.9 (page 26) Under ‘Further Information’ add sentence ‘Civil and Military Aviation and Defence interests’ and add hyperlink to Department for Energy and Climate Change Overarching National Policy Statement for Energy (EN-1) http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/consents-planning/nps2011/1938-overarching-nps-for-energy-en1.pdf	Comment noted, paragraph changed.
13.		Para A2.9 (page 26) Suggest add sentence at end of para – ‘However, the MOD intends to provide a pre -application consultation if requested by applicants.’	Comment noted, paragraph changed.
14.	Wing Commander D. H Insall	Suggest a sentence is added: No wind turbine larger than those permitted under Sec 1.1 as domestic turbines may be sited closer than 2 km (two kilometres) from another residential building.	With reference to minimum separation distances. Please see previous response to No: 4.
14.		Suggest deletion of Section 2.1 in its entirety. ‘Wind Farming’ is NOT a rural employment activity supporting land management: it is industrialisation’ I am a farmer.	Comment noted. No change proposed.
14.		Suggest deletion of Section 3. This is NOT part of planning guidance: it is BRIBERY.	Agree. Section removed to Appendix.

15.	CPRW Conwy Branch	Introduction: Support the need to guidance.	Comment noted.
15.		Section 1: Provides no actual guidance on what the planning requirements are for an acceptable wind turbine development. Merely sets out the planning application submission requirements for any scale wind development, suggest this would be better as an appendix.	This is an interim guidance document, use to guide the applicant and decision maker. Policy on the acceptability of on shore wind energy development will be set out in the Local Development Plan. The findings of the Examination in Public are imminent. It is the intention to revise this document once the policy is in place and name it a Supplementary Planning Guide.
15.		Suggest re-title and the Introduction rewritten to reflect that the document's focus is on wind energy as part of farm diversification and community scale rather than commercial.	Disagree. The current guidance sets out more than definitions to farm diversification and community projects. The purpose pursuing the document is to issue guidance now while awaiting the adoption of the Denbighshire Local Development Plan.
15.		Document fails to provide any policy guidance as to the criteria to be met for a proposal to be successful. Criteria should include: acceptable turbine height, distance from residential properties, landscape impact etc.	The location of individual turbines is determined by a number of site specific factors. Each application must be decided on its own merits. .
15.		Fees/Permitted development: These change over time, document should specify the date. Same applies to 'permitted development'.	Date to be specified on references. The guidance document to be reviewed should circumstances require.
15.		Design and Access Statement: Suggest details of electricity consumption is submitted for a specified period of several years, such as 3 or 5.	Agree. Alter paragraph to include additional text. Seasonal variations will be apparent in quarterly bills. Suggested text for bullet point 2, page 7: Details of annual electricity consumption of dwelling / farm / business over <i>three consecutive years</i> .
15.		Site/layout plan: Suggest plan should show the location of nearest residential dwellings to turbine development.	Agree. Alter paragraph to include additional text. Suggested text: Applicants should assess the potential for a proposal to have an impact on the outlook from inhabited buildings within 500m of a proposed turbine <i>Inhabited buildings should be named and mapped</i>
15.		Section 2: Suggest greater clarity is given by specifying if an acceptable scheme can or can't generate more than the electricity needs for the holding. What proportion of a farm's income from a turbine is acceptable?	<i>Are we saying that a scheme can or can't generate more than it needs on the holding? I say it is acceptable for the development to generate more than is required. The acceptability of the size and sitting of a higher/bigger turbine is a different consideration. Discuss with</i>

			Members at the training.
15.		Section 3: Suggest greater clarity is made on the physical planning criteria for such schemes e.g. distance from dwellings, visual impact, noise etc. Where is this found?	Towards the end of the first paragraph of Section 3 states that local benefits of a community driven project will be considered against other material planning considerations. They are in Appendix 2: Other Supporting Documents.
15.		Appendix 2: A2.1 Suggest guidance should specify that photographs points should be agreed with the LPA prior to application submission.	I cannot see what benefits this would bring. The Council can require additional photographs at the application stage should this be required.
15.		Detail Guidance: Turbine Size. The IPG needs to be amended to reflect the LDP policy VOE9. Suggest a buffer of 1km around the edge of the AONB for either reduced height or no turbines.	The Deposit Local Development Plan is subject to change following the examination hearing sessions held in January 2012. This interim guide is likely to be reviewed again following adoption of the Plan.
15.		Detail Guidance: Residential Separation Distance. Suggest the document introduces minimum separation distances to address the visual aspect of residential amenity as opposed to other criteria such as noise, shadow flicker etc. It is a legitimate planning consideration to safeguard the outlook from a property in respect of unacceptably overbearing or dominating development. This approach would limit the spatial distribution and height, potentially limiting landscape impact damage as well as giving more protection to directly affected householders.	With reference to minimum separation distances. Please see previous response to No: 4.
16.	Cynrhair Hiraethog Alliance	Section 2.1 – Farm Diversification. Support farming and its need to diversify in rural areas however cannot support the planning system allowing landowners to diversify into wind turbines when they do not farm. Less emphasis on diversification and more on cumulative landscape impact.	Many material considerations are assessed in the determination of applications to erect wind turbine(s). The IPG seeks to clarify our definition of wind energy farm diversification schemes. The weighting attached to each material consideration is decided by the decision maker.
16.		Section 2.2 - Community Driven Energy Projects. If the planning regulations are to be amended to enable villages and communities to benefit financially from wind turbines, why not allow benefits from other land uses less	There is a national aspiration towards generating energy from renewable resources. The weighting attached to each material consideration is decided by the decision maker.

		likely to cause landscape impact. More emphasis should be placed on cumulative landscape impact.	
16.		Section 3 – Community Benefits Schemes. Why is a whole section devoted to this even though it is not a material planning consideration. Details of the proposed community payments of the Clocaenog windfarm have been made public* even before full details of the schemes and applications for planning consent have been submitted. (* Economic Opportunities for Wales from Future Onshore Wind Development (January 2013)).	The IPG seeks to define the term used in Planning Policy Wales for 'community driven schemes'. Community benefit from a commercial wind energy development is different. Benefits are not material planning considerations. Distinction between the two is necessary in this guidance document.
16.		Appendix 1 – Environmental Impact Assessment. Concerned that the developer may leave out information in the detailed studies; and thus have an effect on the conclusions that are presented. EIA's need to be rigorously tested by independent experts which can be expensive for the Council. Is there sufficient funds?	The Council have two opportunities to seek information to determine a planning application, namely the Scoping Opinion stage (pre application) and following the submission of a valid planning application. Members of the public have the opportunity at the planning application stage. We consider this to be sufficient opportunity to raise any issues not covered in the Environmental Statement. In the majority of cases, the Council is confident that the planning fee will cover the cost of any additional external support is required. On larger wind turbine applications, those determined by the Infrastructure Planning Commission the Council has agreed a fixed fee from the developer to pay for any additional expertise.
16.		Appendix 2 – Decommissioning (part of A2.10, page 26) Suggest that <u>in all cases</u> a bond to cover decommissioning costs should be in place before construction commences.	A legal agreement is negotiated on a case by case basis. The Council will seek further clarification on the consistency of securing a bond in all negotiations. The IPG can be reviewed to reflect that decision.
16.		Appendix 2 – Private water supply (A2.8, page 25) Suggest that a planning condition is included in turbine development permissions to clarify the developer's responsibility to indemnify residents against loss of supply. Developer to prove that its development is not to blame for any damage to supply not the other way round as it is at present.	This information should be drawn up and agreed in the scheme of works required to ensure hydro/geological assets are safeguarded during the construction, operation and decommissioning of the turbine(s).
17.	Environment Agency Wales	Appendix 1 – Environmental Impact Assessment. Advise that a water feature survey and assessment of risk to water features from proposed turbines is submitted.	Noted. Text regarding the 'Recording of surface and groundwater features' has been included in A2.5.

17.		Appendix 2 - Section A2.8 – Hydrology and Geology. Stress the importance of understanding upland drainage and runoff implications of development on flood risk down stream. Suggest a drainage report may be required with a planning application in addition to the possible requirement for a hydrology and/or geological report.	Agree. Suggested additional text to the end of the 3 rd para of A2.8: <i>In addition a drainage report may be requested to ensure no increase in land runoff rates or modifications to local drainage patterns as a result of development.</i>
17.		Suggest greater mention of delivery of Biodiversity / Nature Conservation gain. Consistent with TAN 5 suggest submission of formal proposals to enhance biodiversity (such as Nature Conservation Enhancement Proposals).	Agree. Consider including reference to Hiraethog Conservation & Landscape Project and the RSPB Habitat Management Project.
18.	Sian Ifan.	Link to an article in the news paper The Telegraph describing and illustrating a list of accidents and fatalities caused by wind turbines internationally.	Comments noted. Distances to roads, public footpaths and inhabited buildings are material planning considerations in the determination of planning applications.
19.	Peter. L. Smith	Section 1.2 G: Other supporting documents. Add this section to the previous section (F) as all planning applications for installations larger than 'Sub Local Authority' scale should be required to present the information listed.	Disagree. Keep separate because of the statutory and non statutory nature of the information required.
19.		Section 3 – Community Benefits Schemes. Suggest that this 'industry best practice' is straight forward bribery. Suggest that Denbighshire County Council should challenge the industry to provide indisputable proof that installations are of benefit to the National Grid at times of maximum demand.	Agree. Section removed to Appendix.
19.		Appendix 1 – Environmental Impact Assessment. EIA or not suggest that wind turbine development should be forbidden in SSSI's, National Parks, AONB's and World Heritage Sites.	Appropriate weighting will be attached to development proposals in these areas.
19.		Appendix 2, Section A2.2 Ecological & Ornithology Impact. With regard to large scale wind turbines, suggest that damage to local wildlife and changes to local weather patterns are not yet understood. There could be lasting damage.	Comment noted. Concerns passed to the Council's Ecologist.

19.		Appendix 2, Section A2.10 Legal Agreements. Suggest that the lifespan of wind turbines has been proven to be less than originally forecast, 12 years, with repair and maintenance required more than expected. Without Government subsidy the private industry would not consider them viable. Suggest a bond, projecting inflation over a period of 25 years, is put in place to secure dismantling of installations.	A legal agreement is negotiated on a case by case basis. The Council will seek further clarification on the consistency of securing a bond in all negotiations. The IPG can be reviewed to reflect that decision.
20.	Dena Proctor	Concerns regarding the irreversible long term impact of turbine development on birds, bats, peat soils and associated flora. Against the use of public money to support commercial companies in this development. Funding should be used to develop new efficient and non destructive technology.	Noted.
20.		Support the work of STEM.	Noted, see response to Respondent Number 22, below.
21.	Anwen Roberts	Particularly concerned about proposed Mynydd Mynyllod development.	Comments have been passed on to the case officer dealing with any correspondence on applications to be determined by the Infrastructure Planning Commission.
21.		Suggest that minimum distances are set between wind turbine development and residential properties.	Please see response above (No.4) regarding minimum separation distances between turbines and habitable dwellings
21.		First hand experience of noise levels generated by turbines as the respondent works at Graig Lelo Quarry, below the Wern Ddu turbines.	Noise complaint passed over to Public Protection.
21.		Express concerns regarding the safeguarding of private water supplies.	Appendix 2 –Section A2.8, addressed hydrology and private water supply reporting.
22.	John Broughton on behalf of Stop the Exploitation of Mynydd Mynyllod	Consultation: Seems unfair that members of the public have to devote their own time and money to respond to consultation documents like this one when the wind industry and its supporters are able to employ full time experts. This inequality is even more unfair when one realises that the wind industry only exists because of	The Council is satisfied that consultation has been carried out in a consistent manor. Additional time was given in response to those who requested.

	(STEMM).	subsidies from energy customers, many of whom are in fuel poverty.	
22.		General comments: Suggest that minimum separation distances between turbines and habitable buildings to protect public health against the impacts of noise, amplitude modulation and shadow flicker.	Please see response above (No.4) regarding minimum separation distances between turbines and habitable dwellings.
22.		Section 1. A: Completed Application Form & B: Location Plan. Ensure the site boundary (red line) is continuous.	The Council sees no reason to require a continuous red line. No change proposed.
22.		Section 1. C: Site Plan. Final paragraph, change 'should' to 'must'.	Agree. Text amended.
22.		Section 1. E. Fee. The fee for sites up to 5 hectares is totally inadequate. Does any dishonoured cheque from the applicant render the application invalid.	The fee is set independently of the Council. Certificates of Decisions are not issued if the fee has not been paid.
22.		Section 1. F. DAS. Context/Purpose – it is now recognised that wind turbines do not 'offset' carbon emissions.	Noted. However, no proposed changes to text.
22.		Section 1. F. DAS. Layout – 500 metres distance to inhabited buildings is insufficient, suggest 1.5km distance.	Please see response above (No.4) regarding minimum separation distances between turbines and habitable dwellings.
22.		Section 1. F. DAS. Layout – 'locality' required further definition, suggest all operational & consented within 20km are consideration.	To be assessed on a case by case basis.
22.		Section 1. F. DAS. Layout – Suggest that a minimum distance to public footpaths, bridleways and other public access is noted here. No development should be within a minimum distance (at least 2x height or turbine at blade tip).	To be assessed on a case by case basis.
22.		Section 2.1 Farm Diversification. The following comments were made: Disagree with TAN 6 in principle (farmer to protect landscape). If the farmer is a tenant evidence should be provided that the landlord has consented. Suggest that a 'physically relating' turbine should be within 50 metres to the farm complex.	Agree. Partly procedural issue (requiring landowner consent) and partly detail to be assessed on a case by case basis.

		<p>A full Business Plan, three years certified annual accounts and electricity bills should be sought to judge subsidiary. Some indication of acceptable turbine capacity ratios be stated, suggest 2 x the proven electricity consumption as a maximum.</p> <p>There should be a presumption that 'farm diversification' schemes are limited to one turbine.</p>	
22.		<p>Section 2.2 Community Driven Energy Projects. Suggest more definition is required to explain 'the benefits being returned to the community'. Clarify if 'all', 'most' or 'some' benefits are returned.</p> <p>'Benefits' should be defined, change the word to 'profitability' and /or electricity.</p> <p>'Community' should be defined, those who live within a certain distance or all those who can view them.</p>	<p>Add the word 'local' to the last paragraph in the first bullet point. This will clarify that the financial benefits should be used locally.</p>
22.		<p>Section 3 Community Benefits Schemes.</p> <p>As this is not an element of planning law or planning permission therefore suggest it should not form part of the guidance.</p>	<p>Agree. Section removed to Appendix.</p>
22.		<p>Section 3 Community Benefits Schemes.</p> <p>Comment on the content:</p> <ol style="list-style-type: none"> 1. In practice the minimum now offered is £5,000 per megawatt with some developers agreeing £7,500. 2. Must be clearly stated that Denbighshire County Council cannot access the funds for its own purposes, nor determine their use, nor used to provide services which the Council is legally obliged to provide. 	<p>Comments noted. Will forward to Regeneration team.</p>
22.		<p>Appendix 1 - Environmental Impact Assessment.</p> <p>Suggest that all wind turbines taller than 15 metres in height (to rotor tip) should be subject to a Full EIA.</p> <p>Suggestion made to protect the landscape and protected birds and bats.</p>	<p>Disagree. The EIA regulations require turbines over 15m to be screened for EIA, however EIA should only be required where significant environmental effects are likely. This can only be assessed on a case by case basis, and there is no justification for requiring all wind turbine development to be subject to EIA.</p>
22.		<p>Appendix 1 - Environmental Impact Assessment.</p> <p>Suggest that the Council's own internal process should be</p>	<p>Disagree. There is no requirement to list the internal consultees. Officers within the Council are qualified professionals in their fields.</p>

		clarified. List which individual or group of officers are responsible for such determinations.	Should the Council feel require additional expertise it will commission external consultants to assist.
22.		Appendix A2.1 - Landscape and Visual Impact. Wind industry use various studies to promote how wind turbines in the landscape do not deter tourists. They are all fundamentally flawed as the people in the areas surveyed have little or no experience of seeing landscapes dominated by large industrial turbines. 'Cumulative impact assessment' should also consider prospective applications subject to National Infrastructure Planning Process.	With regard to tourism a number of 'sensitive receptors' are evaluated in landscape and visual terms. With regard to 'cumulative impacts' the text has been amended to include reference to SSA-A and major areas of wind development.
22.		Appendix A2.2 - Ecology and Ornithology. Suggest that a full survey of the surrounding area over a minimum of 6 months starting on the 1 st March in any calendar year should be undertaken to ensure the protection of birds and bats from turbine death. Bats, in particular suffer from air pressure changes in the vicinity of the rotor blades which causes their lungs to burst. Suggest the following reference is used to appraise ornithology impacts: <i>Benner (1993) Summary of avian impacts at wind turbine.</i>	Whilst the content of the comment is not incorrect it is considered over prescriptive to amend the guidance document to include this additional text. The County Ecologist will advice on a case by case basis the type and length of habitats and species surveys required. The references list in the guidance document is not exhaustive. This reference suggestion has been passed to the County Ecologist who will consider its content.
22.		Appendix A2.3 - Noise. ESTU-97 has been discredited by several studies as inadequate to protect people from noise impacts. Acceptable noise level should be a specific planning condition which is monitored post installation at a cost to the applicant. Suggest the following reference is used to appraise noise impacts: Cox. Richard et al (2012) Wind Turbine Noise Impact Assessment, Where ESTU is silent. Download – 'Cooperative Measurement Survey and Analysis of Low-Frequency and Infrasound at the Shirley Wind Farm in Brown County, Wisconsin'.	ETSU-R-97 is still Government endorsed guidance which is referred to in TAN8. DECC commissioned Hayes McKenzie in 2011 to review the current wind turbine noise guidance. It concluded that the ESTU guidance is still relevant but advised that further best practice guidance is developed to ensure consistent interpretation of ESTU recommendations. Therefore, in the absence of any new guidance, the Council should continue to have regard to the ESTU guidance when assessing noise impact.

22.		Appendix A2.4 - Shadow Flicker. Suggest that a '10 rotor diameter' is insufficient distance from turbine (s) to habitation. Submit '40' as a more appropriate distance for rural parts of Denbighshire.	Shadow flicker should be considered on a case by case basis, taking into account the position of the turbine in relation to the nearby dwelling as well as topography of the land, existing screening and orientation of windows. No basis for setting arbitrary minimum separation distances.
22.		Appendix A2.5 Construction Method Statement. Details to demonstrate the practical effectiveness of the mitigation measures should be sought.	To be assessed on a case by case basis.
22.		Appendix A2.7 - Heritage Evaluation. Suggest that close proximity is defined as 2 kilometres and where sites are within this distance, 'exploratory dig' should be undertaken prior to construction.	To be assessed on a case by case basis.
22.		Appendix A2.8 – Hydrology. Developer and operator to take full responsibility for all costs of rectification of adverse impacts on private water supplies post installation. Planning condition or legal agreement. Quoting an example at Wern Ddu, Gwyddelwern where the operator refuses to acknowledge that its actions caused a private water supply to dry up.	Comment noted. Section A2. 9 has been strengthened.
22.		Appendix A2.9 Broadcast Equipment. Developer and operator to take full responsibility for all costs of rectification of adverse impacts on broadcasting equipment post installation. Planning condition or legal agreement.	Comment noted. No change proposed.
22.		Appendix A2.10 – Legal Agreements. Support the text, but recommend the following: 1. Bonds for dismantling turbines are essential so is the removal of the site foundations. 2. Believe it to be essential that full agreement is settled prior to grant of planning approval subject only to minor changes.	A legal agreement is negotiated on a case by case basis. The Council will seek further clarification on the consistency of securing a bond in all negotiations. The IPG can be reviewed to reflect that decision.
23.	John Hopkinson	Introduction – Question the word 'independently'.	Welsh Government commissioned independent consultant to carry out the work, which was subject to public consultation.

23.		Section 3 Community Benefits Schemes. Agree that it must not impact on the decision-making process and suggest deletion in its entirety to ensure public confidence in the planning process. The Council's Regeneration team should be asked to produce a short document to this effect. Amend reference to the list of purposes in the introduction to reflect the above.	Agree. Section removed to Appendix.
23.		Appendix 2 A2.1 – Landscape and Visual Impact. Future wind turbines may be 150m tall similar to a 50 storey building which would never be allowed in north Wales. Wireframe representations of impact have largely been discredited as a tool to consider visual impact, far better to visit in-situ turbines of a similar size – site visit to Scotland.	IPG Appendix 2 provides guidance on the supporting information to be submitted with a planning application. Aim is to ensure landscape and visual impact assessments (incl. wireframe images) are produced in accordance with professional best practice guidance.
23.		Previous planning guidance have stated that turbines shall rotate in the same direction, this draft does not cover this.	To be assessed on a case by case basis. The comment has been forwarded to the Landscape Architect for consideration.
23.		Appendix A2.3 – Noise. With regard to references, please consider quoting the years with each standard e.g 'BS1234: 2007'. Question whether ESTU-R-97 is most relevant when its almost 20 years of age.	ESTU-R-97 is still Government endorsed guidance which is referred to in TAN8. DECC commissioned Hayes McKenzie in 2011 to review the current wind turbine noise guidance. It concluded that the ESTU guidance is still relevant but advised that further best practice guidance is developed to ensure consistent interpretation of ESTU recommendations. Therefore, in the absence of any new guidance, the Council should continue to have regard to the ESTU guidance when assessing noise impact.
23.		Minimum distance between dwellings and turbines. Consider 500m to be too small and that 2km is specified by other local authorities.	No reference made to which other local authority.
24.	Johanna Jackson.	Wish to agree and endorse the content of John Broughton's response on behalf of STEMM	Noted, see response to Respondent Number 22, above.
25.	Wayne Carrow.	In summary, fully support the views of the response by John Broughton on behalf of STEMM.	Noted.

25.		<p>As an electrical and mechanical engineer, does not agree that wind energy technology to be the answer to reducing our carbon footprint. Pitfalls of the turbine development far outweigh the benefits. Suggest that Corwen has seen more flooding in the years since 3 turbines have been installed locally. A list of the pitfalls considered:</p> <ul style="list-style-type: none"> - Turbines are only built so as not to spoil any individual's quiet enjoyment of their home. Suitable minimum distance of 1.5km. - Turbines can damage people's health (noise & shadow flicker). - Turbine adversely affects the tourism economy and cause housing blight. - Turbines irretrievably ruin the landscape. - Turbines cause fuel poverty. 	<p>Planning Policy Wales sets out general support for renewable energy projects. It is preferable for applications to be assessed on a case by case basis, however having a guidance document helps set out the expectation and consistency in approach when dealing with the application. Proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site are key areas of assessment to protect people.</p>
26.	Tricia Jones.	<p>In summary, fully support the views of the response by John Broughton on behalf of STEMM. In particular wish to emphasise the following points:</p> <p>Turbines are only built so as not to spoil any individual's quiet enjoyment of their home. Suitable minimum distance of 1.5km.</p> <ul style="list-style-type: none"> - Turbines can damage people's health (noise & shadow flicker) - Turbine adversely affects the tourism economy and cause housing blight. - Turbines irretrievably ruin the landscape. - Turbines cause fuel poverty. 	<p>Planning Policy Wales sets out general support for renewable energy projects. It is preferable for applications to be assessed on a case by case basis, however having a guidance document helps set out the expectation and consistency in approach when dealing with the application. Proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site are key areas of assessment to protect people</p>
27.	Chris Park.	<p>In summary, fully support the views of the response by John Broughton on behalf of STEMM. In particular wish to emphasise the following points:</p> <p>Turbines are only built so as not to spoil any individual's quiet enjoyment of their home. Suitable minimum distance</p>	<p>Planning Policy Wales sets out general support for renewable energy projects. It is preferable for applications to be assessed on a case by case basis, however having a guidance document helps set out the expectation and consistency in approach when dealing with the application. Proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site are key areas of assessment to</p>

		<p>of 1.5km.</p> <ul style="list-style-type: none"> - Turbines can damage peoples health (noise & shadow flicker) - Turbine adversely affects the tourism economy and cause housing blight. - Turbines irretrievably ruin the landscape. 	protect people
28.	Les Harrison.	<p>Consultation: Raise concern regarding the amount of publicity undertaken for the draft Interim Planning Guidance.</p>	The Council is satisfied that it has followed it procedure on consulting the public.
28.		<p>Would like to raise the following point: States that from personal experience energy from wind technology is inconsistent and unreliable. Turbines ruin people's lives. They can make people ill. Houses cannot be sold near the turbines. Wind turbines will result in loss of jobs and local incomes to do with tourism.</p>	<p>Planning Policy Wales sets out general support for renewable energy projects. It is preferable for applications to be assessed on a case by case basis, however having a guidance document helps set out the expectation and consistency in approach when dealing with the application. Proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site are key areas of assessment to protect people</p>
28.		<p>Minimum distance of 20 x the height (to tip) should be the absolute minimum between any turbine and a domestic property.</p>	<p>National planning policy does not advocate setting arbitrary minimum separation distances; there may be instances where a turbine within 500m of a residential property is acceptable in planning terms, and similarly there may be instances where turbines > 500m from a residential property would still give rise to unacceptable impacts on residential amenity, therefore 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.</p>
28.		<p>Fully support the views of the response by John Broughton on behalf of STEMM.</p>	Noted, see response to Respondent Number 22, above.
29.	Local Authority Landscape Architect.	<p>See recommendation for change in the separate table below.</p>	
30.	Mr Kelvin Boys-Yates.	<p>Add support to the Interim Planning Guidance. In particular wish to emphasise the following points:</p>	<p>Planning Policy Wales sets out general support for renewable energy projects. It is preferable for applications to be assessed on a case by case basis, however having a guidance document helps set out the</p>

		<p>Turbines are only built so as not to spoil any individual's quiet enjoyment of their home. Suitable minimum distance of 1.5km.</p> <ul style="list-style-type: none"> - Turbines can damage peoples health (noise & shadow flicker) - Turbine adversely affects the tourism economy and cause housing blight. - Turbines irretrievably ruin the landscape. - Turbines cause fuel poverty. 	<p>expectation and consistency in approach when dealing with the application. Proximity of sensitive dwellings, the size and scale of the turbine and the topography of the site are key areas of assessment to protect people</p>
31.	Llandegla Community Council.	<p>Comments made in relation to installations larger than Sub Local Authority Scale (over 5MW).</p>	
31.		<p>Section 1.2 Local Requirements for Wind Turbine Planning Applications.</p> <p>Suggest that the criteria and requirements are insufficiently stringent in detail. Require all planning applications to present all the information listed within this section.</p>	
31.		<p>Section 3 Community Benefits Schemes.</p> <p>Suggest Section 3 is deleted from the final document as it is likely to create friction within affected communities due to opposing views.</p>	<p>Agree. Section removed to Appendix.</p>
31.		<p>Appendix 1: Environmental Impact Assessment (EIA).</p> <p>No existing association, professional body or other authority has the capability of conducting an EIA which would encompass issues far beyond their experience. Insufficient evidence that EIA would not be biased in favour of an application through information derived from dubious sources.</p>	<p>Disagree. No change proposed.</p>
31.		<p>Appendix 2.1 Landscape and Visual Impact.</p> <p>See comments regarding capability of conducting an EIA above.</p>	<p>Noted.</p>
31.		<p>Appendix 2.2: Ecology & Ornithology.</p> <p>No further planning applications to be considered until the</p>	<p>Noted. No change proposed.</p>

		long term effects of multiple wind turbine installations are understood.	
31.		Appendix 2.10: Legal Agreements. Existing installations are proving not to have the longevity projected by the manufacturers. Older European installations are unused, dilapidated and left to rust. Any bond agreed must be inflation indexed. Change 'may' to 'will'; 'A legal agreement will be required...'	A legal agreement is negotiated on a case by case basis. The Council will seek further clarification on the consistency of securing a bond in all negotiations. The IPG can be reviewed to reflect that decision.
32.	Snowdonia National Park.	No substantive comment to make only to seek assurance that full consideration is given to the landscape, visual and cumulative impacts on the National Park from turbines or wind farms in locations close to the National Park boundary.	Comment noted.
33.	Dafydd Roberts.	Yn gryno, credaf bod gan dir-feddianwyr hawl i godi tyrbeinni (graddfa a maint iawn) i leihau costau ynni a diwallu anghenion y fferm. Cynnig nad ydynt yn fwy nag 20 metr o'r ddaear i frig y llafn. Ni ddylai unrhyw dyrbein gael eu caniatáu sydd yn niweidio cynefinoedd na rhywogaethau ar restr Adran 42 o Ddeddf Ewrop. <i>In summary, consider landowners have a right to erect turbines (at the right scale and height) to reduce the energy cost and satisfy the farm holding needs. Suggest that they would not exceed 20 metres in height from ground to blade tip. No turbines should be given consent if they have any adverse effect on habitats or species protected under Section 42 of the European Act.</i>	Cyfieithu
33.		Poeni bod y melinau arfaethedig ar Fynydd Mynyllod (hyd at 145 metr o uchder) yn hollol groes i bolisi lleol a chenedlaethol gan eu bod am ddinistrio golygfeudd a thirlun mwyaf godidog. <i>Express concern that the proposed turbines at Mynydd Mynyllod (up to 145 metre high) are contrary to local and</i>	Cyfieithu

		<i>national policy as they will destroy Wales's most treasured scenic landscape and topography.</i>	
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Late Representations. (only 2 received, a day late).

34	Tina Davies	Support the views of the response by John Broughton on behalf of STEMM	Noted.
35	Carol Jerman	Support the views of the response by John Broughton on behalf of STEMM. Object to the proposals for turbines at Mynydd Mynyllod.	Noted.

Officer recommendations for document improvements.

	Noise	Noise level reference miss typed in relevant section (Section A2.3). Include new document reference.
	Hydrology	Consider reference to hydrogeology rather than geology (Section A2.8) Suggest the inclusion of the following sentence under (Section A2.5) <i>Recording surface and ground water features and measures for protection.</i>
	Ecology	No further comment to make.
	Landscape	Changes to Section A2.1 to include reference to LANDMAP, historic landscapes assessment tool. Reword the section on cumulative impacts to include reference to SSSA-A. Update references and include new.
	Public Right of Way	Include references to 'open access' and the requirement of a 'Recreation and Access Management Plan'. Include new Section A2.7 and renumber following paragraphs.