

## **Renewable Energy Supplementary Planning Guidance (SPG)**

### **Consultation Report**

**May 2016**

#### Introduction

Paragraph 2.4.6 of Planning Policy Wales, edition 8 (Welsh Government, 2016) records that Supplementary Planning Guidance consultation should involve:

*...‘the general public, businesses and other interested parties, and there should be a record of how their views were taken into account before the SPG was finalised’.*

The Council consulted on a draft version of the Renewable Energy Supplementary Planning Guidance for a six week period.

The table below sets out information on the responses received and whether or not the Council proposes to change the SPG in response to them.

The consultation report and final SPG will be presented to Cabinet for final endorsement. Once adopted, SPG may be taken into account as a material consideration in the determination of planning applications. Also, Welsh Government and the Planning Inspectorate will give substantial weight to approved SPG which derives from and is consistent with the parent LDP and has been subject to consultation.

Table of responses

Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
1/1	Vicky Moller	Had a look and find it impossibly discouraging to small scale renewable energy. If you are to comply with the Welsh Government policy to encourage renewable energy of any scale the requirements set out in the SPG will need to change. I don't think tinkering will help.	No change required. Welsh Government policies and the Council's LDP policies support the principle of renewable energy development. However, the detail of such proposals must be satisfactory. A key function of this item of SPG is to provide information on requirements in that respect. The purpose of SPG is to elaborate on specific policies of a parent LDP, not to create new policy. With regard to small-scale renewable energy projects, some of these will be permitted development. Later in the SPG document, the table in paragraph 3.31 (checklist of receptors) includes separate evaluations for domestic and micro scale installations and all other installations.	
2/1	Elizabeth Lesnianski (Martletwy Community Council)	Q1 – Do you support an approach that makes use of the Landmap assessment dataset? Answer: Yes	Support noted and welcomed.	
2/2	Elizabeth Lesnianski (Martletwy Community Council)	Q2 – Do you concur with how the Authority proposes to classify the influences that installations have on the landscape? Answer: Yes	Support noted and welcomed.	
2/3	Elizabeth	Q3 – Are there any comments you would	Noted.	

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	Lesnianski (Martletwy Community Council)	like to make regarding the way the Authority has identified impacts on receptors? Answer: No		
2/4	Elizabeth Lesnianski (Martletwy Community Council)	Q4 – In your view, are the maps detailing the quality of Pembrokeshire’s landscape and agricultural land useful to potential applicants? Answer: Yes. Any land with potential for food production should be safeguarded from solar / renewable energy installations / large scale, as this will be needed for crops in the future.	Support noted and welcomed. In addition to the guidance, most large scale renewable energy projects are subject to time-limited consents. This will allow re-evaluation of the need for renewable energy / land for food production and / or other uses in the future.	
2/5	Elizabeth Lesnianski (Martletwy Community Council)	Q5 – Do you think that the SPG document would be useful for all prospective applicants for renewable energy installations? Answer: Yes	Support noted and welcomed.	
2/6	Elizabeth Lesnianski (Martletwy Community Council)	Q6 – Are there any general comments that you would like to make? Answer: Yes. As for Q4.	See PCC response to Q4, ref 2/4.	
3/1	Richard James (Pembrokeshire Coast National Park Authority)	The SPG makes good reference to the importance of conserving the landscape character of the National Park and this Authority’s own SPG relating to renewable energy development.	Support noted and welcomed.	
3/2	Richard James (Pembrokeshire	Table at paragraph 3.31 – recommend a footnote to refer to the scales as defined	Agree.	Add Footnote: <i>*For Wind Energy</i>

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	Coast National Park Authority)	in Appendix 2 for wind energy, to avoid confusion with the Welsh Government defined scales highlighted in paragraph 3.1. This follows from my previous comments on not underestimating the potential impact from certain turbines that would be ‘micro’ under Welsh Government definitions.		<i>see Appendix 2 for defined scales.</i>
3/3	Richard James (Pembrokeshire Coast National Park Authority)	Appendix 2 ‘prior to application considerations’ bubble – suggest adding ‘highway access’ to highlight this as a possible constraint for anyone looking at larger-scale turbines.	Agree.	Amend box to read: <i>Infrastructure, site &amp; highway access &amp; PRow</i>
3/4	Richard James (Pembrokeshire Coast National Park Authority)	Appendix 3 ‘prior to application considerations’ bubble – suggest adding ‘storage space for fuel’ as a consideration.	Agree.	Amend box to read: <i>Storage space for fuel</i>
4/1	T. K. Bradney	It is highly likely that your department is assailed by those who see a beauty in a 300 foot mast with a propeller on top – or a previously green field that is now covered in what appear to be mirrors. If this is the case I feel that the alternative case should be made. I believe that the Council has adopted the correct strategy in relation to renewable forms of electricity generation. Climate change is an important factor in these matters, but so is the welfare and well-being of the people. Pembrokeshire is essentially a rural county whose	The broad support for the Council’s approach is noted and welcomed. The principle of support for renewable energy proposals is established through Welsh and PCC LDP policies. However, the detail of each scheme needs to be judged on its individual merits.	

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		<p>predominant industry is tourism. We in South Pembs' have just spent two years writing letters and collecting petitions to object to a 5 x 326 foot high turbine wind farm at Rhoscrowther. Our efforts were rewarded, firstly by a unanimous rejection of the proposal by yourselves and then a rejection of the subsequent appeal by the Cardiff-based Inspector.</p> <p>As I made clear in my address to the planning committee, Pembrokeshire came joint second with an area in the North Island of New Zealand in a National Geographic survey into 'sustainable tourism'.</p> <p>Surely we cannot risk what we have in respect of beaches, walks and wildlife to satisfy those who are often motivated on a personal level by money, which we are supplying through subsidies.</p> <p>I ask the Council to further restrict those schemes which seek to create an adverse visual impact on our beautiful county; or at the very least maintain the status quo.</p>		
5/1	Hannah Thomas (Natural Resources Wales (NRW) /	We welcome the submission of the draft SPG for Renewable Energy, however we note that much of the draft SPG appears to be re-iterating parts of existing guidance, for example the Guidelines for	Noted.	

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	Cyfoeth Naturiol Cymru (CNC)	Landscape and Visual Impact Assessment version 3 (GLVIA 3).		
5/2	Hannah Thomas (NRW / CNC)	The SPG would benefit from concentrating on specific additional guidance to the Pembrokeshire area, for example local guidance for siting and design of each energy type.	No change required. This document aims to guide Renewable Energy proposals, linking with other guidance documents and information systems such as LANDMAP. It is not intended to repeat such vast amounts of information within this SPG.	
5/3	Hannah Thomas (NRW / CNC)	The document would benefit from some re-structuring, to provide greater clarity and we suggest separate sections for each energy type, dealing with their particular impacts individually.	No change required - please see Appendix 1, 2 & 3.	
5/4	Hannah Thomas (NRW / CNC)	Chapter 1 – we advise that the purpose of the SPG should be stated up front for clarification.	No change required - please see paragraphs 1.4 & 1.5 of the draft document.	
5/5	Hannah Thomas (NRW / CNC)	It would be helpful to set out Policy GN.4 for ease of reference.	No change required - please see paragraph 3.2 of the draft document.	
5/6	Hannah Thomas (NRW / CNC)	3.1 – please note that new guidance on Developments of National Significance (DNS) process has been released (over 10MW for onshore wind), as set out in the Planning (Wales) Act 2015. The threshold for Nationally Significant Infrastructure Projects (NSIP) remains at 50MW.	Agree.	Add Footnotes: *Please note the threshold for Nationally Significant Infrastructure Projects (NSIP) is 50MW. **Please note new guidance on Developments of

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				<i>National Significance (DNS) has been released (over 10MW for onshore wind), as set out in the Planning (Wales) Act 2015.</i>
5/7	Hannah Thomas (NRW / CNC)	3.9 – a landscape appraisal – depending on the scale of proposals and including Environmental Impact Assessment (EIA) development, a full Landscape and Visual Impact Assessment (LVIA) may be required in accordance with GLVIA 3. For smaller schemes, a landscape appraisal should be carried out in accordance with the principles of GLVIA 3. Both LVIA and landscape appraisals should clearly differentiate the landscape and visual parts of the assessment. Reference should be made to Landmap and other relevant landscape character assessments.	The advice is noted, but no change is required. The bullet points under 3.9 are elaborated on in the paragraphs that follow, for example Landscape Appraisal 3.13-3.18, Visual Impact Assessment 3.19-3.23. Please see Chapter 4 for reference to EIA.	
5/8	Hannah Thomas (NRW / CNC)	3.9 – visual impact assessment – we advise in place of ‘it is often preferable to provide accurate photomontages...’ that the SPG states ‘it is best practice to provide ZTV mapping along with accurate photo-montages from a comprehensive selection of viewpoints for larger schemes requiring LVIA. For	Agree.	Amend to read: <i>...It is best practice to provide ZTV mapping along with accurate photo-montages from a comprehensive selection of</i>

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		smaller schemes where a landscape appraisal is carried out, photomontages with mapping showing viewpoint locations may be sufficient’.		<i>viewpoints for larger schemes requiring LVIA. For smaller schemes where a landscape appraisal is carried out, photomontages with mapping showing viewpoint locations may be sufficient. ..</i>
5/9	Hannah Thomas (NRW / CNC)	3.9 – historic environment – this should also mention Registered Parks and Gardens and Registered Historic Landscapes. Planning Policy Wales (PPW) requires that information on the Register of Historic Landscapes in Wales should be taken into account where there is a more than local impact on an area on the Register. The assessment of the Registered Landscape may require a full Assessment of the Significance of Impacts of Development on Historic Landscapes 2 (ASIDOHL 2) and advice should be sought from the Dyfed Archaeological Trust on the level of assessment required. (Please note that the Archaeological Trusts will be taking on this role from NRW and Cadw during 2016).	Agree.	Amend to read: ... <i>Registered Parks and Gardens and Registered Historic Landscape...</i>  Add Footnote: <i>*The assessment of the Registered Landscape may require a full Assessment of the Significance of Impacts of Development on Historic Landscapes 2 (ASIDOHL 2) and advice should be sought from the Dyfed Archaeological Trust</i>



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				<i>on the level of assessment required.</i>
5/10	Hannah Thomas (NRW / CNC)	3.11 – this needs to make reference to the setting of the Pembrokeshire Coast National Park (PCNP) and include reference to PCNP Seascape Assessment and SPG ‘Cumulative Impact of Wind Turbines on Landscape and Visual Amenity’.	The advice is noted, but no change is required. The SPG already references PCNPA ‘special qualities’ and the need to consider their LDP policies and SPG. Links to such documents are contained under ‘Useful Links’.	
5/11	Hannah Thomas (NRW / CNC)	3.13 – comments at paragraph 3.9 also apply with regards to Landscape Appraisal / LVIA and reference should be made to GLVIA 3. If landscape appraisal is being used as a general term to encompass all types of landscape assessment, this could be confusing.	The advice is noted, but no change is required. Reference to GLVIA 3 guidance in 3.21 and under ‘Useful Links’ at the end of the SPG.	
5/12	Hannah Thomas (NRW / CNC)	3.16 – landscape appraisals / LVIA’s may refer to designated sites other than landscape – e.g. biodiversity / archaeological and to agricultural land quality where they inform the landscape assessment, but the landscape appraisal will not assess the impact of the proposal on these designations.	The advice is noted, but no change is required.	
5/13	Hannah Thomas (NRW / CNC)	3.17 – it is unclear whether this is referring to landscape effects or visual effects. It says it is landscape effects. However the table refers to effects on a view, therefore suggesting a visual effect.	No change required. Visual Impact is dealt with under 3.19-3.23; reference to view here is in terms of Landscape Character.	

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5/14	Hannah Thomas (NRW / CNC)	3.19 – visual impact assessment – this is actually talking about cumulative effects on the whole. We suggest separate paragraphs on visual impact and cumulative effects (which can be both landscape and visual).	No change required. Cumulative Impact is dealt with under 3.32-3.34.	
5/15	Hannah Thomas (NRW / CNC)	3.20 – Visual impacts of solar picked out – does this need to be in a separate section on solar?	No change required. Paragraph 3.20 follows on from 3.19, which discusses general aspects of visual impact assessment.	
5/16	Hannah Thomas (NRW / CNC)	3.21 – visual impact of wind energy picked out – does this need to be in a separate section on wind energy? This talks about 2 types of ZTV – to blade tip and blade swept area. The usual ZTVs provided are to blade tip and hub height. Accurate photomontages are not an alternative to ZTVs but an additional requirement. GLVIA 3 is only mentioned here, however we advise this is the main professional guidance on LVIA and should be included up front in the landscape section. It is fine to mention Landmap Guidance Note 3 here as specifically about wind energy.	No change required. A separate section on visual impact of wind energy proposals isn't needed. Paragraph 3.21 follows on from 3.19, which discusses general aspects of visual impact assessment, and 3.20, which deals with this topic in relation to solar proposals.  An amendment to the paragraph is suggested in relation to comments on photomontages.	Amend 3.21 to read: <i>...Additional ZTV maps may also be appropriate for the blade swept area, along with photomontages from a comprehensive selection of viewpoints. ...</i>
5/17	Hannah Thomas (NRW / CNC)	3.22 – visual impact of biomass proposals picked out – should this be in a separate section on biomass? It's unclear why these separate sections are provided only on visual impact.	No change required. Paragraph 3.22 follows on from 3.19, which discusses general aspects of visual impact assessment, 3.20, which deals with this topic in relation to solar proposals, and 3.21, which deals with this topic in	

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5/18	Hannah Thomas (NRW / CNC)	3.26 – we welcome that this has been included in the SPG that blade tips should be a minimum of 50m from any nearby bat habitat feature. This could be a hedgerow, woodland or wooded copse, and not just a hedgerow (as stated in the document). This section should also refer to Natural England’s Technical Information Note TIN 051 – ‘Bats and onshore wind turbines’ which highlights that it is incorrect to measure 50m from the turbine base to habitat feature at ground level as this does not take into consideration the height of the habitat feature. We advise the guidance on the calculation in the TIN is included in this SPG.	relation to wind energy. Agree. Paragraph 3.26 will be amended in accordance with the advice in this response (inclusion of woodlands and wooded copses) and the technical advice in TIN 051.	Amend 3.26 to read: <i>Requirements specific to wind turbine proposals include a minimum distance of 50 metres from any hedge bank, woodland or wooded copse to the blade tip..... For further details on the consideration of turbines and habitat features please see Natural England’s Technical Information Note TIN 051 – ‘Bats and onshore wind turbines’ under ‘Useful Links’ at the end of this document.</i>
5/19	Hannah Thomas (NRW / CNC)	3.28 – 3.29 – refers to all types of receptors assessed under different types of assessment, however is this the best way of presenting this? The method of impact assessment and types of receptors will vary according to the type	The advice is noted, but no change is required.	

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		of assessment. Sensitivity of receptors is dealt with in detail under GLVIA 3 and presumably under other types of assessment methodology.		
5/20	Hannah Thomas (NRW / CNC)	3.31 – the table refers to landscape areas, dividing into statutory and non-statutory. The statutory 1 <sup>st</sup> column includes the National Park and Registered Parks and Gardens and the 3 <sup>rd</sup> column includes the National Park and Registered Historic Landscapes (which are non-statutory national designations). However, it doesn't include the Registered Parks and Gardens. Would it be better to refer to nationally designated areas and then define whether statutory or not? Please note that Registered Parks and Gardens are to become statutory under the new Historic Environment Bill. Does non-statutory local value mean all other landscapes such as Special Landscape Areas in Pembrokeshire? It would be useful to clarify this in this section.	Agree amendment to column 3. There are no designated Special Landscape Areas in Pembrokeshire therefore no change needed here.	Amend to read: <i>Large scale schemes could affect National Park locations and registered Landscapes. Great care is therefore needed in locations close to the National Park boundary and in areas clearly visible from it and other areas of designated landscape value.</i>
5/21	Hannah Thomas (NRW / CNC)	3.32 – Cumulative Impacts – please note that there is specific guidance under GLVIA 3 and the cumulative guidance on wind turbines by White Consultants, 2013. Is this section trying to cover all aspects of cumulative impact or just landscape? Is this used for noise,	Reference is made under 3.32 to the 4 stages, but bullet point 1 is now clarified.  Amend 3.34 to reference GLVIA 3.	Amend 3.32, bullet 1 to read: <i>Renewable energy developments that have already taken place (operational);</i>

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		ecology, etc? The 4 aspects are usually referred to as operational, consented, in planning and refused in landscape assessments.		Amend 3.34 to read: <i>Further guidance on the cumulative impact of wind energy proposals can be found in GLVIA 3 guidance 2013 (see 'Useful Links' at the end of this document) and in Pembrokeshire's and Carmarthenshire's 'Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Guidance', White Consultants, April 2013. The White Consultants guidance is available alongside this SPG...</i>
5/22	Hannah Thomas (NRW / CNC)	3.33 – How often are the interactive maps updated? This could be included here.	No change required. Map updates are regular; however they do not occur to a fixed timescale.	
5/23	Hannah Thomas (NRW /	5.2 – please note that Ramsar sites are named after the Ramsar Convention on	Agree. Paragraph 5.2 will be modified accordingly.	Amend RAMSAR to read:

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	CNC)	Wetlands, which took place in Iran, therefore it isn't an acronym.		<i>Ramsar</i>
5/24	Hannah Thomas (NRW / CNC)	Appendix 1 – Solar Energy – iv – 5 <sup>th</sup> bullet point – landscapes of particular sensitivity – does this mean Registered Historic Landscapes, Registered Parks and Gardens, etc?	No change required. The 5 <sup>th</sup> bullet point under item iv covers Registered Historic Landscapes and Registered Parks and Gardens.	
5/25	Hannah Thomas (NRW / CNC)	Appendix 1 – Solar Energy – vi – we advise adding retail buildings	Agree. Point vi of Appendix 1 will be modified accordingly.	Amend vi to read: <i>Roofs of agricultural, industrial and retail buildings can offer extensive areas on which solar PV panels can be placed....</i>
5/26	Hannah Thomas (NRW / CNC)	Appendix 1 – Solar Energy – Prior to Application Considerations – site selection should consider landscape sensitivity, including PCNP, other designations and visual impact. Whilst a full, detailed LVIA is not expected at pre-application, these aspects should have been considered prior to proceeding to an application (not just the practicalities of topography and ground conditions). Landscape and visual effects have the potential to be significant and prevent a scheme going ahead and good site selection (the right development in the right place) is in everyone's interest. This applies to all types of allocation, not	Agree. Pages 23, 25 and 28 (prior to application considerations for solar energy, wind turbines and biomass energy) will require modification to reference this.	Amend bullet 7 to read: <i>Local Landscape Sensitivity, topography &amp; ground conditions</i>

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		just solar.		
5/27	Hannah Thomas (NRW / CNC)	Appendix 1 – Solar Energy – Application considerations – this seems to mix agricultural land quality considerations with landscape, when they are separate issues. Landscape context and character refers to Landscape Management Plan – does this mean the PCNP Management Plan? This also refers to ‘landscapes of historic importance’ – does this mean on the Register? This needs to be clarified. This applies to all types of application, not just solar.	Generally agree. Pages 23, 25 and 28 (application considerations for solar energy, wind turbines and biomass energy) will require modification. In each case, the fourth bullet point should be split, to separate landscape sensitivity from agricultural quality and land classification. The term ‘Landscapes of Historic Importance’ does refer to areas on the Register – and should therefore be capitalised. The reference to Landscape Management Plans is in the third bullet point in each case. This does not refer to the National Park Management Plan. Rather, it refers to Management Plans prepared to support specific renewable energy proposals. These are referenced elsewhere in the SPG document.	Amend bullet 4 & create a new bullet point 5 in each instance to read: <i>Landscape sensitivity (PCNPA, Landscapes of Historic Importance, statutory designations, etc)</i> <i>Quality &amp; Grading of Agricultural Land</i>
5/28	Hannah Thomas (NRW / CNC)	Appendix 2 – Wind Energy – iii – we note the 4 main sizes of wind turbine – please note that these do not tally with the PCNP Cumulative Impact of Wind Turbines on Landscape and Visual Amenity SPG or other guidance such as the Heads of the Valleys Wind Turbine Development Landscape Sensitivity and Capacity Study (by Gillespies). This uses the following sizes: Micro <25m/roof mounted (1 turbine)	The comment is noted, but no change proposed.	

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		<p>Small 26-49m (3 turbines or fewer)                      Medium 50-79m (4 turbines or fewer)                      Large 80-109m (5 turbines or fewer)                      Very large 109m+ (any number of turbines).</p> <p>We note that wind turbines are generally getting bigger e.g. Pen-y-Cymoedd 145m to blade tip, therefore suggest size range needs to extend beyond 135m.</p>		
5/29	Hannah Thomas (NRW / CNC)	<p>Appendix 3 – Biomass – iii – please note that any development between 10MW – 50 MW is now classed as a Development of National Significance (DNS) as set out in the Planning (Wales) Act 2015.</p> <p>We advise inclusion of information here to remind the applicant that developments of this nature may require a permit under the Environment Permitting (England and Wales) Regulations 2010. It is advisable that all permit applications are parallel tracked with planning applications as this allows NRW to provide advice at an early stage and provides a more reliable indication of the likely outcome of planning and permitting applications.</p>	<p>Regarding DNS, this information will be added to point iv of Appendix 3 (which follows the table and is wrongly numbered as point i in the draft). Information on permitting will be added as a new point, vi, at the end of this section of the SPG document.</p>	<p>Add text to the end of iv, to read:  <i>Furthermore development between 10MW – 50MW is now classed as Developments of National Significance (DNS), see Planning (Wales) Act 2015. Developments of this nature may require a permit under the Environment Permitting (England and Wales) Regulations 2010. It is advisable that all permit applications</i></p>



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				<i>are parallel tracked with planning applications in order for NRW to provide advice at an early stage.</i>
5/30	Hannah Thomas (NRW / CNC)	Appendix 4 – landscape designations – Landscape Designations Plan – it would be helpful to show all the available classifications of Landmap – Outstanding, High, Moderate, Low. If only Outstanding and High are shown, this needs to be linked to a specific point / explanation in the text.	Agree. The map in question (Landmap Overall Landscape Classification) will be amended so that all four categories are shown for each aspect area.	Amend Appendix 4 map to include all categories of each LANDMAP aspect area.
5/31	Hannah Thomas (NRW / CNC)	Appendix 4 – Landmap visual and sensory plan – the text recognises that all 5 layers of Landmap are important so there needs to be some explanation in text as to why these particular attributes are picked out.	The data held by LANDMAP combines to create over 240 different map layer interpretations; therefore it is not possible to show all of these here. A very small number of layers are illustrated, chosen as they are examples of the data that can be generated using LANDMAP.	Delete Visual & Sensory Level 3 Map, & rename the local distinctiveness map to read: LANDMAP data example: Visual & Sensory Classification of the landscapes sense of place & local distinctiveness (PCNPA greyed out)
5/32	Hannah Thomas (NRW / CNC)	Appendix 4 – Local Development Plan Landscape Designations Plan – please note that not all of these are landscape designations and Registered Historic	The title of Appendix 4 landscape designations needs to be changed to recognise the historic environment element. Unfortunately we have been	Appendix 4, amend map title to read: <i>Local Development Plan Landscape &amp;</i>

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		Landscapes are missing from the plan.	unable to access a map of the Registered Historic Landscapes to add this to the SPG, but will add a link into a new footnote (No.6) on page 8 of the SPG to reference where further information may be found.	<i>Historic Environment Designations (PCNPA greyed out).</i> Add new text to footnote 6, page 8 to read: <i>For further details see</i> <a href="http://www.dyfedarc.haeology.org.uk/projects/HistoricLandscapeCharacterisation.htm">http://www.dyfedarc.haeology.org.uk/projects/HistoricLandscapeCharacterisation.htm</a>
5/33	Hannah Thomas (NRW / CNC)	Useful links – NRW Landmap – please note that the database weblink needs to be updated to the link below:  <a href="https://naturalresources.wales/planning-and-development/landmap/">https://naturalresources.wales/planning-and-development/landmap/</a>	Agree. The website link will be updated.	Amend LANDMAP link: <a href="https://naturalresources.wales/planning-and-development/landmap/">https://naturalresources.wales/planning-and-development/landmap/</a>
6/1	D Edson	I would request that there is an assumption of no further developments of these types within Pembrokeshire and a total ban on them within the National Park and within 5 miles of the coast. My reason is that they are contrary to the environmental assets of Pembrokeshire which are the much publicised reasons for vital tourism trade. Already there is no vantage point from which turbines are not visible in numbers ranging from a few	No change required. Welsh Government policies and the Council's LDP policies support the principle of renewable energy development. However, the detail of such proposals must be satisfactory. A key function of this item of SPG is to provide information on requirements in that respect. The purpose of SPG is to elaborate on specific policies of a parent LDP, not to create new policy. A policy that did not	

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		<p>to twenty or more. The PCC has already spent hundreds of thousands of pounds of public money fighting appeals against refusal of planning permission and by writing into the Development Plan definite refusal guidelines, dramatic reduction in costs fighting applications could be forthcoming.</p> <p>The recent Rhoscrowther Wind Farm appeal is an example of costs and PCC determination to keep Pembrokeshire's environmental beauty.</p>	<p>provide in principle support for renewable energy proposals would be contrary to Welsh Government policy and would not survive the independent LDP Examination process. However, there have been instances where renewable energy proposals, while acceptable in principle, have not met LDP requirements in terms of their detail. In such cases planning permission is refused.</p>	
7/1	Martin Bell (the Environmental Network for Pembrokeshire (TENP))	<p>General – the preparation of the draft SPG is welcomed, although a little delayed, and it is surprising that the Planning Committee is not the appropriate body for managing the consultation and for approving the final SPG as it is the determining body for planning applications.</p>	<p>The general support for the SPG document is welcomed. Matters relating to the preparation and review of the LDP (including SPG) is assigned to Cabinet for consideration in accordance with the Council's Constitution and the Terms of Reference of the Key Committees and Forums.</p>	
7/2	Martin Bell (TENP)	<p>1.2 – whilst it is agreed that policy GN.4 is the key reference, it is considered that policies GN.1 and GN.38 should also be referenced at this point.</p> <p>Policy GN.1 for example includes important criteria which would allow or restrict most applications for all developments including renewable, and Policy GN.38 includes the justification of paragraph 6.155 last sentence which refers to 'without sacrificing the essential</p>	<p>No change required. The referencing of the key policy GN.4 in paragraph 1.2 is appropriate. This is the LDP's policy on Resource Efficiency and Low-carbon Energy Proposals. It is the parent policy which the Renewable Energy SPG elaborates on.</p> <p>There are references to several other policies likely to be of significance in a renewable energy context later in the document (paragraphs 3.2 and 3.3).</p>	

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Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
		integrity, coherence and character of the landscape...’		
7/3	Martin Bell (TENP)	2.2 – it is recommended that prior to changes being made applicants seek advice from the County Council or Natural Resources Wales (NRW). It is suggested that there is a reason given; i.e. that other (legal) consents may be required, e.g. an abstraction licence.	Agree.	Add the following text to the end of 2.2: <i>“in case other (legal) consents are required, e.g. an abstraction licence.”</i>
7/4	Martin Bell (TENP)	3.5 – reference could be made at this point (or in the Introduction – perhaps as a paragraph 1.2) to the Wellbeing of Future Generations Act etc, which set the tone for consideration of many developments, including renewables.	Agree. Although not specific to renewable energy, references will be added on the Well-being of Future Generations Act and the Environment (Wales) Act. This will be in the table in paragraph 3.5 rather than in earlier paragraph 1.2.	Amend table to include links to: <i>Well-being of Future Generations (Wales) Act 2015</i> <i>Environment (Wales) Act 2016</i>
7/5	Martin Bell (TENP)	3.6 – perhaps include reference to recently introduced charges for pre-app advice.	Agree.	Amend second sentence to read: <i>Information on how to submit a pre-application advice request, and the charges which apply for this advice, are available from the Council’s web-site:</i>
7/6	Martin Bell (TENP)	3.9 – is there any need to review this paragraph on DAS (Design and Access Statement) requirements – are DASs still required? Without the need for a DAS on all / many planning applications it would	No change required. Design and Access Statements are still required to accompany certain types of full and outline applications, including many Major Development applications and	

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		<p>be appropriate for the SPG to underline ways in which planning applications can encourage the involvement of renewable technology into the physical infrastructure of the site / properties and the arrangement / orientation of properties within the site to take advantage of natural light and solar heat – micro contributions but cumulatively valuable – reflecting perhaps the following extract from TAN 8, paragraph 5.7 – ‘Design and energy SPG could cover such wide ranging topics as housing fenestration and estate layout relating to passive solar gain or the requirement of renewable energy generating capacity for new office developments, such as the utilisation of heat pumps, micro-generation systems and community heating networks. Development briefs for major development should also incorporate requirements regarding renewable energy, energy efficiency and conservation’.</p>	<p>certain Conservation Area, World Heritage Sites and Listed Building Consent applications. Where a DAS isn’t required, a Local Planning Authority may still request further clarification or information on design. A link to TAN 8 is provided in the table in paragraph 3.5.</p>	
7/7	Martin Bell (TENP)	<p>3.9 – Visual Impact Assessment. Some reference should be made to seasonal changes which will reflect the degree of tree cover between late autumn / winter / early spring and the more summer months – this will affect observations re.</p>	Agree.	<p>Amend to read: “ - <i>this should identify the visual impact on the landscape character, and may change</i></p>

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Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
		Visibility of projects from receptors.		<i>with the seasons.”</i>
7/8	Martin Bell (TENP)	3.9 – in addition to economic considerations reference should also be made to community benefits in those situations where the community / elements of the community stand to benefit from one-off donations or regular income from the installation. With a number of schemes across the UK delivering / involving a ‘community’ element in their promotion and delivery it is important to recognise such interests. There are also intangible social benefits associated with community-led schemes. A number of applications relating to renewables are made by community groups. This is an important area of omission from the SPG.	No change required. This issue is covered by the bullet point on ‘economic considerations’ and the benefits of a scheme. It is also covered in Appendix 1, 2 and 3 under the social and economic impact of a scheme.	
7/9	Martin Bell (TENP)	3.11 (and 3.19) – connection to the National Grid and any overhead or underground cables, ancillary buildings and substations. It is assumed that this bullet point refers to the presence of associated infrastructure and not to whether there is capacity within the grid at the time of making the application. Clarification is required. An additional bullet point could include any benefits delivered via local energy storage, community resilience or energy security which would be consistent with a	No change required. The references in paragraphs 3.11 and 3.19 cover both the connection to the National Grid and also ancillary connection considerations. Grid capacity is an emerging issue, but one that needs to be addressed at regional and national levels. Energy security is clearly a matter for national consideration and the broad agenda is set by Welsh Government and the UK Government.	

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		drive towards sustainability.		
7/10	Martin Bell (TENP)	3.15 – reference is made to the Landscape Character Assessment undertaken by the NPA. It would be of considerable benefit if PCC undertook a similar appraisal of the area of the County outside the National Park.	Agree. This document is currently being prepared as a separate SPG.	
7/11	Martin Bell (TENP)	3.17 – the Table of the Magnitude of Influence – at least one source for these gradings should be identified.	This table is derived from various sources and the use of historic planning applications.	
7/12	Martin Bell (TENP)	3.21 – reference is made to aviation lighting. Surely the LPA can require the use of infra red warning rather than flashing red which compromises rural ‘nightscapes’. Infra red will also be of benefit in low clouds / mist, etc’.	No change required.	
7/13	Martin Bell (TENP)	3.26 – distance of the revolving blades from hedgerows. Is there a single distance of 50m or is there a greater negative impact from the faster moving blades of a larger turbine, e.g. the suction effect on bats / birds from those larger blades?	Amend text to give additional information on where to access information on the impact of Bats and onshore wind turbines.	Add text to the end of 3.26 to read: <i>For further details on the consideration of turbines and habitat features please see Natural England’s Technical Information Note TIN 051 – ‘Bats and onshore wind turbines’ under ‘Useful Links’ at the end of this document.</i>

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Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
7/14	Martin Bell (TENP)	3.31 – reference is made to Conservation Areas and Listed Buildings but with phrases of ‘Domestic and micro scale installations may have a cumulative effect’. Do such installations require consent? Not answered. I would suggest that there is an overlap with para. 2.4, where Article 4s are discussed. A grouping of ‘exceptional’ situations (C.As, L.Bs, A.Ms, and Article 4s) may be appropriate with comments on the need or otherwise for planning permission.	No change required. Domestic and micro scale installations may not require consent. Whether they do or not will depend on whether they meet the criteria for them to be regarded as permitted development. However, irrespective of that, they may have a cumulative impact. Where permitted development rights exist, the Council will not have an influence on whether a project goes ahead or otherwise.	
7/15	Martin Bell (TENP)	3.31 – ‘The distance away from the highway will normally be the height to blade tip + 10%’. Does this also refer to distance from a right of way and particularly a bridleway? The proximity of wind turbines to bridleways / stables are frequent areas of dispute.	Technically, Public Rights of Way are part of the highway network. However, it would be helpful to reference PROWs in the final sentence of the right hand column of the table in 3.31.	Amend final right hand column of 3.31 to read: <i>The distance away from the highway/PROW will normally....</i>
7/16	Martin Bell (TENP)	Appendix 2 – I understand that new turbines can have blade tip up to 300m, which is considerably in excess of 135m.	No change required. Turbines do now exceed 135m turbine height to blade tip, however this table is taken from Welsh Government guidance and is indicative not precise.	
7/17	Martin Bell (TENP)	Whilst the many appendices and references are very useful (and this point may be common to a number of SPGs) it would be helpful if the SPG was reviewed on an annual basis to ensure that it reflects advances made in	No change required. PCC will review all adopted SPG and identify the need for any additional SPG as part of Plan Review.	



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		renewable technology and recently issued publications.		
8/1	Veronica Roach (Pembroke Dock Civic Society)	Q1 – Do you support an approach that makes use of the Landmap assessment dataset? Answer: Yes	Support noted and welcomed.	
8/2	Veronica Roach (Pembroke Dock Civic Society)	Q2 – Do you concur with how the Authority proposes to classify the influences that installations have on the landscape? Answer: Yes	Support noted and welcomed.	
8/3	Veronica Roach (Pembroke Dock Civic Society)	Q3 – Are there any comments you would like to make regarding the way the Authority has identified impacts on receptors? Answer: No		
8/4	Veronica Roach (Pembroke Dock Civic Society)	Q4 – In your view, are the maps detailing the quality of Pembrokeshire’s landscape and agricultural land useful to potential applicants? Answer: Yes. The society notes that most of the agricultural land in Pembrokeshire is Grade 3 or 4. As the County was once noted for growing potatoes, other crops and the rearing of farm animals for the production of milk and meat, it feels that on as such land areas, applications for hosting solar PV arrays should be avoided and roofs of agricultural and industrial buildings utilised instead.	Support noted and welcomed. Most large scale renewable energy projects are subject to time-limited consents. This will allow re-evaluation of the need for renewable energy / land for food production and / or other uses in the future. Nonetheless, there is potential to use the roofs of agricultural, industrial and retail buildings to host solar PV arrays.	

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Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
8/5	Veronica Roach (Pembroke Dock Civic Society)	Q5 – Do you think that the SPG document would be useful for all prospective applicants for renewable energy installations? Answer: Yes	Support noted and welcomed.	
8/6	Veronica Roach (Pembroke Dock Civic Society)	Q6 – Are there any general comments that you would like to make? Answer: Yes. In our comments on Q4, we make reference to the reduced capacity for growing crops, etc', as a result of land areas becoming solar farms. In addition, we are now seeing large areas of agricultural land being taken up by housing. We appreciate that with an enormous increase in population in Britain, housing is needed, but surely not at the expense of feeding the people. Lack of infrastructure is also becoming a great problem – e.g. water, sewerage provision, etc. Surely we should be looking at the whole picture and not dealing with things piecemeal.	Comments noted. The issue of future housing development & infrastructure provision will be considered at LDP review.	
9/1	Stephanie Edwards (Carew Community Council)	Q1 – Do you support an approach that makes use of the Landmap assessment dataset? Answer: Yes. Will members of the public, interested parties (neighbours to a proposed development) also have access to this dataset?	Support noted and welcomed. There is online public access to the Landmap dataset, which is hosted by Natural Resources Wales.	
9/2	Stephanie Edwards	Q2 – Do you concur with how the Authority proposes to classify the	Support noted and welcomed.	

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Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
	(Carew Community Council)	influences that installations have on the landscape? Answer: Yes		
9/3	Stephanie Edwards (Carew Community Council)	Q3 – Are there any comments you would like to make regarding the way the Authority has identified impacts on receptors? Answer: No		
9/4	Stephanie Edwards (Carew Community Council)	Q4 – In your view, are the maps detailing the quality of Pembrokeshire’s landscape and agricultural land useful to potential applicants? Answer: Yes	Support noted and welcomed.	
9/5	Stephanie Edwards (Carew Community Council)	Q5 – Do you think that the SPG document would be useful for all prospective applicants for renewable energy installations? Answer: Yes	Support noted and welcomed.	
9/6	Stephanie Edwards (Carew Community Council)	Q6 – Are there any general comments that you would like to make? Answer: No		
10/1	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Q1 – Do you support an approach that makes use of the Landmap assessment dataset? Answer: Yes	Support noted and welcomed.	
10/2	Neil Sefton	Q2 – Do you concur with how the	Footnote added to reference source of	Add footnote to

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	(Community Energy in Pembrokeshire, c/o Planed, Narberth)	<p>Authority proposes to classify the influences that installations have on the landscape?</p> <p>Answer: No. The table explaining the varying levels of influence a proposal may have does not state what these ratings are based on. We would like to see the rationale for each rating provided. The term ‘the introduction of incongruous development’ also needs to be more clearly defined, as it could be argued that any new development is incongruous.</p>	<p>table. The term incongruous development refers to ‘not in harmony or keeping with the surroundings’.</p>	<p>reference: <i>Example table taken from Locogen LVIA Assessment Methodology</i></p>
10/3	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	<p>Q3 – Are there any comments you would like to make regarding the way the Authority has identified impacts on receptors?</p> <p>Answer: No</p>		
10/4	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	<p>Q4 – In your view, are the maps detailing the quality of Pembrokeshire’s landscape and agricultural land useful to potential applicants?</p> <p>Answer: Yes. It would be useful if areas where projects would never be permitted were highlighted on the maps.</p>	<p>Support noted and welcomed. In relation to the additional comment, the LDP does not identify any areas where renewable energy projects would never be permitted. Each proposal is judged on its individual merits under the current Plan. When the LDP is reviewed, it will be necessary to carry out a Renewable Energy Assessment which will provide new evidence to inform policy formulation and, if necessary, modification.</p>	

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10/5	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	<p>Q5 – Do you think that the SPG document would be useful for all prospective applicants for renewable energy installations? Answer: No.</p> <p>1 – We believe there should be a clearer distinction between micro-scale and larger-scale installations, as the guidance in this SPG document is not proportionate when considering micro-scale renewables. A paragraph stating the scale of projects the guidance is pertaining to, and any possible variance for smaller scale, would be welcomed.</p> <p>2 – The SPG document should be worded in a way to encourage the submission of renewable energy projects. The current wording implies a bias against renewables, for example paragraph 3.4 states ‘A balanced approach is needed, weighing the policies that support renewable energy against the degree of environmental, social and economic impacts, and any effects on allocations in the Plan not yet developed’. This should be worded more positively or at least in a more neutral manner.</p> <p>3 – The Pembrokeshire Local Development Plan: GN.4 Resource Efficiency and Renewable and Low-</p>	<p>No change required.</p> <p>Comments noted.</p> <p>The quoted text excerpt advocates balance and does not infer negative bias. Welsh and PCC LDP policies support the principle of renewable energy developments. The starting point in evaluating individual schemes will be the ‘in principle’ support, but it is also appropriate to consider whether there will be environmental, social and / or economic impacts.</p> <p>Comments noted.</p>	

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		carbon Energy Proposals, states 'Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported'. This should be explicit in the SPG document.		
10/6	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Q6 – Are there any general comments that you would like to make? Answer: Yes (see below).		
10/7	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	1.1 – the introduction makes reference to national and local policy, including renewable energy targets and reduction of carbon emissions, but does not expand on how this will be achieved or what the yearly targets are.	No change required. The purpose of this SPG is not to repeat the details of Welsh, UK or European regulations and guidance. The Council is monitoring consented and implemented renewable energy schemes – See Annual Monitoring Report data. The Council will prepare a Renewable Energy Assessment at LDP Review. This will inform future policy formulation and will set a renewable energy target for the Council's planning area.	
10/8	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.4 – 'A balanced approach is needed, weighing the policies that support renewable energy against the degree of environmental, social and economic impacts, and any effects on allocations in the Plan not yet developed'. This infers a negative bias against renewables.	No change required. The quoted text excerpt advocates balance and does not infer negative bias. Welsh and PCC LDP policies support the principle of renewable energy developments. The starting point in evaluating individual schemes will be the 'in principle' support,	

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		This should be worded more positively or at least in a more neutral manner.	but it is also appropriate to consider whether there will be environmental, social and / or economic impacts.	
10/9	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.5 – ‘Key documents / Information sources on Renewable Energy proposals’ should include the Wellbeing of Future Generations Act 2015 as this will have a strong influence on how such documents are interpreted.	Agree.	Amend the table 3.5 to include: <i>Well-being of Future Generations (Wales) Act 2015</i>
10/10	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.9 – ‘Key information that should be provided with a planning application for a Renewable Energy proposal’ does not include: <ul style="list-style-type: none"> <li>• Carbon emissions – how the project is helping to reach targets; and</li> <li>• Community benefit policy.</li> </ul>	Agree.	Amend 3.9 to include: <b>Economic considerations....</b> <i>This may include community benefits.</i> <b>Carbon Considerations –</b> <i>This should include how the project is helping to reach renewable energy targets, net carbon costs/gains.</i>
10/11	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.11 – general considerations that also need to be taken into account include: <ul style="list-style-type: none"> <li>• No definition of what ‘clearly visible’ is;</li> <li>• Grid connection should not be included as this is not a planning consideration; and</li> </ul>	The meaning of clearly visible is widely understood and does not require a written definition.  Grid connection is a planning consideration – see LDP policy GN.3.  Agree. The points raised will be added	Amend 3.11 to include: <b>Positive additional benefits –</b> <i>This may include local energy storage, community resilience and</i>

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		<ul style="list-style-type: none"> <li>This is an opportunity to include positive additional benefits of projects proposed, such as local energy storage, community resilience and energy security.</li> </ul>	to the bulleted list following paragraph 3.11.	<i>energy security.</i>
10/12	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.13 – ‘National Parks are areas designated because they have very high quality landscape and hence the landscape impact of renewable energy proposals close to the Pembrokeshire Coast National Park boundary and / or clearly visible from National Park locations may be highly significant’. This needs to be amended as not all areas of the Pembrokeshire Coast National Park are designated as very high quality.	Revise to reflect the PCC’s legal duty in respect of National Park purposes. ‘National Park’ is the highest level of landscape designation available in Wales. It is true that not all areas of the National Park will necessarily also be within the highest categories within the various Landmap layers. However, the National Park designation must take precedence. There is an expectation that landscape quality will be at least maintained and ideally improved in the designated area.	Replace the last sentence of 3.13 with: <i>National Parks are designated for their natural beauty, wildlife and cultural heritage. PCC has a statutory duty to have regard to the purposes of the National Parks when exercising or performing any functions in relation to, or affecting, land in a National Park. Hence the landscape impact within the National Park of proposals within PCC is a material consideration.</i>
10/13	Neil Sefton (Community	3.17 – the table explaining the varying levels of influence a proposal may have	Footnote added to reference source of table. The term incongruous	Add footnote to reference:



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	Energy in Pembrokeshire, c/o Planed, Narberth)	does not state what these ratings are based on. An explanation should be provided. The term 'The introduction of incongruous development' needs to be clearly defined.	development refers to 'not in harmony or keeping with the surroundings'.	<i>Example table taken from Locogen LVIA Assessment Methodology</i>
10/14	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.19 – 'The Visual Impact Assessment of a scheme on the wider landscape should ensure that all possible effects of change and development on views and visual amenity are taken into account in decision making'. Whilst a project might have a potential impact on character, it would not necessarily do so on general visual amenity. The grid is mentioned again and should not be, as Developer does not control that element of the project.	No change required. The text as currently drafted refers to possible effects of change and development on views and visual amenity. It is appropriate that both matters should receive consideration. If it transpires that only one element is affected in a particular case, that doesn't make the SPG text invalid. In terms of grid connection, this is a planning consideration – see LDP policy GN.3.	
10/15	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	3.26 – 'Requirements specific to wind turbine proposals include a minimum distance of 50 metres from any hedge bank to blade tip'. Is this for turbines of all scales?	No change required. Recommendations from NRW.	
10/16	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Appendix 1 – first mention of community benefit.	Amendment proposed to 3.9 to make community benefits more clear.	Amend 3.9 to include: <b><i>Economic considerations....</i></b> <i>This may include community benefits.</i>
10/17	Neil Sefton (Community	Appendix 2 – table needs to be redefined – Ofgem will provide definitions for	No change required. Turbines do now exceed 135m turbine height to blade tip,	

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	Energy in Pembrokeshire, c/o Planed, Narberth)	consistency. The guide states a large turbine has a blade tip of up to 135m when there are turbines with blade tip up to 300m. We would like to see this changed.	however this table is taken from Welsh Government guidance and is indicative not precise.	
10/18	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Appendix 3 – ii – Biomass and Anaerobic Digestion have been aggregated.	No change required. The text identifies two types of biomass energy extraction- wet biomass and dry biomass. This is correct and does not need to change.	
10/19	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	All of the Appendices will soon become redundant with changing technology, better to link to a site such as Ofgem, or downloadable datasets, to ensure information is relevant.	No change required. Like all SPG, this item will require periodic review to allow updating. Putting in place a guidance document subject to continual updating without consultation on each round of changes would be undemocratic and undermine the certainty provided by the LDP and supporting SPG documents.	
10/20	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Community energy / involvement are not referred to and neither is the package of significant cultural, environmental, economic and social profits such projects provide.	No change required. Social and economic impacts are referenced under Application Considerations; this includes the community benefits of a project.	
10/20	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Carbon emissions are not referred to.	No change required. Greenhouse gas emissions are mentioned as early as paragraph 1.1 of the draft SPG. These include CO <sub>2</sub> .	

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10/21	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Economic benefits to communities of community renewables, including the 'multiplier' effect – using local contractors, money going back into the local economy, is not referred to.	No change required. In the bulleted list following paragraph 3.9, economic considerations are referenced. However, this is in a general context, not specifically in relation to community-led schemes. Social and economic impacts are however referenced under Application Considerations in Appendix 1, 2 & 3; this includes the community benefits of a project.	
10/22	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Security of energy supply for Pembrokeshire should be highlighted as an important consideration.	No change required. Security of energy supply is a national consideration. Pembrokeshire contributes to this significantly, both through 'conventional' energy production and through a multitude of operational renewable energy schemes.	
10/23	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Well-being of Future Generations Act not referred to. The legislation has been brought in to make the public bodies think more about the long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. Community energy projects will significantly help to achieve the goals within the Act and this should be taken into account by planning committees, in line with Planning Policy Wales' Chapter 4 on Sustainability.	The Well-being of Future Generations Act came into force in Wales on 1 <sup>st</sup> April 2016. It thus post-dates the commencement of consultation on the draft Renewable Energy SPG. Although not specifically planning legislation, it puts in place a 'sustainable development principle' which tells organisations how to go about meeting their duty under the Act. References will be added the SPG on the Well-being of Future Generations Act (and also the Environment (Wales) Act). This will be in the table in paragraph 3.5.	Amend table to include links to: <i>Well-being of Future Generations (Wales) Act 2015</i> <i>Environment (Wales) Act 2016</i>

Ref.	Individual / organisation	Representation summary	PCC response	Recommended change to SPG
10/24	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	<p>PPW paragraph 4.4.3 – in contributing to the Well-being of Future Generations Act goals, planning policies, decisions and proposals should:</p> <ul style="list-style-type: none"> <li>• Promote resource-efficient and climate change resilient settlement patterns;</li> <li>• Play an appropriate role to facilitate sustainable building standards (including zero carbon) that seek to minimise the sustainability and environmental impacts of buildings (section 4.12);</li> <li>• Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including water supplies, sewerage and associated waste water treatment facilities, waste management facilities, energy supplies and distribution networks and telecommunications) while ensuring proper assessment of their sustainability impacts.</li> <li>• Maximise the use of renewable resources, including sustainable materials (recycled and renewable materials and those with a lower</li> </ul>	<p>No change required. It is not the purpose of SPG, or indeed a parent LDP, to reproduce / paraphrase large excerpts of text from Welsh or UK policy or guidance documents. The principles of Welsh and, where there are no devolved powers, UK policy are required to be reflected in LDPs. An LDP which fails to do this is unlikely to survive the independent Examination process. SPG elaborates on specific areas of LDP policy. Where legislation, policy and / or guidance have changed since LDP publication, this will be picked up when the LDP is reviewed.</p>	

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		embodied energy).		
10/25	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Grid connection is referred to several times in the document when it is not a planning consideration and should not be included.	No change required. Grid connection is a planning consideration – see LDP policy GN.3.	
10/26	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Guidance is not proportionate when considering micro-scale renewables. Could benefit from a paragraph stating the scale of projects the guidance is pertaining to and any possible variance for smaller scale.	No change required. Micro-scale is referenced in 3.31, in particular a reference is made to potential cumulative impact. Often such types of development will be considered Permitted Development, and therefore this planning guidance document will not be used in their consideration.	
10/27	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	More definition needed for the following: <ul style="list-style-type: none"> <li>• Carbon emission targets;</li> <li>• Year on year renewables targets;</li> <li>• What is 'clearly visible'?; and</li> <li>• What is the 'introduction of incongruous development'?</li> </ul>	No change required. A response to the issues raised in the first and second bullet points can be found in 10/7. A response to the point raised in the third bullet point can be found in 10/11.	
10/28	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Local support for a project should be given stronger weighting.	No change required. Community benefits should be set out in the application (see 10/10). Notwithstanding this, local support for a project does not, in itself, indicate that a proposal is either acceptable or unacceptable in planning terms. Each application should be considered on its planning merits, some of which may indeed be community	

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			benefits.	
10/29	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Generally, wording and attitude around renewables should be more positively presented.	No change required. The draft document does not convey negativity about renewable energy. Nor does the parent LDP. However, the evaluation of individual proposals is often complex and requires great care. The SPG document seeks to provide guidance to help with submission and evaluation aspects.	
10/30	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Guidance should encourage the submission of renewable energy projects and the attainment – and surpassing – of targets set in line with local and national policy.	No change required. LDP policy GN.4 says that ‘developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported’. The draft SPG provides elaboration of the policy, to achieve the aims set out in SPG paragraph 1.5. Provision of clear guidance is intended to help those who wish to submit applications, as well as those whose role is the evaluation of such proposals.	
10/31	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	Officers and planning committees should be advised of the urgency to address climate change and that this should be the highest consideration when deciding projects. Global climate change is the single biggest environmental threat facing us. In order to tackle climate change, and have a better life, big, decisive action is needed from local government. In his letter to Planning Leads on 15 <sup>th</sup> March 2016, Carl	The point made here is of critical importance. Welsh Government guidance and policy and also LDP policy embeds the concept of sustainability and acknowledges the dangers that are and will continue to arise from climate change. The letter referred to was issued by Carl Sargeant, AM, then Minister for Natural Resources, Welsh Government, during the consultation period. Although not a	

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		<p>Sargeant, AM, states:</p> <p>‘When taking decisions on local planning policies and individual development management decisions, consideration should be given to the overall context of helping to tackle climate change and delivering the sustainable development duty placed on all public bodies by the Well-being of Future Generations (Wales) Act. This needs to happen for all renewable energy and low carbon technologies and at all scales from nationally significant projects to community and individual building scale schemes’.</p>	<p>response to this document, it is directly relevant and is separately referenced at the end of this report (item 12/1).</p>	
10/32	Neil Sefton (Community Energy in Pembrokeshire, c/o Planed, Narberth)	<p>The recently published Welsh Assembly document ‘A Smarter Energy Future for Wales, March 2016’ states Wales must:</p> <p>1 – Establish a clear vision for its future energy policy, including a central role for local energy.</p> <p>13 – Amend planning policy so that it prioritises local and community renewable energy projects and requires the carbon impact of new developments to be a key factor in planning decisions.</p>	<p>No change required. The Council does and will continue to reflect Welsh Assembly planning policy in setting its own planning policies. The review of the Council’s LDP will commence in 2017. Where the context for policy formulation has been changed or updated, this will be taken into consideration. The role of SPG is to elaborate on adopted LDP policy, not to amend or update that policy.</p>	
10/33	Neil Sefton (Community Energy in Pembrokeshire,	<p>We do not feel that the SPG document adequately reflects local or national policy with regard to renewables and climate change. We would ask that it is</p>	<p>The response is noted. The points made in response 10/30 also apply here.</p>	

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	c/o Planed, Narberth)	re-drafted to support the county and the country's aims.		
11/1	Julie Kirk (internal – Pembrokeshire County Council)	<p>Q4 – In your view, are the maps detailing the quality of Pembrokeshire's landscape and agricultural land useful to potential applicants?                      Answer: Yes, but subject to the comment below.                      Comment: Whilst several of these maps may be useful for illustrative purposes, the first map at Appendix 4 'Landmap Overall Landscape Classification of Outstanding or High (PCNPA greyed out)' should be revisited to ensure that the classification shown is accurately plotted in relation to the description.</p>	Agree. The map in question (Landmap Overall Landscape Classification) will be amended so that all four categories are shown for each aspect area.	Amend Appendix 4 map to include all categories of each LANDMAP aspect area.
12/1	Carl Sergeant (Welsh Government)	<p>Although not a response to this consultation, Carl Sergeant, Minister for Natural Resources, Welsh Government, issued the following letter to Planning Lead Members, Chief Planning Officers and Planning Inspectorate Wales on 15/03/16 (during the consultation period). Its content is of great significance in the context of this consultation.</p> <p>'Dear Colleague,                      Following on from the United Nations Conference on Climate Change (COP21) in December, last week Wales hosted the International Green Growth Forum which brought together leaders of States and Regions from across the world and included the launch of <i>The Business of Becoming a Sustainable Nation</i> – our prospectus for green growth in Wales.                      Green Growth is about ensuring sustainable growth and jobs across the whole of our economy, not just in the environment sector.</p>		



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		<p>When taking decisions on local planning policies and individual development management decisions consideration should be given to the overall context of helping to tackle climate change and delivering the sustainable development duty placed on all public bodies by the Well-being of Future Generations (Wales) Act. This needs to happen for all renewable energy and low carbon technologies and at all scales from nationally significant projects to community and individual building scale schemes.</p> <p>Our planning policies in Planning Policy Wales (PPW) are clear that the planning system should support the transition to a low carbon society and that local planning authorities should facilitate the development of all forms of renewable and low carbon energy. In addition, PPW states that the economic benefits associated with a proposed development are understood and these are given appropriate consideration in the decision-making process.</p> <p>I appreciate that visual and amenity impact on surrounding communities and properties is an important issue (and policies are in place to protect against unacceptably adverse impacts) and that discussions of this nature can become quite emotive during the planning process. However planning decisions need to be taken in the wider public interest and in a rational way, informed by evidence, where these issues are balanced against other factors.</p> <p>At the larger scale, the new Developments of National Significant (DNS) system, introduced on 1 March will consider these issues on a strategic level for energy projects, taking into account policies in development plans and Planning Policy Wales.</p> <p>At the local authority level, in December 2015 I wrote to you asking you to be more proactive in developing positive local planning policies towards renewable energy developments through local strategies and spatial allocations.</p> <p>On a community scale, in December 2013, I wrote to you to ask that you be as accommodating as possible when dealing with community projects to take into account the level of knowledge within community organisations of the planning system. This request still stands today and will be facilitated by the introduction of</p>		

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		<p>pre application advice services by all local planning authorities this month.</p> <p>In support of this, the Welsh Government has commissioned the Energy Saving Trust (EST) to deliver training to local planning authority Members and Officers on community renewables. This training will seek to brief decision makers of the issues faced by community projects so that they may be more informed of and considerate to the position of community groups as they navigate their way through the planning system. If you are interested in attending one of these events and have not already been notified, please contact the Energy Saving Trust directly on 029 2046 8345 or <a href="mailto:trainingwales@est.org.uk">trainingwales@est.org.uk</a></p> <p>Finally, at the buildings-level scale we are investigating possibilities to further extend development rights for non-domestic properties to install solar panels. In England permitted development rights for commercial properties have increased so that up to 1MW solar panels can be installed on roofs subject to a prior approval procedure. I want to see if there is an alternative option available in Wales that will be less cumbersome for developers and those in the business community seeking to generate their own energy. We recently commissioned Arcadis to carry out research in this area and this is due to be completed by the Spring of 2016.</p> <p>The Welsh Government is committed to using all using all possible levers it has to increase the supply of renewable energy in Wales for the benefit of the next generation and I expect local planning authorities to take the initiative in delivering sustainable outcomes for future generations’.</p>		