
SECTION 1: INTRODUCTION

Landscape Sensitivity and Capacity Assessment:

Background

- 1.1 This Assessment was commissioned by the Snowdonia National Park Authority (SNPA) Gwynedd Council and the Isle of Anglesey County Council. It aimed to provide a robust evidence base for determining planning applications, informing the development of Supplementary Planning Guidance, helping to protect sensitive and distinctive landscapes from inappropriate development and encouraging a positive approach to development in the right location and at an appropriate scale. In 2015 Gillespies, the Consultants who undertook the study, won the Landscape Institute's Strategic Landscape Award for this work. The study, as it relates to Snowdonia, specifically considers the following three development types.

Renewable Energy Developments

- Wind Energy (focussing on smaller scale developments)

Other Developments (Transmission Infrastructure and Tourism)

- Mobile Masts (Telecommunications Transmission Infrastructure)
- Static Caravan/Chalet Parks and Extensions (Tourism)

- 1.2 The acceptability of large scale development in the rural landscape is an emotive subject and one where compromise is often needed. Whilst it is generally acknowledged that the most valued landscapes should be protected, there are some areas where development can be accommodated, albeit in a controlled way to minimise adverse effects. This study aims to understand where and how best to accommodate the different types of development identified in the brief.
- 1.3 The assessment approach outlined in Section 2 was developed in conjunction with a Project Steering Group, which comprised representatives from the National Park Anglesey and Gwynedd Joint Planning Policy Unit (JPPU).
- 1.4 It is important to note that this is a strategic study and is not prescriptive at an individual site level. It does not replace the need for a landscape and visual impact assessment (LVIA) as part of a formal Environmental Impact Assessment (EIA) or a LVIA where landscape effects need to be considered, but assessed in a more scaled down application of the *Guidelines for Landscape and Visual Impact assessment (Edition 3)*. The assessment does not take account of other natural and cultural heritage considerations (except where they relate to landscape character and visual considerations), technical factors or the perceived need for the development.
- 1.5 Key requirements of the brief for the study were that it should be user friendly, concise and consistent with approaches in neighbouring authorities.
- 1.6 A brief overview of renewable energy and other developments is included below.

Renewable Energy Developments

- 1.7 The National Park is faced with a wide range of challenges arising from a changing climate. Balancing the need to increase renewable energy production with the need to minimise harm to the distinctive and special qualities of the area's landscape is one of these challenges. The landscapes of north Wales have good conditions to produce wind, hydro and solar electricity as is demonstrated in the '*Anglesey, Gwynedd and Snowdonia Renewable Energy Capacity Assessment*' (2012).

Wind Energy Development

- 1.9 North-west Wales, including the Snowdonia National Park, has large areas of rural uplands and coastal zones with an abundant wind resource. Although the Welsh Government's approach is to limit the development of

large scale wind farms to TAN8 Strategic Search Areas¹, Welsh Government planning policy does not set out spatial limitations for wind energy development under 25 MW. In light of the increasing number of planning applications, EIA screening opinion requests and pre-application enquiries being submitted for individual and clusters of wind turbine developments of varying scales to the Anglesey and Gwynedd councils and to a somewhat lesser extent the SNPA, this study has been commissioned in order to guide development to the most suitable locations and ensure that the key characteristics and quality of the area's landscapes are safeguarded.

- 1.10 Wind turbines are tall structures, which are typically sited in open or elevated areas. This raises the potential for extensive landscape and visual effects, which is exacerbated by the often complex visual interplay between different lighting conditions and the scale and form of groups of turbines.
- 1.11 The movement of the rotor blades attracts the eye and in certain lighting conditions moving turbines can be visible from a long distance.
- 1.12 The acceptability of wind turbines in the landscape is an emotive subject and one where a planning balance needs to be considered. Whilst it is generally acknowledged that the most valued aspects of the natural heritage should be protected, those landscapes of lesser value can potentially accommodate some wind energy development, albeit subject to a development's and the nature of significant adverse effects.

Mobile Masts (Telecommunications Transmission Infrastructure)

- 1.13 Pressures relating to telecommunications infrastructure are experienced most within Snowdonia National Park, particularly in relation to proposals for new and replacement mobile telephone masts. This is due to a combination of a lack of mobile telephone coverage and the varied topography of the National Park which means that more masts are required to provide coverage.

*'In more remote areas, telecommunications infrastructure is one of the few developments which by necessity has to be prominently sited. Such developments inevitably affect the perceived wildness of the landscape, by introducing an overt man-made structure into an area perceived as relatively natural and remote from human influence. There can also be an impact on landscapes when there is an increase of structures along established infrastructure corridors. This results in increased visual clutter and development often in highly visible locations. In addition, the visual effects of masts can increase through cumulative visual impact, as prominent sites often contain several, disparately designed developments.'*²

Static Caravan/Chalet Parks and Extensions (Tourism)

- 1.14 The landscapes of the Isle of Anglesey, Gwynedd and Snowdonia National Park are vitally important to the local economy and are a major contributor to the area's tourism industry. The growth of tourism and leisure has resulted in the development of mobile home and chalet parks. There are a significant number of static caravan/chalet park developments located along the coastlines of the Isle of Anglesey and Gwynedd and also within Snowdonia National Park. Many of these sites (particularly along the coast) are conspicuous and unsightly in appearance with some sites extending over large areas and often dominating and degrading the landscape. A handful of prominently sited units can create a disproportionately visual impact. Sites can often be viewed from elevated locations where the regularity, denseness and colour can create a strong contrast with the landscape and coastal edges
- 1.15 There is currently a blanket ban on any new static caravan/chalet park developments across all three LPAs areas. However, it is broadly accepted that within Anglesey and Gwynedd existing parks could be extended by a 10% increase in units per park (based on the original size of the development) if accompanied by substantial environmental improvements. Likewise, in Snowdonia National Park a 10% increase in the overall area of a park may be permitted (but not an increase in the number of units) if it delivers landscape/environmental improvements. Coastal squeeze³ threatens some of these parks, and the desire to have caravans right on the coastal edge defended by rock armour, for example, has resulted in unsightly

¹ TAN8 Strategic Search Areas (SSAs) - have been independently and empirically assessed to be the most suitable areas for wind energy development in Wales.

² <http://www.snh.org.uk/futures/Data/pdfdocs/LANDSCAPES.pdf>

³ In this context the term coastal squeeze is used to describe the direct loss of land through managed coastal retreat as sea levels rise in the future.

development whose visual effects are significant both for wide vistas along the adjacent beach and for the development as whole from elevated positions inland. As sea levels rise in the future some coastal static caravan/chalet parks may be required to re-locate or expand their plots further inland to make up for the lost land; thus adding further to development pressure along the coastline, if this occurs then opportunities for visual and landscape improvements will be sought.

Planning and Policy Framework

National Policy Context

- 1.16 Planning policy in Wales, comprises both national (Welsh) and local policy documents. At a national level, the *Wales Spatial Plan* (2008) provides a Wales-wide spatial strategy which outlines a broad 20-year agenda to guide future development and policy interventions. *Planning Policy Wales* (Edition 8, January 2016) (PPW) provides the overarching national policy considerations, principles and objectives which underpin the Welsh planning system. PPW is supported by a number of *Technical Advice Notes* (TANs) which, together with circulars and policy clarification letters, comprise national planning policy in Wales.

Planning Policy Wales (PPW) Edition 8 (January 2016)

- 1.17 Land use planning policies for the Welsh Government set out in *Planning Policy Wales* (PPW) establish the Government's objectives for conservation and improvement of natural heritage, in particular the protection of native habitats, trees and woodlands and landscapes with statutory designations.
- 1.18 The LANDMAP information system is formally recognised in *Planning Policy Wales* as the starting point for landscape assessment in Wales. LANDMAP provides information for all of Wales' landscapes.
- 1.19 Extracts from PPW regarding renewable energy and telecommunications developments are included below as follows:

Renewable Energy Developments

- 1.20 All forms of renewable energy are promoted where they are environmentally and socially acceptable.
- 1.21 *'The UK is subject to the requirements of the EU Renewable Energy Directive. These include a UK target of 15% of energy from renewables by 2020. The UK Renewable Energy Roadmap sets the path for the delivery of these targets, promoting renewable energy to reduce global warming and to secure future energy supplies. The Welsh Government is committed to playing its part by delivering an energy programme which contributes to reducing carbon emissions as part of our approach to tackling climate change (see 4.5) whilst enhancing the economic, social and environmental wellbeing of the people and communities of Wales in order to achieve a better quality of life for our own and future generations. This is outlined in the Welsh Government's Energy Policy Statement Energy Wales: A Low Carbon Transition (2012). (PPW Edition 8, Paragraph 12.8.1)'*
- 1.22 *'Planning policy at all levels should facilitate delivery of both the ambition set out in Energy Wales: A Low Carbon Transition and UK and European targets on renewable energy. The Renewable Energy Directive contains specific obligations to provide Guidance to facilitate effective consideration of renewable energy source, high-efficiency technologies and district heating and cooling in the context of development of industrial or residential areas, and (from 1 January 2012) to ensure that new public buildings, and existing public buildings that are subject to major renovation fulfil an exemplary role in the context of the Directive. The issues at the heart of these duties are an established focus of planning policy in Wales, and in this context both local planning authorities and developers should have regard in particular to the Guidance contained in Technical Advice Note 8: Planning for Renewable Energy, TAN22 and Planning for Renewable Energy – A Toolkit for Planners. The Welsh Government will however consider the preparation of further targeted Guidance where appropriate. (PPW Edition 7, Paragraph 12.8.2)'*⁴

Telecommunications Developments

- 1.23 *'The Welsh Government recognises that widespread access to affordable, secure telecommunications infrastructure is important to citizens and businesses across Wales. It is important that the telecommunications infrastructure in Wales is able to meet this challenge, helping to build a thriving and prosperous Welsh economy. To this end, the Welsh Government is working with the telecommunications industry and the*

⁴ Planning Policy Wales (Edition 7, July 2014), Chapter 12 – Infrastructure and Services, Section 12.8

communications regulator Ofcom to share information on communications infrastructure issues, to understand regulatory, planning and economic barriers to investment and to inform future policy making in this area. The Welsh Government has well-established policies for the protection of the countryside and urban areas - in particular the National Parks, AONBs, SSSIs, the Heritage Coast and areas and buildings of architectural or historic importance.⁵

Technical Advice Notes

- 1.24 PPW is supported by a series of Technical Advice Notes (TANs) including the following:
- 1.25 **TAN 8: Planning for Renewable Energy** – allocates seven Strategic Search Areas (SSAs) across Wales. These are areas within which most large wind farms (> 25MW) can potentially be located. TAN 8 identifies areas where proposals are likely to be supported, areas to be afforded significant protection from wind farm development, and the approach to be followed elsewhere. TAN 8 states that most areas outside SSAs should remain free of large wind energy schemes although there may be some potential for wind farms up to 25 MW capacity on urban brownfield sites and for smaller community based and domestic wind energy schemes less than 5 MW elsewhere. *LANDMAP Information Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines (2013)* refers to TAN 8 and provides more detailed information about SSAs and wind energy development with a view to avoiding, minimising and compensating for adverse effects.
- 1.26 In terms of wind energy development it is generally recognised that there is a presumption for major landscape change within and immediately adjacent to SSAs but that there should be no significant change outside SSAs.
- 1.27 TAN 8 makes reference to solar PV energy developments; however this is in connection with domestic scale developments which are outside the scope of this study.
- 1.28 **TAN 12: Design** – requires Local Planning Authorities to appraise the character of the landscape, including its visual and sensory qualities and emphasises that landscape character needs to be considered when developing a robust and coherent planning framework. This is intended to ensure that development is sited in areas which are best able to accommodate them thereby helping to limit adverse effects and maintain landscape diversity. TAN 12 advocates the use of LANDMAP to help inform and identify where development is preferable in landscape terms.
- 1.29 **TAN 13: Tourism** – provides advice on tourism related issues to planning, including occupancy conditions, caravans and chalets development, and other related advice.
- 1.30 **TAN 14: Coastal Planning** – provides advice on key issues relating to planning for the coastal zone, including recreation and heritage and shoreline management plans.
- 1.31 **TAN 19: Telecommunications** – provides advice on telecommunications issues relating to planning including mobile masts and environmental considerations.

Guidance for Sustainable Design in the National Parks of Wales (Spring 2009)

- 1.32 The aim of this Guidance is to promote high quality, sustainable design that enhances the natural beauty⁶ wildlife and cultural heritage of the National Parks of Wales.
- 1.33 The document considers renewable energy developments, landscape, biodiversity, place and local distinctiveness amongst other principles of sustainable design. It provides generic Guidance which can be used by development control staff to assess planning applications, developers, landowners and designers.

Local Policy Context

- 1.34 Following the Planning and Compulsory Purchase Act (2004), each Unitary Authority in Wales is required to prepare a local development plan (LDP) for its area. The Snowdonia National Park Authority published its LDP in 2011.

Snowdonia National Park Authority, Eryri Local Development Plan (ELDP) 2007-2022 (2011)

⁵ Planning Policy Wales (Edition 7, July 2014), Chapter 12– Infrastructure and Services, Section 12.11

⁶ Section 7 of this document sets out Natural Resources Wales’ Statement on “Natural Beauty

1.35 In carrying out its statutory planning responsibilities, Snowdonia National Park Authority (SNPA) must also have regard to the statutory responsibilities and management role of National Park Authorities as set out in the Environment Act 1995.

These purposes are to:

Conserve and enhance the natural beauty, wildlife and cultural heritage of the Park.

Promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

1.36 The LDP notes that:

'Whilst large-scale energy power generation projects are incompatible with National Park status an assessment of renewable energy in Snowdonia considered that scope might exist to contribute to reducing demand for electricity derived from fossil fuels through efficiency savings and through small-scale renewable energy developments to meet domestic or community needs. These included small-scale hydro, domestic wind turbines, photovoltaics, biomass and landfill gas'. (Paragraph 3.19).

1.37 The LDP includes a specific policy relating to landscape protection in relation to development: Development Policy 2: Development and the Landscape (2), which reads as follows:

'The scale and design of new development, including its setting and landscaping should respect and conserve the character of the landscape. Unacceptable impacts on the landscape will be resisted and particular regard will be had to the protection of:

- *Section 3 areas of natural beauty*⁷.
- *Undeveloped coast.*
- *Panoramas visible from significant viewpoints.*
- *Landscape character areas based on LANDMAP and as defined in the Landscapes of Eryri Supplementary Planning Guidance.*⁸

1.38 **The LDP also states that:**

*'Snowdonia's landscapes include rugged mountains, high moorland, wooded valleys, lakes, waterfalls, estuaries and coast which all contribute to 'Special Qualities' of the area. The impact of these landscapes is enhanced in many locations by a sense of tranquillity and remoteness. The Authority (SNPA) will encourage development that does not have an adverse effect on any of these special features in order to maintain the quality of life for the people living in the National Park and the experience of visitors to the National Park. Developments outside the National Park may also have an adverse impact on landscape character and affect views from and into the area. The Authority also recognises the need to discuss with neighbouring Authorities the effects of developments on the landscape. The Authority will consider the landscape and visual impact of proposals close to the National Park boundary and how these may impact on the National Park purposes.'*⁹ Paragraph 3.18

1.39 A number of Supplementary Planning Guidance (SPG) documents have been produced to provide further detailed information in support of the Eryri LDP. These documents are used by the Authority in decision making and are material considerations. The following SPGs are relevant to this study:

- Visitor Accommodation (October 2012).
- Landscapes of Eryri (Working Draft) - Snowdonia National Park has used LANDMAP to inform the identification of Landscape Character Areas (LCAs) and accompanying management guidelines.
- Renewable and Low Carbon Energy (Draft).

Castles and Town Walls of King Edward in Gwynedd, World Heritage Site Management Plan (Cadw) (2004)

⁷ Section 3 of the Wildlife and Countryside (Amendment) Act 1985 placed a responsibility on each of the National Parks of England and Wales to prepare a map showing those areas of mountain, moor, heath, woodland, down, cliff or foreshore, the natural beauty of which the Authority considers it is particularly important to conserve.

⁸ Eryri Local Development Plan (ELDP) 2007-2022 (2011)

⁹ Eryri Local Development Plan (ELDP) 2007-2022 (2011)

1.40 This World Heritage Site covers the Castles and Town Walls of Caernarfon and Conwy and the Castles of Harlech and Beaumaris. The three castles highlighted in bold fall within the study area and the Castle and Town Walls of Conwy are located within the study area buffer.

1.41 A Management Plan¹⁰ has been prepared for the World Heritage Site to protect and enhance the Castles' settings and to encourage their presentation to the public for life long education and research. The setting of the monuments is protected through the local planning system; planning policies have been set out by the Councils and Park Authority to protect the World Heritage Site and its landscape setting (including important and historic views into and out of each monument in the World Heritage Site which generally extend beyond the area of essential setting).

Snowdonia National Park Management Plan (2010-2015)

1.42 The Snowdonia National Park Management Plan provides the strategic policy framework for the National Park. It is reviewed every five years and is informed by The State of the Park Report (Draft 2009) which is also reviewed on a five yearly basis. The State of the Park Report also contains a tranquillity map.

The Seascape Assessment of Wales (Welsh Seascapes and their sensitivity to offshore developments) 2009

1.43 CCW (now Natural Resources Wales (NRW)) has assessed the character and special qualities of Welsh seascapes, including their comparative sensitivity to offshore development.

1.44 The Seascape Assessment of Wales subdivides the Welsh coast into 50 regional seascape units detailing the character and qualities of each unit. It also assesses the sensitivity and capacity of each seascape unit to offshore renewable energy developments. Whilst the report focuses on offshore wind energy development it nevertheless provides a valuable information resource in determining the potential effects of onshore wind energy developments on seascape character and qualities.

The Anglesey and Snowdonia National Park Seascape Assessment (2013)

1.45 The Anglesey and Snowdonia Seascape Character Assessment, completed in August 2013¹¹, assessed the broad Seascape Character Types (SCTs) and more detailed Seascape Character Areas (SCAs) that make up the two regions.

1.46 One of the main purposes of the Seascape Study was to capture the perceptual and experiential qualities of the coast, and relate them to different physical environments and geographic areas. The outputs of this study have informed this Landscape Capacity and Sensitivity Study with SCTs and SCAs referenced throughout.

Countryside Council for Wales, Wales Tranquil Areas Map (March 2009)

1.47 The Wales Tranquil Areas Map, 2009 and the statistical analysis that accompanies it, provide an objective and robust evidence base to inform planning decisions. Together they provide an indicator of change in tranquillity that can be used in Strategic Environmental Assessments (SEA) and EIA. They identify how planning decisions over the last 12 years have affected the extent of tranquillity in Wales and provide the baseline against which the potential impact of plans and programmes on tranquillity and dark night skies can be assessed in the future.

1.48 GIS data layers and maps which make up the 2009 Map are available and are a useful source of data. A copy of the 2009 map overlain with postcode data is provided on Figure A-3.

Approach to the Study

1.49 The main objectives of the assessment are to:

- Provide a strategic assessment of the *relative sensitivity*¹² of the landscapes of the Isle of Anglesey, Gwynedd and Snowdonia National Park to a range of renewable energy, transmission infrastructure and/or tourism development using defined sets of landscape and visual criteria which include both physical and perceptual aspects as well as a consideration of landscape value.

¹⁰ <http://cadw.wales.gov.uk/historicenvironment/protection/worldheritage/cstlsedward1/?lang=en>

¹¹ Anglesey and Snowdonia Seascape Character Assessment, Fiona Fyfe Associates (August 2013)

¹² Relative Sensitivity – the sensitivity of each discrete geographical Landscape Character Area (LCA) is assessed in relation to the type of development and the baseline of the overall study area.

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- Develop a series of landscape strategies which provide an indication as to where development might best be located and an indication of the appropriate scale of development, based on thresholds of *maximum capacity*¹³.
 - Provide siting and design Guidance relevant to each of the different types of development and consider a methodology for the cumulative landscape and visual appraisal of the different types of development.

1.50 There is currently no formally agreed approach for assessing the sensitivity or capacity of landscapes to the different development types which are considered in this study. The methodology set out in the Technical Appendix is developed from current published guidance and the approach taken in other similar studies. It is based on the premise that development should be more readily accepted in the least sensitive areas and should avoid areas that are highly valued for their scenic, recreational and undeveloped qualities such as tranquillity and remoteness; particularly those areas safeguarded by international or national designations and those where the cumulative effects of existing and consented schemes limit further development.

Structure of the Report

1.51 The remainder of the report is structured as follows:

Section 2: Baseline landscapes of the Snowdonia National Park

Section 3: Evaluation of Landscape Sensitivity and Presentation of Strategies

Section 4: Generic Guidance on Siting & Design

Section 5: Guidance for Assessing Cumulative Landscape and Visual Effects

Section 6: NRW Statement on Natural Beauty

Technical Appendix 1 Methodology

1.52 The report is also supported by figures and appendices as listed in the contents.

¹³ Maximum capacity refers to the extent to which a landscape can accommodate different types of development without significant adverse effects on landscape character, quality, fabric, value or amenity, including significant adverse visual effects.