Hearing Session 8

RENEWABLE ENERGY

9.30 am, Thursday 15 September 2016

Joint Local Development Plan Anglesey and Gwynedd



This Statement has been produced by the Isle of Anglesey County Council and Gwynedd Council to set out their response to the matters and issues raised by the Inspector for the Hearing relating to the Renewable Energy in the submitted Anglesey and Gwynedd Joint Local Development Plan.

This Statement relates to the elements of the Plan that have been raised by the Inspector as matters to be discussed. Where appropriate the Statement draws on and cross-refers to the main sources of information used in the preparation of the Plan such as the outcomes of public consultation, the Sustainability Appraisal, the Background Documents and the supporting Topic Papers. Document reference numbers are given where appropriate.

For the purpose of clarity within this statement any Matters Arising Changes suggested to the Deposit Plan and/or a Focussed Change to the Plan, is shown in bold **Red** and underlined. Any Focussed Change text to the Deposit Plan is shown in **Bold** underlined text.

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Matters & Issues Agenda

1 Introduction

2 Procedural Matters

- Do policies ADN1 & 2 provide appropriate safeguards to protect the areas' landscape?
- 3.1 **Response** Yes. Policy ADN1 in relation to On-shore wind energy development refers to the scale of development deemed appropriate and criteria 2 and 3 refers to landscape designations whereby only domestic scale development could be supported. This is based on the Landscape Sensitivity and Capacity Study (DC.020) which evaluates the scale of development for on-shore wind turbines and field-scale solar PV energy proposals that could be accommodated in different Landscape Character Areas (LCA). Criterion (i) clarifies that any development should not have an unacceptable impact upon the landscape character.
- 3.2 Policy ADN2 also states in the last paragraph that proposals should not cause unacceptable harm to the landscape.
- 3.3 The Plan should be read as a whole therefore Policies in Chapter 7.5 'Managing Growth and Development Natural and Built Environment' would also apply. The Councils propose to produce a Supplementary Planning Guidance (SPG) on 'Locating stand-alone renewable energy development' which will refer to key issues and restrictions within the Plan area which include environmental designations. The anticipated timetable for producing the SPG is currently set out in "Scope of Supplementary Planning Guidance and draft preparation timetable" (June 2016) (DA.010b)
- 3.4 The Councils are therefore of the opinion that appropriate safeguards are in place to protect the areas' landscape through preventing unacceptable impact on the landscape character of a location.
- 4 Does the plan provide an appropriate framework for realising the area's potential for renewable energy production (policy PS7)?
- a Is there justification for adopting the same approach in policy ADN1 to local landscape designations (SLA) as to national designations?

- 4.1 **Response** The Councils commissioned a Special Landscape Areas Review Gwynedd and Anglesey (2013) (DC.008) study which followed the LANDMAP guidance and undertook a 4 stage approach being:
 - Stage 1: Defining Strategic Criteria establishing whether there is a valid, defensible and clearly justified need for SLA designations in Gwynedd and Anglesey. The study defined a set of six criteria against which each potential SLA was judged, ensuring that in every case a consistent process was followed in considering the need for local designation.
 - Stage 2: Establishing Broad Search Areas including querying and combining the evaluation scores from across the five LANDMAP Evaluated Aspects. The existing location of Landscape Conservation Areas (LConAs) in Gwynedd provided a key starting point for this stage, but the current LANDMAP data (and other mapped evidence) was also used to help refine and, where necessary, propose new SLAs.
 - Stage 3: Establishing Specific Special Landscape Areas individual SLAs were further refined by more detailed desk-based work and field survey. For each SLA identified, a clear statement of need was drafted and any links/amendments to the current designations (Gwynedd's LConAs) documented. The JPPU consulted with council officers, the AONB teams and the Countryside Council for Wales on the proposed SLAs before proceeding to the next stage.
 - Stage 4: Preparing Statements of Value and Significance –once the proposed SLAs were agreed, these were then mapped in GIS and accompanying Statements of Value & Significance provided for each.
- 4.2 This ensured the method for identification of potential Special Landscape Areas (SLA) is robust and makes the best use of available local evidence. The purpose of this SLA designation is to ensure that the character of these areas is not altered by inappropriate forms of development and that features which contribute to local distinctiveness are conserved.
- 4.3 Table 2.03 in the Landscape Sensitivity and Capacity Study (DC.020) refers to Criteria for Assessing Landscape and Visual Sensitivity to Wind Energy Development. In relation to Landscape Value it states: "... The degree of sensitivity depends on the nature of the proposal and the landscape qualities which are valued by the designation. The hierarchy of the designation has a bearing on sensitivity of a landscape. Internationally and nationally designated landscapes such as National Parks, World Heritage Sites and AONBs are considered to be very sensitive, followed by regional and local designations such as AOBs and SLAs...". Some indicators of Higher Sensitivity for landscape value are identified and this list contains National Park, AONB, Heritage Coast, AOB as well as SLAs.
- 4.4 The findings of the Landscape Sensitivity and Capacity Study in relation to Landscape Objective and Indicative Overall Capacity treats the AONB and SLA the same in terms of the area's capacity to accommodate development.
- 4.5 In light of this it is deemed appropriate to give the same level of protection to SLA as to national designations such as the Area of Outstanding Natural Beauty (AONB) in relation to potential impact from on-shore wind energy developments on the landscape.

4.6 The JLDP Schedule of Focussed Changes (CDLL.023) introduced under NF35 an amendment to criteria 2 & 3 within policy ADN1 by adding reference to the setting of the AONB and SLA. However, in light of representations received during the public consultation on the Focussed Changes document, the Councils response in the Observations Report – Representations about Focus Change (CDLL.029) to NF35 stated that the reference to the setting of the SLA should be removed from the policy. If deemed acceptable and appropriate by the Inspector, the Councils would therefore like to propose that NF35 is amended through the deletion of reference to the setting of the SLA to be addressed via **Matters Arising Change**.

POLICY ADN1: ON-SHORE WIND ENERGY

No Large-Scale or Very Large-Scale wind farms / wind turbines will be permitted in the Plan area.

Other on shore wind turbine proposals will be permitted subject to an assessment of their environmental and sustainability impacts:

- Medium-Scale wind farms / wind turbines will only be granted on urban / industrial brownfield sites or when the proposal involves the repowering of existing wind farms / wind turbines.
- Micro-Scale and Small-Scale wind turbine proposals will be granted outside the AONB, SLA and the setting of the <u>AONB, SLA</u>, National Park and World Heritage Site.
- 3. In the AONB, SLA and the setting of the AONB, SLA, National Park and World Heritage Site only Domestic-Scale wind turbine proposals well related to existing settlements / buildings will be granted.

All proposals should conform to the following criteria:

- i. the proposal will not have an unacceptable impact upon visual amenity or landscape character through: the number, scale, size, design and siting of turbines and associated infrastructure especially in areas designated for their historic or landscape value;
- ii. the proposal will not result in demonstrable harm to biodiversity including statutorily protected sites and species in particular bats and birds;
- the proposal will not result in significant harm to the safety or amenity of sensitive receptors including <u>effect from</u> noise, shadow flicker and <u>impact on</u> public health, and will not have an unacceptable impact on roads, rail or aviation safety;
- iv. the proposal will not result in significant harm to the residential visual amenities of nearby residents;
- the proposal will not result in unacceptable electromagnetic interference to communications installations, radar or air traffic control systems, emergency services communications, or other telecommunication systems;

- vi. the proposal will not have unacceptable cumulative impacts in relation to existing wind turbines, those implemented and those which have permission, and other prominent landscape features;
- **vii.** turbines and associated infrastructure will, at the end of the operational life of the facility, be removed and an appropriate land restoration and aftercare scheme agreed.

A proposal will be considered as falling within the category that represents the biggest type for which it qualifies.

- 4.7 Therefore the Councils are of the opinion that due to the robust evidence provided to justify the SLA areas identified within the Plan they should be afforded the same protection as national designations for on-shore wind energy development within these areas. The variation between SLA and National Designations is the level of protection afforded to the setting of the National Designation.
- b Is the restrictive approach in policy ADN2 to development outside development boundaries appropriate?
- 4.8 **Response** This needs to be considered in light of the Background Paper Renewable Energy Study (2016) ((DA.020) & (DA.020a to e)) which if deemed acceptable and appropriate by the Inspector, the Councils would like to propose an additional Policy ADN1A which would be used for dealing with solar PV farms energy proposals as Matters Arising Change. (Annex I contains a copy of the changes to the Renewable Energy Section of the Deposit Plan in relation to introducing the new policy ADN1A)
- 4.9 In light of this on-shore wind turbine applications and field scale solar PV energy developments would not be considered under Policy ADN2. Therefore the main type of renewable energy developments that would be considered under this policy would be biomass, hydro power, heat pumps and combined heat & power.
- 4.10 It is acknowledged that there are certain proposals that will come forward which are located outside defined development boundaries. These proposals must be satisfactorily justified, for example, in the case of hydro power having to be located on a watercourse. Other proposals may relate to an existing property or structure that is situated outside development boundaries and small scale development located closely to existing properties or structures could also be justified.
- 4.11 For large scale developments in the open countryside the need for the scheme to assist in achieving Welsh Government renewable energy generation targets will be weighed up against the need to protect the landscape from inappropriate development. Such schemes will be assessed against other policies contained in the Deposit Plan primarily relating to the impact on the landscape and biodiversity of the proposal and the cumulative impact of renewable energy installations and any other prominent developments in the landscape.
- 4.12 Therefore this Policy seeks to ensure that large scale development outside development boundaries, i.e. in the open countryside, will only be allowed in

- exception circumstances where there is an overriding need or a specific locational circumstance for the siting of the development at a specific location.
- 4.13 The Council consider that due to the high quality of the environment within the Plan area, which is reflected in the high number of designations in the area, e.g. 2 AONBs, setting for the National Park, Heritage Coast, World Heritage Site (WHS) and Candidate WHS, historic landscapes (see Appendix 7 of the Deposit plan for a comprehensive list) a precautionary approach is justified to protect the landscape from unacceptable development.
- Will policy CYFF4 be effective in influencing carbon management of new development?
- Response Yes. The amendment to the Policy introduced by Focussed Change NF32 refers to the need for an energy assessment to identify the most suitable carbon management options for a development. To ensure that not all types of developments should be subject to an energy assessment the Councils if deemed acceptable and appropriate by the Inspector would like to propose a further amendment to Policy PCYFF 4 through adding the text "...where appropriate, an energy assessment..." into NF32 as shown below to be addressed via Matters Arising Change to the Plan:

An energy assessment can help identify the most suitable carbon management options for a development and, where appropriate, an energy assessment should be undertaken prior to deciding upon the most suitable course of action to take. The potential options for energy efficiency and renewable energy generation are listed below.

- 5.2 The document Supplementary Planning Guidance Scope and Draft Timetable (DA.010b) in relation to the Design Supplementary Planning Guidance (SPG) being prepared by the Councils to support Policy PCYFF 4 amongst other policies, will have a specific section in relation to Carbon Management and clarify what specific type of information is required by different types / scale of development to satisfy Policy PCYFF 4.
- Does the Plan provide clear and appropriate mechanisms for the implementation and monitoring of the Renewable Energy policies?
- 6.1 **Response** The amount of renewable and low carbon energy development delivered will be kept under review in the Annual Monitoring Report (AMR). The AMR forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended targets and its proposals are delivered within the anticipated timeframes.
- 6.2 The AMR will also analyse the effectiveness and continued relevance of the Plan's policies in the light of circumstantial changes. Monitoring will enable the Councils to

- not only record behind any deviation from anticipated rates. If it appears that the targets are not being reached, or that there is a significant circumstantial change, it will be necessary to deal with this through a partial or full review.
- 6.3 Chapter 8 of the Plan includes a Monitoring Framework, which was subject to Focus Changes (CDLL.023). In response to the Inspector's preliminary note to the Councils in May 2016 (DA.002), the Monitoring Framework's presentation was refined and presented to the Examination (DA.0010c). The Councils are prepared to make additional necessary changes to the Framework to ensure it is always a forward looking process to monitor the Plan's effectiveness, incorporating a commitment to take action if development does not come forward as expected and identify measures to be undertaken to address any changes.

7 Any other Matters

Annex I – Changes to Renewable Energy Technology Section within the Deposit Plan

In light of the findings of the Study into the Assessment of the Potential for solar PV farms in Gwynedd and Ynys Môn Planning areas, this appendix outlines the Councils suggested amendment to the Renewable Energy Technology section within the Deposit Plan (these additional amendments are shown in RED in the following table).

Relevant Part	Suggested Change	Amendment Shown in Red
•		
of the Deposit plan Paragraph 7.2.24	Amend the wording introduced under focussed change NF33 to reflect the findings of the solar PV farms and wind farm developments studies for allocating areas of search.	Delete the additional wording introduced by NF33: In September 2015 the Welsh Government provided an updated 'Practice Guidance: Planning for Renewable and Low Carbon Energy — A Toolkit for Planners'. This had an additional section on how to assess the potential for solar farm developments. A letter dated the 10 December 2015 by the Minister for Natural Resources stated his expectations for energy policies in LDPs. He expects allocations or identification of areas of search for local authority scale (5MW to 25MW) renewable energy schemes or other low carbon technologies. In light of this the Councils have commissioned additional work to ascertain any potential areas for solar farm development. In addition an assessment against the areas Landscape Sensitivity and Capacity Study will ascertain whether any local authority scale areas of search should be identified in the Plan. Replace with the following text: The findings of the study on the potential for allocating areas of search for solar PV farms concluded that there are opportunity areas that should be identified in the Plan. In relation to wind farm developments it has been concluded that due to landscape sensitivity and capacity issues no potential opportunity areas should be allocated as areas of search.
		areas or search.

Relevant Part	Suggested Change	Amendment Shown in Red	
of the Deposit			
plan			
New Policy	Introduce a new policy ADN1A and		
	Explanation for solar PV farms and	POLICY ADN1A: SOLAR PV FARMS	
	associated explanatory text. This		
	outlines the considerations with such	Proposals for Solar PV Farms greater than 0.5MW or 1.2Ha should be directed towards	
	development and allocates areas of	the allocated areas of opportunity as shown on the Proposals Map. Only in	
	search in relation to such	exceptional circumstances where there is a need for the scheme which can be	
	developments.	satisfactorily justified or there are specific locational circumstances for a particular	
		siting, will development at other areas be supported.	
		All proposals should conform to the following criteria:	
		(i) The proposal will not have an unacceptable impact upon visual amenity or	
		landscape character through: the number, scale, size, design and siting of	
		solar PV panels and associated infrastructure especially in areas or the	
		setting of areas designated for their historic or landscape value;	
		(ii) The proposal will not result in demonstrable harm to biodiversity including	
		statutorily protected sites and species;	
		(iii) The proposal will not result in significant harm to the safety or amenity of	
		sensitive receptors including effect from glint and glare and will not have	
		an unacceptable impact on roads, rail or aviation safety;	
		(iv) The proposal will not result in significant harm to the residential visual	
		amenities of nearby residents;	
		(v) The proposal will not have unacceptable cumulative impacts in relation to	
		existing solar PV farms, those implemented and those which have	
		permission and other prominent landscape features;	
		(vi) The panels and associated infrastructure will, at the end of the operational	
		life of the facility, be removed and an appropriate land restoration and	
		aftercare scheme agreed.	
		(vii) That a Construction Environmental Management Plan (CEMP) is provided	

Relevant Part of the Deposit plan	Suggested Change	Amendment Shown in	ı <u>Red</u>		
		to demo	onstrate that any pot	tential negative effe	cts arising during
		construct	tion and decommissioning	ng phases are avoided.	
		Explanation:			
		7.2.38A The Assessme	ent of the potential for	solar PV farms in Gwy	nedd Planning Area
			was commissioned to		
			nent. It was based upon		
			e and Low Carbon Ener	<u>gy – A Toolkit for Pla</u>	nners (2015) by the
		Welsh Govern	ment.		
			strategic level assessme		
			e allocated as areas of		
			separate parcels of land		
			e other 33 subject to	grid constraint at the	e present time. The
		tollowing table	e identifies these areas:		
		Table 14A : Top Rated	Onnortunity Areas		
		Site ID	Allocation	Site Location	Total Site Area
		<u> </u>	Number	(Nearest	(Ha)
				Settlement)	
		<u>35</u>	<u>\$1</u>	Bangor	<u>5.7</u>
		<u>5</u>	<u>S2</u>	Rhoslan	<u>117.3</u>
		<u>7</u>	<u>S3</u>	Rhoslan	90.9
		<u>84</u>	<u>\$4</u>	<u>Rhoslan</u>	<u>1.5</u>
		Table 14B : Other Opp	ortunity Areas		
		Site ID	Allocation	Site Location	Total Site Area
			<u>Number</u>		<u>(Ha)</u>

Relevant Part of the Deposit plan	Suggested Change	Amendment Shown			
		<u>9</u>	<u>S5</u>	<u>Llanddona</u>	<u>72</u>
		<u>50</u>	<u>\$6</u>	<u>Llanddona</u>	<u>4.4</u>
		<u>20</u>	<u>\$7</u>	<u>Llandegfan</u>	<u>22.3</u>
		<u>51</u>	<u>\$8</u>	<u>Llanfairpwll</u>	<u>5.1</u>
		<u>52</u>	<u>\$9</u>	<u>Llanfairpwll</u>	<u>3.5</u>
		<u>22</u>	<u>\$10</u>	<u>Llanfairpwll</u>	<u>14.7</u>
		<u>2</u>	<u>\$11</u>	<u>Gaerwen</u>	<u>137.6</u>
		<u>32</u>	<u>\$12</u>	<u>Gaerwen</u>	<u>6.5</u>
		<u>53</u>	<u>\$13</u>	<u>Llangefni</u>	<u>2.8</u>
		<u>26</u>	<u>\$14</u>	<u>Llangefni</u>	<u>14.4</u>
		<u>57</u>	<u>\$15</u>	<u>Llangefni</u>	<u>4.2</u>
		<u>42</u>	<u>\$16</u>	<u>Pentraeth</u>	<u>5.7</u>
		<u>56</u>	<u>\$17</u>	<u>Pentraeth</u>	<u>4.4</u>
		<u>28</u>	<u>\$18</u>	<u>Pentraeth</u>	<u>13.2</u>
		<u>16</u>	<u>\$19</u>	<u>Pentraeth</u>	<u>27</u>
		<u>37</u>	<u>\$20</u>	<u>Pentraeth</u>	<u>7.4</u>
		<u>4</u>	<u>\$21</u>	<u>Gwalchmai</u>	<u>54.9</u>
		<u>10</u>	<u>S22</u>	<u>Gwalchmai</u>	<u>44.1</u>
		<u>6</u>	<u>\$23</u>	<u>Llanddeusant</u>	<u>126.7</u>
		<u>19</u>	<u>\$24</u>	<u>Llanddeusant</u>	<u>19.3</u>
		<u>39</u>	<u>\$25</u>	<u>Caergeiliog</u>	<u>6.4</u>
		<u>3</u>	<u>\$26</u>	<u>Caergeiliog</u>	<u>115</u>
		<u>27</u>	<u>S27</u>	Caergeiliog	<u>12.3</u>
		<u>34</u>	<u>\$28</u>	Caergeiliog	<u>7.4</u>
		<u>45</u>	<u>S29</u>	Caergeiliog	4
		<u>47</u>	<u>\$30</u>	Caergeiliog	<u>5</u>
		<u>58</u>	<u>S31</u>	Caergeiliog	4.1
		<u>59</u>	<u>\$32</u>	Caergeiliog	<u>2.3</u>

	<u>23</u>			
		<u>\$33</u>	<u>Bangor</u>	<u>16.3</u>
	<u>60</u>	<u>\$34</u>	<u>Bangor</u>	<u>2.8</u>
	<u>61</u>	<u>S35</u>	<u>Bangor</u>	<u>4</u>
	<u>62</u>	<u>\$36</u>	<u>Bangor</u>	<u>2.6</u>
7.2.3 7.2.3	solar PV. Site spectapplications would selections would selected applications would selected applications would selected application and significant effects. 8D Some of the opporesidential propertion the impact of a problem impact from a number selected application of the impact selected application of the impact selected application of the impact o	nitive statement of the ific assessment and still need to be assess for assessing potent eritage constraint how the upon the setting of cortunity areas covered by the interest of proposals in the interest of proposals in the interest of the surposal of t	tial areas has avoid wever consideration would still led on their individual tial areas has avoid wever consideration such constraints. The a large area and eful consideration way of adjacent users a same locality. The sun may cause a to properties higher or are manually reconsidered. In important consideration was and whether the sun whether the sun sand whether sun	ed areas subject to should be given to encompass certain ill be given towards and the cumulative eviewer distraction, or up a slope. If the ealigned every few eration e.g. loss of rough site levelling,

Relevant Part of the Deposit plan	Suggested Change	Amendment Shown in Red
		7.2.38F The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as field scale solar PV energy development by identifying and protecting sensitive and distinct areas from inappropriate development.
		7.2.38FF The indicative landscape capacity within the Sensitivity and Capacity Study, helps to identify the type of developments which could be potentially accommodated, however, this does not in itself suggest that planning applications for development in these areas will be appropriate. Other variables such as environmental designations and technical constraints, site specific siting, layout and design will need to be considered on a case by case basis.
		7.2.38G The Sensitivity and Capacity Study produces specific guidance notes for each type of development to help direct any proposed development to the most appropriate location in landscape and visual terms within each Landscape Character Area (LCA).
		7.2.38NG The assessment for identifying potential opportunity areas has had regard to the Sensitivity and Capacity Study in relation to the potential scale of development that could be accommodated in the different LCA. It should also be used for any proposals on sites outside these opportunity areas identified.
		7.2.38H There is the potential for short-term effects during construction and decommissioning phases. A Construction Environmental Management Plan (CEMP) should ensure that any potential negative effects arising during construction and decommissioning phases are avoided.
Policy ADN2	In light of the findings in relation to solar PV farms it is suggested that an	POLICY ADN2: OTHER RENEWABLE ENERGY TECHNOLOGIES

Relevant Part of the Deposit plan	Suggested Change	Amendment Shown in Red
	additional policy is prepared in relation to solar PV farms scale development. In light of this, policy ADN2 needs to be amended to reflect	Proposals for non-wind renewable energy technologies or non-solar PV farms will be permitted within development boundaries provided they do not cause unacceptable impact to the character or amenity of the area.
	the fact that it no longer is applicable for these type of development.	Small scale proposals located outside development boundaries are required to justify the need to be sited in such a location.
		Large scale proposals located outside development boundaries will be permitted in exceptional circumstances where there is an overriding need for the scheme which can be satisfactorily justified or there are specific locational circumstances for the siting of the development.
		In all cases proposals should not cause an unacceptable harm to the landscape, biodiversity, archaeology and areas of historic value or their settings. In addition the potential effect of cumulative impact of renewable energy technologies should be considered.
Paragraph 7.2.39	This paragraph should be amended to clarify what type of solar applications is covered within this specific policy and what type is to be dealt with under the new ADN3 policy.	7.2.39 This policy covers a range of renewable energy technologies including domestic scale solar, biomass, heat pumps, hydro power, Combined Heat and Power (CHP). This policy does not cover on-shore wind farms / turbines which are covered by policy ADN1 or solar PV farm developments which are covered by policy ADN1A.
Paragraphs 7.2.45 to 7.2.48	These paragraphs refer to the Landscape Sensitivity and Capacity Study in relation to solar PV energy development. In light of this they should be moved from the Explanation to policy ADN2 and rather	Remove paragraphs 7.2.45 to 7.2.48 from the Explanation to policy ADN2: 7.2.45 The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as field scale solar PV energy development by identifying and protecting sensitive and distinct areas from inappropriate development.

Relevant Part	Suggested Change	Amendment Shown in Red
of the Deposit		
plan		
	be included within the Explanation to	7.2.46 The indicative landscape capacity within the Sensitivity and Capacity Study, helps
	policy ADN3.	to identify the type of developments which could be potentially accommodated,
		however, this does not in itself suggest that planning applications for
		development in these areas will be appropriate. Other variables such as
		environmental designations and technical constraints, site specific siting, layout
		and design will need to be considered on a case by case basis.
		7.2.47 The Sensitivity and Capacity Study produces specific guidance notes for each type of development to help direct any proposed development to the most
		appropriate location in landscape and visual terms within each Landscape
		Character Area (LCA).
		7.2.48 Regard should be given towards the Sensitivity and Capacity Study in relation to
		the potential scale of development that could be accommodated in the different
		LCA.