

APPENDIX B

Draft Revised SPD: “Landscape Sensitivity to Wind Turbine Development” - Revised Statement of Consultation.

A draft Supplementary Planning Document (SPD) entitled “Landscape Sensitivity to Wind Turbine Development” was issued by Huntingdonshire District Council on 16th November 2012. The initial Statement of Consultation is now revised in the light of the consultations received.

The document was put out to full public consultation from 16th November 2012 for a seven week period until Friday 4th January 2013. It is intended as a replacement for the current SPD “Wind Power” which was adopted in 2006. Copies were made available at the Council Offices at Pathfinder House, and at Libraries throughout the district, and notice of the consultation was circulated to all parish councils and an extensive list of renewable energy companies, interested business organisations, local interest groups, consultants, pressure groups and other bodies, as well as private individuals with a known interest. A press release was issued to local newspapers.

The main channel of consultation was via the Council’s consultation portal at <http://consult.huntingdonshire.gov.uk/portal> but responses were also taken via email and in writing. All these responses can now be viewed on the consultation portal – including responses that were allowed even though they were made after the formal consultation period had ended.

Over 360 responses were received and this level of response is doubtless due to the rapid spread of wind turbine developments of all scales throughout the district since the original SPD was adopted in 2006. During that period there have been three high profile local Inquiries, with a further one due to start at the end of 2013. Local action groups opposed to some of the larger schemes have further contributed to the rise in public awareness of the issues surrounding wind farms. Many of the consultation responses have come from members of such groups and there has been an inevitable concentration on specific issues highlighted by their representations – with responses often duplicating lists of issues and proposals. Nevertheless the overall range of the consultation responses represents a wide spectrum of views, with submissions from energy companies and environmental consultants often arguing for a more liberal interpretation of policy, contrary to the more restrictive suggestions of action groups and individuals.

This revised Statement of Consultation will be made available prior to the adoption of the SPD. It includes details of:

- a) The persons and organisations that have **responded** during the consultation process. These are listed in Appendix 1.
- b) A summary of the main issues raised in representations received.
- c) How those issues have been addressed in the revised supplementary planning document, and what amendments, if any, are proposed.

NB It must be noted that HDC have commissioned a position statement on the “Cumulative Landscape and Visual Impacts of Wind Turbines in Huntingdonshire.” The current draft form of this study will be finalised when new planning guidance (following from Ministerial Statement on “Local Planning and Onshore Wind” dated 6th June) has been published. It will then be subject to full public consultation and be presented to Cabinet for adoption.

Broad Issues arising from the Consultation Process

Many of the consultation responses covered more than one issue, and sometimes their content does not fit neatly into a specific topic. In these cases the responses are noted under more than one issue summary. Nevertheless, with the level of responses received, it was felt that an analysis on the basis of the main issues that were raised by consultees was the only sensible method of reporting on the consultation process.

The numbers listed after each issue refer to the ID number given in the consultation portal.

There is a summary of the issues raised by the responses, then in the “comment” section there is a detailed description of any amendments that are deemed necessary, or a “no changes needed” judgement.

1. Responses requiring no comment

HDC Planning Consultation Portal ID Numbers - General Issues

5-7/9/10/14/21/25/26/29-31/34-37/38/48/51-53/56/65/66/70/76/77/83/84/90/
135/137/149/157/178/190/191/223/225-228/234/267/271/273/297/298/
302/305/308/312/330/333/337/346/353/359/361/362

HDC Planning Consultation Portal ID Numbers - Specific Support

11-13/15/17/18/20/22/23/27/28/33/243/245

Many of the comments were very general in nature, often anecdotal and referring to no specific part of the draft SPD, and containing no actual proposal or amendment. Some comments in this category expressed general approval, and others expressed support / agreement relating to specific points.

Comment: No changes needed.

2. General health Issues, especially potential noise impacts

HDC Planning Consultation Portal ID Numbers -

32/65/112/118-25/133/137/138/188/229/230/336

Some parties were concerned about potential effects on general health by Wind Turbine Developments [WTDs], particularly relating to their potential noise effects.

Comment: These issues must be considered separately from landscape and visual matters. National guidance is already available on the Assessment and Rating of Noise from Wind Farms [ref ETSU-R-97], and planning applications for wind turbine developments will consider noise, shadow flicker and general health impacts on a case by case basis, and as deemed appropriate by the relevant guidance. Planning conditions can be used to help monitor and mitigate against noise impacts.

No changes needed.

3. Residential Amenity impacts and the recommendation of a minimum separation distance between turbines and particular properties, and/or between turbines and settlements.

HDC Planning Consultation Portal ID Numbers -
42/67/68/69/86/95/115/137/160/166/186/188/229/230/
232/236/240/258/261/315/316/318/326/327/331/336/356/357

Many responses were concerned with potential visual and noise impacts that WTDs might have on dwellings and settlements and have put forward amendments to this draft SPD to establish minimum separation distances between turbines and residential properties, and also in some cases between turbines and settlements, particularly those with designated Conservation Areas. These concerns were prompted mainly by potential visual impacts, but also potential noise effects.

Comment: There is no Government support for instituting the idea of a separation distance in English planning policy. There is no generally agreed separation distance necessary to prevent overbearing or overwhelming visual intrusion from commercial scale wind turbines. Although such impacts are often considered to occur within 800m of a property Inspectors have found overbearing or overwhelming impacts at greater distances but they have also allowed schemes at closer distances. This SPD will not establish a separation distance, but rather will continue to support the principle that each case will be considered on its merits.

Residential visual amenity assessment is a necessary part of the Environmental Impact Assessment information considered during the planning process, but it is an impact on private amenity and should be considered separately from Landscape Sensitivity assessment and guidance.

Since the consultation on the Draft SPD the District Council has commissioned a position statement on “The Cumulative Landscape and Visual Impact of Wind Turbines.” A section (paras 4.22-4.37) of this draft study puts forward guidance thresholds and criteria which will help assess impacts on residential properties and settlements – but it must be emphasised that at present the position statement is guidance rather than policy.

This draft SPD is not the appropriate document to consider noise impacts. As has been stated elsewhere in this report there is national guidance on “Assessment and Rating of Noise from Wind Farms” [ref ETSU-R-97] and this issue will be considered as a separate matter within the planning process.

No changes needed to the draft SPD with regard to this particular issue.

NB It must be noted that HDC have commissioned a position statement on the “Cumulative Landscape and Visual Impacts of Wind Turbines in Huntingdonshire.” The current draft form of this study will be finalised when new planning guidance (following from Ministerial Statement on “Local Planning and Onshore Wind” dated 6th June) has been published. It will then be subject to full public consultation and be presented to Cabinet for adoption.

4. Quality and veracity of photomontages supplied with wind farm applications

HDC Planning Consultation Portal ID Numbers - 75/97/129/142/171/188/231/315/347

A number of comments were received to the effect that the current best practice methodology for producing photomontages (“Visual Representation of Wind Farms – Good Practice Guidance” Scottish Natural Heritage, 2006), was flawed and resulted in unrealistic representations of wind farms. Some comments recommended that current best practice should be replaced by recommendations recently produced by The Highland Council [“Visualisation Standards for Wind Energy Developments” Highland Council, 2010].

Comment: Huntingdonshire District Council is fully aware of the continuing debate about photomontage techniques and it is noted that SNH are currently consulting on this (see “Visual Representation of Wind Farms” – Consultation Draft May 2013).“ Whatever the outcome of this process, technical guidance on this complex issue should not be covered in a document which relates to Landscape Sensitivity, and the draft revised SPD will not cover these issues, nor recommend any particular technical methodology.

Nevertheless, with the construction of increasing numbers of wind turbine developments HDC officers will take the opportunity to compare photomontage evidence presented as part of a planning application with views of the completed development. But any conclusions drawn from this process will not be included in a revised SPD.

No changes needed.

5. Cross boundary cooperation and the encouragement of a wider strategic approach to renewable energy issues.

HDC Planning Consultation Portal ID Numbers - 3/71/96/166/185/186/236/299/301/303/306/309

Some individuals and local councils sought more cooperation between LPAs within an area or region, favouring a broader strategic approach to renewable energy issues.

Comment: Whether this is desirable or not, or whether it could be achieved under the current planning system where regional plans have been revoked, it is certainly not within the remit of a Supplementary Planning Document based on assessments of Landscape Sensitivity. However, it must be noted that LPAs do consult with neighbouring LPAs on development which may have some cross boundary impact, especially those deemed to require EIA or LVIA.

No changes needed.

6. Grid connection

HDC Planning Consultation Portal ID Numbers - 5/6/91/117/126/262/315/317/335/357

Several comments were received advising HDC to use the draft revised SPD to stipulate that any connection from wind farm to national grid must be made via underground cables, rather than poles, pylons, and overhead cables.

Comment: Whilst it is not possible under planning law for HDC to stipulate such a requirement, the recently issued “Wind Turbine Developments – A Guidance Note for Applicants and Agents” (revised July 2013) will be amended to include the following –

- a) A requirement that any planning application for a wind turbine development must include full details of the proposed grid connection. This is in line with the guidance contained in the PPS22 Companion Guide, Technical Annex, para 99.
- b) A statement that HDC prefers and expects that in order to minimise adverse environmental effects, grid connections will be made via underground cables.

No changes needed.

7. Turbine height and landscape capacity

HDC Planning Consultation Portal ID Numbers -
39/40/89/90/93/94/106/109/132/136/139/147/148/151/
158/162/164/167/169/170/173/177/179-184/186/194/195/
215/216/217/223/236/241/256/257/261/265/290/292/299/
315/316/319/324-326/331/332/335/340-343/345/347/355-357

A large number of comments were received proposing amendments to the assessment of capacity of each Landscape Character Area [LCA] to wind turbine developments. Most thought that capacity should be graduated according to the height of the proposed turbines, and that guidance on capacity should be provided for a range of turbine heights and group sizes.

Comment: It is accepted that there is an obvious relation between turbine height and potential landscape and visual impact, landscape sensitivity and landscape capacity. However the draft SPD [and the existing SPD] clearly states that it is primarily concerned with analysing the varying landscape sensitivity throughout the district to commercial scale wind energy developments with turbine heights of 120 +/- 20m [see draft revised SPD “Landscape Sensitivity to Wind Turbine Development“ para 1.16 and 1.18].

This is what the original LUC study assumed and recent commercial scale applications still comprise turbines whose size sits within that envelope – i.e. the conclusions of the LUC study area still absolutely relevant to the current situation.

For smaller turbines the draft revised SPD has not produced detailed guidance on the sensitivity and capacity of the district’s landscapes. This would have required an additional study equivalent to the original LUC one. In preference to this approach the draft revised SPD has added a new chapter [Chapter 13 “Siting and Design Issues for Turbines less than 100m”] containing general guidance and confirming in para 13.1 that the guidance and criteria to be considered when siting commercial scale turbines is generally applicable to smaller turbines as well.

Developments with turbines less than 100m will be considered using the guidance in Chapter 13 of the draft revised SPD and the relevant guidance and criteria for each LCA provided elsewhere in the document. Proposals will be considered on a case by case basis, and each application will be assessed on its merits. The caveats contained in paras 1.5 and 1.19 of the document apply equally to commercial scale development proposals and schemes with smaller turbines. The generic guidance now included in the draft revised SPD obviates the need for more detailed guidance on sensitivity and capacity issues related to smaller turbines within each LCA.

HDC has recently commissioned a **position statement on “The Cumulative Landscape and Visual Impact of Wind Turbines.”** This draft report is concerned with the cumulative impacts of all operational and consented schemes, and those applications as yet undetermined.

It will assess the impacts of more than one size of turbine, and of differing cluster sizes, and will analyse the remaining capacity in each Landscape Character Area and the district, with reference to guidance in the existing and draft revised SPD's. It is intended as a tool to help assess the current cumulative impacts, and to guide the assessment of those effects resulting from future proposed wind turbine developments.

No changes needed to the draft SPD with regard to this particular issue.

NB It must be noted that HDC have commissioned a position statement on the “Cumulative Landscape and Visual Impacts of Wind Turbines in Huntingdonshire.” The current draft form of this study will be finalised when new planning guidance (following from Ministerial Statement on “Local Planning and Onshore Wind” dated 6th June) has been published. It will then be subject to full public consultation and be presented to Cabinet for adoption.

8. Wind turbine efficiency and deliberate restrictions on output

HDC Planning Consultation Portal ID Numbers - 4/54/91/117/126/228/320/351

Some comments were received on the comparative efficiency of wind turbines as a means of generating electricity, and the manipulation of output to maximise profit.

Comment: These issues, in particular the assessment of the generating efficiency, are not matters for planning policy, and are certainly outside the remit of this SPD. The SPD will not comment on the topic, nor on the need or otherwise for renewable or low carbon energy generation. See NPPF para 98.

No changes needed.

9. Grafham Water LCA and ornithological Issues

HDC Planning Consultation Portal ID Numbers - 17/26/49/50/61/239/244

Some consultees remarked that Grafham Water was entirely unsuitable for any wind turbine development due to the presumed adverse impact on bird populations, migration routes and daily bird movements.

Comment: Although this issue is not within the remit of a study based on landscape sensitivity and capacity – and so the draft revised SPD will not judge this issue – the relevant nature conservation organisations (Natural England, RSPB, and the Wildlife Trust) are all consulted on the wildlife and ecological implications of wind turbine developments, and their comments will be a material consideration when a planning application is considered.

No changes needed.

10. Miscellaneous issues proposed for inclusion within the draft revised SPD

HDC Planning Consultation Portal ID Numbers -
4/46/49/50/54/61/79/80/91/96/110/117/126/222/228/230/
239/244/268/294/300/306/309/320/321/334/336/359

Proposals were received that a variety of topics should be considered and/or assessed by the revised SPD.

Comment: these topics included –

- a) Cultural Heritage Impacts.
- b) Use of Financial Bonds in case of health or other unforeseen effects.
- c) Impacts on Tourism and the local economy.
- d) Assessment of whether EIA is required by WTDs – see also item 20 on this issue.
- e) Provision of a comprehensive guide to all issues and policy relevant to WTDs – see also item 12 on related matters.

All of the above are important issues and some of them will be considered at various stages throughout the Development Management process – but none of them is strictly relevant to the consideration of Landscape Sensitivity to WTD, and they should not be included in this SPD.

No changes needed.

11. Cumulative impacts

HDC Planning Consultation Portal ID Numbers -

11/60/86/92/101-104/144/145/174/175/198/199/205/212/
213/217/225/226/235/250/251/277/278/285-287/304/315/317/
319/324-326/329/331/334/336/338-341/344/345/347/355

- a) Many responses considered that the guidance on cumulative impacts contained in the draft revised SPD was not specific enough and proposed that in certain cases a separation distance of 15 kilometres between developments comprising commercial scale turbines should be applied.
- b) Consultees also often remarked that the lack of any mention of sequential cumulative effects is a serious omission.
- c) A smaller group of responses thought that the guidance on cumulative capacity contained in table 2 of the draft revised SPD had been reinterpreted when compared to the existing SPD, and that this had been done without any evidence base.

Comment:

- d) The idea of a 15km separation distance was used in the report “Placing Renewables in the East of England” produced for EERA in 2008 by Ove Arup. Part of that report was a very broad brush study which used certain assumptions to make a calculation of the potential generating capacity that onshore wind energy projects might provide in the East of England. It is clearly stated in the report (para 1.3) that -
“Whilst the information presented here is appropriate for a strategic regional study, it is not a sufficient basis for decisions about individual renewable energy proposals in the region and it must not be used as such. Each application for renewable energy development in the region must be considered on its merits, including site-specific issues that are not appropriate for discussion in a regional study such as this.” **In the light of this unambiguous statement the draft revised SPD will not include any recommendation for a separation distance between WTDs.**
- e) Cumulative visual effects can be divided into three categories – simultaneous, successive or sequential – depending whether the viewer is stationary, turning round or moving along a linear route. The fact that the draft revised SPD does not consider these different categories in detail does not mean that the varying types of cumulative effect will not be assessed when an application for a WTD is considered. It is a consequence of the potential complexity of the cumulative assessment process and serves to emphasise the importance of considering each case on its merits. Like all the guidance

in the SPD, that on cumulative capacity [paras 2.18 – 2.25] is guidance only – a **starting point for decision making**, as stated in para 1.19.

Nevertheless, the section on cumulative capacity is written with an implicit assumption that the cumulative visual effects that are being analysed are **simultaneous** cumulative visual effects.

It is only at para 2.24 that the term **successive** views is introduced – and then the wording implies that earlier paras are considering a different kind of view. For the sake of clarity and completeness it is proposed to amend the draft revised SPD as follows –

- (i) **Add to para 2.22, first sentence...**“Consideration will need to be given in all circumstances to the visual relationship between one turbine or turbine group and another **when these can be viewed simultaneously.**”
 - (ii) **Add to para 2.24, first sentence ...** “Cumulative assessments also need to consider the effect on the landscape area of successive **and/or sequential** views of single turbines or groups of turbines.”
- f) Table 2 in the draft revised SPD was intended to be a useful, tabular version of the text from the existing SPD that related to the guidance on cumulative capacity in different LCAs. The tabular version perhaps has a more prescriptive character than the earlier text, and this was considered (by some consultees) to be contrary to the over-riding caveat that each application must be considered on its own merits. **The draft SPD will be amended by removing paras 2.18 and 2.25, Table 2 and associated footnote 1, thus returning to the existing situation where the guidance on cumulative impacts is contained in the different LCA chapters.**

NB It must be noted that the forthcoming HDC position statement on “The Cumulative Landscape and Visual Impact of Wind Turbines in Huntingdonshire” also discusses these issues.

12. Wider Planning Policy Issues

HDC Planning Consultation Portal ID Numbers - 57/259/274/275/282/299/316/320/348

There were several proposals concerning broad policy matters.

- a) Some responses thought that there should be stronger reference to the NPPF, in particular para 14 of that document.
- b) Some wanted stronger references to the Development Plan, others to emerging DPD policies.
- c) Several consultees wanted a more detailed explanation of the role of SPDs, whilst some thought there should be further reference National Policy Statement EN-1 with regard to the benefits of and need for renewable energy projects and how they relate to other adverse impacts.
- d) Other comments proposed that references to climate change should be omitted from the SPD and that text should be amended to state HDC opposition to wind turbine developments.
- e) Several responses thought that guidance on these issues should be framed for the whole of the District, and not separated into guidance for each of the component LCAs.

Comment: Actions to address these points will be –

- f) A new paragraph inserted after 1.12 of the SPD referring to NPPF para 14 and the numbering amended accordingly. This to read:
'At the heart of the NPPF is a presumption in favour of sustainable development [footnote: NPPF paragraph 14]. The primacy of the development plan remains, so development proposals that accord with the plan should be approved unless material considerations indicate otherwise. However, if the plan is absent, silent or relevant policies are out-of-date the presumption in favour of sustainable development means that development proposals should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or policies in the NPPF indicate that developments should be restricted.'
- g) A separate reference to the Development Plan is not necessary as 1.1 clearly states the nature of SPD and contains a link to section 15 that deals with the Development Plan. Ideally a more detailed reference to DPD policies would be included. However this would date the SPD very quickly as the policies that it would be supplemental to are currently contained in the Development Management DPD: Proposed Submission 2010 document that is not going to be taken any further as part of the Development Plan. Policies will be included in the emerging Local Plan to 2036, however the exact detail of these is not known as they will be subject to further public consultation. In these circumstances it will only be possible to have reference in the policies to the SPD.
- h) A short explanation of the role of SPDs will be **added** after the first sentence of para 1.1, viz ***"The role of an SPD is to provide guidance on the application of existing Policies in the Adopted Development Plan. The SPD does not form part of the development plan nor is it intended to provide policies beyond those within the development plan"***
- i) There will be a footnote added to para 2.9 with reference to EN-1, viz ***"In respect of landscape impacts, with reference to National Policy Statement EN-1 (5.9.15) it should be noted that significant adverse impacts do not necessarily render a proposal unacceptable in planning terms if it can be demonstrated that such significant adverse effects would be outweighed by the benefits (including need) for the project."***
- j) The proposal that references to climate change should be omitted from the SPD and that text should be amended to state HDC opposition to wind turbine developments is rejected. It is a requirement of the 2008 Planning Act that the Development Plan contain policies that seek to tackle to the effects of Climate Change through adaptation and mitigation. It is therefore entirely reasonable that an SPD that deals with a form of renewable energy and supports such policies of the Development Plan should include the identified text in para 1.7. The suggested replacement text must be rejected.
No changes needed.
- k) PPS22 Companion Guide recommends an approach to these issues based on landscape character assessment and Hunts DC followed this guidance when adopting the Wind Power SPD in 2006 and the associated Landscape and Townscape Assessment in 2007. Guidance that was only based on district-wide criteria would not take account of (or seek to protect) the distinctiveness of the different constituent parts of the Huntingdonshire landscape. **No changes needed.**

13. Removing the “large” category from the proposed reclassification of group sizes.

HDC Planning Consultation Portal ID Numbers - 336/338/367

HDC Overview and Scrutiny Panel [Environmental Well-Being], and some individual members, considered that the large scale grouping of 24 turbines is too large a development for the district.

Comment: The existing SPD “Wind Power” 2006 classified a large group as one of over 25 turbines [see para 2.3 of that document]. The LUC Study [2005] and the Wind Power SPD concluded that nowhere in the district was suitable for turbine groups of more than 25 – they would be likely to result in a significant adverse change in landscape character and /or affect key landscape values. In the light of this conclusion, and other studies and assessments carried out in southern and eastern England, the classification of turbine group sizes has been revised [see draft revised SPD para 2.3 – 2.8] and the large scale group is now defined as between 13-24 turbines. There is no justification or evidence base to warrant further changes to the group sizes by removing the proposed large scale group [13-24 turbines] category. It must be noted that the inclusion of this category in the draft revised SPD does not indicate support or otherwise for applications of this scale – it merely brings them within the remit of this guidance. **No changes needed.**

14. Presentation Issues

HDC Planning Consultation Portal ID Numbers -
24/72/87/90/105/108/134/163/176/180/182/
206/219/269/272/276/283/293/348/349/357

Responses were made regarding various matters of presentation. These included –

- a) The poor quality of Figure 1.1. and its key.
- b) The uncertainty of the purposes of the sketch illustrations, pictures 3.1/3.2/4.1/5.1/5.2/6.1/8.1/9.1/10.1/11.1/12.1
- c) The map of the LCA at the start of Chapter 7 is inadequate to show the B1046 road which is specifically mentioned in the text.
- d) Typographical errors in the document.

Comment: The following changes will be made to the draft SPD.

- e) **Figure 1.1 and the associated key will be replaced with improved quality images; additionally the key for Figure 2.1 will be expanded to include all LCAs.**
- f) Some of the original illustrations were omitted prior to drawing up the draft revised SPD, but it is apparent from the consultation responses that the presence of those remaining illustrations adds nothing to the understanding and clarity of the guidance. **All the illustrations will be omitted.**
- g) Although it would be impossible to clearly show the B1046 on the existing map, additional explanation will be added to the text to clarify the exact route of that road. **Add to para 7.5: “The northern part of this landscape character area, (approximately north of the B1046 which runs from St. Neots southeast through Abbotsley and Great Gransden) has a high capacity**”

Add to para 7.7.: “The northern part of the landscape character area (approximately north of the B1046 which runs from St. Neots south east through Abbotsley and Great Gransden) has a moderate capacity “

h) The following minor errors will be amended –

- **Para 1.13 omit “policies listed”, replace with “detailed”.**
- **Para 2.8 will be amended to – “The largest approved/operational onshore scheme (not including those schemes with later extensions) in Eastern England”**
- **Para 2.8 will be amended to – “ ...the 2008 study by Ove Arup for the East of England Regional Assembly ⁽¹⁰⁾ which undertook ...”**
- **Paras 2.15 and 2.16 will be amended to : “... Figure 2.1 which shows the different Landscape Character Areas, The Great Fen boundary, and the boundary of its Landscape and Visual setting.”**
- **Para 7.6 first line: change “one small-scale turbine group“ to “one medium-scale turbine group”**
- **Para 13.1, first sentence, omit “single.”**
- **Para 13.1, last sentence, “small turbines” should be changed to “smaller turbines”**
- **Para 13.8, 3rd bullet point will be amended to “.....Greater care will be needed in settled areas designated for their ecological, landscape or historical value, such as the Great Fen (see section 2.15 and figure 2.1) and Conservation Areas.**

15. Identification of Historic Villages

HDC Planning Consultation Portal ID Numbers -
107/111/150/220/263/269/315/326/329/339-41/343/345/347/355

Consultees were concerned that the mention of “historic villages” in several of the site specific guidance criteria for the LCAs was not precise enough, and wanted these villages identified. Often it was suggested that those villages with Conservation Areas should be the ones intended by the criteria, and that this should be made clear by listing those villages in the Draft revised SPD.

Comment: Several of the villages and settlements mentioned by name in the SPD can be considered as “historic”, even though they do not have a Conservation Area, e.g. Conington, mentioned in para 4.1 for the Fen Margin LCA.

In the Northern Wolds, the village of Buckworth, though not mentioned in the SPD text, is an archetypal Northern Wolds historic settlement with a prominent landmark church spire standing out on the horizon, and the village clustered on the higher parts of the valley sides. However there is no Conservation Area.

Impacts on Cultural Heritage Assets are usually considered separately from landscape and visual effects, yet there is an acknowledged overlap between the two, particularly when the setting of Heritage Assets is being considered. Limiting the category of “historic villages” to just those with designated Conservation Areas will unduly restrict the protection to historic villages

and settlements that the SPD guidance can give via its status as a material consideration in any planning application. This proposed change is not justified.

No changes needed.

16. Up to date Review Needed

HDC Planning Consultation Portal ID Numbers -
74/78/81/85/88/92/127/128/130/143/155/156/167/168/186-
189/192/199/236/252/254/299/328/348

Many consultees proposed that the revision of the Wind Power SPD (2006) should be accompanied by a review of the existing and consented Wind Turbine Developments in the district, and that this review would give an indication of the “accuracy or validity” of the existing SPD.

Comment: HDC has recently commissioned a **position statement with regard to “The Cumulative Landscape and Visual Impact of Wind Turbines.”** This will focus on the cumulative impacts of all operational and consented schemes, and undetermined applications which are still pending. It will also offer guidance on the assessment of future proposals. It will assess the impacts of more than one size of turbine, and of differing cluster sizes, and will analyse the remaining capacity in each Landscape Character Area and the district, with reference to guidance in the existing and draft revised SPD’s .

However the position statement will not be a reflection of the “accuracy or validity” of the existing SPD, indeed it is difficult to see how such an assessment could be applied to a “Guidance” document. The existing SPD is valid in the sense that it has been adopted by the Council after going through the required processes, and whether it is accurate or not in its judgements of landscape sensitivity and/or capacity can only really be tested by the ultimate arbiter of planning decisions – the appeal system and the Planning Inspectorate.

No changes are needed to the draft revised SPD with regard to this issue.

NB It must be noted that HDC have commissioned a position statement on the “Cumulative Landscape and Visual Impacts of Wind Turbines in Huntingdonshire.” The current draft form of this study will be finalised when new planning guidance (following from Ministerial Statement on “Local Planning and Onshore Wind” dated 6th June) has been published. It will then be subject to full public consultation and be presented to Cabinet for adoption.

17. The Guidance is too restrictive

HDC Planning Consultation Portal ID Numbers -
62/64/207-210/235/248/251/266/271/279/281/284-287

Some responses thought the guidance contained in the draft SPD was too restrictive, and that there were some scenarios that were not considered, or that in some cases the draft SPD contained conflicting guidance and assessment criteria – also see item 18 below.

Comment: The draft SPD is guidance (para 1.1) and “a starting–point for decision making (para 1.19). It does not, nor could it ever, cover all potential wind turbine development scenarios in all potential locations. It confirms that guidance contained in the draft revised SPD “should not be interpreted as a definitive statement that a particular landscape is suitable for a particular development. Every site is unique, and any proposal involving wind turbines must be informed by a detailed site specific analysis of landscape constraints and impacts.” (draft SPD,

para 1.5). **In order to re-enforce this emphasis on the uniqueness of each proposal an additional sentence will be added to para 1.5, “Each proposal will be assessed on its own merits.”**

18. Criteria to be considered when assessing landscape sensitivity

HDC Planning Consultation Portal ID Numbers -
62-64/113/136/140/153/165/201/207/209/210/361

Consultees raised a number of issues concerning landscape sensitivity to wind turbine development and the criteria used in its assessment –

- a) Some responses questioned the relevance of the “Torridge Study” – a recent study by LUC of landscape sensitivity to wind turbine development carried out in 2011 for Torridge District Council, Devon.
- b) Some comments remarked on the seeming inconsistency of the criteria detailed in Chapter 14.
- c) Consultees were sometimes unsure whether the assessment of landscape sensitivity applied just to the immediate locality of a proposed development, or to the wider landscape and landscape character area.

Comment:

- d) Criteria for assessing landscape sensitivity to wind turbine development are based on the attributes of the landscape that are most likely to be affected by wind turbine development. These attributes are generic – things like settlement pattern, skyline, topography – and are common to all landscapes whether they are in Devon or Cambridgeshire. The “Torridge Study” is referred to in the draft SPD para 2.14 footnote 13, and part of its methodology forms the basis for Chapter 14. It has been used because it represents a refinement of the assessment methodology that formed part of the original LUC Huntingdonshire Study – and, importantly, it is a more readily understandable explanation of part of the assessment process.
No changes needed.
- e) The criteria detailed in Chapter 14 of the draft SPD will not necessarily be consistent with each other, and their relative importance in a sensitivity assessment will vary with the landscape under consideration and the type and scale of development proposed.
No changes needed.
- f) The assessment of landscape sensitivity can take place at all geographical scales. At the scale of a particular landscape character area (or on an even larger scale, such as a Natural England designated National Character Area), there could be a broad brush assessment of sensitivity to a particular type of development, but within that area there will probably be variations of sensitivity associated with smaller scale variations in landscape character. Each assessment is valid as long as the parameters that relate to it are made plain.
No changes needed.

19. Further explanation of some topics needed

HDC Planning Consultation Portal ID Numbers -

Some comments suggested that more information and explanation was needed with regard to certain paragraphs in the draft SPD. In particular the following -

- a) The reference to “evolving assessment” in paragraph 1.2
- b) The reference to “further survey and assessment” in para 2.7
- c) The reference to “valley crests” in paras 8.1 (a), 8.3 (b), and related issues concerning the “ridge” dividing the Kym and Ellington Brook valleys which features in the Southern Wolds chapter of the draft SPD, paras 10.2 (g), 10.3, 10.4 (h), and 10.6 (g).
- d) The reference to the SNH guidance in Chapter 13.

Comment:

- e) The reference to “evolving assessment” in para 1.2 refers to the trends in landscape sensitivity (and capacity) studies that have been undertaken since the LUC study was done in 2005 and the original Wind Power SPD was adopted in 2006. These are explained in greater detail in paras 2.3 – 2.6 of the draft SPD. There has been no specific assessment further to the LUC Study. **In the interests of clarity it is proposed to amend para 1.2 (second bullet) to read “The development of the methodological approach to assessing the landscape sensitivity to wind turbine development that has taken place since 2005”.**
- f) The reference to “further survey and assessment” in the draft SPD para 2.7 refers to the minor amendments and clarifications that have been made with regard to the new group sizes detailed in the draft SPD para 2.6. These are relevant to paras 6.3 and 9.4 in the draft SPD, and Chapter 8 on the Northern Wolds where there were various inconsistencies between the text of the LUC study, the table 14.1 in the LUC study, the text in the original SPD, and table 2.1 in the original SPD. One of the aims of the draft SPD was to clarify and reduce these inconsistencies, whilst remaining “true” to the arguments of the LUC study – and in so doing to produce a more useful and coherent SPD. **To clarify this, para 2.7 in the draft SPD will be amended to read “ Within each of these groups there may be minor qualifications. These will be drawn out from the details of the original LUC study as assessed using professional judgement of suitably qualified landscape personnel, with the aim of making this revised SPD a more usable and coherent document.”**
- g) Some responses noted the lack of definition for the term “valley crests” and the uncertainty and discussion this had engendered at the recent Inquiry for the original Bicton windfarm proposal. The term is used in the chapter on the Northern Wolds LCA, paras 8.1(a) and 8.3(b) in both the existing and draft SPDs. From the wording of paras 8.1(a) and 8.3(b) it is apparent that the thrust of the guidance is to protect the “more intimate landscape of the valleys” and the settlements located there.
I agree with the appeal decision which concluded that the word (crest) “should be understood in its normal sense as the top part of something that slopes or rises upwards. Thus a slope would have a distinct horizon, the position of the crest possibly changing depending on the position of the viewer.” see Bicton appeal decision para 25.

Attempts by various consultees to provide a concise definition usually involved invoking other equally undefined terms such as “valley sides,” and using simple diagrams which would be out of place in a supplementary planning document. The variable nature of most of the key components (such as landform, vegetation cover, scale, sensitivity etc) mean that it is impossible to create a workable criterion on this issue that would cover all the possible permutations. The only recourse is the existing one of providing

guidance on the various issues that might apply in each LCA, when considering each application on its merits.

No change needed.

- h) Most of the consultees who commented on Chapter 13 thought that the extracts from the SNH guidance were useful, and often suggested that other extracts be included. However although the SNH document is referred to, there is significant overlap between its guidance and that already contained in the draft SPD. Accordingly specific references to skylines, ridges etc will not be included as these are covered already. Nevertheless the suggestion re “small scale topography” would be a useful and relevant addition, and **a new paragraph will be added after 13.7 (but still under the heading “Size and Scale”). This to read - “Even small turbines have the potential to dominate small scale topography. Care should be taken not to introduce turbines which would have an overbearing presence on complex or intricate landforms.”**

20. Concerns that Chapter 13 of the draft revised SPD classifies 100m height turbines as “small,” and assumes that all turbines less than 100m height have similar impacts, and other issues with regard to such turbines.

HDC Planning Consultation Portal ID Numbers - 90/109/135/151/164/169/192/223/265

- a) Some consultees considered that Chapter 13 “Siting and Design Issues for Turbines less than 100m” implied that all such turbines are classified as “small” when compared with commercial scale turbines of over 100m in height to blade tip – and that consequently their landscape and visual effects were also classified as being of a similar scale.
- b) Some responses sought clarification of the regulations surrounding Environmental Impact Assessments and what scale of turbine development might require an EIA. There was a suggestion that all turbines over 80m should require an EIA submitted with the planning application.
- c) Other responses suggested that there should be more detailed guidance for small scale wind turbine developments.

Comment:

- d) There was an unfortunate typographical error in para 13.1 of the draft revised SPD. The last line of this para should read “ ...**smaller turbines**...” and not “...small turbine...” as the consultation version stated. This will be amended. The LUC study, the original Wind Power SPD, and the draft revised SPD all focus primarily on commercial scale turbines with a height of 120m +/- 20m. Turbines below this scale are “smaller” – though not “small.” Because HDC receives many applications for turbines below 100m height it was deemed sensible and logical to include relevant guidance in this document. At no place in this chapter is there any suggestion that all turbines of 100m height and lower have similar impacts – indeed the draft revised SPD states repeatedly that each case must be treated on its merits, and gives site specific guidance indicating that impacts will vary with scale and location of the proposal. In order to reinforce these points, and for avoidance of doubt, para 13.1 will be amended to include an additional sentence immediately before the last sentence of that para – “...**are acceptable. Turbines less than 100m height will have varying landscape and visual effects, as commercial**”

scale turbines do, depending on height, cluster size, location and a variety of other factors discussed below. As with...

- e) EIA requirements follow from an EU directive which is encompassed in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. HDC must comply with these regulations. A full EIA is an extremely wide ranging assessment covering many issues that may not all be relevant to every qualifying project. However when a Scoping Opinion is requested by a developer, HDC can require certain information even if it deems that a full EIA is not necessary. In the case of wind turbine developments it is common practice to require a fully detailed Landscape and Visual Impact Assessment (and other assessments eg Ornithology, Cultural Heritage) even if an EIA is not required. **No changes needed.**
- f) Guidance for small scale turbine developments is discussed in Chapter 13 (with other references), the HDC note "Wind Turbine Developments – a Guidance Note for Applicants and Agents," and there is also relevant information in the draft position statement "Cumulative Landscape and Visual Impacts of Wind Turbines." Each case must be assessed on its merits, but these documents discuss the relevant issues which must be considered. It would be impossible for any guidance to cover all the permutations of turbine size, cluster size, location etc. This issue based approach is the most realistic and practical. **No changes needed.**

21. Comments on Specific Guidance Criteria for Various Character Areas

HDC Planning Consultation Portal ID Numbers - 318/338/353/354/366

- a) Some comments (often associated with the Stop Bicton Wind Farm Action Group) suggested that the site specific guidance for the Northern Wolds LCA should be amended at para 8.3(g) so that Southern Wolds LCA was added.
- b) HDC Overview and Scrutiny Panel requested that Ouse Valley LCA guidance para 6.1(e) be reconsidered.

Comment :

- c) Para 8.3(g) recommends that when siting a potential small-scale wind turbine development of 2-5 turbines care should be taken to "consider the impact on views of the horizon from the Central Claylands, Fen Margin and Fens."
The Northern Wolds LCA shares long boundaries with the Central Claylands and Fen Margin LCAs. Additionally it has a strong visual connection with the Fens LCA, with the Northern Wolds often forming the skyline of long distance views from the Fens even though their boundaries are not shared – hence the rationale behind 8.3(g).
But the Northern Wolds LCA also shares a long boundary with the Southern Wolds, and this link is referred to in the LUC study - paras 11.1 and 11.2 last bullet point. Relevant issues include –
 - i. These two wolds LCAs have important physical features in common too, namely the valley of the river Kym and the ridge of higher ground that overlooks this valley. Both

these features run on a roughly north west / south east axis extending from the county boundary west of Tilbrook to the Ouse Valley.

- ii. The ridge is more wooded in the Southern Wolds LCA and is an important element of the site specific guidance criteria for that LCA.
- iii. The key issues of the Northern Wolds chapter of the Landscape and Townscape Assessment SPD include the “protection of key views towards the distinctive skyline of ridge tops, church towers, and woodland.

For these reasons it is consistent with existing guidance to **amend para 8.3(g) to read “Consider the impact on views of the horizon from the Central Claylands, Southern Wolds, Fen Margins, and Fens.”**

- d) The draft revised SPD states that the Ouse Valley LCA has a high capacity for a single turbine, although locations would be “relatively constrained, particularly with regard to potential effects on nature conservation values.” Other relevant aspects of the guidance include retaining “the sense of tranquillity and relative isolation” and avoiding the “areas which retain a distinctive valley landscape.” In the light of these potential constraints, and given the stated capacity for a single turbine, it is entirely sensible that the guidance recommends consideration of locations “in association with existing infrastructure,” so that the higher sensitivity locations within the LCA which are so important in maintaining the key characteristics of tranquillity and high ecological value are avoided.

No changes needed.

22. Rejection of the Premises of the Draft Revised SPD

HDC Planning Consultation Portal ID Numbers -
4/19/43/44/45/54/221/237/242/246/270/320/322/323/350/351/360

A number of consultees, including some individual council members, rejected the implicit assumption of the Draft Revised SPD that suitable locations throughout the district might be able to accommodate turbine development of an appropriate scale. Several consultees thought that only the Fens and adjacent low lying areas had the landscape qualities to accommodate commercial scale turbines, and that the visual impacts of such developments were unacceptable in the remainder of the district. Significant changes were proposed to the SPD.

Comment: The introduction to the Draft Revised SPD (paras 1.2 and 1.6) makes it clear that the purpose of the revision to the existing Wind Power SPD was not to rewrite its conclusions; to do so would have required another extensive study and this was deemed wholly unnecessary as the draft revised SPD was felt to be broadly in line with national policy (NPPF, National Policy Statements and PPS22 Companion Guide), contained appropriate guidance that could be used in Development Management, and reflected the issues and judgements made at relevant appeals.

Having Supplementary Planning Guidance which is not compliant with national policy is not a realistic option for a local planning authority, as would become quickly apparent when the inevitable appeals were decided.

No changes needed.

23. Great Fen Project

HDC Planning Consultation Portal ID Numbers - 47/99/111/141/150/196/356

Some responses noted the “policy protection” for the Great Fen area highlighted at paras 2.15 and chapters 3 and 4. Clarification was requested as to why similar protection was not being recommended for other areas of high landscape, nature conservation, or biodiversity value.

Comment: The NPPF (Section 11 “Conserving and Enhancing the Natural Environment”) specifically lists nationally designated areas, such as National Parks and AONBs, where great weight should be given to “conserving landscape and scenic beauty.” It lists categories of site designated for their nature conservation and/or biodiversity value, (Ramsar sites, SSSIs etc) where planning permission should be refused unless certain conditions are met and sets out the general principle in NPPF para 113 that *“Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”*

Huntingdonshire has no nationally designated landscape areas, but it does possess some significant and designated areas of outstanding nature conservation and biodiversity value. The Great Fen project is the largest and most significant of these, and its status has been recognised in emerging local plan policies and supporting text (see draft policy LP7: Strategic Green Infrastructure Enhancement, and supporting text 4.75. NB the original footnote 14 to para 2.15 will need updating to reflect current emerging policy). Other areas with nature conservation and biodiversity interest are referred to in the emerging local plan, but none apart from the Great Fen have the “policy protection” against wind turbine development. It must be noted however that local plan policies would not preclude proposals for wind turbines in or near the Great Fen, only that the policy would be an important material consideration when determining the application. Similarly other designated areas (SSSIs etc), which might be affected by a proposal, would also be a material consideration but the weight given them would be less than that given to the Great Fen, given its specific inclusion in the emerging local plan – though of course each case must be assessed on its merits.

No changes needed, apart from updating of footnote 14, para 2.15.

24. Factual Errors and Misunderstandings in Some Consultee Responses

HDC Planning Consultation Portal ID Numbers -
58/82/89/131/132/146/194/195/255/315/316/325/326/329/339-342/345

Some responses contained particular factual errors, some of which were common to several responses. These repeated errors were –

- a) Assuming the locally designated “Area of Best Landscape” has current status – this designation was abolished following the publication of PPS7 in 2004.
- b) Assuming that other LPAs have policies which fix a minimum distance between turbines and dwellings / settlements – there are no such policies. There may be recommendations or draft recommendations. Milton Keynes DC recently “lost” a Judicial Review on such an issue, though the case was complicated by other related matters. South Cambs DC do not have such a “minimum distance rule.” The government position is still one of opposition to the introduction of any “minimum distance rule.”

- c) Assuming that designating an LCA as having a high capacity for a particular scale of turbine development automatically gives permission for such developments in any part of the LCA - this is a misunderstanding of the SPD guidance, which can militate against particular applications wherever they may be proposed, eg the application for the original wind farm proposal at Bicton, near Kimbolton where the SPD guidance was an important part of the Inspector's decision to dismiss an appeal after HDC had refused planning permission.
- d) Assuming that all new commercial scale applications will be for turbines greater than 127m height – the most recent applications (at Molesworth and Bicton) are for turbine heights of 126m and 125m respectively.
- e) Assuming that the terminology classifying group cluster sizes applies across all height bands, ie implying that a group of six 40m turbines is a medium scale group, but a group of three 125m turbines is only a small scale group – the draft revised SPD Chapter 1 makes clear that it applies primarily to turbines of 120m +/- 20m, and the terminology of cluster sizes is consistent within that height band. At no point is it claimed that the terminology should be used across differing height bands, and apart from Chapter 13 other height bands are not considered.

APPENDIX 1: List of those responding to the public consultation.

Full Name	Company / Organisation
	Lightfoot Design
	Pegasus Planning Group
	Renewable Energy Systems Ltd
	HDC Overview and Scrutiny Panel (Environmental Well-being)
	Nene Valley Gliding Club
	TCI Renewables Ltd
Andrew Brown	
Anna and Michael Horrell	
Ann Enticknap	St Ives Town Council
Beatrice Brandon	

Caroline McArthur	
Chris and Vicky Wood	
Chris Kemp	
Chrissie Short	
Christopher J Ayrton	
Cllr Jonathan Gray	
Cllr Mrs Banerjee	
Cllr Peter Reeve	
Cllr Robin Howe	
Cllr Ian Bates	
David Brown	
David Orr	
Denise Johnson	
Gareth Martin	Fenland District Council
Geoff Burn	
Geoffrey Pawling	
Henry Malt	
Jon Croke	
Klokkaris	
Lynda and David Grindley	
Margaret Malt	
Marie Stacey	Hallmark Power Ltd
Martin and Diane Patterson	
Miss Emma Naylor	Peterborough City Council
Miss Nicola Bell	RWE Npower Renewables Ltd (RWE NRL)
Miss Sian Williams	The Wildlife Trust BCN
Mr Alan Marnes	
Mr Allan Parsons	
Mr and Mrs Abel	
Mr Andrew Pooley	
Mr Bev Gray	CFAG
Mr Charles Paull	Tilbrook Parish Council
Mr David Abbott	Highways Agency
Mr Gareth Ridewood	CPRE Cambridgeshire
Mr George Isaacs	
Mr Ian Dickson	
Mr Jack Kenny	
Mr James Muelchi	
Mr John Chase	Buckden Parish Council
Mr John Gimblett	
Mr Jonathan Chitty	
Mr K Fowler	
Mr Larry Fitch	Abbotsley Parish Council
Mr Lionel Thatcher	Kimbolton & Stonely Parish Council
Mr Maurice Dixon	
Mr Nathan Hawkes	

Mr Richard Flynn	
Mr Rimmer	
Mr Rob Watson	
Mr Ronald Jones	
Mr Roy Reeves	Warboys Parish Council
Mrs Anne Beszant	
Mrs Fiona Anderson	Hamerton & Steeple Gidding Parish Council
Mrs Joy Allington	
Mrs Lorna Lane-Ley	
Mrs Margaret Telford	
Mrs Marjorie Tattersall	
Mrs Odette Eldred	
Mrs Pat Barker	Brington and Molesworth Parish Council
Mrs Pat Dillon	Toseland Parish Council
Mrs Penelope Bryant	Somersham Parish Council
Mrs Sarah Wilson	Godmanchester TC
Mrs S Maher	
Mrs Victoria Wood	Stop Molesworth Wind Farm Action Group
Mr Thomas Cosgrove	Broadview Energy
Mr Tom Gilbert-Wooldridge	English Heritage
Mr Watters	
Ms Amy Howard	
Ms Zoe Woods	
Offord Cluny & Darcy Parish Council	Offord Cluny & Offord Darcy Parish Council
Pam Wardle	Catworth Parish Council
Pat Huff	
Planning Liaison Anglian Central	The Environment Agency
Revd Philip Foster	
Richard Murphy	Stop Bicton Wind Farm
Richard West	
Rob Colmer	
Rodney Nelson	
Rowland Wood	
Sarah Malt	
Silvia Earl	
Stephen Brandon	
Susan Bickley	
Susan Hayward	