

# APPENDIX B

## **Draft Supplementary Planning Document: “Wind Energy Development in Huntingdonshire” [March 2014] Revised Statement of Consultation.**

A draft Supplementary Planning Document (SPD) entitled “Wind Energy Development in Huntingdonshire” was issued by Huntingdonshire District Council on Friday 28<sup>th</sup> March 2014. 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 28<sup>th</sup> March 2014 for a six week period until Friday 9<sup>th</sup> May 2014. 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.

Over 180 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 four high profile local Inquiries, with a further one due to start in June 2014. 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. 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 potential 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, and what amendments to the draft supplementary planning document, if any, are proposed.

## **Broad Issues arising from the Consultation Process**

We are directed by the relevant legislation to respond on the basis of the main issues raised during 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. 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 – 1-10/13/58/96/98/112/114.

Many of the comments were observations of a general 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 disapproval, some gave approval, and others expressed support / agreement relating to specific points.

**Comment: No changes needed.**

## 2. Issues proposed for inclusion in the SPD

HDC Planning Consultation Portal ID Numbers – see topics listed below.

Some parties were concerned that other relevant issues should be included in the draft SPD; these included the following topics, and the associated ID numbers are given after each one.

Residential Amenity [64/119]

General Biodiversity / Wildlife Matters [14/32/34/59/119/123/124/152/170]

Noise and Amplitude Modulation [34/63/119/153]

Shadow Flicker [34/63/153]

Buffer / Separation Distance between Turbines and Dwellings / Settlements [63/77/116]

Importance of Community Opinion [34/119]

General Heritage Matters [34/105-107/119]

Solar Farms [64/75/99/109]

Flood Risk / Water Levels [171]

Inefficiency of Turbines [5/7/9/97]

**Comment:** These issues must be considered separately from landscape and visual matters, and any detailed consideration of them would not be appropriate in an SPD which specifically focusses on landscape sensitivity to turbine development and cumulative landscape and visual impacts. Apart from Solar Farms and Buffer Distances the topics listed above will be part of the Environmental Impact Assessment for any large scale turbine development.

There is often national guidance available [eg ETSU-R 97 on noise issues, and various English Heritage publications] which obviate the need for local guidance. Planning applications for wind turbine developments will consider noise, shadow flicker, residential amenity, impacts on biodiversity / wildlife, flood risk, and impacts on Heritage Assets on a case by case basis, and as deemed appropriate by the relevant guidance.

Efficiency issues are discounted from inclusion in planning considerations by the NPPF [para 98] and buffer distances by the recent on-line Planning Practice Guidance for Renewable and Low Carbon Energy.

Solar Farms involve different landscape and visual impacts from turbine developments and should be considered separately as a distinct type of development.

**Changes needed.** For clarity and avoidance of doubt the following amendments will be made to the draft SPD:

“Summary and Introduction” Item 1.

The overall purpose of this SPD is to assist the interpretation and application of those policies concerned with landscape character, **visual impacts**, and the location of **wind turbine developments**. **The draft SPD specifically focusses on these issues and does not consider other impacts which may also be associated with wind turbine development.** This draft SPD ...”

### 3. Identification of Historic Villages

HDC Planning Consultation Portal ID Numbers - 42/75/77/99/100/118/156/160/169/186.

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 areas.

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.**

### 4. Updated information and Table 15

HDC Planning Consultation Portal ID Numbers – 49.

- a) One consultee correctly identified that Table 15 was incorrect.
- b) There is a general issue about the possible updating of relevant data as the scale of turbine development changes over time.

**Comment:**

- a) The original figures from the corresponding table in the TLP Position Statement had been transferred to the draft SPD unaltered. **Change needed.** New figures reflecting the situation at January 1<sup>st</sup> 2014 will be calculated and inserted in a revised Table 15.
- b) The relevant data and associated tables, figures and text will be updated when significant changes to the scale of development have accrued. An explanation of this has been added prior to para 18.16. **Change needed.**

## 5. Specific Biodiversity and Wildlife Issues

HDC Planning Consultation Portal ID Numbers – 14-33, 123-153.

Much detailed and useful comment was received from the RSPB and the County Council on biodiversity matters. This covered the following main issues.

- a) Biodiversity enhancement as per NPPF para 109, and suggested amendments to the site specific guidance for different LCAs [chapters 3-11] and wider landscape management objectives.
- b) Avoidance of significant cumulative effects on wildlife – especially birds.
- c) Recognising that some species associated with designated nature conservation sites may be associated with other areas [eg feeding grounds] which are distant from those sites; and responding to the implications of this fact.
- d) Mitigation of potential impacts on biodiversity and wildlife.
- e) Avoidance of impacts on species / features associated with nature conservation sites in different LCAs.
- f) General “wildlife constraints.”
- g) Buffering of nature conservation sites.
- h) Monitoring regimes, and improvement of data re cumulative ecological assessment.
- i) Production of Ecological Sensitivity Maps, and Bird and Bat Sensitivity Maps.

**Comments:** on each of the above points in order.

- a) Amend site specific guidance “Seek opportunities to achieve wider landscape management objectives identified in the Huntingdonshire Landscape and Townscape Assessment in association with any proposed development, **and seek opportunities to provide net gains to biodiversity, such as through creation of new habitat, appropriate to the ecological setting and scale of the proposal.**” This to be done at paras 3.1(i), 3.3(h), 4.1(i), 4.3(k), 4.5(j), 4.7(j), 5.1(h), 5.3(k), 6.1(g), 7.1(i), 7.3(j), 7.7(f), 8.1(g), 8.3(j), 9.2(e), 9.4(f), 10.2(j), 10.4(l), 10.6(l), 11.1(h).
- b) Avoidance of significant effects [cumulative or lone] on wildlife is an issue best considered by the relevant Statutory Consultees at the pre application consultation and the planning application stage. It is not a direct landscape / visual issue, and guidance on these matters is not appropriate for inclusion in this SPD.
- c) Again this matter is best dealt with by the relevant Statutory Consultees and is not appropriate for inclusion in this SPD.
- d) Again this matter is best raised by the relevant Statutory Consultees at the pre application consultation and the planning application stage. NB Issues of impacts on Biodiversity and Protected Habitats and Species, mitigation, compensation etc are dealt with by Local Plan draft policy LP5.
- e) Ditto
- f) The RSPB was concerned with the wording at para 18.12, and whilst it is still best for Statutory Consultees to deal with the detail of individual cases, para 18.12 will be amended to better reflect the potential consequences of the most significant impacts. The para should now read ...”This could have fairly modest impacts **on the design of a scheme** eg 50-100m offsets **from a feature such as a hedgerow to prevent effects on foraging bats, while in the case of the most sensitive sites eg Special Protection Areas and Ramsar sites this may a greater impact** eg if there were an affected flight path related to protected bird species, **the scheme may need to be**

***relocated or substantially reduced in scale to avoid significant effects on the species or site concerned.***”

- g) “Buffering” of designated nature conservation sites is recommended best practice and specific guidance is available from Natural England and other Statutory Consultees. This is an issue best dealt with by the relevant Statutory Consultees at the pre application consultation and the planning application stage. The reason that the Great Fen is mentioned in the SPD is because of its “Landscape and Visual Setting” which was recognised by HDC and has status in planning – effectively a buffer but not for biodiversity or wildlife reasons. More detailed information on buffering for these reasons is not a topic appropriate for this SPD.
- h) Monitoring regimes and data collection re cumulative ecological assessments – again best dealt with by the relevant Statutory Consultees at the pre application consultation and the planning application stages.
- i) Ecological Sensitivity Maps: again not strictly a landscape or visual matter and more appropriate to be produced by the relevant Statutory Consultees or a county level where ecological expertise is available.

NB Information on these matters may be more relevant for inclusion in the forthcoming revision of the HDC “Guidance Note for Applicants and Agents of Wind Turbine developments.”

## **6. Clarity and readability of SPD maps – figures 18.1-18.8.**

HDC Planning Consultation Portal ID Numbers – 50/78/80-87/89-92.

Several consultees thought the quality of the plans was poor and that the information contained in them was difficult to read and understand.

**Comment:** The plans were not of the highest quality, and by the nature of the subject matter they have to present a great deal of information – all of which is relevant. Bigger plans might have been easier to read, but it was felt that A3 fold-out ones were easier to handle in such a document.

**Change needed:** Higher quality versions of the plans will be used for the revised version of the draft SPD which will be put forward for adoption by Council. If adopted these versions will be available for printing and for viewing on screen. They will use more memory which may preclude them being sent as email attachments, but the whole document will be available to download from the HDC website.

## 7. Basic changes needed to the draft SPD.

HDC Planning Consultation Portal ID Numbers –  
63/158/162/163/166/167/168/172/176-181/183/184/185

Several consultees thought that there were some basic shortcomings with the form and content of the draft SPD. These included:

- a) It was too long and complicated.
- b) A new sensitivity study was needed to update that done by LUC in 2005. This would provide a new baseline and would take account of any changes in landscape character produced by the operation of those wind turbine developments [and other developments] built since 2005. New LCA descriptions may be required.
- c) There should be greater emphasis on EU and UK energy policy in chapter 1 of the SPD.
- d) The methodology used in chapter 19 leads to an overestimate of the actual effects of consented and operational windfarms.
- e) Chapter 22 [Appeal Decisions] was thought to be unrepresentative and of limited value.

**Comment:** on each of the above points in order.

- a) The SPD is long and it is relatively complicated – mainly because it has to deal with a complex, high profile, and highly emotive subject where planning guidance must be robust and consistent, as well as being useful to developers. Every effort has been made to keep the document to a reasonable length, yet still cover the nuances of the various characteristics of the Huntingdonshire landscape and the methodologies used to assess impacts and guide development to appropriate locations. **No changes needed.**
- b) Despite the LUC study being roughly 10 years old it is felt that the assessment of most of the various indices which make up landscape sensitivity and landscape value have remained fundamentally unchanged, and that the site specific guidance criteria for each LCA would still be entirely appropriate. Nevertheless the information in part 2 of the draft SPD on the location, height and number of all turbines as of January 1<sup>st</sup> 2014 provides grounds to guide the assessors and decision makers to areas where sensitivity and value – and hence susceptibility to change to use current terminology – might have altered, and hence to make new assessments on a case by case basis. **No change needed.**
- c) Chapter 1 of the draft SPD contains many references to the NPPF and the Planning Practice Guidance on Renewable and Low Carbon Energy [and other policy documents], and in particular to sections relevant to landscape and visual matters. There is ample opportunity at the planning application stage for applicants to present more detail of EU and UK energy policy, and to argue for its appropriate weight in the planning balance. The draft SPD is guidance which focusses on landscape and visual issues and as such it rightly concentrates on those aspects of policy which directly relate to those issues. **No change needed.**

- d) Paragraphs 19.25-19.36 analyse turbine visibility, magnitude of impacts and expand the concept of guidance thresholds – previously instanced in para 17.8 referring to SNH para 18 onwards.

The use of the categories of magnitude shown on Table 18 are based on the likely ranges of distance over which differing levels of magnitude of visual impact are likely to occur from wind turbines of a height of between 100 -129 m to blade tip. Although PAN45 is revoked it is considered that the broad categories of effect included within it are still pertinent. The distance categories in PAN 45 relate to an open landscape and it is considered that much of Huntingdonshire does have that open characteristic, particularly in the more elevated Claylands, Wolds and on the Fens. A similar approach was also incorporated at page D9 within the Arup Report 'Placing Renewables In the East of England Final Report -2008' (which is referenced in the Draft SPD). This Arup Report also draws on a study undertaken by the University of Newcastle which provided at Table D1 .2 of the Arup study the basis for most of the descriptions of magnitude used at Table 18 in the Draft SPD.

The distances and definitions were tested in the field at the majority of the existing wind turbines within Huntingdonshire and also at a number in neighbouring districts including Fenland District. These visits were made by representatives of The Landscape Partnership and/or Huntingdonshire District Council to benchmark the descriptions with as built schemes . The approach used was set out in paragraph 19.28. This included the larger turbine schemes at Cotton Farm, Red Tile Farm together with assessment of smaller turbines in the district. Locations were identified from public locations within the distance bands to evaluate if the descriptions matched the effects that currently occur from the as built wind turbines. As set out in the draft SPD a further category was incorporated within 1 km to reflect locations where turbines may have a greater/overpowering effect. It was considered that the distance and magnitude bandings were appropriate to the Huntingdonshire landscape. Paragraph 19.27 of the draft SPD also makes clear that these were approximate points of transition from one category of effect to another and that local circumstances would also vary by either making a scheme relatively more prominent. It is accepted that reference should also be made in this paragraph of the SPD to the fact that views could be more low-key contained or screened within these distances e.g. by landform and vegetation. To this end para 19.27 should have the following inserted...."**there will often be a transition. Some views could be contained and/or screened by landform or vegetation or both. Equally there may be...**"

The categories of magnitude provided in the Draft SPD are intended to provide a helpful framework for identifying the likely effects within a given range and for then assessing the individual circumstances and effects from any particular scheme at a more detailed level. It is considered that the approach used is appropriate in providing criteria and guidance for evaluating the cumulative situation at a strategic level and also then for assessing individual applications and the cumulative effect of a number of schemes.

It is accepted that para 19.34 of the draft SPD overstates the certainty of unacceptable cumulative effects, and that other factors need to be considered as well. To this end para 19.34 should be amended to read "... Prominent Zones are *less likely* to be acceptable in cumulative visual terms unless other factors substantially counteract any significant cumulative effects; **however each case must be considered on its merits.** An exception..."

As regards the proposed extent of "Prominent" and "Conspicuous" zones as applied to turbines up to 99m in height [see table 19 in the draft SPD] the figures in the first two rows of the table represent a likely maximum extent. It must again be noted that the

methodology here is meant to provide guidance and inform the assessor and decision maker where potential cumulative effects might occur, and to indicate thresholds within which careful assessment is required.

- e) It is agreed that chapter 22 [Appeal Decisions] is somewhat unrepresentative and realistically could never keep abreast of relevant policy changes. **It will be removed from the document and references to it will be omitted.**

## 8. Guidance for the Northern Wolds LCA

HDC Planning Consultation Portal ID Numbers -  
38/42/59/60/62/77/99/100/108/110/115-119/156/157/160/164/169/172/179/182/186.

Many consultees [including individuals, groups, energy companies and professional consultants] felt that the changes to the numeric capacity guidance for the Northern Wolds LCA in chapter 8 of the draft SPD were not fully justified. Some consultees referred back to the current SPD, and some to both the SPD and the background study “Wind Turbine Development in Huntingdonshire” by Land Use Consultants, which underpinned the subsequent SPD “Wind Power.”

**Comment:** The section on the Northern Wolds LCA was the focus of the main inconsistencies within the LUC study, and also between that study and the subsequent SPD “Wind Power.” The text of the LUC study concluded that there was high capacity for small scale groups of “up to 5 turbines” or “up to 4 or 5 turbines.” So there is already inconsistency. However in the summary table 14.1 in the LUC study this confusion is compounded further - the Northern Wolds is stated as having high capacity for a small scale group of 2-3 turbines, and low capacity for a grouping of 4-12 turbines. The subsequent SPD “Wind Power.” – which is the current adopted local policy guidance – repeats the judgments of this table.

Thus not only is there the issue of the abrupt change in guidance [high capacity for 3 turbines, low capacity for 4] but also other contradictory statements about various groupings of up to 5 turbines. It is unlikely that these different and inconsistent statements – some with policy status, and some with the status of a background study – could ever be satisfactorily resolved.

Some consultees used mistaken definitions for “high” and “moderate” sensitivity. For the avoidance of doubt the LUC study [page 11] states – *“Moderate [sensitivity] – key characteristics of the landscape are vulnerable and maybe adversely affected by turbine development. The landscape may have some ability to absorb types of wind energy development without a significant change in character. High [sensitivity] - key characteristics of the landscape are fragile and would be adversely affected by turbine development. Wind turbine development would be likely to result in a significant change in character.”*

The draft SPD has redefined the group sizes to produce a series of groupings in keeping with more recent and current studies and policy guidance. The abrupt change in capacity judgment has been dealt with by the introduction of a “moderate capacity” judgment for the small scale grouping of 2-5 turbines; and this also preserves a consistent set of group sizes for all LCAs within the district, rather than introducing special group sizes for this one particular LCA.

It must be remembered that these capacity figures are guidance only, and broad brush guidance for the whole of an LCA. Each case must be judged on its merits, and the numeric guidance is only one factor of the many that are pertinent to the landscape and visual issues



which will be considered when making any final decision about a particular proposal. The capacity of a particular site will be considered by reference to its particular context.

In the light of these points it is HDC contention that the changes to the Northern Wolds are justified and that with regard to this issue the draft SPD should remain unaltered. **No change needed.**

## 9. Prioritising “candidate” locations

HDC Planning Consultation Portal ID Numbers – 109

One consultee recommended that HDC identify “candidate” locations – those sites and areas which were deemed most suitable for wind turbine development.

**Comment:** This is an important point and one that is considered at NPPF para 97 where “identifying suitable areas...” is a recommended course of action for local authorities.

Whilst identifying suitable **sites** is clearly impractical over the district as a whole, the draft SPD does provide the relevant criteria to guide applicants to suitable **areas** and away from inappropriate ones – due to its methodology of identifying guidance criteria for each LCA based on landscape character assessment, and flagging up potential cumulative effects. It must be noted however that the LPA cannot affect the order that applications are made, and each case is considered on its merits, so it is ultimately impossible to ensure that the most suitable sites come forward first. **No change needed.**

## 10. Misunderstandings

HDC Planning Consultation Portal ID Numbers -  
11/35/59/60/62/73/77/97-100/108/110/115-119/122/154-157/160/165/169/171/186/

A number of consultees appeared to misunderstand certain parts of the draft SPD in relation to the following issues.

- a) Some consultees assumed that because the numeric guidance in Table 1 of the draft SPD [on page 10] recommended that there was “high” capacity for a certain group size and scale of development then this meant that a proposal within those limits would be “entitled” or automatically approved.
- b) A number of consultees commented on locations being within the Huntingdonshire DC “Area of Best Landscape,” or thought that Green Belt recommendations applied.
- c) Several responses said that there should be mention of risks and impacts associated with ice projectiles, high winds, proximity to roads and/or waterways, and impacts on the road network related to the construction phase of phase of turbine development and delivery of components to site.
- d) Many consultees thought that there should be particular restrictions on the height and number of turbines [for instance when an LCA was “full”] and a minimum separation distance between turbines and dwellings.

- e) Some consultees observed that impacts of WTDs outside the district should be taken into account, and also that LCA boundaries rarely exhibit a sudden change of character.
- f) A number of responses objected to what they saw as “judgments” being made in the SPD, which would in effect amount to pre-judging particular proposals.
- g) Some consultees thought that the approach taken by the draft SPD was intended to replace the requirements of an Environmental Impact Assessment, and be a substitute for the professional judgments and clearly argued written assessments recommended by the recent 3<sup>rd</sup> edition of the “Guidelines for Landscape and Visual Assessment [GLVIA].
- h) A few consultees were under the impression that the draft SPD was discouraging the use of “Zones of Theoretical Visibility” and the like.

**Comment:** on items listed above.

- a) Proposals must be assessed with respect to all elements of the guidance in the draft SPD – this includes [i] not just numeric guidance [which in any case is not specific to a particular site but is a broad brush figure for the whole of each LCA] , but [ii] the site specific guidance criteria given for each LCA in chapters 3-11 of the draft SPD, and [iii] any cumulative impacts that might be potentially significant in the light of the guidance thresholds given in Table 16 [and elsewhere] of the draft SPD. **No change needed.**
- b) The “Area of Best Landscape” designation was abolished following guidance given in the then PPS7 [2004]. It has no current planning status. There is no Green Belt land in Huntingdonshire, so national policy recommendations do not apply. **No change needed.**
- c) These listed risks and impacts are not appropriate for inclusion in a document concerned with landscape and visual issues. However, for commercial turbine developments all these issues will generally be considered and assessed in an Environment Impact Assessment submitted with the planning application. **No change needed.**
- d) This is a common misunderstanding. The on line “Planning Practice Guidance for Renewables and Low Carbon Energy” [PPG] clearly rejects the use of specific limits to the separation between turbines and dwellings – and this has recently been confirmed again in a Local Plan examination involving Wiltshire CC. Similarly, numeric restrictions on height or numbers of turbines in particular areas would be ruled inadmissible under the current planning system.  
The approach to these issues should be as recommended in the NPPF and PPG – by use of landscape character assessment and the clear presentation of written guidance criteria which can be used to assess the potential effects [including cumulative ones] of turbine proposals – and this is the approach taken by the draft SPD. Each case must be considered on its merits, and that consideration must be done on the basis of potential effects rather than by numeric limits. **No change needed.**
- e) The effects of turbine developments within 10km of the district boundary have been included in the assessments of current cumulative effects which is presented in part 2 of the draft SPD. The consideration of each case on its merits will include cross boundary effects, and where sites are close to boundaries between LCAs the draft SPD will include guidance advising consideration of criteria from each LCA. This has been standard practice in the consideration of relevant cases, as it is common sense that landscape character can rarely change abruptly at a boundary. Some of these issues

are discussed at para 19.9 but there will be clear guidance added to para 2.2 which will now read ...”chapters that follow (one for each character area). **Where a proposed scheme is close to the boundary between two LCAs the guidance for each LCA will be considered.** Further information...”

- f) It is stated in the “Summary and Introduction” [items 1/2/3/4/6 etc] to the draft SPD and repeated throughout the document that the draft SPD is guidance and does not seek to set out absolute thresholds. The essential caveat that “each case must be considered on its own merits” is included at numerous, relevant, and important points in the text. Judgments have their place when that consideration is made. **No change needed.**
- g) The draft SPD is not intended to replace EIA requirements – this is clearly stated at para 16.12 - nor is it meant to obviate the desirability of clear written arguments as recommended by GLVIA3. There is no part of the draft SPD that would support either of these contentions. **No change needed.**
- h) The comments on the use of ZTVs in the draft SPD para 19.23 apply to the concept of basing most of the guidance and assessment of current and future turbine developments on ZTVs, and this approach is not recommended for reasons given in 19.23. Nevertheless the submission and use of ZTVs to help in the assessment individual cases is common [though not universal] practice, and is a most useful tool. The draft SPD does not seek to discourage this practice. **No change needed.**

## 11. Relation between parts 1 and 2 of the draft SPD.

HDC Planning Consultation Portal ID Numbers -  
34/36/40/41/43/44/60/63/65-69/73/75/99/100/108/111/116-119/153/156/159/160/165/186

Many responses commented on the relationship between parts 1 and 2 of the draft SPD, and were concerned that there was a lack of cohesion and clarity in how the 2 parts fitted together, and some confusion when some issues [eg policy matters and cumulative effects] are included in both parts.

**Comment:** The two parts of the draft SPD each have a different focus as explained in the “Summary and Introduction” of the document. **In order to improve the overall structure of the SPD sections on Policy will be amended and moved to the “Summary and Introduction” section,** whilst other issues which are considered in both parts of the draft SPD [especially cumulative capacity and effects] will be better cross referenced and important points regarding the difference between parts 1 and 2 will be emphasised.

These latter changes are detailed below -

Item 4 will be amended to read...”Part 1 of the guidance is a **revised and extended version** of the February 2006...”

Item 9 in the “Summary and Introduction” section will have all but the last sentence changed to bold type... “ **Its analysis of landscape sensitivity is based on a scenario of no existing wind farms – the assessment is purely concerned with how the various landscape characteristics of each area might potentially be affected by different scales of turbine development. The site specific guidance criteria given for each of the district’s component character areas are valid whatever the current level of turbine development in the district.** If this were not the case then the analysis would have to be revisited after each new development consent – which would be clearly impractical.”

Item 11 will be amended slightly and be partly in bold...**By reference to the overview of the relative capacities established in Part 1, guidance thresholds are proposed in Part 2 which establish an upper limit to the extent of the greatest cumulative impacts in each LCA. The more sensitive the LCA, the lower the guidance thresholds.** The difference between the guidance threshold area and the actual level of impact gives an indication of the “spare” capacity (or lack of it) for future turbine development in each LCA.”

Part of the last sentence of para 2.22 will be in bold, **“Further guidance on cumulative landscape and visual effects is given in part 2 of this draft SPD”** and this clause will be appended to paragraphs throughout the document, at  
3.2 / 3.4 / 3.6 / 3.8 / 4.2 / 4.4 / 4.6 / 4.8 / 5.2 / 5.4 / 5.6 / 5.8 / 6.2 / 6.4 / 7.2 / 7.4 / 7.6 / 7.8 /  
8.2 / 8.4 / 9.3 / 9.5 / 10.3 / 10.5 / 10.7 / 11.2.

Other amendments will be made which will also improve the clarity of the guidance.

Para 1.5 will be amended and moved to the “Summary and Introduction” section, and be inserted at the start of para 12 of that section which will now read –  
**“This draft SPD is concerned only with the landscape and visual issues which are associated with wind turbine development. Proposals will also need to address other factors that need to be taken into account when assessing the wider potential effects of such proposals, such as biodiversity, heritage assets, tranquillity, noise, shadow flicker, and the effect on people living and working in the vicinity. It is essential to stress...”** the whole paragraph will be in bold type.

Table 1 [page 10] will have an amended title – it will now read – **“Table 1: Summary of landscape capacity for wind turbine development assuming a nil wind farm baseline scenario. For guidance on cumulative effects and assessment of current operational and consented turbines please refer to chapter 19 [Assessing Cumulative Effects] and Table 16 in part 2 of this document.”**

Para 19.12 should be amended so that its role [and that of table 16] in part 2 of the draft SPD is more apparent. It should now read -  
**“The percentage figures given in this section should not be seen as absolute thresholds that preclude development. However, they provide a guide as to when the cumulative landscape effects might be crossing a line where the underlying key landscape characteristics would begin to be affected due to the cumulative influence of wind turbine development. In this respect they are important in identifying potentially significant cumulative effects. There will usually be areas of land within each LCA...”**

These changes to the overall structure and relevant detail concerning the relation between parts 1 and 2 of the SPD will improve the cohesion and clarity of the document.

## 12. General and specific issues about tables in the draft SPD, and suggestions that some tables include additional information

HDC Planning Consultation Portal ID Numbers - 14/37/49/54-56/70/72/74/75/76/117/120

Several consultees thought that –

[a] Additional information should be included in various tables throughout the draft SPD.

[b] Other consultees suggested that the use of tables in part 2 of the draft SPD gave undue weight to figures and numeric assessment, downgrading the role of clear and reasoned written assessments.

[c] Some consultees questioned the omission of the Table 2 which was included in the proposed 2012 draft SPD “Landscape Sensitivity to Wind Turbine Development.”

### Comment:

[a] It is felt that the many tables in the draft SPD are already often conveying complex information, and that the inclusion of additional information [which in some cases can already be found in illustrative form in figures 18.1 – 18.8 from the draft SPD] would not be in the best interests of clarity.

Suggested summaries appended to Table 16 outlining which LCAs are “full” would not be useful as an LCA where the guidance threshold has been exceeded would not preclude further applications in that LCA, nor would it guarantee automatic refusal – it would only mean that there would be strong arguments to support refusal.

“Weighting” of different columns in Table 16 would also not be practical. The consideration of different cases in different LCAs would inevitably focus on different parts of the table.

**No change needed.**

[b] Part 2 of the draft SPD contains much information in tabular form, nevertheless there is no suggestion that this should downgrade the role and status of clear written arguments, analyses, and assessments of effects as recommended in GLVIA3. Para 19.1 confirms that the draft SPD guidelines should be considered alongside detailed study, but for avoidance of doubt the following should be added at the end of para 19.1... **“Whilst analysis and assessment of cumulative effects should respond to guidance thresholds and other tabular information given in part 2 of the draft SPD, this must be accompanied by a clearly argued written presentation covering the relevant details of each case.”**

[c] This table was actually omitted after the public consultation process for the 2012 draft SPD. The comment in the Statement of Consultation for the 2012 document stated –

*“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.”*

**It is felt that the reasoning behind its omission still applies. No change needed.**

A list of those persons and organisations responding to the public consultation is given below.

Name	Company / Organisation
Amy Crossley	The RSPB
Anna and Michael Horrell	
Anthony Levene	
C Watters	
Caroline Hunt	South Cambridgeshire District Council
Caroline McArthur	
Chris and Vicky Wood	
Chris Collison	
David Burnett	
David Ruck	
Debbie Steel	Brampton Parish Council
Denise Johnson	
Fiona Anderson	Hamerton & Steeple Gidding Parish Council
Gareth Ridewood	
Graham Moore	Middle Level Commissioners
Henry Malt	
Ian Churcher (Dr)	
J Bowd	Holywell-cum-Needingworth Parish Council
Jenny Gellatly	Little Paxton Parish Council
Jill Watkinson	
John Chase	Buckden Parish Council
John Gimblett	
Jon Croke	
Joy Allington	
Judit Carballo	Cambridgeshire County Council
K Adamson	
Laurence Allington	
Lois Dale	Houghton & Wyton Parish Council
Lorna Lane-Ley	
Madelaine Liddiard	Godmanchester Town Council
Mark Doyle	
Martin Gamble	
Nichola Traverse-Healy of Barton Willmore Planning Partnership	RES UK and Ireland Ltd
Nigel White	
Odette Eldred	
Pat Dillon	Toseland Parish Council
Paul Ryan	The Stukeleys Parish Council

Peter Ashford  
Piers Wood  
Revd Philip Foster  
Rob Colmer  
Roslyn Deeming  
Simon Bywater (Cllr)  
Sue Bull  
Thomas Cosgrove  
Tim Byrne of Jones Lang LaSalle  
Tim Byrne of Jones Lang LaSalle  
Tom Gilbert-Wooldridge  
Victoria Wood

Natural England

Anglian Water Services Ltd  
Broadview Energy  
Energiekontor UK Ltd  
RWE Innogy UK Limited  
English Heritage  
Stop Molesworth Wind Farm Action  
Group