

Landscape Sensitivity Assessment Supplementary Planning Document Scoping Report (July 2014)

Summary of representations

- The initial consultation on the Landscape Sensitivity Assessment (LSA) Supplementary Planning Document (SPD) Scoping Report (July 2014) concluded on the 8th September 2014.
- 13 valid representations were received.
- A single open ended question was proposed. Are there any other issues not already covered by the LSA that should be considered within the scope of the SPD and why?

General Comments

- Report ignores the fact that Mid Devon's countryside is made up of complex interwoven areas, impinging closely upon each other and in such a way that large energy developments will impact not only on the area in which they are proposed but equally on contiguous areas of higher sensitivity. The zoning approach used is therefore flawed.
- The assessment does not accurately recognise a scenario of placing a wind turbine on a hill which affects both the valley it is located within and the adjacent valley.
- Impacts are experienced across multiple landscape types but the assessment only considers the landscape type in which the application is sited.
- The document is flawed in principle because of the irreconcilable conflict between the need to develop on-shore renewable energy sources and the objective to preserve the quality and character of the rural Mid Devon landscape.
- If economics permitted, a conservative approach might be to encourage smaller photovoltaic developments arranged along field headlands where visual impact would be mitigated.
- Objection to the report in principle as it is not fit for purpose. Preference for Landscape Character Assessment. The report shouldn't be a substitute for commissioning consultants on a case-by-case assessment, as each case is unique. The report appears to encourage solar and wind applications against the flow of Government advice.
- Advantage of solar and wind is that they need not be permanent. The study does not discuss de-commissioning. Propose both the engineering and ultimate restoration of the site receive scrutiny at the planning stage.

Organisations & Public Bodies

- Dartmoor National Park welcomes the Landscape Sensitivity Assessment as SPD and its increased weight. Support key issues and considerations in respect of the setting of the National Park and its special qualities.
- The Highways Agency's policy regarding wind development is detailed in DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development". Appendix A of this guidance in particular sets out, set back distances and the need for detailed traffic management plans for delivery/removal of components during construction / decommissioning. In respect of PV developments it is important to stress the need to undertake glint and glare assessments to determine impact on trunk road traffic.
- Grand Western Canal Joint Advisory Committee (JAC) considers the components of landscape are: physical landscape, experiential landscape, biodiversity, historic environment and visibility. The JAC hope the components of the landscape are considered in an integrated and equitable way and where there is need to make a decision that it is based on sound evidence. The JAC believe the canal along its length is sensitive to industrialisation of the countryside and development in this location should be avoided.
- The Devon Countryside Access Forum attaches new guidance produced by the Public Rights of Way Team at Devon County Council (DCC). They advise that the implications of on-shore wind and PV development on public rights of way and accessible green space, and the views enjoyed by users, should be included in the SPD being prepared. The SPD should cross-reference the DCC guidance to ensure all aspects are incorporated.
- CPRE support the principle of the document but have concerns that the report is a desk top study that is incapable of assessing intricate patterns of the Mid Devon Landscape. Wording in many places is ambiguous and open to interpretation. Concerns include:
 - The sensitivity assessment scoring for small solar development (ground level) and for 50m high wind turbines are essentially the same, although impact would appear greater, this is considered an inconsistency. It is unclear what value the sensitivity assessments have. The report is therefore considered misleading.
 - The landscape sensitivity assessment does not appear to preclude any development however sensitive, but instead uses general phrases such as landscape is 'unlikely to accommodate turbines'.
 - The report refers to cumulative impact but provides no guidance to sequential cumulative effect, a relevant issue for all planning applications.
 - The assessment does not recognise a scenario where a landscape character type located some distance from a National Park (but in a more prominent location) as more sensitive than a scheme in a closer location, but better screened. Instead the assessment is simply based on a distance calculation.
 - The importance of the fragmented nature of the landscape has not been given due weight in the report.
 - Support for the statement the 'overall aim should be to make sure that solar and wind developments do not become a key characteristic of the landscape'.

Parish & Town Councils

- Bradninch Town Council supports the process of preparing an LSA SPD.
- Halberton Parish Council propose such developments should not be located in close proximity to local communities; sites should have very small visual impact away from roads and communities; proposals should be located within brownfield sites or wastelands alongside railway tracks; wind proposals should be in industrial settings rather than on greenfield land; and all new farm/industrial buildings should have solar PV installed to reduce the need for large scale farms.
- Morebath Parish Council agrees with the proposed layout of the LSA SPD and refers to comments submitted by the Parish Council to application 12/01522/FULL, Keens Farm, Morebath and subsequent appeal submission outline their position on large scale PV.
- Stoodleigh Parish Council endorses the contents of the LSA and the approach taken by MDDC to prepare the LSA as SPD.
- Willand Parish Council support using the information to prepare an LSA SPD. They suggest the document includes a section that outlines the grades of agricultural land or a link to the information, as this is relevant to sites considered for solar panels and sensitivity of the landscape.

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Forward Planning Team

Mid Devon District Council