

COMMENTS ON THE LANDSCAPE SENSITIVITY ASSESSMENT SUPPLEMENTARY  
PLANNING DOCUMENT BY

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## 1. INTRODUCTION

Paragraph 2.3 of the Scoping Report summarises the intended scope of the Landscape Sensitivity Assessment. This follows from paragraph 2 of Minute 90 of the Planning Committee of 9 October 2013 which indicates that the report was to provide essentially three features, namely:

- (i) an assessment of sensitivity to wind turbines and solar PV,
- (ii) guidance on the cumulative effect of these, and
- (iii) some guidance on " where and how any additional renewable energy development could be accommodated" ( emphasis added)

## 2. CONCLUSIONS

In my submission,(a) the nature of the assessment(i) is fatally flawed,(b) although some guidance is given on cumulative effect( ii) this is limited to clusters of turbines and no guidance is given on the sequential effect of multiple turbines, and(c)regarding (iii) the report gives no clear indication of anywhere where development would not be possible.

## 3.FEATURE (i)

Figure 2.1 clearly illustrates that throughout Mid Devon different landscape types are tightly interwoven with the consequence that there is no sizeable area of any particular landscape type. The difficulty in trying to provide useful guidance for such a landscape is that comments on the effect on a given landscape type are of little value because they totally ignore the effect of the development on adjacent landscape types and those adjacent landscape types may be more sensitive to development than the type where the development is to be sited.

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3.1 This is particularly critical when considering wind turbines which, because of their height, will be seen a considerable distance away and almost certainly from different landscape types not far away.

3.2 As mentioned in Question 5 listed in Minute 118 of the Planning Committee of 6 November 2013, by comparing Figures 4.2 and 4.7 it can be seen that there are little real differences between the sensitivity assessment they have provided for a small solar development ( essentially at ground level) and for a 50 m high wind turbine. Clearly a 50 metre high turbine will have a very much greater impact on the surrounding countryside than a solar array at the same location. The fact that the Figures do not show this points to the serious defect in the assessment mentioned above.

3.3 The answer given by the authors to this criticism is:

" The aim of the maps is to show visually the results of the sensitivity assessment; it isn't to illustrate visual impact of individual developments on the surrounding landscape."

This raises the question as to what value the sensitivity assessments are. To say the least, the assessments are misleading for the effect of any given development on the surrounding landscape.

3.4 ( Even solar arrays are likely to be seen from adjacent different landscape types so that the same comments apply, although naturally to a much lesser extent .)

3.5 The consequences of such misleading assessments can be seen from the guidance given on page 113 of the September draft. This forms the subject of Question 1. The conclusion to place the turbine on a hill rather than in a valley follows perfectly logically from the conclusions that have been reached, namely that sensitivity will be higher in the valleys than on the hills. It completely fails to take into account the fact that a turbine on a hill is likely to dominate an adjacent valley.

As regards the response by the authors, the fact that the wording has been " turned around" does not negate the completely false assessment. No one is saying that the LSA should cover " specific visual amenity issues ( including residential visual amenity) or impact on heritage, tourism or recreation ( or other economic activities)" but it should be an attempt to give an accurate assessment which it does not.

3.6 The reply in the following paragraph concludes that the study will help the council " where proposed development is sited or sized inappropriately for that LCT" ( emphasis added). This highlights the severe limitations of the study which renders it completely inadequate and misleading in its current form.

3.7 An allied issue arises in relation to Question 6 concerning the effect of a development near Exmoor and Dartmoor National Parks. The report comments on the effect of areas which " abut", "adjacent areas" and areas " within close proximity". It is surely misleading to comment on only these areas in relation to the parks when there can well be areas further away from which a development would appear more prominent from the parks than from these areas which are very close to it. As mentioned in Question 6 , the inspector in refusing proposed turbines at Bickham Moor said that these would adversely affect the setting of Exmoor National Park even though they would be several kilometres away.

3.8 The fact that the assessment follows the same approach as previous assessments for other areas does not mean that it is correct.

#### 4. FEATURE (ii)

Practically nowhere is there any clear statement that development at any particular location should not be allowed. Take the revised passage they have quoted in reply to Question 1:

" This indicates that the landscape will be particularly sensitive to turbines higher than 75m and is unlikely to be able to accommodate turbines over 110m to tip or in groups of more than 5 turbines"

So landscape which is " particularly sensitive" to turbines higher than 75 m is " unlikely to be able to accommodate" turbines over 110 m . What sort of guidance is this? Surely landscape which is " particularly sensitive" to turbines over 75 m cannot accommodate such turbines rather than be " unlikely to be able to" accommodate much higher ones (110m or more). This type of imprecise language pervades the study. It gives hope to developers to apply for planning permission all over Mid Devon. Planning Officers will really have no clear guidance as to how such planning applications should be treated.

4.2 The fact that the report indicates, as pointed out in answer to Question 3, that Mid Devon cannot accommodate very high turbines is beside the point.

#### 5. FEATURE (iii)

As regards feature (ii), namely cumulative impact, in answer to Question 4 the authors have now simply referred in the report to the relevant government statement but have provided no guidance in relation to sequential cumulative effect at all and yet this is an issue which comes up in all planning applications whether they be for a single turbine or for a cluster of turbines.

#### 6. SUMMARY

For this report to be something which can be relied on by planning officers as giving them a realistic assessment very considerable revision of it is necessary.

