

## **Scoping Consultation: Landscape Sensitivity Assessment Supplementary Planning Document**

I wish to object to this document not simply in terms of its scope but in principle. I appreciate that the Council has presumably expended a significant sum in commissioning the report and therefore feels it should put it into use, but in my view it is not fit for purpose and it would be best to cut losses at this stage. It seems strange to me that it has taken since last November, when the committee considered this document, until now for it to be brought forward again for consultation. Surely this indicates that there is no urgent need for this guidance and that Mid Devon are coping adequately with the relatively few applications for turbines in its area, using their own excellent Landscape Character Assessment. Currently (see para 1.2) the Council commissions consultants on an case-by-case basis to advise on landscape sensitivity. This document could not possibly be a substitute for this process, as however much the landscape is categorised, each case will still be unique.

There is intense local objection to the majority of turbine and solar farm proposals, and Mid Devon members commonly support these objections by refusing the applications, sometimes against officer recommendation. Such refusals are now much more often supported on appeal by the Government which has become considerably more rigorous in its consideration of the proposals. In this context it seems perverse to promote a policy document which actually encourages the construction of turbines and solar farms by identifying the areas where these could be sited with (in the consultants' view) less damage to the landscape than might occur elsewhere. The inhabitants of these areas will of course find themselves in a location which is likely to be targeted by energy developers. Within these nominated areas, even wholly valid landscape objections will be likely to be undermined. Beyond this, the document ignores the fact that Mid Devon's countryside is made up of complex interwoven areas, impinging closely upon each other in such a way that large energy developments will impact not solely on the area in which they are proposed but equally on contiguous areas of higher sensitivity.

'Zoning' the countryside in the way that this report does is therefore a fundamentally flawed policy. I strongly recommend that the Council does not proceed further with this document in this form.

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