

Mid Devon CPRE Group

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MDDC Forward Planning
Phoenix House
Tiverton
EX16 6PP

Re : Landscape Sensitivity Assessment Supplementary Planning Document

Dear Mr Chardnell

Thank you for meeting with me and my colleague yesterday, it was helpful to ensure we had all the correct information for us to be able to comment on this document.

The principal of having a document of this nature is helpful, and in fact when I attended the launch of the Devon LUC assessment I had great hopes that it would enable planning officers to make a sound judgment on what type and where renewable energy developments should be sited. However the LUC Mid Devon report appears to be a desk top study that is incapable of assessing the intricate pattern of our Mid Devon landscape. The study demonstrates its limitation in many areas. The wording throughout the study appears ambiguous, thus leaving it open to interpretation by developers to challenge local opinion and that of your planning officers.

The sensitivity of the impact of a solar development and a wind turbine is greatly different, unlike as suggested in the study. Whilst a solar farm can be of considerable acreage, the impact of a 50 m turbine has far reaching impact due to its vertical construction. A turbine sited in an area that has been designated as medium sensitivity impact is likely to be close to a valley, an area of high sensitivity impact, over which it would completely dominate. Again this highlights the fragmented nature of our landscape.

The categories used for sizes and scale of both wind and solar are banded for the purpose of the study, however the wording used is misleading as in "landscape will be particularly sensitive to turbines higher than 75m is unlikely to accommodate turbines over 110m". This leaves the whole subject open to interpretation, failing to give clear guidance to a planning officer.

The cumulative effect mentioned in the document only covers clusters of turbines; it fails to give guidance on the sequential effect, a situation that is fast arising in the Mid Devon area where many turbines have already been constructed. We must also not be thinking only of our own boundaries. Due to the height of turbines, both the cumulative and sequential effect cross boundaries, this can be especially seen on the North Devon boundary.

Exmoor National Park is the smallest in the country, it has been acknowledged by Government Inspectors, as in the Bickham Moor inquiry, that the setting of the park is important and we need to preserve the tranquillity of the landscape. Due to the high elevation of the park this can cover areas some distance away. This document appears to dismiss this point, covering only the adjacent landscape, thus failing to recognise the importance of the far reaching views from the park.

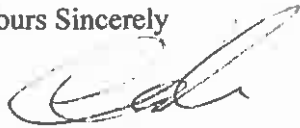
The importance of the fragmented nature of the landscape has not been given due weight in this report. It fails to determine where industrial renewable energy installations should not be permitted.

The most useful statement from the presentation in November 2013 was “The overall aim should be to make sure that solar and wind developments do not become a key characteristic of the landscape” A statement that we are in danger of failing on.

The Landscape Character Assessment carried out by MDDC was created by being on the ground and understanding our landscape, a sound practice. The LUC report fails to understand our area, interpreting desk top study is not a quality method of assessing this unique, sensitive and valuable landscape.

We would hope that before this document is adopted as policy, revisions are made taking the above comments into consideration.

Yours Sincerely



Catherine Lamb
Spokes person CPRE Mid Devon

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