

The Representations of the Northumberland & Newcastle Society ('the Society') on certain Policies of the Draft Northumberland Local Plan ('the NLP')

9th August 2018

Introduction

1. The Society is well known to Northumberland County Council's Local Plan policy team having fully partaken in earlier local plan consultations. The extent of these representations and the Society's principal concerns are summarized in the executive summary, below (paragraphs 4 – 6), and are thereafter more fully explained and evidenced.
2. In these representations, our focus on certain landscapes within the county are by way of example – this is not the place to cover every area – so that while references to those areas should be taken as direct representations concerning them, the application of the wider lessons to be drawn should also be applied by NCC in revising the draft policies concerned.
3. Following the executive summary, these representations:
 - a. Set out central government's relevant directions and guidance (paragraphs 7– 12);
 - b. Consider and make modest recommendations for amendment of the ENV policies (paragraphs 13 – 17) and the REN policies (paragraph 18) while raising serious concerns about the supporting text to policy REN 2;
 - c. Review and analyse the manner in which NCC has approached and implemented the 'identification of suitable areas' (paragraphs 19 – 23);
 - d. Consider some specific landscapes by reference to photographs produced as exhibit 2 to these representations (paragraphs 24 – 25); and
 - e. Conclude in accordance with the executive summary and the advice of the Society's retained landscape consultants (paragraphs 26 – 27) .

Executive Summary (N.B. These are substantial representations and we strongly they be read in toto – an executive summary cannot encapsulate all the requisite detail or the nuances of our concerns)

4. Subject to some modest, suggested amendments (see paragraphs 13 – 17, below), the Society supports the draft environmental protection ('ENV') policies of the NLP but believes that their thrust is at risk of being seriously undermined by NCC's apparent intention to 'identify suitable areas for wind turbine development'. The extent of these areas (and the varying height of turbines regarded by NCC as appropriate in them) is shown on the extract from the NLP's draft policies map attached to these

representations as Exhibit 1. According to NCC figures, this shows 66% of the entire area of Northumberland (excluding the National Park and the AONB's where no wind turbines are to be permitted) as 'suitable for wind-turbine development'!

5. Again, the Society similarly supports the criteria-based approach of policies REN 1 and REN 2 and, subject to some modest suggested amendments (see paragraph 18, below), the criteria themselves. That is because, as NCC has accepted, the old 'Areas of Least Constraint' promoted by earlier planning documents proved disastrous in making Northumberland a 'soft touch' for wind turbine developers, encouraging and, in some cases, leading to inappropriate wind turbine development.
6. However, and for the following reasons, the Society strongly opposes NCC's apparent intention to 'identify suitable areas for wind turbine development':
 - a. If the local plan 'identifies' the areas proposed for wind turbines (see exhibit 1), the criteria contained in policies REN 1 and REN 2 will be seriously undermined because developers will be able to argue that, at least in principal, most if not all have been addressed and found to have been met in the 'identification' process. There will be a reversion to the problems that arose from 'Areas of Least Constraint'. In the supporting text to policy REN 1, NCC acknowledges the conflict between a criteria-based approach and the 'identification of suitable areas', yet sets that conflict aside in the context of wind turbines for the purposes of policy REN 2 - in doing so, it actually lowers rather than heightens the threshold for wind turbines, as opposed to other renewable energy development. That approach is entirely contrary to the direction and guidance of the NPPF and PPG and, indeed, the apparent objectives of the local plan, as expressed elsewhere in its text.
 - b. The Society's retained landscape consultants, Alison Farmer Associates, have advised that the 'identification' process as conceived and applied by NCC is flawed (see paragraphs 19 - 23, below).
 - c. On rational planning grounds substantially to do with 'landscape protection', the Society believes that 'local communities' likely to be affected by the 'identification of suitable areas' strongly oppose their valued local landscapes being 'identified as suitable for wind turbines', regardless of height. NCC's reference to turbines up to 25 m in height as 'small' is misleading bearing in mind that, say, the Angel of the North has a height of 20 m. The Society posits this question: how suitable or appropriate would one or more structures as or taller than the Angel of the North be in any of the landscapes pictured in exhibit 2 to these representations?

- d. Where the ‘identification’ process is flawed and, in any event, where local communities oppose their areas being ‘identified’, it would be contrary to Government direction and guidance (see paragraphs 7 -12 below), indeed, perverse, for NCC to thrust ‘identification’ on the local communities concerned.
- e. In any event, the Landscape Character Areas (‘LCA’s’) specifically considered in these representations by way only of example (the Society does not have the resources to study every LCA in Northumberland) should not be ‘identified’.
- f. NCC is under no obligation, legal or moral, to ‘identify suitable areas’. Government’s direction that local plans be ‘proactive’ in the mitigation of the effects of climate change gives no special focus to ‘on-shore wind’ and other draft local plan policies (E.g. by encouraging other forms of renewable energy and by advocating best practice is building design etc.) clearly discharge that responsibility. In any event, government direction and guidance treat ‘on-shore wind’ more restrictively than other forms of renewable energy development and, in any event, emphasise that renewable energy objectives do not trump landscape protections. In contrast, by diluting the criteria-based approach in the case of wind turbines through the ‘identification’ process, the draft local plans stands that direction and guidance on its head.
- g. Given that renewable energy objectives do not trump landscape protection, it would make no sense for the local plan to contain strongly worded landscape protection (ENV) policies while allowing wind turbines a lacuna. The (flawed) ‘identification’ process offers exactly that lacuna.
- h. If the fact that the ‘identification’ process is flawed (or opposed by local communities in any event) means a temporary moratorium on wind turbines in Northumberland’s ‘jewel in the crown’¹ landscapes, so be it. In any event, general permitted development rights will, in many circumstances, continue to facilitate wind turbines of up to 15m in height and, without development of further wind turbines above that height, the local plan will remain strongly ‘proactive’ in terms of encouraging other forms of renewable energy and carbon-reduction measures.
- i. If and when government guidance removes the protections provided to local communities by the Written Ministerial Statement of 18th June 2015 and now encapsulated in the revised National Planning Policy Framework (‘NPPF’), Northumberland’s landscapes will continue to enjoy the undiluted protection of the criteria set out in draft policies REN 1 and REN 2.

¹ So, described by the draft local plan.

- j. Having evidently ‘considered’ the ‘identification of suitable areas for wind turbine development’, NCC should, for the reasons explained, abort the process.

Central Government Direction and Guidance - The NPPF and the PPG and the GPDO

7. The NPPF, supported by the Planning Practice Guidance (‘PPG’), ‘sets out the government’s planning policies for England and how these are expected to be applied.’
8. National Planning Policy specifically relating to renewable and low carbon energy is set out in section 14 of the recently published revision of the NPPF². The NPPF is a ‘high level’ document and covers the challenge of climate change and related issues briefly. The PPG reflects and expands on its provisions.
9. Importantly the revised NPPF, together with the PPG: ‘
 - a. Expressly applies the Written Ministerial Statement of 18th June 2015 (‘the WMS’) stating that *‘development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing’* (footnote 49 to paragraph 154); and
 - b. Specifically requires ‘landscapes’ to be taken-into-account in local plans despite the need for their policies to be proactive in mitigating and adapting to climate change (paragraph 149).
 - c. Confirms: *‘Planning policies and decisions should contribute to and enhance the natural and local environmental by: a) protecting and enhancing valued landscapes....’* (paragraph 170). **Valued landscapes are known to include nationally designated landscape but also other landscape which may be valued by local communities for a range of different reasons.**
10. This is consistent with the PPG’s following guidance (in this paragraph 10, our comments regarding particular guidance, in each case, appear in square-bracketed plain text):
 - a. *‘The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy.....’* [In fact, the revised NPPF no longer sets

² 24th July 2018.

out this ‘responsibility’ but that is not to say it no longer applies. However, the stated responsibility does not focus on or elevate the importance of wind turbines. Rather, it extends to all aspects of ‘green energy’. Neither does it conflict, for instance, with the entitlement of a local community to conclude that its landscapes are unsuitable for wind-turbines or that a specific proposal for on-shore wind would be inappropriate. Further, the corollary to any such ‘responsibility’ is that where, for instance, a community has had wind turbines forced upon it, it may legitimately say ‘enough is enough’. Meeting a responsibility negates it];

- b. *‘the need for renewable or low carbon energy does not automatically override environmental protections’³* [This clarification was expressly to address the concern that, per the June 2013 WMS, *‘some local communities have genuine concerns that when it comes to wind farms insufficient weight is being given to environmental considerations like landscape, heritage and local amenity’*. What it means is that landscape, heritage and local amenity are not to be trumped by renewable energy objectives. Put another way, a local plan’s environmental protection policies should not be jeopardised or overridden by its renewable energy policies – the two areas of policy should be consistent. It follows that where environmental protection policies restrict development in the open countryside, a different approach to wind turbines is neither necessary nor appropriate];
- c. *‘cumulative impacts require particular attention, especially the increasing impact that wind turbines [N.B. this comment is not restricted to ‘large turbines’] and large-scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases’*. Later, the PPG advises: *‘...it should not be assumed that, just because no other sites will be visible from the proposed development site, the proposal will not create any cumulative impacts.’* (paragraph 022);
- d. *‘local topography is an important factor in assessing whether wind turbines and large-scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas’* [Northumberland’s ‘flat-topped hills’ and ‘far horizons’ make wind turbines potentially and especially damaging];
- e. *‘great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting’;*

³ The origin of this particular guidance was the Written Ministerial Statement by Eric Pickles on local planning and onshore wind - 6th June 2013.

- f. *'proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration'* [a point highly relevant when considering, for instance, the Glendale Valley; Whittingham Vale; the Upper Coquet; the Upper Aln; or Simonside];
- g. *'protecting local amenity is an important consideration which should be given proper weight in planning decisions.'* [N.B. 'local communities clearly have a much better grasp of 'local amenity' than planners and 'experts' who do not access it.]

11. While the above Guidance is expressed in terms of individual planning applications, the issues are also relevant to the 'identification of suitable areas for wind turbine development'. Specifically, in terms of that possible 'identification':

- a. There is no definition of what the term 'suitable' means. The NPPF and PPG do not define the term, though the PPG, under the heading, *'How are 'suitable areas' defined in relation to wind energy development?'* states: *'Suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.'* We are none the wiser! 'Suitability' is therefore subjective.
- b. The PPG makes it clear that *'There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.'* [emphasis added]. Those within 'local communities' inevitably know their landscapes well and their views are not to be subordinated to 'experts'. N.B. in the PPG's advice, *'Whether the proposal has the backing of the affected local community is a matter of planning judgment'*, that 'judgment' concerns the question of whether a local community 'backs' a proposal. It does not mean that planning officers have latitude to substitute their views (or those of 'experts'), on landscape or heritage issues, for those of 'local communities'.

12. In considering both the above National direction and guidance in relation to 'on-shore wind', it must be not be forgotten that the GPDO⁴, in most situations, provides deemed planning permission for free-standing wind

⁴ The Town & Country Planning (General Permitted Development) Order 2015.

turbines up to 11.1m in height and for those attached to buildings up to 15m.

The Draft ENV Policies – a useful starting point

13. In addition to the above National direction and guidance, the starting point, for current purposes, may appropriately comprise an examination of the draft local plan's 'environmental protection policies' which appear under the heading: **Northumberland's 'Natural, historic and built environment'**. These (ENV) policies are, after all, not to be overridden by 'renewable or low carbon energy'.
14. The policies continue the broad themes and protections of earlier iterations and we broadly support them (and their supporting text). In particular:
 - a. Per paragraph 2.6, *'Northumberland's environment is distinctive in terms of its natural beauty and historic significance. The sweeping landscapes and seascapes, important wildlife habitats, iconic landmarks and characteristic towns and villages are hugely valued, not just by local inhabitants, but also by the many visitors from across the region and beyond.'*
 - b. Per paragraph 2.7: *'Superimposed on Northumberland's internationally recognised natural assets is a rich cultural heritage - a legacy of archaeological sites and structures and historic buildings, settlements and landscapes. The relatively undeveloped nature of the County has allowed often exceptional levels of preservation for some parts of the historic environment.'*
 - c. Per paragraph 2.9: *'Many natural and built assets are vulnerable to development and human activity and some heritage assets remain 'at risk'; all of these need careful protection, enhancement and/or management, including through planning decisions.'*
 - d. These introductory comments lead on to strategic objectives. Per paragraph 3.8: *'Northumberland's natural, water and historic environment is distinctive and valued. It is a significant asset to both people that live in the County and beyond. It makes an important contribution to the character, quality of life, and sense of place and the economy of Northumberland. It is a valuable resource for communities, businesses and visitors.'*
 - e. Then, desired 'outcomes' include the following: *'The supply of energy and heat from renewable and low carbon sources will have contributed towards meeting national targets and helped to address fuel poverty.'* The desirability of that outcome must of course acknowledge the County's existing contribution, specifically from 'on-shore wind', as well as its substantial and recognized scope for

contribution through other mediums – in meetings with NCC’s officers over recent years, there appears to have been a reluctance to acknowledge that contribution, further illustrating NCC’s failure to properly distinguish between ‘on-shore wind’, on the one hand, and all other forms of renewable energy (and other ways of reducing the carbon footprint), on the other⁵.

- f. In terms of ‘Resources’ – per paragraph 3.15: *‘Northumberland is rich in energy resources. Its minerals provide the raw materials that are necessary to deliver the infrastructure, buildings, goods and energy that both society and the economy needs. There is also potential for further renewable energy development, however it is recognised that there is a limit to the scale of wind energy development that can be accommodated in Northumberland without significantly adversely affecting the special landscapes and cultural heritage of the County, or impacting on residential amenity. Alternatives to wind energy are increasing in prominence as technology advances.’* Subject to qualification, that statement is substantially consistent with our stance. The qualification is that many areas ‘identified’ as ‘suitable’ on the draft Policies Map are far from suitable and some aspects of the selection of the areas in question are, we are advised, flawed⁶. Certainly, the ‘limit’ has been reached in areas already containing ‘on-shore wind’ development.
- g. Thus, policy STP1 concludes that sustainable development must (inter alia) *‘respect the County’s unique environmental assets’* amongst which, as the Plan accepts, the County’s landscapes are vitally important. As an aside, paragraph 4.43’s qualification to the presumption in favour of grant where national designations apply, notably the National Park and the coastal AONB, throws up another aspect peculiar to Northumberland – many landscapes outside those designations are, in fact, significantly more beautiful and, accordingly, sensitive than many areas within them, a factor disregarded by the study of ‘Landscape Sensitivity’ prepared for NCC by, inter alia, the Planning Environment Studio (‘the PES study’), relying as it does on finite boundaries between landscape types and areas: on either side of such boundaries the PES study reaches quite different and therefore irrational ‘sensitivity’ conclusions. We return, later, to this issue.
- h. Paragraph 4.45 similarly recognizes the Society’s position – that the legal obligations on both the government and NCC in terms of greenhouse gas emissions and planning policies give ‘on-shore wind’ no special primacy, a position in effect enforced and

⁵ Our recent experience is that NCC’s officers now acknowledge this distinction.

⁶ The Society has retained Alison Farmer Associates to advise on landscape issues and has agreed with NCC that it may adduce her final report after the 15th August deadline. The consultation period was too short to enable completion of the full report before that date. Meantime, these representations reflect her preliminary findings. The final report will be shared with NCC as soon as it is available.

advanced by the WMS and the updated NPPF – encouragement of ‘on-shore wind’ is to be more restrictive and subject to the backing of local communities.

- i. In turn, policy STP 4, as only one of nine ways of supporting ‘*climate change mitigation*’, refers to ‘*the development of decentralized, renewable and low carbon energy*’. Other than domestic and single farm turbines, all other ‘on-shore wind’ is wholly centralised – all power feeds into the National Grid (which, for capacity reasons, often cannot take it!). In any event as paragraph 4.45 makes clear, the requirement of Section 9 of the 2004 Planning Act applies only to a plan’s policies ‘*taken as a whole*’. The amendments we suggest to the plan’s draft renewable energy policies and their approach (specifically regarding the ‘*identification of suitable areas*’) would in no way undermine the required approach given the plan’s other policies. Indeed, by mitigating the focus on ‘on-shore wind’, the effect of the remaining policies might well assist other technologies: as the plan acknowledges, they are ‘*increasing in prominence*’.
- j. Accordingly, the Society supports the broad thrust of draft policy ENV 1 but believes it should be clearer in its protection of ‘non-designated’ areas. Our suggested amendments are shown, below, in red:

Policy ENV 1 - Approaches to assessing the impact of development on the natural, historic and built environment:

1. *The character and significance of Northumberland’s distinctive and valued natural, historic and built environments, will be conserved, protected and enhanced by:*
 - a. *Giving appropriate weight to the statutory purposes and special qualities of the hierarchy of international, national and local designated and non-designated nature and historic conservation sites and their settings, as follows:*
 - i. *Greatest weight will be given to international and national designations, in accordance with the obligations set out in relevant legislation and advice;*
 - ii. *Following this, sites of regional and local importance;*
 - b. *Recognising that many of the County’s landscapes, though not designated, comprise or contain areas of high landscape value, in turn highly valued by local communities.*
2. *In applying part (a) and (b) above, recognising that:*

- a. *Assets with a lower designation or non-designated, can still be irreplaceable, may be nationally important and/or have qualitative attributes that warrant giving these the appropriate protection in-situ;*
 - b. *Development and associated activity outwith designated sites can have indirect impacts on these assets; and*
 - c. *Landscapes of whatever quality must be viewed in their broadest settings.*
3. *Applying an ecosystem approach that demonstrates an understanding of the significance and sensitivity of the natural resource. Such an approach should result in a neutral impact on, or net benefit for those ecosystems.'*

15. Likewise, we support Policy ENV 3 and its supporting text (paragraphs 8.18 - 8.23):

- k. We note with approval paragraph 8.18's confirmation that *'Northumberland's landscape is rightly considered a jewel in its crown.'* Likewise, we endorse the *'holistic approach to the landscape'* approved at paragraph 8.20 with paragraph 8.21 endorsing that approach specifically for local plan purposes when *'considering what is important about the landscape....rather than confining the consideration of landscape to defined areas.'*
- l. However, as we explain later in these representations, while the approach taken by the Northumberland Landscape Assessment 2010 is noted and may be valuable for certain purposes, the extension of that approach to 'the identification of suitable areas' in the Northumberland Local Plan Technical Document – March 2018 (which, in turn, relied on the PES study) is the exact opposite of holistic: it proscribes 'defined areas' as (at least) 'in-principle' 'suitable' for wind turbines and wholly fails to consider the holistic landscape within which those areas sit. Again, we return to that issue. later.

16. We confirm similar support for policies ENV 4-11.

17. However, the way in which the principles of these policies are turned on their head in the interests of 'on-shore wind' conflicts with the ENV policies.

Policies REN 1 and REN 2 – the Identification of Suitable Areas for Wind Turbine Development

18. The policies themselves – disregarding the 'identification of suitable areas':

- a. The introductory text to policies REN 1 and REN 2 comprises

paragraphs 11.69 – 11.71. In fact, the reference in paragraph 11.71 and in paragraph 003 of the PPG to the NPPF is incorrect. The relevant guidance now appears only in the PPG, by reference to the previous version of the NPPF. To ‘square the circle’, the Society recommends the following substitutionary wording for paragraph 11.71 so as to exactly reflect and explain paragraph: 003 of the PPG – it is important not to omit the ‘*importance of the planning concerns of local communities*’:

The PPG advises that: ‘The National Planning Policy Framework [add a footnote to explain that the revised NPPF omits that ‘explanation’] explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities. As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them.’

- b. The Society particularly draws attention to and agrees with paragraph 11.74 (emphasis added):

*‘The NPPF advises Local Planning Authorities to consider identifying areas for renewable and low carbon energy development where this would help secure development of such resources. **However, a criteria-based policy has been developed and is considered to be the most appropriate approach to help guide and assess proposals for renewable energy developments other than wind turbines that may come forward over the plan period.**’*

This is an illuminating paragraph because: (1) it shows NCC’s understanding of the conflict between criteria-based policies and the ‘identification of suitable areas’; (2) It sees the choice being between the two – the justification for excluding wind turbines is not explained; (3) it accepts that the obligation is only to ‘consider’ ‘identification’ – there is no obligation to actually ‘identify’; and (4) effectively acknowledges the way in which ‘identification of suitable areas for wind turbine development’ would undermine the criteria in both policies REN 1 and REN 2 as they apply to wind turbines.

- c. Turning to policy REN 1, itself, the Society invites three additional criteria:

- i. *‘The value attributed by local communities to particular undesignated landscapes.’* [This to reflect the importance of such landscapes as acknowledged by the PPG and especially in the context of Northumberland where so many undesignated landscapes are of a quality that would

warrant 'designation', elsewhere.]

- ii. *'The extent to which the affected landscapes are to be viewed holistically.'* [This in recognition of the wide vistas and inter-visibility characteristic of Northumberland's landscapes.]
- iii. *'The planning concerns of potentially affected local communities.'* [This to reflect the PPG: *'As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them.'* (paragraph 003)]

d. In turn, the Society invites:

- i. The amendment of criterion l., substituting *'efficiency'* for *'output'*. The latter is a highly misleading concept (E.g. because it ignores or distorts the issues of intermittence and grid capacity), the real test of worth being *'efficiency'*;
 - ii. The amendment of criterion a., adding before *'Landscape'* the words: *'The need to protect'* and splitting-off the references to *'[landscape] ..sensitivity and the sensitivity of visual receptors'* into a separate criteria. The amendment is necessary to make the policy consistent with the draft ENV policies and to reflect the fact that renewable energy objectives are not to trump landscape protection (or *'the planning concerns of local communities'*).
 - iii. The deletion from policy REN 1 of criterion m. The concept of *'economic benefits'* is potentially confusing. While energy developers may derive substantial *'economic benefit'*, allowing them to *'stuff local communities' mouths with gold'*, neither aspect can be regarded as materially relevant in planning terms when the real issue is likely to be harm to landscape and heritage assets.
- e. Turning to REN 2, the Society is pleased to note the recognition of the *'considerable development pressure for onshore wind turbine [sic] in the County in recent years'*, caused, in substantial part, by the *'identification'* of *'Areas of Least Constraint'*, a term with very similar connotations to *'suitable areas for wind turbine development'* although their extent was much smaller than that of the proposed *'suitable areas'*.
- f. However, the Society suggests a clarification in paragraph 11.78 to make clear that the planning authority will not substitute its own subjective opinion on landscape (amenity or heritage) issues for those of the *'local communities'*. The reference in the NPPF, the PPG and, indeed, the draft local plan to *'planning judgment'* applies not to the subjective merits or demerits of a particular scheme, for

instance in landscape terms, but to *'whether the proposal has...' the local community's backing.'*

- g. The Society also suggests the removal of the last sentence of paragraph 11.78: *'It is considered that the criteria in the policy will enable this judgement to be made.'* That sentence misapplies the NPPF and PPG guidance which, as noted, requires 'planning judgment' to be applied to the extent or fact of local community planning concerns, not (in such a subjective area) to the scheme's subjective merits or demerits. Rather, the policy criteria exist to assist both planning officers and the local community to formulate, in so far as they may exist, 'planning concerns'.
- h. Paragraph 11.80 must go. As explained, the 'identification' process is seriously flawed; the areas 'identified' are quite extraordinarily over-extensive while the text makes abundantly clear why, as NCC accepts in the context of REN 1, 'identification of suitable areas' conflicts with and materially undermines a criteria-based approach. As paragraph 11.80 makes worryingly clear, it would be almost impossible to turn down a wind-turbine development in a so-called 'suitable area' making the criteria in both policies REN 1 and REN 2 almost worthless. It is worth setting-out the text to illustrate the problem (with emphasis added and the Society's further comments in red):

*'Policy REN2 refers to the requirement for the development site being located within an area identified as being suitable for wind energy development [unnecessary if areas are not identified, e.g. for the reasons identifies in REN 1's supporting text]. The areas that are considered to be suitable for wind turbine development in Northumberland are shown on the Policies Map [See the Society's criticism, above and below – the map is misleading and confusing while the choice and extent of 'identified areas' is flawed]. Where a proposal is sited within a suitable area **it would establish that development would be supported in principle** but the proposal would still need to satisfy a number of policy criteria with a view to ensuring that the effects on local communities and the environment are acceptable and the planning impacts identified by affected communities have been **fully** addressed [If such impacts have been fully addressed, one would expect local communities to withdraw their objections – whether they were to do so or not would be the acid test]. It is also important to note that there are a number of factors that have not been considered in identifying these suitable areas as they are matters for a more detailed assessment at the planning application stage [This demonstrates the dangerous overlap between matters ostensibly addressed at the 'identification' stage and the criteria – a problem recognised by NCC in connection with policy REN 1 but overlooked, here].*

- i. Paragraph 11.81 again illustrates the flawed approach adopted by NCC to the 'identification' issue. First, it fails to take account of the deemed consent for certain turbines provided by the GPDO. Second, against the backdrop of both Northumberland's 'flat-topped' hills and 'far horizons', it is absurd to call a 25 m high steel structure with spinning blades 'small' – all turbines requiring express planning consent are inherently obtrusive and unnatural in a rural setting. Third, as the Society's consultant has advised, a plethora of even 'small' turbines can easily harm a landscape almost or as much as would the larger variety. Likewise, a single incongruous structure of any size would be easily visible in many landscapes (see, for instance, the photographs of the Glendale Valley referred to at paragraphs 24 - 25, below). Fourth, turbines of different sizes can exacerbate 'clutter'. Fifth, the reference to the potential 're-powering' of, say, Middlemoor/Wandylaw is naïve when the (undisclosed) adverse effects of that scheme, as identified by NCC's 2015 study (see footnote 10, post) of that area, are taken into account. It would be perverse to allow the perpetuation of a scheme that, had a proper assessments been made at the outset, would have been turned away.
- j. In relation to paragraph 11.82, sadly '*effects on long and medium range views from and to iconic landscapes and heritage assets and the outlooks for heritage assets*' were not adequately evaluated in either the PES study and less still in the technical document – desk based as it was, no-one even 'had a look'! The super-charged 'presumption in favour of grant' represented by the 'identification of suitable areas', unwarranted as it is given that renewable energy objectives do not override landscape interests, means that 'inter-visibility' is far than adequately '*recognised in the policy*'.
- k. Likewise, paragraph 11.83 refers to '*cumulative impact*' yet 'identification' opens the door to it at and adjacent to, for instance, Wandylaw/Middlemoor.
- l. Turning to the policy REN 2 criteria, please refer-back to our comments in relation to REN 1. Provided those suggestions in relation to the criteria are accepted, we have nothing to add to those in REN 2. However, the Society reserves the right to vary this stance as its discussions with NCC continue.

19. The Identification of Suitable Areas for wind turbine development:

The Society was aware of NCC's prospective commissioning of a study intended as a prelude to the 'identification of suitable areas' and asked to be consulted in relation to its terms of reference; its extent; and the manner in which it was to be prepared (e.g. the view-points that might be used). NCC's officers then in control of the process rejected that invitation and, contrary to their assurances, failed to share a draft of the study with the Society, for comment. Had the Society's input been accepted, at least

some of the deficiencies of the PES study might have been avoided.

20. The following paragraphs set-out the advice received by the Society in relation to that study.

21. **'Assessment of the Sensitivity of the Landscapes of Northumberland to Wind Energy Development' - the Planning Environment Studio and BayouBlue Environment ('the PES study')**. The Society is advised that the following issues arise:

- a. **The Study Brief:** The brief for the PES study imposed two important limitations on the work:
 - i. Firstly, that the study area was to cover only land within the Northumberland County and to exclude the Northumberland National Park which is a separate planning authority.
 - ii. Secondly, it requested that consideration be given only to turbine height and not to the number of turbines within a renewable energy scheme.
- b. Whilst these two parameters are understandable in terms of creating a manageable assessment they potentially distort the findings of the study. The first runs the risk of the importance and effects on protected landscapes adjacent to the study area being underplayed. This is particularly important where a protected landscape has a sinuous boundary and may include relatively narrow areas of land which extend out and are therefore surrounded by undesignated land or where the character of the landscape extends into the protected landscape such that there is no abrupt change in character between that in the protected landscape and that outside.
- c. The second limitation on the study may have an effect on the assessment of cumulative effects. This requires consideration of the increasing turbine numbers and the impact of different size turbines seen in juxtaposition to one another, which may cause visual 'clutter'. This is considered in the PES study under capacity considerations and is noted as informing the overall judgements on sensitivity. Importantly landscapes which contain existing wind farm development may not necessarily have capacity to accommodate any further turbines either of the same or different size.
- d. **Methodology and Criteria:** Overall the methodology set out in the PES study follows best practice and demonstrates a sound understanding of the criteria to be taken into account when assessing sensitivity of landscapes to wind farm development.

However, a number of broad points are important to make:

- i. Sensitivity takes account of nationally important landscapes but there are many landscapes which can be regarded as having high scenic quality that are not designated or have no formal recognition in planning policy. These are referred to as valued landscapes⁷. The PES study considered qualitative aspects of landscape in relation to scenic quality, distinctiveness and rarity but this does not constitute a detailed understanding of what a local community might regard as a valued landscape.
- ii. Landscape character areas and types are used as a framework for assessment purposes but it is recognised that character does not change abruptly between areas or types and that, in a similar vein, differences in sensitivity classification will not abruptly change between one area or another, either. The sensitivity mapping does not therefore directly define 'suitable' areas for wind turbine development.
- iii. Adjoining character areas may have different sensitivity ratings, but, in reality, the sensitivity of the landscape is a gradual transition from one to the other.
- iv. The definition of 'suitable' areas cannot be based on an understanding of sensitivity only to different heights of turbine: consideration must also be given to cumulative effects (i.e. the number of turbines), amongst other things.
- e. These points are important to bear in mind when a sensitivity assessment is being used to inform the identification of 'suitable' areas for wind turbine development. Work is ongoing to further test this issue in relation to specific character types, especially in relation to so-called small and medium size turbines.
- f. **Cumulative Effects:** Paragraph 2.4 of the PES study distinguishes between sensitivity and capacity highlighting issues with capacity and implied thresholds. Importantly, it highlights that the sensitivity assessment does not identify thresholds but these should be considered in terms of policy and need for renewable energy (certain findings of the PES study nevertheless seem to ignore the requirement that renewable energy is not to trump landscape interests). The dangerous implication is that

⁷ The NPPF (July 2018) highlights that 'Planning policies and decisions should contribute to and enhance the natural and local environmental by: a) protecting and enhancing valued landscapes....' (para 170). Valued landscapes are known to include nationally designated landscape but also other landscape which may be valued by local communities for a range of different reasons.

determining thresholds for development is beyond the scope of the sensitivity assessment but should be determined by the local planning authority when also taking account other environmental factors (refer to paragraphs 1.29 and 2.4 of the PES study). In fact, thresholds are a critical adjunct of landscape sensitivity.

- g. Nevertheless, the PES study includes some consideration of cumulative effects and purports to take account of this in reaching an overall judgement on the sensitivity of each landscape character area. Using the sensitivity classification alone to define suitable areas for wind farm development without reference to the detailed text description which accompanies it may lead to the identification of suitable areas for wind farm development which in reality are unable to accommodate further development due to cumulative effects.
- h. A preliminary review of the capacity of landscapes which contain existing large-scale wind farm development has been undertaken to determine which are considered to have capacity for further development and this is set out in the table below. What it demonstrates is that not all areas which contain wind farm development have the capacity to accommodate more without adverse cumulative effects. Only two LCTs are considered to have some capacity namely LCTs 36 and 37.

LCT	Wind Farm	No of Turbines	Turbine Height (m)	Capacity commentary from PES study	Sensitivity Rating to medium-large or larger turbines
8	Green Rigg	18	100	Visibility with Ray from NP. Also, inter-visibility with Bavington Mount and Kirkheaton	All areas are regarded as high sensitivity except 8c and 8g = medium to high. 8g described as a 'wind farm landscape'. Additional larger scale wind turbines have potential for significant cumulative impacts even in 8c and 8g. Limited capacity in terms of 'suitable' area
	Ray	16	125	Visibility with Green Rig from NP	
	Middlemoor	18	125	Closely located to Wandylaw (adjoining LCT) and read as one including from AONB	
10	Wandylaw	10	125	Closely located to Middlemoor and perceived as one windfarm including from AONB. Further large-scale turbines in 10b would potentially	10a – medium to high sensitivity – in general not suitable for medium-large or larger turbines 10b – high sensitivity – not suitable for large or larger scale turbines due to inter-visibility.

				narrow the strategic gap between larger installations.	Limited capacity in terms of 'suitable' area
16	Barmoor	6	110	Highly visible. Further development likely to be visible from NP. Potential for significant inter-visibility with new wind farm development in the Borders.	All character areas are regarded as high sensitivity to medium-large and larger turbine sizes. Limited capacity in terms of 'suitable' area
36	Bavington Mount	1	61	Inter-visibility with Green Rigg and Ray windfarms.	Medium sensitivity. Possibility of locating wind energy development here rather than more sensitive landscapes. May be suitable 'strategic' area for wind farm development in order to protect more sensitive landscapes
	Kirkheaton	3	66	Further wind energy development could create a wind farm landscape.	
37	Wingates	6	110	Potential cumulative effects on NP	Medium – high sensitivity A large-scale wind farm may be suitable in LCA 37b maintaining distance with other wind farms – Wingates, Ray and Green Rigg, Bavington Mount and Kirkheaton. May be suitable 'strategic' area for wind farm development in order to protect more sensitive landscapes
39	Sisters	4	125	Significantly impacted by wind farm development and inter-visibility with off shore development. LCA 39a characterized by wind farm development.	39a and 39c = Medium sensitivity. 39b medium to high sensitivity. May be suitable but cumulative effects with existing installations will be significant. Development in 36b may trigger unacceptable landscape effects. Limited capacity in terms of 'suitable' area
	North Steads	9	125		
	Lynemoth	13	121.5		
41	Blyth	1	130	Due to inter-visibility with wind turbines in	Medium sensitivity. Further wind energy development unlikely to

				adjacent landscape and off shore this landscape is often perceived as a 'wind farm landscape'.	present negative landscape change. May be suitable 'strategic' area for wind farm development
42	Cramington	2	125	Inter-visibility with Lynemouth, Sisters and North Steads and others. Predominance of visually prominent turbines = wind turbine landscape.	Medium-high sensitivity. Larger scale turbines would have harmful landscape effects. Limited capacity in terms of 'suitable' area
43	Boundary Lane	3	100	Notable tracts of 'wind farm landscape'.	Medium-high sensitivity. Medium to large and larger scale turbines would be unsuitable in principle. Limited capacity in terms of 'suitable' area
	Kit Pit Hill	6	100		

- i. By way of specific example, the PES study's assessment of LCA's 3b and 3c is quite different to that for LCA 10a and 8c from which they are divided by only the A1. Immediately on each side of the trunk road, many parts of the landscape are substantially the same. This criticism can be made in terms of many if not all the imposed designated boundaries between LCA's and, indeed, LCT's. The resultant problems with the consultants' 'judgment' are magnified when considering the potential impact of tall vertical structures.
- j. The iniquitous effect of the above flaw is again illustrated by comparing the treatment of, on the one hand, LCA's 3b and 3c which the draft policies map shows are regarded as 'unsuitable' for wind turbines and LCA's 10a and 8c which it suggests are 'suitable'. In this connection it is to be noted that neither LCA's 3b nor 3c are within or, on their western boundaries close to the coastal AONB. Yet, despite the PES study suggesting that some turbines could be accommodated, there, the relevant 'local communities' are to have the protection of their immediate landscape being judged as 'unsuitable'. Conversely, those local communities in LCA 8c, for instance North and South Charlton, despite being 'just over the A1' and already affected by the Wandylaw/Middlemoor wind-farm, in particular, are denied that protection. N.B. the Society does not suggest LCA's 3b and 3c should be 'identified' but the fact that they are not demonstrates the iniquity of the 'identification' exercise.

- k. While LCA 8c (the Charlton Ridge) gets a low 'sensitivity rating' from the PES study (and, in fairness, others before it), the photographs at exhibit 2 to these representations, illustrate both why that is misconceived and why the landscape is highly valued by the local communities which principally live close by and use and enjoy that landscape. The photographs also show the area's inter-visibility with those surrounding it, including the coast.
- l. Neither would the introduction (even in principle) of turbines smaller than those at Middlemoor be any more appropriate than those of the same size. The photographs featuring the existing turbines show how 'clutter' would be exacerbated by shorter turbines where the blades would cross with the columns of their larger neighbours. A view from the road between Heckley and the B6346, connecting Alnwick to Eglington (N.B. not included in exhibit 2), shows how even the existing, uniform turbines produce 'clutter' because of the topography – mixing turbines of different heights or adding them on adjacent land would understandably distress the local community, as the Society believes the relevant Parish Council has stated in its own, representative representations.

22. The 'Northumberland Local Plan Technical document: Suitable areas for wind turbine development in Northumberland – March 2018' ('the technical document'): Following on from the PES study, NCC prepared the technical document in support of the preparation of the draft Local Plan. It was evidently intended to provide a high-level assessment to inform the identification of 'suitable areas' for wind energy development, ostensibly in accordance with the NPPF and WMS. The Society's landscape consultants advise that this document is also deficient, as explained below:

- a. It set out a range of considerations (detailed in table 3.2 of the report) including guidance related to health and safety and health and wellbeing in relation to wind energy development as well as statutory environmental designations including biodiversity and historic environment. The results of the PES study on landscape sensitivity were also considered.
- b. No reference was made separately in relation to nationally designated landscapes on the basis that they had been taken-into-account in the PES study (para 4.7). However, as a high-level assessment and in the context of considering the identification of 'suitable' areas, other statutory environmental considerations such as national landscape designations should have been identified separately. The PES study did not examine the special qualities of these protected landscapes and the effect of turbine development

on them explicitly in terms of the purposes of designation, although inter-visibility issues were highlighted⁸.

- c. The study was undertaken as a desk top exercise only with no fieldwork to check the conclusions being reached in terms of mapped areas. This points to an over reliance on the PES mapping to determine suitable areas rather than a review of the detailed commentary and analysis which points more explicitly to some areas being more 'suitable' over others. By way of example, the photographs at exhibit 2 tell a different story.

- d. The study concluded:

'Based on the methodology used in this study, there are planning and environmental considerations and designations that rule out large areas of Northumberland for wind turbine development of these (41-135m height) scales. It is therefore recommended that suitable areas for wind turbines of this scale cannot be identified'. (paragraph 5.6)

- e. While that conclusion is welcomed, what follows is surprising and of serious concern:

'It is recommended that consideration is given to identifying the site of the existing permitted developments as suitable for wind turbine development in principle.....proposals could come forward during the plan period to upgrade or repower the existing wind turbines. (paragraph 5.7).

- f. **Mapping of 'Suitable Areas':** The on-line interactive mapping and the 'hard-copy' policies map, applying the findings of the technical document, show three categories of wind turbine development namely up to 25m, 25m-40m and over 40m⁹. It is not clear why

⁸ In passing, it is noted that Figure 4.1d should refer to medium to large turbines and Figure 4.1.e to large turbines to tally with the findings of the PES study.

⁹ As NCC has acknowledged, the Society has serious concerns not just at the extraordinary coverage of the ostensibly 'suitable areas' but regarding the consultation process, given the difficulties encountered in accessing and operating the interactive policies map ('IPM'). NCC has explained to the Society some of the technical limitations with the IPM and how the layers are displayed, including for example being unable to use cross-hatching. NCC has clarified that while the notation between the IPM and the hard copy differed, there is no difference in the extent of the areas shown on these. But that was certainly not immediately apparent to the Society and, it is suspected, many others. Though NCC believes that the blue colouring in the key to the IPM differs from one overlay to the next, officers have accepted that this is very hard to discern. NCC has also explained to the Society that the IPM allows each of the layers to be turned on and off to help with the identification of what is being displayed on the map. However, the Society's representatives and all others they know of who have tried to understand the IPM have unable to discern any difference at all. NCC has accepted by that while, ostensibly, the IPM and the hard-copy proposals map show the same information regarding the identification of suitable areas, there are different styles of presentation (e.g. areas 'identified' as suitable for turbines over 40m were shown by cross-hatching on the hard copy but are shown as a solid blue colour on the IPM). NCC has accepted that there is scope for confusion or at least 'Jo public' might find understanding the IPM. Though NCC is understood not to have received any complaints from members of the public about the usability of the IPM, nonetheless it was agreed that in the next iteration of the Local Plan, NCC would look at making the notation on the IPM for the different scales of wind turbine clearer. NCC has said the Local Plan consultation offers the public the chance to express views on 'identification'. However, the Society's concern is that the 'identification' issue will be overlooked by many members of the public, lost as it may well be, in the tide of documents, policies and complexities of the Local Plan process.

these size categories have been chosen but they differ from those within the PES study. As noted above the technical study concluded that suitable areas for large scale turbines could not be identified but it is not clear if they are included in the over 40m group?

- g. The maps are difficult to follow (see again, footnote 9) and show large swathes of Northumberland as suitable for wind farm development. Many of the areas identified appear explicitly defined following field boundaries. However, there is no written justification of the areas leaving it unclear as to how and why these areas, as opposed to any others, have been identified.
- h. With no landscape character areas and types shown in the layers in the interactive mapping, it is not possible to consider the 'suitable areas' in light of the analysis in the PES. This makes it difficult for the mapping to be interrogated and understood.
- i. Furthermore, the interactive mapping includes areas for turbines less than 15m. However, turbines of this size or smaller often do not require planning permission as they are covered by the GPDO and therefore mapping suitable areas for this type of development seems unnecessary.
- j. **Observations:** In relation to large scale turbine development two important observations can be made in relation to the technical document's conclusions and subsequent mapping:
 - i. Firstly, the assessment of existing impacts of current operational schemes indicated that some have a wider and more significant adverse effect than was originally predicted. On this basis, it may not be desirable to accept further development or repowering of existing wind farms;
 - ii. Secondly, cumulative effects become increasingly relevant as the number of existing and consented wind farm developments grow in specific areas. There are likely to be limits on the extent to which wind farm development can be accommodated in areas where development already exists. These points were expressed in the PES study and summarised in the table, above.
- k. In relation to smaller scale wind turbine development, the technical document concludes that large areas across Northumberland could be suitable for turbines up to 25m and between 25-40m in height and that this therefore means suitable areas for wind turbines of this scale could be identified.
- l. However, this is to ignore a number of salient factors:

- i. Turbines between 15m - 40m tall would, in many rural high-quality landscapes, give rise to adverse effects due to their individual size but also in relation to cumulative effects.
- ii. Many of the landscapes identified as 'suitable' are potentially highly valued and qualify as 'valued' landscape in NPPF terms.
- iii. Mapping of suitable areas combined with policy criteria is potentially confusing. It runs the risk of identifying areas which are considered to be acceptable 'in principle' when in fact they are not (e.g. the PES study may have identified concerns), or when the policy criteria are applied, demonstrate that the proposal cannot meet the requirements in the policy i.e. environmental factors cannot be adequately addressed.
- iv. The role of a criteria-based approach is critical in ensuring good design and siting as well as addressing cumulative effects but there is a clear risk that 'identifying suitable areas' will undermine the application of those criteria by enabling developers to argue that many of the criteria have already been met, at least in principle.

23. As a result, the Society is advised that the 'identification' process appears flawed and at best unclear for the reasons explained above.

In order to ensure an appropriate approach to encouraging renewable energy, whilst protecting environmental assets and the interests of communities, it would seem reasonable that the local plan stops short of mapping areas of suitability, but places reliance on the criteria-based approach set out in the policies and on the detailed analysis contained within the PES study. While this may curtail prospective wind-turbine development, save as covered by the GPDO, for so long as the WMS exists in its current form, there are very good reasons for accepting that curtailment:

- a. It is common ground between NCC and the Society that criteria-based, renewable energy policies are required in Northumberland, not least because of the recognized harm caused by the earlier identification process that lead to 'Areas of Least Constraint'. These lead to development 'honey-pots' that put local communities under prolonged and highly stressful pressure.
- b. An earlier study¹⁰ showed, some permitted wind-farms, notably the conjoining Wandylaw and Middlemoor schemes, resulted in

¹⁰ 'Assessment of the Extent to which Existing On-shore Wind Development in Northumberland Have Been Successfully Accommodated into the Landscape, May 2015' - Planning & Environment Studio & Bayou Blueenvironment.

adverse impacts identified at the time by local objectors but which were downplayed by ‘experts’ acting for the developers and in essence overlooked by the decision maker.

- c. The current ‘identification’ is seriously flawed and, given NCC’s acknowledgement that the county’s landscapes are a ‘jewel in the crown’, it would be perverse to rely on it, thus jeopardizing those and other assets (e.g. archeological heritage; wild-life; bio-diversity etc.).
- d. As NCC plainly accepts in the text supporting policy REN 1, it has no obligation to ‘identify suitable areas’, only to consider the possibility of doing so. NCC has therefore discharged that obligation – it need not proceed to impose the ‘identification’ at all and certainly not where having ‘listened’ to local communities, it is clear that those communities are opposed to their areas and landscapes being ‘identified’.

Some Specific Landscapes – Reality Check

24. As explained, above, too much of the analysis leading to NCC’s ‘identification of suitable areas’ has been based on desk-based study and /or an inadequate selection of viewpoints. Those living in or adjacent to the many valued, though often undesignated, landscapes have a far greater knowledge of their potential ‘sensitivity’ to turbine development than planning officers and, often, ‘experts’. By way only of example, the following table comprises a catalogue of photographs taken by one of the Society’s members. The photographs, themselves, comprise exhibit 2 to these representations.

Photograph number(s)	Viewpoint	Main LCA’s in view	Comment
1-10	Road over Beanley Bank	12a; 15a; 18c; 8d; 10a; 8c; Cheviots & peripherally, 8d & 14b.	Panoramic views of the Glendale Valley & rising ground on each side + views to Cheviots & across to 8c. Middlemoor turbines increase in visibility towards S Charlton & Alnwick – risk of ‘windfarm landscape’
11-26	Titlington Pike	As above + 6a, 14c & 18d.	Ditto + wider panorama due to greater height of viewpoint.
27	Road to south of Shawdon Hall	6a, 10b.	Lower vantage point so views less extensive but still the feeling of being in a bowl of surrounding hills.
28-33	Road Bolton to Shipley	6a; 8d,7a; 10b; 8c	M’moor turbines in clear view, many low-down on their columns. Connection & visual proximity to Hulne Park apparent.
34-40	Land above South Charlton	10a; 8c; 7a; 8d; 12a; 3c; 4c; &, peripherally, 5c.	To the north, the Wandylaw & Middlemoor turbines dominate on a fairly tho’ not entirely flat terrain. The view illustrates how smaller turbines would worsen clutter just as badly as those existing, if not more so. The views south & east are impressive as are those to the west with inter-visibility, including to and from Hulne Park, a significant feature.

25. The Society believes these photographs speak for themselves save noting that:

- a. They were taken by an amateur photographer and do not provide the same detail, definition or panorama as the naked eye – they underplay the beauty and inter-visibility of the landscapes in question;
- b. Many other viewpoints could have been chosen to demonstrate the lessons the Society believes can be drawn from a proper visual inspection of relevant landscapes;
- c. Those lessons include the following: (1) that, for example, the LCA's between Alnwick and Wooler and between the National Park and the coastal AONB, west of the A1, are extraordinarily beautiful (as are many other landscapes potentially exposed by NCC's 'identification' - to call them 'valued' is a material understatement); (2) that steel columns mounted by spinning blades as or higher than the Angel of the North are almost always going to be highly visible in these and other Northumbrian landscapes; (3) their visibility will almost always be harmful to the landscapes concerned; (4) to identify them as 'suitable for wind turbine development' at all or with the 'encouragement' of the supporting text to policy to REN 2 is nothing short or perverse; and (5) the photographs demonstrate how the areas concerned cannot be neatly sub-divided by lines on a map – a holistic view is essential as is a true acknowledgment of inter-visibility between landscapes (a factor that is almost infinitely variable depending on the viewpoint taken).

Conclusions

26. The Society repeats the executive summary on page 1. of these representations but adds, below, those of Alison Farmer Associates, pending completion of their full report:
- a. There are serious difficulties in applying sensitivity assessment to the definition of areas as 'suitable' for various sizes of wind turbine. Sensitivity, capacity and suitability are different things.
 - b. The mapping of sensitivity based on character areas and types presents a simplistic impression of the issues to be taken into account. In reality variations in sensitivity occur across character areas and types and transition from one area into adjoining areas. For these reasons it is important that the mapping in the PES assessment, insofar as it can be relied upon, is not separated from the detailed commentary within the report. In mapping and determining 'suitable' areas for wind turbine development both the PES mapping and descriptive analysis (as well as the other factors referred to above) need to be interpreted and considered at a

strategic scale and in relation to other environmental considerations. When this is done it reveals that few (if any) landscapes containing existing wind farms can in fact accommodate further development.

- c. The PPG indicates that identifying areas as suitable for wind farm development should not override other environmental policies. For this reason, environmental policies relating to natural, cultural heritage and national landscape designations should remain paramount as well as landscapes which are locally valued. This further strengthens the need to avoid identifying suitable areas for turbine development which is likely to affect, cumulatively or otherwise the National Park and/or the AONBs and locally valued landscapes¹¹.
- d. A separate assessment of the effects of existing wind farm development on the special qualities of the National Park and AONB could be undertaken to complement the work of the PES study. This would give the issues affecting the National Park greater prominence in decision making and is especially relevant to Northumberland National Park due to its shape and vulnerability to development beyond its boundaries, as well as the scale of wind farm development which has already occurred within its setting.
- e. Although policy REN2 highlights that areas identified as suitable are only to be regarded as such in principle and that policy criteria also need to be satisfied, there is an obvious overlap between the matters ostensibly taken-into-account in the 'identification' exercise and the criteria to be applied through policy REN 1 and 2.

¹¹ As the planning inspector who dealt with the unsuccessful appeal regarding the wind turbine proposal at Follions Farm, within the Cheviot Fringe, said (APP/P2935/A/13/2204271): (paragraph 12) *'I am in no doubt that the wind turbine would be seen from a wide area, including from parts of the National Park ...* (paragraph 14) *Any current structures in the surrounding area are limited to sporadic buildings which assimilate well into the rural landscape as a result of mature landscaping and their sensitive siting.* (Paragraph 16) *I also travelled into the National Park and viewed the appeal site from various vantage points. While this area is some distance from the appeal site, clear views across the valley are available from here. At present these views down into the valley are of unspoilt open countryside interspersed with small settlements, trees and farmsteads. A wind turbine here would introduce a strident and uncharacteristically tall 'made-made' structure into these views. Despite the intervening distance it would appear unduly dominant and incongruous from here, particularly given the size of the moving blades.* (Paragraph 17) *Overall, I find that the proposal would have a significant adverse effect on the visual amenity of the area.'* These findings could apply to almost any prospective wind turbine development around the Cheviot Fringe including within the Glendale Valley but also in many other landscapes.

That in itself creates a risk of those criteria being undermined. This is unsatisfactory where the 'identification' exercise is deficient in the ways explained and, in any event, heightens the importance of taking-into-account and reflecting the views and concerns of the affected communities.

27. Accordingly, the Society looks forward to further discussions with NCC to ensure the protection of Northumberland's vitally important landscapes.