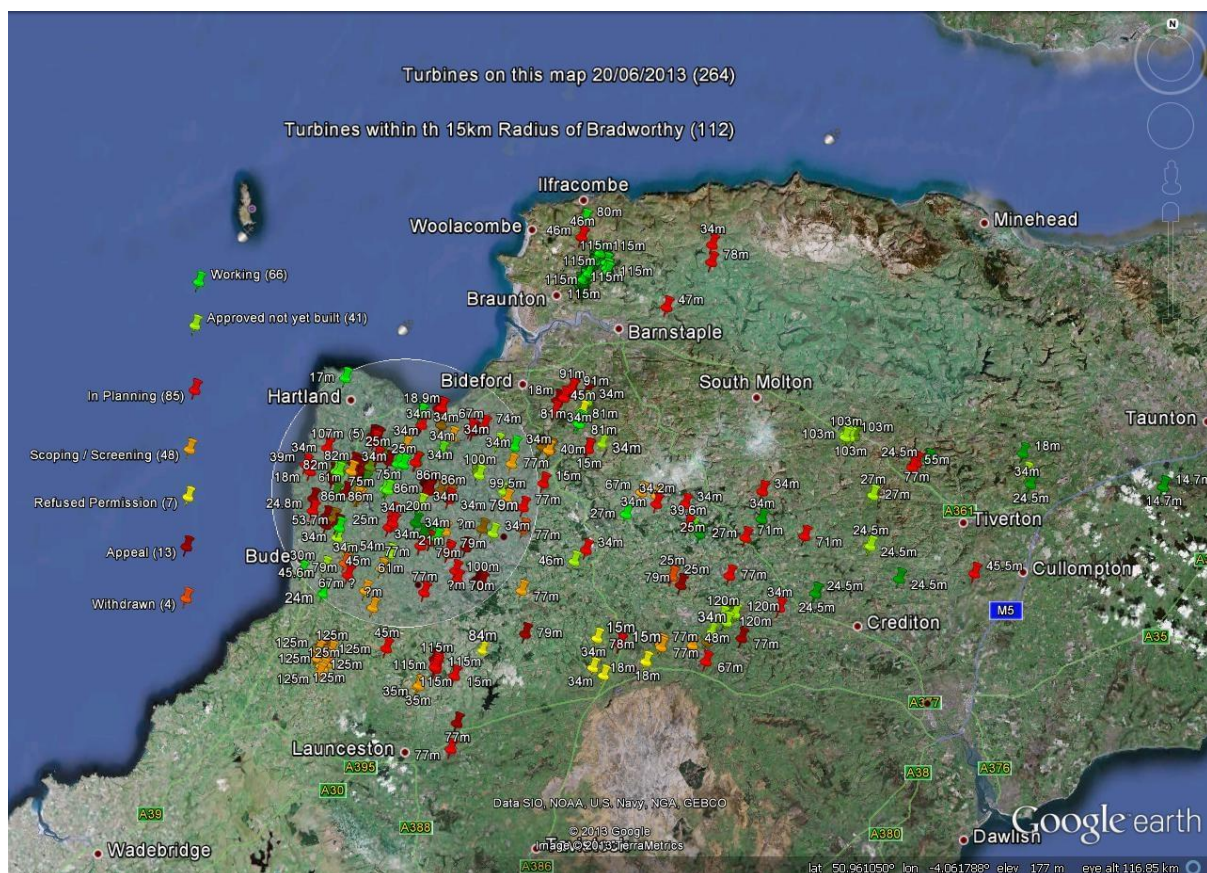


## CPRE Devon “Help Desk” - Renewable Energy Planning Applications

**INTRODUCTION.** These planning applications are particularly difficult to deal with since the Government is committed to meeting ambitious “Renewable Energy” targets and offers over-generous subsidies to landowners, who can contribute by installing wind turbines and solar farms. So much so, that it can often make financial sense for a landowner to “farm these subsidies” rather than to produce food.

As with all planning applications, it is only the “Material Considerations” that will count with the planning authorities and a catalogue of some of these is given below. These are important because, even if the Local District or Unitary Council turns down an application, the Developer is likely to go to appeal and may win with the Planning Inspectorate. The Government’s drive for “sustainable Development”, almost at any cost, through its National Planning Policy Framework (NPPF) and the Growth & Infrastructure Bill is tending to favour many planning applications that we deem to cause real damage to the landscape and the environment. The cumulative effect of the current Tsunami of renewable energy projects can be seen on our website [www.cpredevon.org.uk](http://www.cpredevon.org.uk) . It is this cumulative effect that is producing a groundswell of opposition at local and political level. A glance at the Torridge and North Devon Wind Turbine situation in late June makes the point all too clearly.



This “March of the Turbines and Solar Farms” is not confined just to these areas but is accelerating across much of South Devon and in the South Hams in particular. A new inter-

active map that shows you not only where these Facilities will be, but also provide you with details of the planning application, [can be found at http://turbine.dartmail.co.uk](http://turbine.dartmail.co.uk) . Turbines, depending on their height and position, can dominate the local landscape. Solar Farms can be huge, covering large areas of countryside that could be used for agriculture. These latter installations require perimeter protection, sometimes with CCTV, and have industrial facilities to convert and transmit electricity to the Grid. The cumulative effect of these installations is beginning to have a profound effect on the local economy, a large element of which involves tourism.

**The citizen's approach to these Planning Applications.** It should be remembered that there are often several groups involved. The Developer may well be a small group whose aim is solely to get planning permission, which they will then immediately sell on to a much larger company, which will construct the Turbine and then sell on the energy output to one of the major energy companies. Whether the National Grid can accept this output is sometimes an issue. The "Planning Application" and its approval is thus the key moment to strike. These planning applications will be listed by your local Unitary or District Council. Links to these Authorities can be found here <http://www.cpredevon.org.uk/29-devon-district-councils.html> Every one of these sites will have a "Planning" section where every Planning Application can be found, together with the date by which comment must be received.

This is not to say that these "Material Considerations" are the only line of attack. Local Ward Members are inevitably sensitive to their voters and when it is clear that a planning application is purely to milk yet more money from Government subsidies, or that a so-called "Community Project" is in fact no more than an investment opportunity for the wealthy, these factors, if skilfully put forward, can have a very positive effect. It will, therefore, be important to ensure that, wherever possible, any planning application goes before the full Planning Development Committee rather than being decided by planning officials.

Remember, it is important to "get out the vote". A comprehensive letter from CPRE Devon, for example is considered as a single opinion. The aim should be to create a general groundswell of local opinion, individually expressed, to have the desired effect, since this will force the local Ward member to take notice and seek out support from others.

**The role of CPRE Devon.** CPRE Devon does not automatically oppose every application for a wind turbine or solar farm. Small wind turbines have always had their place in the countryside as part of the economics of the farm whether for drawing up water or for producing electricity. Solar panels also have their place with many large farm and other buildings having large roofs suitable for their installation. There are also some brown field sites where solar arrays make a lot of sense. We do not have the capacity to support everyone either opposing or indeed supporting a particular planning application for a renewable energy installation. We naturally try to help our members but our advice is readily available through this website. However, we would expect a financial contribution or

an application for membership from those we help and who do not yet belong. Only in this way can we afford to bring our expertise to bear for the public good. Each planning application has to be taken on its individual merits but the relentless march across the landscape of both huge wind turbines and large solar farms is becoming a major threat not just to the beauty and tranquillity of the landscape but is beginning to have a serious impact on tourism, a key component of the local rural economy.

There are many issues, some more relevant than others, that could be considered. The list below is not exhaustive but many of these can be brought to bear on almost any planning application for a wind turbine, or indeed for a Solar Farm. Some require the support or contribution of official bodies or professional companies which will require funding. Photomontages, for example, can completely mislead the viewer by skilful choice of lenses, and bat surveys need to be done by experts rather than the enthusiastic amateur if they are to carry weight.

**Relevant Issues.** A round-up of useful issues is listed below:

❖ **Landscape**

- National Park [www.dartmoor-npa.gov.uk](http://www.dartmoor-npa.gov.uk)
- AONB. There are separate AONBs for North, East and South Devon all with their own concerns  
[.www.naturalengland.org.uk/ourwork/conservation/designations/aonb/default.aspx](http://www.naturalengland.org.uk/ourwork/conservation/designations/aonb/default.aspx)
- AGLV.
- Photomontages produced to wind industry standards are likely to give a misleading impression for several technical reasons.
- Strongly suggest flying a blimp at blade tip height for a few days as near to the site as possible. Few people can estimate vertical height especially if expressed in metres – most people think in feet and think that 100 m vertically is the height of a very tall tree. A visual marker will shock most people. CPRE can suggest a local blimp hire business.
- Ask Local Authority councillors to include a standard requirement for the developer to fly a blimp.

❖ **Heritage.** <http://www.english-heritage.org.uk>

- Listed buildings and their settings
- Scheduled ancient monuments and their settings
- Archaeology on site or nearby?
- As above on photomontages, blimps and lobbying councillors.

❖ **Residential Amenity**

➤ Noise

- Inadequacy of ETSU-R-97 to provide protection:
    - Allows greater noise at night
    - Fails to deal adequately with the dramatic effects upon noise distribution produced by wind shear
    - Allows averaging of quiet periods with noisy ones
    - Excludes low frequency noise and infra-sound, both demonstrated at over 1,000 m from a turbine in Wisconsin, 2012.
  - Inadequacy of statutory nuisance protection, procedures costly, slow and ineffective.
  - Downwind turbines are often noisier than upwind.
  - Recommend independent analysis of developer's noise and wind data by independent expert. At Luscombe Cross, SHDC commissioned and paid for this.
  - See Welsh Assembly response to petition on turbine noise and testimonies of those affected by turbines predicted to fall within ETSU limits.
  - All turbines need an enforceable specific Excess Amplitude Modulation (EAM) noise condition and wording to deal with tonal element. Unacceptable EAM has been recorded at 1,500 m from turbines.
  - See Milton Keynes Council letter re Minimum Distance judgment
  - Ask South Hams councillors to adopt a minimum distance rule within their draft paper on renewables. The MK judgment does not prevent or discourage this.
- Shadow Flicker – only applies to light strobing across windows of buildings. Any mitigation promised by developer will not apply to gardens, roads or open spaces.
- TV and mobile phone interference.
- Dominant and overbearing effect upon homes?

❖ Ecology

➤ Birds

- SPAs
- SSSIs [www.sssi.naturalengland.org.uk/Special/sssi/index.cfm](http://www.sssi.naturalengland.org.uk/Special/sssi/index.cfm)
- Specific species most threatened include raptors, lapwings, golden plover.
- Breeding birds -c.f. Natural England's standing advice on "Breeding Birds" requires full mitigation for loss of nesting sites and James Pearce-Higgins's research showing that birds tend to stop nesting within half a mile of turbines, across a range of species.(2010 Journal of Applied Ecology)

- Bats
  - SACs Special Areas of Conservation. A key document for bat habitats. <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/default.asp>
  - SSSIs
  - Noctule bats most threatened as fly at blade height
  - All bats are European protected species and protected by European law
  - Bats are more threatened by turbines than birds:
    - Bats are killed by barotrauma from air pressure near turbines as well as by contact with blades.
    - They have been shown by scientists to be attracted to turbines.
    - They have low reproductive rates with long generation times
- Suggest commissioning a data report from Devon Biodiversity Records Centre [www.dbr.org.uk/](http://www.dbr.org.uk/) specifying a 10km radius search for bats and a 3km radius search for all other species plus statutory and non-statutory sites.

**Health & Safety.** There are many H & S dimensions to the deployment of wind turbines.

- Ice shedding – catapulting of ice which forms on blades
- Blade Throw – blades shearing off while rotating
- Turbine Collapse e.g. at Bradworthy, Devon
- Effects upon roads, public footpaths etc including sun strobing effects and other distractions to motorists and other road users
- Horse riders –
  - British Horse Society recommended distances at least three times the height of the turbine
  - Countryside Agency safe distance at least four times the height of the turbine.

## ❖ Tourism

- Devon County Council [www.devon.gov.uk](http://www.devon.gov.uk) “Role and Action Programme for Tourism 2008-2011” estimated the tourist “spend” on accommodation alone in Devon to be £1,200m in 2006 and tourism estimated to generate 13% of jobs. Presumably a higher proportion in South Hams than in Devon overall.
- “The Economic Impacts of Wind Farms on Scottish Tourism” (2008) commissioned by the Scottish Government showed that in a person to person survey, 25% of respondents were negative about wind farms including 10% who were strongly negative (would not visit an area with wind farms). An internet survey referred to in the same report found that a higher proportion 17.8% were strongly negative, than if

asked face to face. What effect on jobs and local economy if this level of avoidance applies to South Hams tourists.

❖ **Ministry of Defence Considerations.**

- The Defence Infrastructure organisation (DIO) is responsible for all Air Traffic Control Radars in the UK and provides coverage maps that show likely interference with ATC radar coverage for various turbine heights. As an example; the Turbine Blade Tip Map for a blade tip height of 100m shows that large areas of North Devon, the South Hams, West Devon and Teignbridge are no-go areas for wind turbines of this size due to their interference with Plymouth Military Radar.

These maps can be accessed at the DIO website and more detailed information can be obtained from <https://restats.decc.gov.uk/cms/aviation-safeguarding-maps/>

- It will be important to ensure that the Local Authority take these maps into account for any wind turbine application in their area.

**Tailpiece.** Renewable energy comes in many forms and can include tidal and wave power, hydro-electric facilities and making use of the heat generated within the earth's crust. Some of these techniques are more developed than others and all depend on local geography and geology. Devon is likely to be spared "Fracking" and has abundant potential wave and tidal resources. The problem with both Wind and Solar facilities is that these are not out of sight and out of mind. They are very much and increasingly 'in your face", with profound effects on the local tourist economy and the landscape that make Devon a delight to live and work in and a magnet for visitors.

Your local CPRE District Group will know of many local communities that have banded together to challenge or support a particular planning application near where you live. Make contact with us and join in. These challenges take time and effort and cost money. A contribution, however small, is helpful to all of us trying to look after your local environment.

Robin Hogg 25.09.2013