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Response of Renewable Energy Foundation to Natural England's Wind Energy Guidance Consultation: *Assessing the Environmental Capacity for On-Shore Wind Energy Development Consultation on Proposed Approach to Natural England Guidance*¹

Introduction

The Renewable Energy Foundation is a registered research and education charity encouraging the development of renewable energy and energy conservation whilst emphasizing that such development must be governed by the fundamental principles of sustainability.

REF is supported by private donation and has no political affiliation or corporate membership. In pursuit of its principal goals REF highlights the need for an overall energy policy that is balanced, ecologically sensitive, and effective.²

With reference to the assertion that climate change is the most significant long term threat facing the natural environment, we urge that the text makes explicit reference to the need not to damage or destroy the very environment action on climate change is designed to protect. It would be very welcome if the enduring value of natural and semi-natural landscapes and environments were recognised at the outset of the document. We consider that this value is a far more enduring phenomenon than the period of investment in on-shore wind farms..

¹ <http://www.naturalengland.org.uk/ourwork/policy/consultations/>

² <http://www.ref.org.uk>

We observe that it is vital that the damage caused by the installation of on-shore wind energy should not be disproportionate to the benefits it brings, and that this should be as integral a part of the purpose of Natural England as participation in the delivery of renewable energy capacity.

The recognition that some landscapes and places should remain free from development is welcome. This in itself helps to create some confidence that Natural England will set out to achieve this outcome, rather than only encouraging on-shore wind where it thinks it can justify its installation on landscape grounds.

We consider that it is misleading to suggest that there are a significant number of places where major new on-shore infrastructure is actually desirable. Such a radical intervention is very often going to bring a change of scale, noise and visual conditions that cannot, under any stretch of the imagination enhance a location. We would prefer a more realistic phrasing that recognised that in many cases the objective is to minimise landscape damage, even in places where landscape character is not of exceptional quality.

In order to achieve circumstances when “environmental concerns can be effectively balanced with development needs and the growing wind energy sector” there needs to be substantial weight behind Natural England’s role in discouraging and preventing damaging applications, preferably early in their development, but if necessary carried through to the end of due process. Only then can Natural England’s support and encouragement of on-shore wind proposals be part of a credible balance, rather than a one-sided system of encouragement wherever possible.

It is not clear to us that there is a sufficiently clear distinction in the mind of Natural England between the use of its assessment criteria by itself and by others. Although developers will surely use any guidance Natural England issues, they will use it with very different purpose. Natural England must be determined not to let others colour its own pursuit of its assessment criteria.

The aspiration to move towards a consistent and transparent approach across the whole of England is to be warmly welcomed. Consistency should not, however, come at the expense of rigorous judgement.

Questions

1. Do you agree that there is a need for Natural England guidance on assessing the environmental capacity for on-shore wind energy?

Yes, but this guidance must be designed to further the effectiveness of Natural England's statutory purposes and work with the existing planning system and policies rather than circumvent them.

2. Do you agree that the guidance should be primarily aimed at Natural England staff?

Whether it is or not, it will be used by others and thus needs to be clear enough to prevent damaging arguments over interpretation of the guidance.

3. Do you think Natural England guidance would be helpful to other stakeholders?

Yes, if it is clear and even-handed and followed very consistently by NE staff across the country.

4. Should the guidance only consider Natural England's statutory interests?

The guidance should be based on Natural England's widest policy remit in the spheres of landscape, biodiversity and promoting general well-being through management of the natural environment, etc., but should not consider interests outside of this. It is not helpful for a decision maker, who is tasked with weighing competing interests, or in the general interest if statutory bodies comment on issues outside of their expertise.

5. Is there other material related to wind energy that you think Natural England should produce as part of this guidance?

We welcome the inclusion of experiential (such as tranquillity and wildness) and landscape character data.

6. Do you agree with our definition of 'environmental capacity'? Should the guidance be using different terms, such as 'potential', 'scope', 'sensitivity' or 'opportunity'?

Natural England's remit is to consider the well-being of the natural environment; it is not an investor or partner in energy provision, although some of the language in the draft document appears to hint at a proactive role beyond the organisation's statutory remit. To this end, we strongly believe that Natural England should work in terms of 'sensitivity' of landscapes and habitats. If the term 'capacity' actually means *sensitivity*, in the sense of meaning the limits to which a landscape can be utilised for on-shore wind without being significantly damaged, then

this term is acceptable. But the ambiguity of the term is unhelpful and we strongly prefer 'sensitivity'.

7. Do you think the overview of potential impacts of on-shore wind energy on the natural environment is an accurate and fair reflection?

Not enough emphasis is placed upon the effects of wind turbines on long distance views, where although the development may be many kilometres away, the scale of intervention and the character of that intervention (animate and industrial) can be severely damaging to a composition of landscapes and views.

Access to the natural environment is an important contributor to public well-being. It is important to consider the impacts of developments on those areas used for day-to-day outdoor activities even when of quite ordinary landscape quality.

Noise impacts should be specifically included; low level turbine noise travels surprisingly far (1 km +) and is more disturbing than equivalent levels of other industrial noise.

8. Are the proposed criteria appropriate for assessing the range of factors that contribute to environmental capacity (i.e. both ecological/geophysical and landscape factors)?

Tranquillity should be separated from wildness. I.e. particular care should be taken to preserve the existing peace of any area of landscape routinely used for walking etc. By conjoining 'tranquillity' and 'wildness', it could be inferred that tranquility is only of value in wild areas

9. Are there any criteria missing? If so, please list and explain.

The potential impact of noise should be specifically included – see response to Question 7.

10. Should any of the criteria be merged or amended?

See answer to Question 8.

11. Do you have any other comments on the proposed criteria?

12. Do you agree with the proposed approach to assessing capacity?

13. Do you agree with approach to considering scale and cumulative impacts?

The trend with existing wind farms is for 'repowering' i.e. replacing older, smaller turbines with larger more powerful models. It is important that any assessment of a landscape takes this into consideration at the outset and that if the area is deemed by Natural England to be capable of

absorbing turbines of a particular scale that this scale is quantified, so it will not be assumed that turbines of any scale would be subsequently acceptable.

14. Do you agree with the ‘weighted-density’ approach taken to identifying and mapping ecological and geophysical features and the nine datasets used, or should the guidance take a ‘boundary’ approach?

We have insufficient information to comment.

15. Do you agree with the approach to using GIS and other information to inform the application of the landscape criteria?

We have insufficient information to comment.

16. Are the suggested GIS maps and datasets the right ones?

In respect of the list in Table 2, should consideration be given to the cross-country, migratory paths of birds? Obviously, those species which would overfly any wind farms would not be an issue, but we understood that some migrating species such as swans will fly at quite low levels particularly in foggy weather.

17. Do you have any comments on the general principles for fit with landscape character in Annex 2?

The photographs and text in Annex 2 are very interesting and helpful as an illustration of the general principles discussed. The weather conditions pertaining when some of the photographs were taken results in the sample wind turbines being (possibly atypically) indistinct. It would be helpful to have images taken on a clear day.

More examples where Natural England would consider the landscape fit is clearly not satisfactory and would not satisfy the new criteria proposed would be particularly useful.

18. Do you agree with our proposal for regional workshops?

Yes assuming these are carefully planned with specific targeted examples of how the criteria-based guidance will apply in the region.

19. Do you have any suggestions for potential opportunities to work with Natural England to test how our criteria can best be applied at a regional and/or sub-regional scale?

Engagement with local authorities and statutory consultees is clearly desirable, but may not be sufficient. We note that local conservation and historical societies frequently possess special

knowledge, and we recommend that NE engages pro-actively with such bodies to ensure that this information is brought to bear on the evaluation of the criteria.

2 September 2009