AGENDA

CABINET

MONDAY, 3 JUNE 2013

11.00 AM

COUNCIL CHAMBER, COUNCIL OFFICES, ST PETERS HILL, GRANTHAM

Beverly Agass, Chief Executive

MEMBERS:	Councillor Mrs. Linda Neal (Leader/Portfolio: Policy, Strategy and Strategic Partnerships), Councillor Paul Carpenter (Deputy Leader & Portfolio: Governance & Communication), Councillor Mrs Frances Cartwright (Portfolio: Grow the Economy and Economic Development), Councillor John Smith (Portfolio: Healthy Environment), Councillor Mike Taylor (Portfolio: Strategic Resources - Well Run Council), Councillor Terl Bryant (Portfolio: Good Housing) and Councillor Bob Adams (Portfolio Holder: Arts and Leisure)
Committee Support Officer:	Lucy Bonshor 01476 40 61 20 e-mail: l.bonshor@southkesteven.gov.uk

Members of the public are entitled to attend the meeting of the Cabinet at which key decisions will be taken on the issues listed on the following pages. Key decisions are marked *.

1. APOLOGIES

2. MINUTES

(Enclosure)

3. DISCLOSURE OF INTERESTS (IF ANY)

4. *ADOPTION OF WIND ENERGY SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Report PLA971 from the Portfolio Holder for Grow the Economy and Economic Development.

(Enclosure)

5. MATTERS REFERRED TO CABINET BY THE COUNCIL, SCRUTINY COMMITTEE OR THE POLICY DEVELOPMENT GROUPS

6. ITEMS RAISED BY CABINET MEMBERS INCLUDING REPORTS ON KEY AND NON KEY DECISIONS TAKEN UNDER DELEGATED POWERS.

7. REPRESENTATIONS RECEIVED FROM NON CABINET MEMBERS

8. ANY OTHER BUSINESS WHICH THE CHAIRMAN, BY REASON OF SPECIAL CIRCUMSTANCES, DECIDES IS URGENT

MEETING OF THE CABINET
8 APRIL 2013 - 11.00 AM – 11.15 AM

PRESENT:

Councillor Paul Carpenter
Councillor Mrs Frances Cartwright
Councillor John Smith
Councillor Mike Taylor
Councillor Terl Bryant

Councillor Mrs. Linda Neal - Chairman

Chief Executive (Beverly Agass)
Strategic Director Community & Environment (Tracey Blackwell)
Head of Housing & Neighbourhoods (Ian Richardson)
Head of Legal & Democratic Services (Lucy Youles)
Cabinet Support Officer (Lucy Bonshor)

Non-Cabinet Members :Councillor Bob Adams

CO52. MINUTES

The minutes of the meeting held on 4th March 2013 were agreed as a correct record of the decisions taken.

CO53. DISCLOSURE OF INTERESTS (IF ANY)

None disclosed.

CO54. *TENANCY POLICY

Decision:

Cabinet approves the Tenancy Policy as appended to report H&N0113

subject to amendments to clarify some of the wording being agreed with the Portfolio Holder.

Considerations/reasons for decision:

1) Report H&N0113 from the Head of Housing & Neighbourhoods.

2) The introduction by the Government of wide ranging reforms to the social housing legislation, regulation and policy.
3) The Government's revised tenancy standard which sets out that all providers of social housing must publish a clear and accessible Tenancy Policy which outlines the landlord's approach to tenancy management.
4) Consultation undertaken with the Community Focus Forum, a stakeholder consultation event and the Communities Policy Development Group.
5) The policy reflects Cabinet's previous position following their decision taken on 4th March when the Tenancy Strategy was approved.
6) Under the Localism Act, responsibility for social housing regulation passed to the Homes and Communities Agency (HCA) Regulation Committee from 1 April 2012.
7) Comments made by Members at the meeting concerning the clarity of wording within the draft document.

Other options considered:

No other options have been considered as there is a requirement for the Council to have a policy for the granting and management of tenancies of council housing.

DATE DECISION EFFECTIVE:

Decision CO54 as made on 8th April 2013 can be implemented by Wednesday 17th April 2013, unless subject to call-in by the Scrutiny Committee Chairman or any five members of the Council from any political group.

South Kesteven District Council, Council Offices, St. Peter's Hill, Grantham, Lincolnshire NG31 6PZ

Contact: Cabinet Support Officer - Lucy Bonshor Tel: 01476 40 61 20
e-mail: l.bonshor@southkesteven.gov.uk

REPORT TO CABINET

REPORT OF: Economic Development Portfolio Holder

REPORT NO: PLA971

DATE: 3rd June 2013

TITLE:	**Adoption of Wind Energy SPD**	
KEY DECISION OR POLICY FRAMEWORK PROPOSAL:	Key Decision	
PORTFOLIO HOLDER: NAME AND DESIGNATION:	Cllr Frances Cartwright Grow the Economy, Economic Development Portfolio Holder	
CONTACT OFFICER:	Karen Sinclair, Planning Policy & Partnerships Service Manager 01476 406438 k.sinclair@southkesteven.gov.uk	
INITIAL IMPACT ANALYSIS: **Equality and Diversity**	Carried out and Referred to in paragraph (7) below n/a	Full impact assessment Required: n/a
FREEDOM OF INFORMATION ACT:	This report is publicly available via the Your Council and Democracy link on the Council's website: www.southkesteven.gov.uk	
BACKGROUND PAPERS	Draft Wind Energy SPD http://www.southkesteven.gov.uk/index.aspx?articleid=4775	

1. RECOMMENDATION

That:

a) Cabinet notes the comments received in response to the public consultation on the draft Wind Energy Supplementary Planning Document (SPD) as set out in Appendix 2 and the further consultation on the definition of small wind turbine as set out in Appendix 3

b) The proposed changes to the draft Wind Energy SPD set out in Appendix 4 to the report are approved

c) The Wind Energy SPD, as amended in accordance with recommendation b) above, is adopted

d) The SPD take effect following the end of the call in period and it be applied to all qualifying pre-application enquires, requests for scoping opinions and planning applications registered as valid after this date.

e) The following paragraphs and figures of the Landscape Character Assessment (2007) are rescinded: 1.20 (part only – reference to wind energy proposals), 4.33, 4.55, 4.76, 4.100, 4.132, 4.153, 4.172, 4.175 and Figure 28.

2. PURPOSE OF THE REPORT

2.1 To enable the Cabinet to consider the issues raised in the representations made during the public consultation on the draft Wind Energy Supplementary Planning Document (SPD), to consider proposed changes to the document and for it to be adopted.

3. DETAILS OF REPORT

3.1 The draft Wind Energy SPD was approved for the purposes of public consultation by the Cabinet on the 1st October 2012 (Report PLA 945).

3.2 The SPD provides guidance to planning officers, elected members, developers, local communities and the public on:

- Key planning issues associated with wind energy developments during their construction, operation and decommissioning
- Criteria that will be applied when determining applications for wind energy developments
- Good siting and design of wind energy schemes including how potential impacts can be minimised
- Information that should be provided when submitting a planning application

3.3 As a SPD the Wind Energy SPD will, when adopted, be a material consideration in the determination of relevant planning proposals and, having been through a process of consultation, can be given a significant degree of weight.

3.4 Public consultation on the draft SPD took place between the 19th October and 30th November 2012. The SPD was made available at the District Council offices and libraries, on the website and publication was advertised by way of a statutory notice published in the local press and the issuing of a press release. Direct notification of the consultation was also made to Parish/Town Councils and other organisations that were considered likely to have an interest in the subject matter.

3.5 At the end of the consultation period, a total of 619 representations were received from 68 individuals, Parish Councils, neighbouring local authorities, local and national organisations and wind energy companies and renewable energy sector representatives. Appendix 1 attached to this report provides a breakdown of the number and type of representations received to each section of the draft SPD.

3.6 In April 2013 a further four week consultation was undertaken on whether the definition set out in the SPD of a small scale wind turbine should be changed from up to 50 metres in height (to blade tip) to up to 30 metres in height (to blade tip). This change was proposed in recognition that small turbines may

still be substantial structures in the landscape and that those towards the upper height limit for small turbines of 50 metres (as defined in the draft SPD) could have a significant impact and therefore ought to be subject to greater scrutiny. It also reflected the experience of the Council over the past 12 months in terms of the type/size of wind turbines for which planning applications have been made within the District. At the end of the consultation period, representations had been received from 29 individuals or organisations.

3.7 Appendix 2 summarises the representations received to the draft SPD together with a response and, where appropriate, proposed changes to the SPD. Appendix 3 summarises the representations received to the consultation on the definition of a small wind turbine. The changes proposed, which are set out in full in Appendix 4, do not change the original approach/guidance set out in the draft SPD but rather are intended to provide clarification of these e.g. policy context, Environmental Impact Assessment (EIA) procedures, use of visualisations, ecological assessment requirements for small scale developments, water issues and consultation arrangements. In addition to responding to issues raised in representations, a number of changes are proposed to ensure the SPD is up to date and/or reflect recent developments.

Issues Raised

3.8 The sections of the SPD that attracted most representations were separation distances and the incorporation of Lincolnshire County Council's Statement of Intent on Wind Farms into the SPD. The proposal to rescind parts of the Landscape Character Assessment also received a number of responses.

Separation Distances

3.9 The issue of separation distances was referred to in the draft SPD (paragraphs 3.2.14 – 16) but as none were included no detailed work on the issue of separation distances was undertaken in preparing the SPD.

3.10 In April 2013, the High Court handed down judgement on a legal challenge by RWE Npower Renewables to the Milton Keynes Wind Turbine SPD, which sought to set minimum separation distances between wind turbines and residential dwellings. The single ground on which the judicial review was successful was that the local authority had already defined in its adopted Local Plan a wind turbine buffer zone. As such, the amended separation distances in the SPD were in conflict with the pre-existing buffer zone in the adopted local plan, a position that was contrary to Local Planning Regulations.

3.11 Whilst the judgement confirmed that local authorities may define separation distances between turbines and dwellings and that these may be defined in a SPD, it was clear that they should be phrased positively rather than negatively i.e. that policies should not be phrased in terms of planning permission being refused if turbines were within x meters of a dwelling, but rather that planning permission may be granted if turbines are more than x meters of a dwelling. However, below the threshold distance, the impacts of proposals would still need to be considered on a case by case basis and it would be counter to national policy simply to refuse such a proposal based on distance without

judging the impact of the development, in particular in respect of noise and residential visual amenity.

3.12 The judgement made no comment on the justification or appropriateness of the separation distances Milton Keynes sought to introduce and it remains the case that it would have to be demonstrated the separation distances were based on robust evidence, were reasonable and justified and subject to full public consultation if it were intended to introduce them. To introduce separation distances now would require a significant further investment of resources and delay possible adoption of the SPD for possibly as much as 12 months, if not longer, whilst they were researched, proposals that might constitute reasonable and justified separation distances be drawn up and then consulted upon.

3.13 In essence the position outlined in paragraph 3.11 is what the draft Wind Energy SPD has sought to reach: applications for large or medium sized turbines need to be supported by a full range of technical information to enable a detailed assessment to be made and specifically an assessment of residential visual amenity within 2km of a turbine. Given this, it is not intended to pursue the introduction of separation distances at this time.

Lincolnshire County Council Wind Farm Position Statement

3.14 A number of representations suggested that the Council should seek to align the SPD with Lincolnshire County Council's (LCC) Position Statement (which the County Council adopted in February 2013 as its policy towards the location of wind farm development). On several issues, the LCC policy employs separation distances and takes a blanket approach that proposals falling within the specified distance should not be allowed. In light of the Milton Keynes judgement, as discussed above, it is considered that it would be inappropriate for the SPD to be aligned with the LCC policy on wind farms.

Landscape Character Assessment

3.15 The South Kesteven Landscape Character Assessment (LCA) makes reference to the sensitivity of each of the seven identified landscape character areas (*lca*) to wind energy development. Although the wording is caveated to indicate that each proposal should be considered on its own merits, these sections have been read as the Council's position on wind energy development and have been taken to indicate that wind proposals in some *lca*s would be considered favourably.

3.16 The preparation of the SPD provides an opportunity to make clear that it is against the key issues set out in the SPD that wind energy proposals will be assessed and considered and that the sections of the LCA relating to wind development sensitivity are not a material consideration in the determination of relevant planning applications. The draft SPD indicated, therefore, that it was the intention, on the adoption of the SPD, to rescind those sections of the LCA that refer to the sensitivity of the landscape to wind energy developments. A number of representations were received in respect of this proposal: some misunderstood and thought it was the intention that the whole of the LCA be rescinded whilst others thought that the references to the sensitivity to wind energy development in the LCA should remain.

3.17 It is considered, for the reasons set out in paragraph 3.14 above, the reasoning for rescinding those parts of the LCA referring to wind energy proposals remains justified and appropriate. The following sections of the LCA will, therefore, be rescinded: 1.20 (part only – reference to wind energy proposals), 4.33, 4.55, 4.76, 4.100, 4.132, 4.153, 4.172, 4.175 and Figure 28. Information to this effect will be notified on the website and included in hard copies of the LCA when they are made available in the future.

Definition of Small Wind Turbine

3.19 Of the 29 representations received to this consultation, 18 supported the proposed change, three objected and eight made comments. Of those who supported the change, six suggested that the upper height should be reduced even further to 20 or 15 metres as being more in keeping with the scale of buildings, particularly churches, within the landscape or because it would be more consistent with the thresholds set out in the Environmental Impact Assessment (EIA) Regulations. Even those who objected supported the principle that reducing the upper height definition was a move in the right direction. Given the consultation response on this issue, it is proposed that the reduction in height of a small wind turbine to 30m be included in the Wind Energy SPD.

4. OTHER OPTIONS CONSIDERED

4.1 Do not adopt the SPD - the alternative would be to rely on prospective developers hopefully engaging in pre application discussions prior to submitting a planning application. The preparation of the SPD is more positive in that it provides guidance to developers, SKDC officers and the general public on the key issues and impacts to consider in assessing or submitting a planning application for wind energy.

5. RESOURCE IMPLICATIONS

5.1 There will be minimal costs associated with the adoption of the SPD through the publication of statutory notices.

6. RISK AND MITIGATION

6.1 Risk has been considered as part of this report and any specific high risks are included in the table below:

Category Risk	Action / Controls
Reputational – perceived inconsistency in decisions concerning wind energy development	Preparation of Wind Energy SPD and monitoring and reporting of effectiveness through Annual Monitoring Report

7. ISSUES ARISING FROM IMPACT ANALYSIS

7.1 A Stage 1 Equality Analysis was carried out prior to consultation on the SPD. There are not considered to be any changes proposed to the SPD that are likely to impact upon the outcomes of the Equality Analysis previously undertaken.

8. CRIME AND DISORDER IMPLICATIONS

8.1 None arising out of this report.

9. COMMENTS OF FINANCIAL SERVICES

9.1 All costs associated with the development of the Supplementary Planning Document will be met from existing budgetary provisions included in the 2013/14 financial framework.

10. COMMENTS OF LEGAL AND DEMOCRATIC SERVICES

10.1 The Planning and Compulsory Purchase Act 2004 established a system of local development planning in England. The Town and Country Planning (Local Planning) (England) Regulations 2012 make provision for the operation of that system. In respect of supplementary planning documents, regulation 14 states:

> **14 Adoption of supplementary planning documents**
> As soon as reasonably practicable after the local planning authority adopt a supplementary planning document they must —
>
> (a) make available in accordance with regulation 35 —
> (i) the supplementary planning document; and
> (ii) an adoption statement; and
>
> (b) send a copy of the adoption statement to any person who has asked to be notified of the adoption of the supplementary planning document.

10.2 If adopted, this process must be followed in accordance with the regulations.

11. APPENDICES:

11.1 Appendix 1: Breakdown of Representations by draft Wind Energy SPD section
Appendix 2: Responses to consultation on draft SPD and proposed changes
Appendix 3: Responses to consultation on definition of small wind turbine
Appendix 4: Proposed changes to draft Wind Energy SPD

Appendix 1: Number of Representations to draft Wind Energy SPD (by section of SPD)

SPD Section		Total Number Respondents	Total Number Representations	Representation Type			Pages in Appendix 2
				Comment	Support	Object	
	General	25	33	30	2	1	1-16
1.1	Purpose of SPD	4	4	1	2	1	16-17
1.3	How SPD was Prepared	1	2	1	0	1	18
2.0	Role of Wind Energy	1	1	1	0	0	18-19
2.2	What is Wind Energy	8	9	7	1	1	19-23
2.3	Contribution to Carbon Reduction	15	15	12	1	2	23-28
2.4	Policy Context	4	4	2	0	2	29-30
2.4	National Planning Policy	12	17	14	1	2	30-37
2.4	Local Planning Context	7	7	3	1	3	37-39
2.4	LCA	15	15	12	0	4	39-45
2.4	LCC Statement of Intent	13	14	10	0	4	45-51
3	Key Considerations for Design & Siting	12	12	10	0	2	51-55
3.2	Landscape & Visual Amenity	37	120	86	6	26	55-104
3.3	Ecology & Ornithology	21	81	57	12	12	104-134
3.4	Historic Environment	18	64	51	1	12	134-158
3.5	Hydrology	4	14	11	2	1	158-164
3.6	Traffic & Transport	16	20	19	0	1	164-171
3.7	Noise & Vibration	23	52	38	2	12	171-195
3.8	Socio-Economics	16	55	48	3	4	195-215
3.8	Shadow Flicker	11	28	21	0	7	215-226
3.10	Aviation	6	9	8	0	1	226-229
3.11	Telecommunications	6	6	6	0	0	229-231
4	The Application Process	3	3	2	0	1	231-232
4.2	Consenting Mechanisms	3	3	2	1	0	232-233
4.3	Environmental Impact Assessment	9	9	6	1	2	233-237
4.5	Habitats Regulations Assessment	1	1	1	0	0	237
4.6	Consultation	6	6	4	1	1	237-239
4.7	Planning Conditions	4	4	3	0	1	239-241
4.8	Planning Obligations	6	10	9	1	0	241-245
	Appendix 1	1	1	1	0	0	245

Consultee | **Agent** | **Consultation Point**

26302 Mrs M.T.D Cooke
Castle Bytham Parish Council

General

CommentID: WED5

Nature of Response: Commenting

Reasons:
Castle Bytham Parish Council are happy to endorse the Draft Wind Energy SPD.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee | **Agent** | **Consultation Point**

26329 Ms R Woolley
Braceborough & Wilsthorpe Parish Council

General

CommentID: WED6

Nature of Response: Commenting

Reasons:
Parish Council agreed the document needs to have the strongest rules and conditions in place to protect the ecology, environment and tourism in Lincolnshire.
Parish Council concur with response sent by Hough on the Hill Parish Council. Also wish it to be known that the Parish Council does not want to see a Guideline Document, which is only a standard or principle by which to determine a policy or action. Wish that document becomes a Policy Document by which determines a course of action to be adopted by the District Council.

Changes to the draft that you consider necessary:

SKDC Response:
The level of detail contained in the draft SPD would be inappropriate in a policy. The SPD, when adopted, will be a material consideration in the determination of planning applications and, having been through public consultation, can be given a significant degree of weight.

Recommended Changes:
n/a

Consultee | **Agent** | **Consultation Point**

472273 Mr John Hannam
Colsterworth and District Parish Council

General

CommentID: WED11

Nature of Response: Commenting

Reasons:
In general welcome this document and thank Councillors who helped prepare it.
Main comment is that the SPD should be more supportive of the Council's Core Strategy EN1. The District Council is elected to serve the interests of local residents and does not need to make concessions to international energy companies.

The Core Strategy states (para 1.8.2) that one of the elements that make South Kesteven an atractive location for sustainable growth and prosperity is 'the attractive rural setting and generally high quality of life' and has a vision for 'a good quality of life, health and wellbeing for everyone as well as celebrating the distinctiveness of the districts countryside and heritage'.

Changes to the draft that you consider necessary:

SKDC Response:
It is unclear how the SPD could be more supportive of Policy EN1, as the SPD sets out detailed guidance covering a number of the issues included under Policy EN1 to ensure that these are satisfactorily addressed.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
472273 Mr John Hannam Colsterworth and District Parish Council		General

CommentID: WED12

Nature of Response: Commenting

Reasons:
General comments on formatting.

Changes to the draft that you consider necessary:
Abbreviations should be used more consistently.
Some sections should be shrunk by signposting rather than repeating sections from supporting documents which developers and Council officers will be familiar with, except where the SPD adds specific guidance. Alternatively some background information could be moved to appendices.
Para 3.2.9 has bullets but no numbered paragraph.

SKDC Response:
A review of acroynms will be undertaken for inclusion in the final document. The SPD does not contain large sections from supporting documents and the document has been prepared for planning officers, developers and members of the public, the latter of which may not be familiar with the background guidance. The bullets under Para 3.2.9 form part of the paragraph.

Recommended Changes:
Include list of Acroynms as Appendix.

Consultee	**Agent**	**Consultation Point**
26367 Ms R Woolley Witham on the Hill Parish Council		General

CommentID: WED73

Nature of Response: Commenting

Reasons:
The Parish Council does not wish to enter any representation.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		General

CommentID: WED76

Nature of Response: Commenting

Reasons:

In general, Stubton Parish Council welcome this document and thank the councillors who helped prepare it.
We have several suggestions for further improvements, but our main comment is that the SPD should be more supportive of the Council's Core Strategy policy EN1 (protection of the character of the district). The district council is elected to serve the interests of local residents and does not need to make concessions to international energy companies.
The Core Strategy also states (para 1.8.2) that one of the elements that make South Kesteven an attractive location for sustainable growth and prosperity is 'the attractive rural setting and generally high quality of life' and has a vision for 'a good quality of life, health and wellbeing for everyone as well as celebrating the distinctiveness of the districts countryside and heritage'.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED11.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		General

CommentID: WED77

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

• Abbreviations should be used more consistently.
• Some sections could be shrunk by signposting, rather than repeating, sections from the supporting documents which developers and council officers will be familiar with, except where the SPD adds specific guidance. Alternatively, some background information could be moved to appendices.
• Para 3.2.9 – Layout and design of ancillary features – section has bullets but no numbered paragraph.

SKDC Response:

See comment for WED12.

Recommended Changes:

See change for WED12

Consultee	Agent	Consultation Point
235539 Mr Clifford Bacon Clipsham Parish Meeting		General

CommentID: WED140

Nature of Response: Commenting

Reasons:

Rutland County Council, following the Statutory Consultation Process, have recently approved and adopted a Supplementary Planning Document entitled 'Wind Turbine Developments. This document

follows on from an independently conducted project 'Rutland Landscape Sensitivity and Capacity Study - Wind Turbines' and sets out guidelines for wind turbine developments taking account of different sizes of wind turbine and different sized groups of turbines, as well as the landscape character (historic and present) in which they may be proposed. May we suggest the idea that, the neighbouring area, either side of the border between our two Counties, should be considered as part of a whole, and therefore that SKDC might appraise the content of the Rutland SPD to see whether it may contain some helpful and more specific content which might be incorporated within the South Kesteven District Council SPD. The adopted document can be found at www.rutland.gov.uk/windturbinesspd

Changes to the draft that you consider necessary:
Our recommendations follow the above observations, namely that the 'Wind Turbine Developments SPD' adopted by Rutland County Council, be appraised by SKDC to see whether some of the guidelines adopted by RCC would be a helpful addition to the SKDC Wind Energy SPD.

SKDC Response:
The Rutland SPD was reviewed as part of the preparation of the SKDC SPD. Other LPAs have also produced similar SPDs, such as Fenland, which have also been reviewed. Several of the matters set out in the Rutland SPD are included in the SKDC SPD e.g. distance from footpaths, powerlines, bridleways, reference to ETSU guidance in relation to noise.
Rutland's SPD has been supported by a detailed landscape sensitivity assessment which assesses the capacity of different landscape types to accommodate wind turbine development and which has been used to draft specific guidelines. As these are based on the specific landscape characteristics of Rutland it would be inappropriate to include them in a document covering South Kesteven.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711211 Mr Jerry Goodrich		General

CommentID: WED143

Nature of Response: Commenting

Reasons:
Concern at the proliferation of huge wind turbines which will affect the well being of residents

Changes to the draft that you consider necessary:
There are surely enough on shore wind turbines to satisfy regulations. The council must, before allowing wind farms including Temple Hill thoroughly investigate noise and health issues. There is ongoing work to ascertain the effect on people's health. Sleep disturbance can lead to health problems. Flicker can affect residents also especially if they are north of turbines. If there is ANY health risks the council should be mindful that their policy can have a detrimental effect and they will he responsible for people's well being.
There MUST be a minimum standard of separationof distance between turbines and homes. The county council say so so why not SKDC. Other countries endorsen minimum distances.
SKDC have a duty of care to protect residents and could leave themselves wide open to litigation if they do not adequately explore all issues pertaining to residents well being.
House prices WILL be affected. I have evidence of that and claims will be made to that effect re rateable value losing money for Skdc. It will also impact the area and to what end? Only a very small minority end up gaining.
In the case of temple hill the interested parties aren't even council residents.
I understand the case for renewables and have one turbine already to sw of my property at frinkley farm. To the west is an app I believe at marston. One also to the north west at foston. 5 huge turbines to the north at temple hill. Am I to be surrounded.
I have no objection to the singleton ones to support business but 5 420 metre turbines has to be too much.

SKDC Response:
The Government's legally binding target of securing 15% of its energy needs from renewables by 2020 (as agreed as part of the (2009 EU Renewables Directive) has not been met. In 2011, 3.8% of energy consumption came from renewables, up 3.2% from 2010 (Digest of UK Energy Statistics, 2011). The Council is not in a position to undertake independent research into health issues but instead takes guidance from national Government. In respect of noise then this would be assessed in accordance with the ETSU-R-97 guidance.
Shadow flicker from the rotating blades of a wind turbine is a known, quantifiable effect. Due to the precipitating factors, shadow flicker can be accurately modelled and predicted and occurs within narrow spatial-temporal limits. This means that even if it is predicted to affect certain dwellings, shadow flicker is only apparent when the intensity of sunlight and angle of the blades to an observer combine with the sun’s position in the sky to create a noticeable effect – this is effectively for short periods in any single day affecting those particular dwellings that are vulnerable during such periods. The predictability and infrequency makes shadow flicker a manageable problem: it can be curtailed by the introduction of various mitigation measures, creating screening features such as treelines (or

using existing ones), and programming the turbines to cease operation for the short time during which dwellings are affected.
Increasingly, the installation of wind turbines at sites across the UK has led to many surveys and studies being undertaken to determine if nearby residents' property values are adversely affected. There is no evidence that a links exists between house prices and the proximity of wind turbines. Many studies have shown that there is an anticipation "stigma", where the perceived negative impact of wind turbines being constructed nearby causes a transitory drop in house prices, which reverses post-construction. In recent years, estate agents and surveyors have begun to accept that data on house purchases show there is no lowering of house prices caused by wind turbines.
On the issue of separation distances the recent High Court judgement on the challenge to Milton Keynes Council Wind Turbines SPD, which included separation distances between turbines and residential properties, has clarified that local authorities can introduce these and that they can be defined through preparation of a SPD.
However, it is the Council's view, following this judgement, the use of separation distances should be phrased positively rather than negatively i.e. planning permission may be granted if turbines are more than x meters of a dwelling. However, this does not enable applications that fall within the defined separation distance to be refused without careful consideration. Below the threshold distance, the impacts of proposals would still need to be considered on a case by case basis and it would be counter to national policy simply to refuse such a proposal based on distance without judging the impact of the development, in particular in respect of noise and residential visual amenity.
In essence this is a position that the draft Wind Energy SPD has sought to reach: applications for large and/or medium sized turbines need to be supported by a full range of technical information to enable a detailed assessment to be made and specifically an assessment of residential visual amenity within 2km of a turbine. Given this, it is not proposed to seek to introduce the use of separation distances at this time.
Notwithstanding the above, separation distances should be robustly evidenced to demonstrate they are reasonable and justified, if they are not to be challenged. It would be inappropriate, therefore, for distances used or endorsed by another local authority or put forward in a study to simply be applied within South Kesteven.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		General

CommentID: WED144

Nature of Response: Commenting

Reasons:
In general we welcome this document and thank those who helped prepare it.
We have several suggestions for further improvements, but our main comment is that the SPD should be more supportive of the Council's Core Strategy policy EN1 (protection of the character of the district). The district council is elected to serve the interests of local residents and does not need to make concessions to international energy companies.
The Core Strategy also states (para 1.8.2) that one of the elements that make South Kesteven an attractive location for sustainable growth and prosperity is 'the attractive rural setting and generally high quality of life' and has a vision for 'a good quality of life, health and wellbeing for everyone as well as celebrating the distinctiveness of the districts countryside and heritage'.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED11.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		General

CommentID: WED145

Nature of Response: Commenting

Reasons:
Abbreviations should be used more consistently.
Some sections could be shrunk by signposting, rather than repeating, sections from supporting documents which developers and council officers will be familiar with, except where the SPD adds specific guidance. Alternatively, some background information could be moved to appendices.
Para 3.2.9 – Layout and design of ancillary features – section has bullets but no numbered paragraph.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED12.

Recommended Changes:
See change for WED12

Consultee	Agent	Consultation Point
26352 Ms Rosemary H Woolley Baston Parish Council		General

CommentID: WED224

Nature of Response: Commenting

Reasons:
It must be policy not guidance to create a stronger document.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED6

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26352 Ms Rosemary H Woolley Baston Parish Council		General

CommentID: WED228

Nature of Response: Commenting

Reasons:
The Parish Council is not against wind turbines but concerned about where they are placed and the impact on health of people who live in close proximity.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED143

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
497391 Mr Tony Aitchison Sport England		General

CommentID: WED229

Nature of Response: Commenting

Reasons:

The SPD appears to be silent on the potential impact of wind turbines on facilities for sport, although mention is made of the potential impacts on a wide range of other uses and activities.
Wind Turbines located on playing fields and also wind turbines located near to playing fields and other sports facilities can have an impact on the ability to play sport at that site and would therefore prejudice its use and lead to the loss of all or part of the site.
Sport England is therefore currently preparing guidance on the impact of wind turbines on sports facilities. The guidance will include information on the potential impact of wind turbines on playing fields and advise whether the location of the wind turbine would have an unacceptable impact on the sports facility.
The guidance is also likely to refer to the requirement for a developer to undertake a Sport Impact Assessment as part of an Environmental Impact Assessment, if such an assessment is required or separately if an ES is not required.
The National Planning Policy Framework recognises the importance of open spaces and opportunities for sport and recreation (Paragraphs 73 & 74) and specifically seeks to protect open space, sports and recreational buildings and land, including playing fields from development.
The potential impacts from wind turbines on playing fields are similar to the concerns outlined in your draft SPD e.g. the impact of flicker on sports activities..
Impacts can include Noise and Amplitude Modulation but could also include, Shadow Cast, which is similar to Shadow Flicker, but is the impact of the shadow moving across the ground and potentially health and safety. In addition an impact which has caused real concern with regard to the impacts on playing fields is the visual distraction from the moving turbine blades on the playing of sport, such as cricket and archery.
Reference is made to two appeal cases which confirm that distraction is a material consideration in the determination of planning applications for wind turbines. The Cornwall case, confirmed a distraction and the wind turbine as proposed would have been around 650m from the cricket pitch.
With regard to the impacts on health and safety we are aware of a number of circumstances where a risk assessment has resulted in a greater impact on a playing field than originally envisaged. This has had a particular impact on school sites.
Sport England has encouraged the use of the fall over distance as a minimum standard in this regard.
Sport England guidance on the impacts on sport, sports facilities and playing fields from wind turbine installations will beaded to our website as soon as it is available.

Changes to the draft that you consider necessary:

Whilst at this stage Sport England cannot provide a specific distance for a wind turbine to be located away from sports facilities, in particular playing fields, (as our guidance is not yet complete) we would nevertheless strongly advocate that the potential for impact on such facilities is included within the SPD and that the document indicates that a Sport Impact Assessment (as part of an EIA or separate if an EIA is not required) is required for any wind turbine application which have the potential to impact on a playing field or other sports facility.

SKDC Response:

Shadow flicker only occurs inside buildings where the flicker appears through a narrow window opening. It is therefore not appropriate to include reference to shadow flicker impacts in relation to sports fields. Topple distances are always included by wind energy developers as a standard health and safety measure. It is accepted that it would be beneficial to reflect that wind turbines may have potential impacts on sport facilities and that this should be assessed (where relevant) and to include reference to the fact that further guidance is to be issued by Sport England.

Recommended Changes:

Change title of 'Socio Economic' Section to 'Socio Economic and Other Impacts' and add new heading and paragraph after 3.8.13 as follows: Sports Facilities "Wind Turbines located on playing fields, or located near to playing fields and other sports facilities, can have an impact on the ability to play sport at that site. Where relevant this should be assessed using the guidance (to be) published by Sport England on the impact of wind turbines on sports facilities."

Consultee	**Agent**	**Consultation Point**
712854 Miss Alison Coaten		General

CommentID: WED231

Nature of Response: Commenting

Reasons:

There is increasing evidence that, even at permissible noise levels, wind turbines disturb sleep, leading to other health problems.
The proposed site for an industrial wind farm at Temple Hill Brandon is approximately 500 metres from our home. We are due East of the site and will see all 5 turbines from our house, which will be

exacerbated when the sun sets behind them throughout the summer. I am extremely concerned about the potential effects on health from noise, shadow flicker and sleep disturbance frequently reported at this proximity. Other countries with experience of wind farms now have a minimum 2km setback distance to protect their citizens and the county council also recommend separation distances, the council should follow their example. I am supportive of renewable energy that is effective and correctly sited, the council should insist that no resident has to put up with the noise of wind turbines, they should be inaudible in homes and gardens, by day and night.

Changes to the draft that you consider necessary:

SKDC Response:
The Council will ensure the development adheres to the strict noise limits as set out in ETSU noise assessment guidance for wind farms and Good Practice Guide prepared by the Institute of Acoustics and published in May 2013.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
695579 Mrs Irene Campsill Horbling Parish Council		General

CommentID: WED232

Nature of Response: Commenting

Reasons:
Whilst the Parish Council appreciate that this is a much broader policy document, their local concerns re planning applications for wind turbines are:
1. the major impact on our unique fenland landscape and heritage
2. The influence on the setting of the Fen Edge Churches
3. Access to sites
4. Impact on wildlife

Changes to the draft that you consider necessary:

SKDC Response:
The issues raised regarding impacts on landscape, ecology and suitable access are covered by the SPD.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		General

CommentID: WED233

Nature of Response: Commenting

Reasons:
Firstly, we would like to voice our strong support for the South Kesteven Wind Energy Supplementary
Planning Document (SPD). The SPD clearly recognises the value of our local heritage, and goes a very long way to ensure that it is not lost for ever as a result of the ill-advised and inappropriate placement of wind turbines. It is a far superior document to the Landscape Character Assessment because it will be democratic and objective, having been through specific public consultation rather than the biased personal view of a consultant. We trust that the SPD in its final form will be accepted and adopted as soon as possible and, as the document states, that at the same time the Landscape Character Assessment insofar as it refers to wind turbines will be declared as superceded. (The SKDC will, we hope, adhere to their promise to rescind the Landscape Character Assessment which states that wind turbines make a low visual impact on the fen landscape.) This will require an actual statement to this effect to be inserted into the SPD, especially if it is going to continue to be available on the Council's website for other purposes.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. However, to clarify it is not the intention that the whole of the LCA be rescinded but only those parts that refer to wind energy proposals and the sensitivity of the landscape to such development.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
607538 Cllr Bob Sampson		General

CommentID: WED271

Nature of Response: Commenting

Reasons:
So much of the Draft Wind Energy Supplementary Planning Document content as drafted is generally based upon National Guidance rather than being robust in detail , and policy that relates directly to South kesteven. The document must address the specifics that may potentially interfere and detract from South Kesteven's largely rural environs and market towns.
The Draft SPD refers to guidance on Landscape Character and Visual Amenity but fails to reinforce the importance of the countryside features and views that inhabitants, visitors and travellers all enjoy and appreciate.
All aspects of safety are paramount not only relating to the operation of installed wind turbines but equally important the human element when such installations are close to roads and communities due to visibility, auditory and movement sensitivities, and the consequential side effects throughout the lifetime of such structures. The SPD should be positive and strong on site selection and separation distances embracing standards and policies of its own calibre that reflect meaningful public safety within South Kesteven.
Physical and climatic geography dictate the siting of single wind turbines or in groups, whether they be on low lying flat plains, promontories or high ground, these are all key countryside features in their own right. We all experience and value such vistas' and panoramas associated with our living and travelling throughout South Kesteven.The sensitivity to locating /grouping wind energy structures is enormous and deserves all the consideration and specific guidance within the Draft SPD necessary to afford protection of the landscape character thought South Kesteven.
In summary the Draft SPD should be rewritten in parts to selflessly demonstrate taking ownership and protection throughout South Kesteven in relation to the policies SKDC will apply in the future on Wind Energy Planning matters.

Changes to the draft that you consider necessary:

SKDC Response:
It is considered that as drafted the SPD sets out clear guidance, which is both relevant and appropriate to South Kesteven, on the issues identified.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713497 Mr Anthony Saunders		General

CommentID: WED304

Nature of Response: Supporting

Reasons:
This document would seem to provide adequate protection for people threatened with living in the vicinity of wind turbines. It should be adopted as soon as possible and replace the Landscape Character Assessment, which is a seriously flawed document in that it contains subjective judgments and was introduced without the consulting those who would be affected by it.

Changes to the draft that you consider necessary:

SKDC Response:
To clarifty, it is not the intention that the whole of the LCA be rescinded but only those parts that refer to wind energy proposals and the sensitivity of the landscape to such development.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26364 Mrs Wendy Moore Pointon & Sempringham Parish Council		General

CommentID: WED346

Nature of Response: Supporting

Reasons:
Follwing discussion the Parish Council welcome and support the Policy.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		General

CommentID: WED384

Nature of Response: Commenting

Reasons:
Our policy on renewable energy developments is set out in various guidance documents as part of our position on climate change (see www.english-heritage.org.uk/climatechange for more information). Of particular relevance to this SPD is our guidance note on 'Wind Energy and the Historic Environment'. This provides advice on how to consider the historic environment within wind energy policies, programmes and projects, addressing issues such as direct physical impacts, the setting of historic features and visual amenity.
We welcome the detailed references to the historic environment within the draft SPD, and its inclusion within the Landscape and Visual Amenity section as well as the Historic Environment section. We would like to see some reference made within the Noise and Vibration section as well as the Shadow Flicker section, as these are issues that can have an impact on the historic environment, particularly setting. The definition of setting in the National Planning Policy Framework is “the surroundings in which a heritage asset is experienced”, and our 2011 setting guidance confirms that elements of setting can include noise, vibration, movement etc as well as views.

Changes to the draft that you consider necessary:

SKDC Response:
It is considered that a cross reference in the Historic Environment section (under Site Selection) would be the most appropriate way to respond to this issue.

Recommended Changes:
Add new bullet point under paragraph 3.4.21 to read: 'consider the potential for indirect impacts on the setting of heritage assets including noise and shadow flicker'

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		General

CommentID: WED455

Nature of Response: Objecting

Reasons:
The document generally is welcomed to give direction to all parties on the way in which these matters should be addressed and generally speaking it looks as though a balanced view has been taken on all issues relating to Wind Farm development. However, there is a key issue here about the criteria applied and that in all cases it is not possible for there to be no impact. The key theme that should prevail through the document is the need to consult to consider the impacts and wherever reasonably possible to make sure that steps are taken to minimise there effect. Clearly there could be some effect on some issues and it will all come down to a question of materiality, particularly when reviewing the need to make sure that the need to provide renewable energy is supported as a broad principle in line with Government policy.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. All development will have some impact and the purpose of the SPD is to clearly set out the issues where impacts may arise and how these may be mitigated.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714592 Mr Phil Hughes Lincolnshire County Council		General

CommentID: WED492

Nature of Response: Commenting

Reasons:
The SPD provides a thorough assessment of relevant issues when considering wind farm development. However, it is disappointing that the more exacting guidelines included in Lincolnshire County Council's (LCC) Wind Farm Position Statement have not been included, although some of LCC's separation distances are reflected in residential amenity and shadow flicker assessments.

Changes to the draft that you consider necessary:
Incorporation of LCC's Wind Farm Position Statement.

SKDC Response:
The SPD seeks to address and provide detailed guidance on many of the issues included in the LCC Position Statement but in a manner that is considered to respond appropriately to the circumstances of South Kesteven. However, in respect of residential amenity particularly, the LCC Position Statement employs separation distances taking a 'blanket approach' that proposals falling within the specified distance should not be allowed. The recent judgement on the legal challenge to the Milton Keynes Wind Turbine SPD highlighted that the use of separation distances should be employed positively (see response to comment WED143 on separation distances (general section)) and the LCC Position Statement would appear, therefore, to be contrary to this approach. As such, it is considered that it would be inappropriate for the Wind Energy SPD to be aligned or incorporate LCC's Position Statement on wind farms as suggested by this and other respondents.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		General

CommentID: WED493

Nature of Response: Commenting

Reasons:
We are pleased to see the development of this document to support the policies in the South Kesteven Core Strategy 2010.
We support the principles behind the document to give advice to developers and the public on the issue of wind energy developments.
The RSPB is supportive of renewable energy projects providing that adverse impacts upon wildlife are avoided by appropriate siting and design. Renewables offer an opportunity to modify or reverse the deleterious changes associated with climate change arising from an over-reliance upon fossil fuels. The available evidence suggests that wind farms can pose three main problems for birds: disturbance, habitat loss or damage, and collision. Birds may be scared away by construction noise, vehicle movements, or the presence of operating turbines. The wind farm itself may physically

destroy bird's feeding, breeding or roosting sites. In addition, birds may fly into the turbine tower or blades and be killed or injured; storms or conditions of poor visibility will increase the likelihood of this occurring.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
677814 Mrs Heidi Wilson Marston Parish Council		General

CommentID: WED510

Nature of Response: Commenting

Reasons:
Wind turbines are associated with a variety of health problems. Scientists have not yet concluded on the existence of wind turbine syndrome but people who live in the vicinity of wind turbines often complain of breathing and digestive problems, headaches, sleep disturbance, tinnitus, mood problems, concentration or memory problems and issues with equilibrium, dizziness and nausea. The 'strobe' effect caused by turning blades is also believed to cause the onset of an epileptic seizure.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED 143.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26136 Yana Bosseva Renewable UK		General

CommentID: WED553

Nature of Response: Commenting

Reasons:
RenewableUK welcomes the opportunity to comment on the draft South Kesteven Supplementary Planning Guidance (SPD) on Wind Energy. The SPD is overly prescriptive and in our view a number of the concerns raised are addressed through the EIA process anyway. Additionally, the SPD only includes a small number of the benefits of wind energy. We have commented on some additional ones which we request to be included.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. However, the SPD is not considered to be overly prescriptive but rather provides clear guidance that is intended to ensure a sufficient level of information is submitted so that the impacts of wind turbine development are addressed satisfactorily.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26136 Yana Bosseva Renewable UK		General

CommentID: WED561

Nature of Response: Commenting

Reasons:

In RenewableUK's view the issues outlined in the draft list of issues for the SPD are best addressed on a case by case basis according to EIA considerations. As well established parts of the planning process, we consider detailed pre-application consultation and EIA to be the most appropriate methods of creating well designed developments in the most appropriate locations.
The draft SPD should reflect the national planning policy on renewable energy, as well as the benefits of renewable energy, in order to provide a full picture of the need for renewable energy and the substantial weight to be given to achieving the national renewable energy targets within the planning balance.

Changes to the draft that you consider necessary:

SKDC Response:

It is agreed that pre-application consultation and scoping is important to ensure the Council's views are considered early on and the SPD emphasises this throughout the document. Reference is made in section 2.4 to the National Policy context.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		General

CommentID: WED563

Nature of Response: Commenting

Reasons:

Within any of the villages it is very difficult if not impossible to accommodate Wind Turbines because of the very nature of the local topography. There is no where they can be successfully blend into the landscape instead they tower above the villages and heritage assets in a manner that does nothing to enhance the character of the area. We believe there should be a 2 kilometre separation between dwelling and turbines.
Within any of the villages it is very difficult if not impossible to accommodate Wind Turbines because of the very nature of the local topography. There is no where they can be successfully blend into the landscape instead they tower above the villages and heritage assets in a manner that does nothing to enhance the character of the area.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED143 (general section) on separation distances.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
714630 Mr David Smith		General

CommentID: WED592

Nature of Response: Commenting

Reasons:

I live exactly 1 mile from the Frinkley Farm Wind Turbine (S10/1759/Full), due to the application and its subsequent approval, I have looked at the facts and figures that are associated with wind

turbines and observed Frinkley's impact on the environment and on the landscape in this area over the last 6 months.
We who looked at the Frinkley application were told:
"The Turbine will have a minimal impact on the landscape"
When looking across the valley from my home, where once I saw a wood, a hillside and clouds, where at night I saw stars and darkness, I now see the turbine and only the turbine, its movement constantly draws the eye to it, its whiteness when its dull, its aero beacon's when its dark. The trees and hillside are gone from view, it dominates the senses. One visitor was so appalled that she informed me that it was worse than the one that can be seen from the Honnington Rd, (A607), further appalling her I had to let her know it was the same one. It dominates our skyline and dominates our valley, it dominates our darkness. I have lodged a complaint and diary with SKDC Environmental Health that has recorded the number of flashes the aero beacon produces, in some situations we are subjected to 272 flashes per minute or 4.5 per second. With the dark nights of winter here, these lights are our constantly demanding, ever changing companions.
We were told by the developers:
"Turbines kill bats and wildlife, turbines drive 95% of wildlife off the site"
When the Buzzards and Red Kites soar near Frinkley, the anxiety that builds for these birds is like watching a circus act where the knife thrower just misses their assistant, I have absolutely no doubt there have been bird strikes. Evidence supplied by the applicants that wildlife is killed and driven off is, incredibly ignored. I have observed that Rooks and Geese have changed their flight patterns due to the Frinkley turbine. If more turbines go up where will the birds fly? In narrow corridors between developments? An obstacle course from ground level to 400ft. What is the countryside for, other than for benign sensible developments, agriculture and wildlife? Please see that turbines are the only development (apart from roads) that actively destroys our wildlife. The Baines application (11/1922) has just had a second wildlife survey, the "expert" spent only 2 hours on site (the rest of his information was from a book). He said "due to the site not being a topological feature it does not attract soaring birds". The ridge on which the Baines turbines are proposed is all topological feature. Why are we expected to believe such twaddle, when we as occupiers of the land see the complete opposite?
We were told:
Wind is essential to our future energy security.
I cannot tell you how frustrated I get when a high pressure system arrives over the country and Frinkley Farm Turbine stops turning. Where is our energy security? Where is the electricity coming from? Frinkley's developers hid in the small print that it would never be more than 24% efficient, never averaging more than 80kw output. The turbine is rated at 330kw. That's equivalent to having four councillors to do one councillors job. Is this what we have to look forward to? four times the steel, four times the concrete, four times the wildlife disruption, four times the number of turbines than is needed to produce the same electric as one equivalent sized nuclear/gas/coal turbine. Where is the environmental sense of that?
When I moved to this area from "The Fens" I thought it was a paradise, the hills and the valleys are so beautiful, the woods and the wildlife is a wonder, the landscape was unspoilt by heavy industry, any developments that were visible were stationary (apart from the east coast railway line, which adds an interest to the landscape, not constantly dominating it) I feel terrible for the neighbours (500 meters) of the proposed Baines Turbines, for the villagers (700 meters) neighbouring the proposed 5 x 411ft turbines of Temple Hill Wind Farm, for the neighbours (1/2 mile) of the 300ft Top Farm proposed turbine at Foston and for drivers on the A1 that will have the 229ft Green lane Marston Turbine competing with traffic for their attention. I feel terrible that our Lincolnshire countryside is being changed so drastically by People and Companies that don't give a damn about the environment or their neighbours, only, what can be made out of a previously food producing field, that they invariably don't live anywhere near in the first place.
I realise it is difficult sometimes to vote down an application knowing that the decision will be appealed and that you (therefore we) ultimately have no say about our own countryside, however it is appreciated by the many that see these turbines for what they basically are, 300ft piggy banks.
Please consult and inform residents who will be affected by turbines, often it is too late before locals find out about an application.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. The SPD sets out (in Section 4.6) the consultation expected to be undertaken prior to proposals being submitted as a planning application to the Council.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
649840 Miss Philippa Brown Fulbeck Parish Council		General

CommentID: WED607

Nature of Response: Commenting

Reasons:
An addition of glossary of terms and acronyms would be useful to the document.

Changes to the draft that you consider necessary:

SKDC Response:
Agree that this would be useful to include.

Recommended Changes:
Add Glossary of Terms and List of Acronyms as appendices

Consultee	Agent	Consultation Point
714710 David Mathieson		General

CommentID: WED609

Nature of Response: Commenting

Reasons:
There does not appear to be any note covering the legacy of wind turbine foundations after their usefulness has expired or even future replacement turbines that may require another foundation? Our countryside was rightly adorned with concrete defenses during WW2; however has anyone looked back at the history of unsuccessful attempts by landowners and farmers to remove pillboxes, defensive positions and airfield infrastructure to claim back their fields? The reality probably still stands - whatever you put in the ground will never be removed.

Changes to the draft that you consider necessary:

SKDC Response:
It is agreed that it would be useful to include reference to the removal of foundations as part of the decommissioning of a site.

Recommended Changes:
Under paragraph 4.7.4 amend 10th bullet point to read:
"... medium scale turbines (requiring that the turbines, and foundations, are removed ...."

Consultee	Agent	Consultation Point
703325 Mr John Halton		General

CommentID: WED617

Nature of Response: Commenting

Reasons:
It is rather strange that the SPD makes no reference to any previous appeal decisions, particularly when SKDC have the benefit of the Inspector's comments for two appeals which were dismissed at Thackson's Well Farm and Palmers Hollow. The Officer's recommendations about the importance of Belton House, Bellmount Tower etc and the landscape are sadly missing. These should at least be included in the appendices.

Changes to the draft that you consider necessary:

SKDC Response:
There are a large number of appeal decisions that could be referenced in relation to all of the issues listed in the SPD. It is not appropriate to detail these in the SPD as it would make the document overly long. Inspectors decisions also do not always concur with each other.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
703325 Mr John Halton		General

CommentID: WED619

Nature of Response: Commenting

Reasons:

Finally, having waited with great expectation for the advent of the draft SPD I am disappointed with the content. It is not prescriptive and of a very general nature. It could literally apply to any district in the UK. The large majority of the content has been taken from known sources readily available and in the public domain. For example, parts of South Kesteven District Council Core Strategy has been reiterated along with standard elements of advice from English Heritage. The document has been compiled with very little understanding of the district in context and the importance of the largely unaltered rural landscape and townscape of the villages. There is no mention of the likely impact wind turbines will have on sensitive settlements which in the main encompass historic heritage assets. Large wind turbines are in danger of unsettling the established hierarchy that these buildings command on the skyline by creating an industrial emphasis which will adversely redefine the countryside. Now that the SPD has been published in draft format it is clear that it contains little specialist input in relation to siting of wind turbines and understanding of the landscape in the district. It does however; seek to remove the current Landscape Character Assessments that are embodied in the Council's Core Strategy.

Changes to the draft that you consider necessary:

SKDC Response:

The SPD acknowledges that "the landscape of South Kesteven is predominantly rural" and the "rural landscape of South Kesteven retains a strongly historic character, particularly in proximity to the District's towns and villages" and sets out clear guidance in response to this. A detailed landscape sensitivity assessment has not been undertaken but it should be clarified it is not the intention to rescind all of the LCA but only those sections that refer to wind energy proposals.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		What is the Purpose of the SPD 1.1.2

CommentID: WED528

Nature of Response: Objecting

Reasons:

Changes to the draft that you consider necessary:

Add 'It should be noted that SPD's do not hold the same weight as an adopted Development Plan Document (DPD) such as the Core Strategy and do not form part of the statutory development plan under which planning applications are principally determined' to the end of para 1.1..2.

SKDC Response:

Agree that the amended wording would provide clarification on the status of the SPD.

Recommended Changes:

Amend first and second sentences of paragraph 1.1.2 to read:
'The SPD does not form part of the Development Plan but is a material consideration in the determination of wind energy planning applications in the area. It supports the positive implementation of Development Plan Polices EN1 …..'

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		What is the Purpose of the SPD 1.1.2

CommentID: WED562

Nature of Response: Supporting

Reasons:
Strongly support the positive implementation of Policies EN1: Protection and Enhancement of the Character of the District.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		What is the Purpose of the SPD 1.1.3

CommentID: WED234

Nature of Response: Commenting

Reasons:
We welcome several references to the role of the Council members as consultees on applications for developments above 50MW to be determined by the National Infrastructure Directorate. We trust that the adoption of the SPD will provide robust support to the Council in composing its response to any large-scale development.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713810 Suzanne Williams Spring Wells Heritage Group		What is the Purpose of the SPD 1.1.3

CommentID: WED338

Nature of Response: Commenting

Reasons:
As larger applications will circumvent the District planning process, the Group would encourage South Kesteven District Council to give thought to the status of this document in such a situation and whether it could subsequently be enhanced.

Changes to the draft that you consider necessary:

SKDC Response:
It would not be possible to give the SPD an 'enhanced' status in the circumstances suggested.

Recommended Changes:
n/a

Consultee
713807 Mr Paul Miley

Agent

Consultation Point
How was the SPD prepared?
1.3

CommentID: WED397

Nature of Response: Commenting

Reasons:
The introduction fails to mention that the first draft of the SPD was prepared by Land Use Consultants, a firm that are also employed by the wind farm developers RWE NPower. This would appear to be a conflict of interest. Statement should be made that they were used and it should at least be indicated how this conflict was managed.

Changes to the draft that you consider necessary:
SPD first draft was prepared by company Land Use Consultants. Details to ensure no conflict of interest: etc etc etc

SKDC Response:
It is not uncommon for consultants to be employment by both public and private sector clients.
LUC were employed to prepare the first draft of the SPD but there were no conflicts of interest as LUC are not involved in any wind farm developments within South Kesteven. LUC have been employed by RWE Npower to prepare Environmental Impact Assessments for wind energy schemes in other parts of the country but these are independent assessments of the environmental impacts of the proposed schemes and are prepared in accordance with the EIA regulations and good practice guidance as set out by the Institute of Environmental Assessment.

Recommended Changes:
n/a

Consultee
713807 Mr Paul Miley

Agent

Consultation Point
How was the SPD prepared?
1.3.3

CommentID: WED398

Nature of Response: Objecting

Reasons:
International best practice from countries with experience of industrial wind farms does not appear to have been adopted in preparation of this SPD e.g. on matters of public health, separation distances etc.
I recognise that research and development is changing rapidly, but this is natural as the industry is growing rapidly

Changes to the draft that you consider necessary:
Recognise and state SPD guidelines internationally - other countries have adopted objective guidance on either separation distances or degrees of compensation for those in the immediate vicinity of industrial farms.

SKDC Response:
See comments for WED 143 (general section) on separation distances. Compensation for those affected by wind farms is not a material consideration the planning process

Recommended Changes:
n/a

Consultee
26136 Yana Bosseva
Renewable UK

Agent

Consultation Point
The Role of Wind Energy
2

CommentID: WED554

Nature of Response: Commenting

Reasons:
We welcome the introductory section on the role of wind energy, and the recognition of its role for carbon emissions reduction. However, there are also other benefits which in our view should be recognised in the SPD. These include job creation and other local benefits; the staibilising of energy prices (by reducing reliance on imported fossil fuels which are also increasing in price); contributing to the need to meet our energy needs and preserve the environment. Therefore, in our view the introductory section of the SPD should include the following benefits of wind energy:
· Reaching the UK's renewable energy generation targets;
· Ensuring the security of energy supply;
· Stabilising energy prices to the customer and reducing fossil fuel dependence; and
· Job creation and other local benefits.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. The SPD already makes reference to the benefits of wind energy in terms of renewable energy targets and job but it is agreed that additional references could be included.

Recommended Changes:
At end of last sentence of paragraph 2.3.2 add:
"… contributing towards the security of the overall energy supply."

Consultee	Agent	Consultation Point
26328 Mr M L Hall Barkston & Syston Parish Council		What is Wind Energy 2.2.1

CommentID: WED265

Nature of Response: Commenting

Reasons:
Wind turbines are generally considered to be an inefficient method of generating electricity, ie the amount of electricity produced, pro-rata to the cost of installation and running, and often operate at very reduced rates of efficiency.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. However, the Government have recently stated that onshore wind has an important role to play as part of a balanced energy mix.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
677814 Mrs Heidi Wilson Marston Parish Council		What is Wind Energy 2.2.1

CommentID: WED505

Nature of Response: Commenting

Reasons:
Wind turbines are considered to be an inefficient means of producing electricity considering the costs involved in their installation and running. Wind energy is unreliable and wind by its nature is unpredictable.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED265

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		What is Wind Energy 2.2.3

CommentID: WED235

Nature of Response: Commenting

Reasons:
We suggest that 50m is still a considerable height for a turbine, and would suggest that the category of 'small' turbines should refer to structures that are well below 50m, and recommend that a 'small' turbine should be defined as up to 25m.

Changes to the draft that you consider necessary:

SKDC Response:
Having undertaken consultation on a proposed change to the defintion of a small wind turbine the Council propose to amend, for the purposes of the SPD, the turbine height for a small wind turbine to 30m (to blade tip)

Recommended Changes:
In Table 2.1 amend the height defintion of a small wind turbine to 'up to approximately 30m' and the definition of medium wind turbine to '30-100m'.

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		What is Wind Energy 2.2.3

CommentID: WED251

Nature of Response: Commenting

Reasons:
Table 2.1 whilst it might be acceptable for a "small" turbine to be defined as under 50KW, allowing a height of up to 50m gives a problem. This is important because there are several places in the document where small turbines are omitted from provisions applying to medium and large turbines. The height should be the dominant determinant for requirements. A 50m high turbine, which is the same height as Billingborough Church spire, can potentially have very adverse effects upon a landscape or historic environment irrespective of its power output.

Changes to the draft that you consider necessary:
We advocate a limit of 25m for the "small" definition.

SKDC Response:
See comment for WED235

Recommended Changes:
See change for WED235

Consultee	Agent	Consultation Point
713497 Mr Anthony Saunders		What is Wind Energy 2.2.3

CommentID: WED305

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Small turbines should be defined as below 25metres in height not 50metres. 50metres is the same height as the spire of Billingborough church, which dominates that part of the fen. Any number of 50metre turbines would ruin the landscape.

SKDC Response:
See comment for WED235.
It should be noted that section 3.2.8 states "siting of turbines shall not prevent the understanding and appreciation of historic landmark features such as hilltop monuments or church spires and towers, which are such a key feature of the Lincolnshire landscape"

Recommended Changes:
See change for WED235

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		What is Wind Energy 2.2.7

CommentID: WED523

Nature of Response: Commenting

Reasons:
In relation to bullet point 3, crane hard standing areas are not always removed after construction. They are often left in situ to facilitate future maintenance of the turbines.

Changes to the draft that you consider necessary:
Suggest 'which is generally removed after construction' is deleted.

SKDC Response:
Agree with comment.

Recommended Changes:
In 4th bullet point under paragraph 2.2.7 delete 'which is generally removed after construction'

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		What is Wind Energy 2.2.8

CommentID: WED272

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust supports the requirement for details of cabling and grid connections to be submitted with any planning application for wind turbines, either as a separate application if required or as additional information including an assessment of ecological impacts. This should allow a more informed decision to be reached as to any potential impacts of the development as a whole.

Changes to the draft that you consider necessary:

SKDC Response:
Support noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		What is Wind Energy 2.2.8

CommentID: WED456

Nature of Response: Commenting

Reasons:
In 4th sentence it states that details must be submitted. This is not always possible and remmend it should be reworded.

Changes to the draft that you consider necessary:
Reword 4th sentence to the effect of '..... wherever reasonably possible this should be submitted ....'

SKDC Response:
Comment noted. However, in response to another representation (WED524) it is proposed to delete this particular sentence.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		What is Wind Energy 2.2.8

CommentID: WED524

Nature of Response: Objecting

Reasons:
Permission for overhead electricity lines is through either an application to the Secretary of State under section 37 of the Electricity Act, or through an application as a Nationally Significant Infrastructure Project (NSIP) – depending on the nature and voltage of the line required. It is not a matter for a Town and Country Planning Act application. In addition, the applicant for grid connection works is normally the local electricity network operator (rather than the applicant for the generating station). It is therefore not appropriate to require the applicant for a TCPA generating station proposal to include within (or alongside) that application, an application for any associated transmission lines. The distinction between these two planning regimes should be made clear.
Whilst National Policy Statement (NPS) EN-1 encourages applications for new electricity generating stations and related infrastructure to be contained in a single application, this is only possible where the generating station application is itself an NSIP application. This is part of the "one stop shop" nature of the NSIP consenting regime, but it does not apply to the TCPA regime. Even then, the NPS acknowledges that this may not always be possible, nor the best course in terms of delivery of the project in a timely way.
The question of the nature and timing of applications for grid connection works is a
different question to that of the provision of environmental information regarding any
necessary grid connection works. Since the ES must cover all elements of a proposal and not just those that are the subject of any particular application in isolation, it would be appropriate for para 2.2.8 to be amended to reflect the requirement for the applicant to include environmental information on the likely grid connection works associated with his proposal.

Changes to the draft that you consider necessary:
Make the distinction between the NSIP and TCPA planning regimes and approach to permission for overhead lines clear. Suggest the following text is inserted: 'Permission for overhead electricity lines is through either an application to the Secretary of State under section 37 of the Electricity Act, or through an application as a Nationally Significant Infrastructure Project (NSIP) – depending on the nature and voltage of the line required. It is not a matter for a Town and Country Planning Act application. However, environmental information concerning the likely grid connection route should be outlined within the environmental assessment submitted with the proposal'.
Delete 'Where planning permission is required from South Kesteven District Council for transmission lines, then a planning application for these must be submitted at the same time as the application for wind turbines. If planning permission is not required from the District Council, details should be submitted for information'.

SKDC Response:
This matter is also covered under Chapter 4 and as such it would be appropriate for the references in paragraph 2.2.8 be deleted so as to avoid any unnecessary duplication of information.

Recommended Changes:
Delete 4th and 5th sentences of paragraph 2.2.8

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Contribution to carbon reduction 2.3

CommentID: WED13

Nature of Response: Commenting

Reasons:
Section goes into some detail about previous EU and UK targets but does not reflect recent announcements. For example DECC have stated that:
'There are currently around 5GW of onshore wind installed in the UK. Around 6GW of onshore wind are awaiting construction, with around a further 7GW in the planning system…… Not all of these projects will be built ….. To meet the trajectory set out in the Renewable Energy Roadmap, we expect to need up to 13GW of onshore wind by 2020.'

Changes to the draft that you consider necessary:

SKDC Response:
The targets set out in section 2.3 are still the correct targets for renewable energy generation in the UK.
The 13GW target represents the central range for deployment set out in the Renewable Energy Roadmap. The ranges do not represent technology specific targets or the level of DECC's ambition. They were based on DECC understanding of deployment, costs and non-financial barriers and DECC states that they could change significantly as the market evolves to 2020 (see para 2.5 of the DECC RE Roadmap).
DECC has also made it clear that it cannot be certain that all the projects in the pipeline will be consented or commissioned or that they will progress quickly enough to contribute when needed. As a consequence, DECC have stated that new wind energy proposals will be required to come forward to meet the 2020 ambition and longer term carbon reduction targets and that onshore wind has an important role to play as part of a balanced energy mix.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Contribution to carbon reduction 2.3

CommentID: WED78

Nature of Response: Commenting

Reasons:
Contribution to Carbon Reduction – this section goes into some detail about previous EU and UK targets but does not reflect recent announcements. For example, in a recent press notice (and many other occasions) DECC have stated that:
There are currently around 5GW of onshore wind installed in the UK. Around 6GW of onshore wind are awaiting construction, with around a further 7GW in the planning system…… Not all of these projects will be built ….. To meet the trajectory set out in the Renewable Energy Roadmap, we expect to need up to 13GW of onshore wind by 2020.
Indeed, recent statements from Westminster suggest that the 13GW requirement may be achieved with what is already in the Planning System.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED13.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Contribution to carbon reduction 2.3

CommentID: WED147

Nature of Response: Commenting

Reasons:

Contribution to Carbon Reduction – this section goes into some detail about previous EU and UK targets but does not reflect recent announcements. For example, DECC have stated that:
There are currently around 5GW of onshore wind installed in the UK. Around 6GW of onshore wind are awaiting construction, with around a further 7GW in the planning system…… Not all of these projects will be built ….. To meet the trajectory set out in the Renewable Energy Roadmap, we expect to need up to 13GW of onshore wind by 2020.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED13.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
711814 Ms Karen Stokes		Contribution to carbon reduction 2.3

CommentID: WED223

Nature of Response: Commenting

Reasons:

Feel that we do not need more onshore Wind Farms. "Enough is enough" as the Energy Minister recently said. Feel we're in danger of swamping Lincolnshire with Wind Farms and changing our landscape forever.
Perhaps SKDC needs to bear in mind what Ed Davey recently said on his website that the target is UP TO 13GW and that most of this has already been decided or to quote him
"To meet the trajectory set out in the Renewable Energy Roadmap, we expect to need up to 13GW of onshore wind by 2020."
Hope that SKDC will bear these points in mind and listen to the people of our area

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED13

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Contribution to carbon reduction 2.3

CommentID: WED311

Nature of Response: Supporting

Reasons:

Welcome the positiveness of this para esp the reference in 2.3.3 to 'accelerating renewable energy in the UK'.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
714277 Mr Richard Hoole

Agent

Consultation Point
Contribution to carbon reduction
2.3

CommentID: WED373

Nature of Response: Objecting

Reasons:
The government doesn't seem to know what it wants and keeps issuing contradictory statements. According to the Department of Energy and Climate Change the UK already has enough wind energy in the system to meet targets. The ability of wind energy to make any form of sensible contribution to CO2 reductions is far from proven. The industry only works at all because of huge government subsidies.
SKDC should not have to follow confused and flawed government policy.

Changes to the draft that you consider necessary:
There is no need to include any information about the role of wind energy. SKDC needs to have a wind energy SPD so that it has guidance on what to do with planning applications, not because it has to meet any government targets.

SKDC Response:
The purpose of this section is to provide some context and reflects the Government's current position on wind energy. See also comments for WED13

Recommended Changes:
n/a

Consultee
714273 Vikki Hoole
reVOLT

Agent

Consultation Point
Contribution to carbon reduction
2.3

CommentID: WED574

Nature of Response: Commenting

Reasons:
details the EU target for the UK to generate 15% of all energy from 'renewable' sources by 2020, with the delivery of this target being laid out in the Renewable Energy Roadmap. However, this is the only firm target the government is committed to and, as DECC has stated:
There are currently around 5GW of onshore wind (3,350 turbines) installed in the UK. Around 6GW of onshore wind are awaiting construction (2,682 turbines), with around a further 7GW in the planning system (3,063 turbines). Many of these in planning are in Scotland. Not all of these projects will be built – in England around half of all onshore wind projects do not receive planning approval. To meet the trajectory set out in the Renewable Energy Roadmap, we expect to need up to 13GW of onshore wind by 2020.
So, although some MPs may desire continued expansion of onshore wind energy, the current targets are already set to be exceeded. There are no obligations on SKDC in terms of national or regional targets.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED13

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Contribution to carbon reduction 2.3.1

CommentID: WED236

Nature of Response: Commenting

Reasons:

This comment also applies to paragraph 2.4.2 'low carbon sources'.

We very much appreciate the constraints placed on SKDC by the need to interpret government policy, even though there is now a considerable body of evidence to support the fact that much of the thinking behind the merits of wind farms is flawed, and that the role of wind farms in carbon reduction is largely misunderstood. The true carbon cost of turbine installation and background support (as well as the real cost of wind energy) is rarely if ever expressed impartially. We refer here, for example, to Roger Helmer MEP's open letter to the government (http://rogerhelmermep.wordpress.com/2012/08/16/why-is-decc-clinging-to-wind/), where he exercises the arguments against the efficacy of wind farms very eloquently and succinctly. The timely adoption of the SPD will go a long way towards ensuring that SKDC will be able to make good decisions on behalf of the countryside and the communities of south Lincolnshire.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED13

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Contribution to carbon reduction 2.3.1

CommentID: WED252

Nature of Response: Commenting

Reasons:

Whilst man made climate change might, on balance, be a Government belief, it should be acknowledged that not all people, communities or scientists believe in it.

Changes to the draft that you consider necessary:

Add to second sentence at the start 'The Government believes that…..' and put in brackets at the end '(although it is acknowledged that not all people and scientists agree)'.

SKDC Response:

The amendment proposed would not add anything to the SPD and is unnecessary.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
711369 Mr Gary Senior		Contribution to carbon reduction 2.3.2

CommentID: WED146

Nature of Response: Commenting

Reasons:

The 2020 onshore target of 13GW is likely to be achieved from the 6GW awaiting construction, 7GW already in the planning process, and 5GW already constructed. We do not need any further

consents to achieve targets, so this should not influence the outcome of any new planning applications.

Changes to the draft that you consider necessary:

SKDC Response:
See comement for WED13

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713530 Mr Andrew Jenkins		Contribution to carbon reduction 2.3.2

CommentID: WED329

Nature of Response: Commenting

Reasons:
Wind energy is not the only or the most efficient source of low carbon energy therefore it should not be assumed that wind farm developments should be permitted on the basis of being essential to reduce greenhouse gas emissions

Changes to the draft that you consider necessary:
Throughout the document there should not be any presumption that wind energy is "essential" to meet carbon reduction targets. Other more efficent technologies are available.

SKDC Response:
See comement for WED13. The SPD does not make the presumption suggested but sets out, to provide some background context, the Government's current position on wind energy.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713807 Mr Paul Miley		Contribution to carbon reduction 2.3.2

CommentID: WED405

Nature of Response: Objecting

Reasons:
this paragraph is misleading in isolation as it suggests there is no option other than extensive onshore wind farm investment in the SKDC area by dint of the need of central government.

Changes to the draft that you consider necessary:
include within this section the statement that DECC have said that the 2020 target is 13GW of onshore. As of 2012, 5GW is running, 6GW are awaiting construction and 7GW are already in the planning system. There is therefore no central Government imperative to approve.

SKDC Response:
See comement for WED13

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
703325 Mr John Halton		Contribution to carbon reduction 2.3.2

CommentID: WED616

Nature of Response: Commenting

Reasons:
The Governments 2020 renewable EU commitment is now already in the system and will be achieved. The council can therefore adopt a policy that seeks to protect it's rich heritage and communities living in the country.

Changes to the draft that you consider necessary:

SKDC Response:
See comement for WED13

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Contribution to carbon reduction 2.3.3

CommentID: WED399

Nature of Response: Commenting

Reasons:
The Renewable Energy Roadmap had a 'central projection' of 13GW installed onshore wind in order to meet the target. More recently this has been described by DECC as 'up to 13GW'. Recent DECC figure confirm that 5GW of onshore wind has been installed in the UK, plus 6GW approved and awaiting constructionand a further 7GW in the planning system. The plan to satisfy the EU target is thus about to be achieved. There is minimal, if any, need for further onshore wind in order to achieve this target. Certainly not in low wind areas or where there are significant landscape or residential amenity objections.

Changes to the draft that you consider necessary:
Recognise that the target is almost achieved/exceeded and that there is no obligation or imperitive on SKDC to accept any industrial wind turbines.

SKDC Response:
See comement for WED13

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Contribution to carbon reduction 2.3.3

CommentID: WED457

Nature of Response: Commenting

Reasons:
In 6th sentence is reference to consumption rather than production correct?

Changes to the draft that you consider necessary:

SKDC Response:
The reference is correct.

Recommended Changes:
n/a

Consultee
26352 Ms Rosemary H Woolley
Baston Parish Council

Agent

Consultation Point
The planning policy context
2.4

CommentID: WED226

Nature of Response: Commenting

Reasons:
All applications should take into account the total life cost of wind energy solution before approved;

Changes to the draft that you consider necessary:

SKDC Response:
This is not a material planning consideration.

Recommended Changes:
n/a

Consultee
372057 Mr Peter Beever
Rutland County Council

Agent

Consultation Point
The planning policy context
2.4

CommentID: WED309

Nature of Response: Objecting

Reasons:
The document omits to include any references to the policies and guidance of Rutland and other neighbouring authorities in the planning policy context part of the document.

Changes to the draft that you consider necessary:
Include references to the policies and guidance of Rutland and other neighbouring authorities. Rutland County Council adopted a Wind Turbine Developments Supplementary Planning Document on 12 November 2012. This can be viewed on the Council's website www.rutland.gov.uk/windturbinesspd.

SKDC Response:
It is not considered necessary to include reference to the policies of neighbouring local authorities in this section. However, in response to another representation from Rutland County Council (to section 4.6) it is proposed to include reference that neighbouring authorities should be consulted at pre-application stage.

Recommended Changes:
n/a

Consultee
490730 Mr Alan Hubbard
The National Trust

Agent

Consultation Point
The planning policy context
2.4

CommentID: WED340

Nature of Response: Objecting

Reasons:
In the same way as the subsequent Section on the SKDC Adopted Core Strategy does not just identify the Renewable Energy Policy (EN3) but sets it in the wider context of Policy EN1, it is considered that the review of relevant NPPF Policy should be set in the context of a) the integrated approach to sustainable development (paras 7-9), b) the Core Principles (para 17) and c) other relevant topic-based advice such as those in Sections/Chapters 3, 7, 9, 11 and 12.

Changes to the draft that you consider necessary:
Supplement these paragraphs do include the NPPF approach to sustainable development, its Core Principles and relevant topic based national policy.

SKDC Response:
Whilst the SPD focuses on those specific sections of the NPPF relevant to the SPD subject matter, it is generally accepted that all (relevant) sections of the NPPF should be considered and it is not considered to be necessary, therefore, to refer to them in detail in the SPD. The Local Policy context is slightly different as Policies EN1 and EN3 are the Development Plan policies against which proposals will be considered and which the SPD supports.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		The planning policy context 2.4

CommentID: WED575

Nature of Response: Commenting

Reasons:
Section 2.4 lays out the relevant NPPF guidance about encouraging renewable and low carbon energy development, but it does not mandate any particular technology. SKDC could thus comply with this guidance by encouraging greater use of heat pumps, shared heating schemes, solar energy, the growing of biomass fuel and by mandating higher standards of energy conservation etc.
There is no EU, national or regional requirement for SKDC to accept any industrial wind farms. If the council does not think them appropriate to the area, this should be adopted as policy. The UK needs low carbon energy, but it does not have to be onshore wind and it does not have to be in South Kesteven. A London borough is not expected to make a significant contribution to the national sugar beet harvest!

Changes to the draft that you consider necessary:

SKDC Response:
South Kesteven has a role to play in trying to meet the Government's renewable energy targets and it is acknowledged by the Government, as outlined in the response to WED 13, that it considers that onshore wind has an important role to play as part of a balanced energy mix. The SPD is not promoting the role of wind energy, rather it is setting out the Council's approach to the consideration of wind energy schemes within the District.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		National Planning Policy 2.4.1

CommentID: WED312

Nature of Response: Supporting

Reasons:
I welcome paras 2.4.1 to 2.4.6 re the National Planning Policy as they are positive.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
714277 Mr Richard Hoole

Agent

Consultation Point
National Planning Policy
2.4.1

CommentID: WED374

Nature of Response: Objecting

Reasons:
The National Planning Policy Framework does not say that local authorities have to support the transition to a low carbon future or encourage the use of renewable resources by using any particular form of renewable energy. Therefore it is not relevant to explaining why SKDC needs an SPD on wind energy.

Changes to the draft that you consider necessary:
Explain that there are many other ways to achieve the NPPF guidelines, not just wind energy.

SKDC Response:
The inclusion of a reference to the NPPF is relevant as it provides context for proposals. Core Strategy Policy EN3 does not support one particular form of renewable energy and it should not be assumed that just because the Council has prepared a Wind Energy SPD that this is the case. It may be appropriate, however, to include a definition of 'renewable energy' in a glossary.

Recommended Changes:
Include definition of renewable energy in Glossary

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
National Planning Policy
2.4.2

CommentID: WED14

Nature of Response: Commenting

Reasons:
The responsiblity in the NPPF for communities to contribute to renewable/low carbon energy generation does not just refer to electricity generation. This can include the energy powering transport and heating. South Kesteven has a high take up of solar energy schemes and ground/air sourced heat pumps (inlcuding SKDC Council houses)

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. It is correct that the Government's 15% target includes electricity, heat and transport.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
National Planning Policy
2.4.2

CommentID: WED79

Nature of Response: Commenting

Reasons:
The responsibility in the NPPF for communities to contribute to renewable/low carbon energy generation does not just refer to electricity generation. This can include the energy powering transport and heating. South Kesteven has a high take-up of solar energy schemes and ground/air sourced heat pumps (including SKDC council houses).

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED14.

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
National Planning Policy
2.4.2

CommentID: WED148

Nature of Response: Commenting

Reasons:
The responsibility in the NPPF for communities to contribute to renewable/low carbon energy generation does not just refer to electricity generation. This can include the energy powering transport and heating. South Kesteven has a high take-up of solar energy schemes and ground/air sourced heat pumps (including SKDC council houses).

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED14.

Recommended Changes:
n/a

Consultee
26184 Mrs Wendy McCallin
Foston Parish Council

Agent

Consultation Point
National Planning Policy
2.4.2

CommentID: WED564

Nature of Response: Commenting

Reasons:
The responsibility in the NPPF for communities to contribute to renewable/low carbon energy generation does not just refer to electricity generation. This can include the energy powering transport and heating. South Kesteven has a high take-up of solar energy schemes and ground/air sourced heat pumps (including SKDC council houses). This type of energy production is more suitable for the areas with open views and isolated villages because they can blend into village setting therefore retaining the character of South Kesteven as an attractive location for sustainable growth and prosperity. Low carbon energy development does not necessarily mean wind turbines an open mind approach is much more appealing.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED14

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
National Planning Policy
2.4.3

CommentID: WED400

Nature of Response: Commenting

Reasons:
Renewable / low carbon energy generation does not just refer to electricity generation. Energy can include that used in transport and heating.

Changes to the draft that you consider necessary:
Recognise that low carbon energy production can include, for example, ground source heat pumps, community heating schemes and solar energy.

SKDC Response:
See comment for WED14

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		National Planning Policy 2.4.3

CommentID: WED565

Nature of Response: Commenting

Reasons:
Lincolnshire's topography makes the impact of two turbines 6 kilometers a part significant to several villages so suitable safeguards need to be in place to protect local amenity against cumulative visual impacts.

Changes to the draft that you consider necessary:
Cumulative landscape impact of Turbines needs to be addressed with setback distances between turbines in areas where visibility extends to 15 kilometers and beyond, to protect villages and towns against cumulative visual impacts.

SKDC Response:
The SPD sets out specific guidance on cumulative impacts and that they should be minimised and impacts assessed and weighed up on a case by case basis. The use of setback distances is not advocated as it is not possible to state a set distance that will apply in all instances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		National Planning Policy 2.4.4

CommentID: WED15

Nature of Response: Commenting

Reasons:
Wind energy is renewable: though not necessarily low carbon in terms of national electricity production.

Changes to the draft that you consider necessary:
Delete 'and wind energy' so sentence reads:
'The fundamental need for renewables is therefore clearly ....'

SKDC Response:
In the context of the preceding sections it is considered that the proposed amendment is reasonable. However, it should be noted that whilst it is true that some energy is required to manufacture, transport and install wind turbines and associated infrastructure this is true of all forms of energy generation. Evidence from a study which included data from 169 wind turbines going back 30 years suggested that the average wind farm generates at least 20-25 times the energy required in its manufacture and installation over its lifetime and the average payback time for a wind farm is 3-6 months.

Recommended Changes:
In 2nd sentence of paragraph 2.4.4 delete "and wind energy".

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		National Planning Policy 2.4.4

CommentID: WED80

Nature of Response: Commenting

Reasons:
Wind energy is renewable; though not necessarily low carbon in terms of national electricity production.

Changes to the draft that you consider necessary:
Suggest delete 'wind energy' from 2nd sentence to read
'The fundamental need for renewables is therefore clearly….'

SKDC Response:
See comments for WED15.

Recommended Changes:
See change for WED15

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		National Planning Policy 2.4.4

CommentID: WED149

Nature of Response: Commenting

Reasons:
Wind energy is renewable; though not necessarily low carbon in terms of national electricity production.

Changes to the draft that you consider necessary:
Suggest amend 2nd sentence to read:
'The fundamental need for renewables and wind energy is therefore clearly….'

SKDC Response:
See comments for WED15.

Recommended Changes:
See change for WED15

Consultee	Agent	Consultation Point
711472 Mrs Pamela MacAllister		National Planning Policy 2.4.4

CommentID: WED191

Nature of Response: Commenting

Reasons:
Whilst it is accepted that there is a need for renewables the indications are that government targets for wind energy are already being significantly met. DECC have recently stated that there are

currently around 5GW of onshore wind installed in the UK. Around 6GW of onshore wind are awaiting construction, with around a further 7GW in the planning system we expect to need up to 13GW of onshore wind by 2020.

Changes to the draft that you consider necessary:
Omit the words 'and wind energy'

SKDC Response:
See comments for WED15

Recommended Changes:
See change for WED15

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		National Planning Policy 2.4.4

CommentID: WED237

Nature of Response: Commenting

Reasons:
We note the reference to the NPPF's advice to local authorities that they should "approve [any] application if its impacts are (or can be made) acceptable". We also, therefore, recognise within this paragraph the case for the opposite scenario – that SKDC is empowered to reject any application where its impact is not (or cannot be made) acceptable. This is important and should be spelt out.
2.4.7 Policy EN1, point 10: the sheer scale of a large-scale wind farm on the fenland landscape would mean maximum visual intrusion.

Changes to the draft that you consider necessary:

SKDC Response:
This change does not add anything to the SPD and is considered unnecessary as it does no more than state the obvious.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		National Planning Policy 2.4.4

CommentID: WED402

Nature of Response: Objecting

Reasons:
Although wind energy is 'renewable', in the context of national energy production (with the attendent backup power, construction and infrastructure costs) there is no proof that it is 'low carbon' energy, as implied by this paragraph.
Nor is the 'fundamental need' for wind energy in particular 'clearly determined and enshrined in Government policy'. The need for low-carbon energy is clearly stated, but not necessarily wind energy.

Changes to the draft that you consider necessary:
Change the second sentence to 'The fundamental need for low carbon energy is therefore clearly determined....etc'

SKDC Response:
See comments for WED15

Recommended Changes:
See change for WED15

Consultee
713807 Mr Paul Miley

Agent

Consultation Point
National Planning Policy
2.4.4

CommentID: WED420

Nature of Response: Commenting

Reasons:
Even though this is an SPD for wind, it should in this section be noted that (appropriate to an area) other renewables options are available

Changes to the draft that you consider necessary:
Describe the alternatives such as biomass, ground source heat pumps, shared heating, heat recovery, combined heat and power, solar etc. In addition the initiatives on energy reduction as opposed to generation could overall net greater gains than simply investing in wind technology that is inefficient in low wind regions.

SKDC Response:
The preceding paragraphs cleary indicate that the NPPF does not focus on wind energy development and similarly Core Strategy Policy EN3 does not support one particular form of renewable energy. See also comments for WED374 (para 2.4.1)

Recommended Changes:
n/a

Consultee
26184 Mrs Wendy McCallin
Foston Parish Council

Agent

Consultation Point
National Planning Policy
2.4.4

CommentID: WED566

Nature of Response: Commenting

Reasons:
Wind energy is renewable; though not necessarily low carbon in terms of national electricity production.

Changes to the draft that you consider necessary:
In 2nd sentence delete "and wind energy" so sentence reads:
"The fundamental need for renewables is therefore clearly"

SKDC Response:
See comment for WED15

Recommended Changes:
See change for WED15

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
National Planning Policy
2.4.6

CommentID: WED525

Nature of Response: Commenting

Reasons:
It should be acknowledged (not least because they are referred to for guidance throughout the SPD) that although EN-1 and EN-3 are the primary basis for decisions by the National Infrastructure Directorate on renewables energy schemes >50MW, they are also a key material consideration for projects <50MW determined by Local Planning Authorities.

Changes to the draft that you consider necessary:
Insert 'EN-1 and EN-3 are a material consideration in planning decisions for renewable energy development with a generating capacity below 50MW'.

SKDC Response:
Agree proposed amendment would provide clarification.

Recommended Changes:
After 1st sentence of paragraph 2.4.6 add: "These Statements are likely to be a material consideration in decision making on planning applications with a generating capacity below 50MW. Whether and to what extent the Statements are a material consideration will be judged on a case by case basis.'

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Local Planning Policy 2.4.7

CommentID: WED238

Nature of Response: Commenting

Reasons:
We cannot visualise a scenario where a large scale wind farm could be considered to be 'appropriate to the character and significant natural, historic and cultural attributes and features of the landscape in which it is situated, and contribute to its conservation, enhancement or restoration.'
Reference 8. The placing of large numbers of wind turbines very close to village amenities does indeed threaten the ability of villagers to enjoy the countryside on their doorstep: care must be taken to site any developed away from land regularly used for village activity, be that riding, dog-walking, rambling, photography, etc.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Local Planning Policy 2.4.7

CommentID: WED313

Nature of Response: Objecting

Reasons:
I am disappointed that the Local Planning Policy is not more positive and encouraging in the desire for more wind turbines to be built in SKDC.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Local Planning Policy 2.4.7

CommentID: WED359

Nature of Response: Supporting

Reasons:
Fully support reliance on Core Strategy Policy EN1 and the need to protect and enhance the District's landscape, especially where no manmade structures are present, so as to ensure the conservation, enhacement and restoration objectives of the policy are met.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Local Planning Policy 2.4.7

CommentID: WED401

Nature of Response: Objecting

Reasons:
The wording of the 2 policies is not even-handed. EN1 calls for assessment in relation to various criteria, whereas EN3 states that permission WILL BE GRANTED, subject to conditions and ACCORDANCE with other strategies.

Changes to the draft that you consider necessary:
Make it clear that EN1 (in isolation, or with linked sub-policies) has greater weight than EN3. Such that where an application does not comply with an EN1 condition (i.e. it is unacceptable), EN3 is not applicable.

SKDC Response:
As policies in the adopted Core Strategy they have equal weight and must still be considered relevant to the consideration of a planning application.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Local Planning Policy 2.4.7

CommentID: WED526

Nature of Response: Objecting

Reasons:
Whilst the opportunity to submit comments on the adopted Core Strategy Policy EN3 (July 2010) has long passed, its reciting in this draft SPD has highlighted a key concern with its content. The requirement for a proposal to demonstrate that it can be connected efficiently to existing national grid infrastructure is wholly inappropriate and should not be a planning consideration.

Changes to the draft that you consider necessary:
Clarification on this point could be made within this SPD.

SKDC Response:
The comment is noted, however, it is not possible to change the wording of a policy in the adopted Core Strategy through the SPD.
The SPD does clearly set out (in Section 4) the issues of connections to the grid and the process for considering these.

Recommended Changes:

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		Local Planning Policy 2.4.7

CommentID: WED567

Nature of Response: Commenting

Reasons:

We believe that it should be retained in Policy EN1 along with all SPD including the Belton House Study. All rural assets are irreplaceable and it is unthinkable to totally obliterate what has been unchanged for centuries only to be blighted for no good reason with industrial machines. There is a place for everything and degrading historical assets and grade 2 or 3 farm land with enormous turbines is not a very environmental friendly act. It is almost impossible to make certain impacts acceptable. Turbines by their very nature are intrusive and would dominate any rural village nestling in the rural Lincolnshire countryside

Changes to the draft that you consider necessary:

Add to EN1
1 Neighbourhood Plans as number 15
2 Retain and add SKDC's Landscape Character Assessments
3 Add The Belton House Study

SKDC Response:

It is not possible to change the wording of an adopted Core Strategy policy through an SPD.
It is not the intention that the whole of the LCA be rescinded but only those parts that refer to wind energy proposals and the sensitivity of the landscape to such development.
Reference to the Belton House Study is already included under the Sources of Further Information in the Historic Environment section.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Local Planning Policy 2.4.7

CommentID: WED576

Nature of Response: Commenting

Reasons:

Core Strategy policies EN1 and EN3 are summarised in Para 2.4.7, but there is no requirement to give them equal weight. So, if a development is judged as unacceptable when measured against one or more criteria of EN1, then policy EN3 is not applicable. Of course, if an application is only slightly or moderately undesirable against one of the EN1 criteria, the planning officers and Development Control Committee will give due weighting to EN3.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED401

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		Landscape Character Assessment 2.4.8

CommentID: WED568

Nature of Response: Commenting

Reasons:
Strongly support the 7 character assessments and strongly oppose the rescinding of these document

Changes to the draft that you consider necessary:
On adoption of the SPD, the Council will retain the seven character assessments as additional reference to wind turbines.

SKDC Response:
It is not the intention that the whole of the LCA be rescinded but only those parts that refer to wind energy proposals and the sensitivity of the landscape to such development. Although the wording of the LCA is caveated to indicate that each proposal should be considered on its own merits, these sections have been read as the Council's position on wind energy development and have been taken to indicate that wind proposals in some of the character assessment areas would be considered favourably. The preparation of the SPD provides an opportunity to make clear that it is against the key issues and guidance set out in the SPD that wind energy proposals will be assessed and considered.

Recommended Changes:
Delete penultimate sentence and amend final sentence of paragraph 2.4.9 to read: "On adoption of the SPD, the Council rescinded those sections of ...."

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape Character Assessment 2.4.9

CommentID: WED16

Nature of Response: Commenting

Reasons:
To label the existing SKDC LCA as 'broad brush' is dimissive. The LCA assessment is still indicative of the overall sensitivity of the areas to development and should not be rescinded.

Changes to the draft that you consider necessary:
Amend to read:
The LCA currently inlcudes an area based assessment of the sensitivity of seven character areas to wind energy developments. Whilst these assessments are still broadly valid, this document provides more 'granularity' about the senstivity of particular locations to wind energy developments.

SKDC Response:
See comment for WED568. However, it should be noted that the LCA does not provide more granularity about the sensitivity of particular locations to wind energy as a detailed landscape sensitivity assessment has not been undertaken in the district.

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
710521 Dr Marek Kierstan		Landscape Character Assessment 2.4.9

CommentID: WED75

Nature of Response: Commenting

Reasons:
I welcome SKDC's initiative in drafting this document and agree with the majority of it.
However I wish to emphasise the need for SKDC to adhere to its intentions, as cited in para, 2.4.9, to rescind the current SKDC Landscape Character Assessment (LCA).
I draw attention to the opinion of the Ombudsman relating to this document, namely; ' …..supplementary planning documents may form part of a council's policy yet not be part of the local plan. The same is true for landscape designs. They do not carry the same weight as policies within the Local Plan but they are material considerations'.

The danger of the views expressed in SKDC's current LCA document is clearly illustrated by the recent East Heckington Wind Farm Inquiry, where the developers tabled SKDC's Landscape Character Assessment as justification for their decision to site their windturbines in the Fens.
It is imperative, in my view, that this document, and the opinion that wind turbines have low impact on fen landscapes, is expunged from the records.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape Character Assessment 2.4.9

CommentID: WED81

Nature of Response: Commenting

Reasons:
To label the existing SKDC Landscape Character Assessment (LCA) as 'broad brush' is dismissive. The LCA assessment is still indicative of the overall sensitivity of the areas to development and should not be rescinded.

Changes to the draft that you consider necessary:
Suggest amend 3rd and 4th sentences to read:
'The LCA currently includes an area-based assessment of the sensitivity of seven character areas to wind energy developments. Whilst these assessments are still broadly valid, this document provides more 'granularity' about the sensitivity of particular locations to wind energy developments.'

SKDC Response:
See comment for WED568 and WED16.

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape Character Assessment 2.4.9

CommentID: WED150

Nature of Response: Commenting

Reasons:
To label the existing SKDC Landscape Character Assessment (LCA) as 'broad brush' is dismissive. The LCA assessment is still indicative of the overall sensitivity of the areas to development and should not be rescinded.

Changes to the draft that you consider necessary:
Suggest amend 4th sentence to read:
'The LCA currently includes an area-based assessment of the sensitivity of seven character areas to wind energy developments. Whilst these assessments are still broadly valid, this document provides more 'granularity' about the sensitivity of particular locations to wind energy developments.'

SKDC Response:
See comment for WED568 and WED16

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Landscape Character Assessment 2.4.9

CommentID: WED253

Nature of Response: Commenting

Reasons:
We cannot emphasise more our support for the last sentence and would wish to be consulted if for any reason SKDC was inclined to alter this. It is vital that the sections of the South Kesteven Landscape Character Assessment (SKLCA) concerning wind turbines are formally withdrawn and superseded by the SPD. The SKLCA is the opinion of the consultant who wrote it and is extremely biased in its treatment of the Fens with regard to the value of the 'natural' and historic landscape – it was not subject to the same express public consultation and is undemocratic.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
713810 Suzanne Williams Spring Wells Heritage Group		Landscape Character Assessment 2.4.9

CommentID: WED339

Nature of Response: Commenting

Reasons:
Consider that an imperative immediate action for SKDC is to formally rescind the conclusions of the Landscape Character Assessment on the suitability of the various SKDC landscapes to wind turbines which was simply the opinion of a consultant. SKDC must therefore adhere absolutely to the intention of para 2.4.9.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
714270 Mrs W McCallin Westborough & Dry Doddington Parish Council		Landscape Character Assessment 2.4.9

CommentID: WED352

Nature of Response: Objecting

Reasons:
Para 2.4.9 The Parish Council disagrees with the statement that the existing SKDC Landscape Character Assessment (LCA) as 'broad brush'. The Local Character Assessment is still indicative of the overall sensitivity of the areas to development and of the seven character areas to wind energy developments.

Changes to the draft that you consider necessary:
Para 2.4.9 The Parish Council disagrees with the statement that the existing SKDC Landscape Character Assessment (LCA) as 'broad brush'. The Local Character Assessment is still indicative of the overall sensitivity of the areas to development and of the seven character areas to wind energy developments.

SKDC Response:
See comment for WED568 and WED16

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
714277 Mr Richard Hoole		Landscape Character Assessment 2.4.9

CommentID: WED375

Nature of Response: Objecting

Reasons:
Is the current Landscape Character Assessment inaccurate? If not there seems no reason to rescind it. It can co-exist with the SPD.

Changes to the draft that you consider necessary:
Do not rescind the Landscape Character Assessment, it can co-exist with the wind energy SPD.

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Landscape Character Assessment 2.4.9

CommentID: WED403

Nature of Response: Objecting

Reasons:
Unless they re proved to have been wrong, there is no reason to rescind the sections of the LCA that refer to the sensitivity of the landscape to wind energy developments. These are useful summaries, not strict rules, and should be retained.

Changes to the draft that you consider necessary:
Remove the intention to rescind the LSA assessments. Add a recognition that they are area-based assessments and need to used in conjunction with the more detailed guidance in the SPD.

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		Landscape Character Assessment 2.4.9

CommentID: WED569

Nature of Response: Commenting

Reasons:
Foston Parish Council believes that SKDC's Landscape Character Assessments should be retained along with the Belton House Study and the SPD for wind energy. Rural assets are irreplaceable and it is unthinkable to totally obliterate what has been unchanged for centuries only to be blighted for no good reason with industrial machines. There is a place for everything and degrading historical assets and grade 2 or 3 farm land with enormous turbines is not a very environmental friendly act. It is almost impossible to make certain impacts acceptable. Turbines by their very nature are intrusive and would dominate any rural village nestling in the rural Lincolnshire countryside. Also reference should be made to the two wind turbine planning appeals that SKDC and Melton Borough Council fought and won on both occasions. The arguments relating to Heritage Assets stand as much today as they did then.
To label the existing SKDC Landscape Character Assessment (LCA) as 'broad brush' is dismissive. The LCA assessment is still indicative of the overall sensitivity of the areas to development and should not be rescinded.

Changes to the draft that you consider necessary:
The LCA currently includes an area-based assessment of the sensitivity of seven character areas to wind energy developments. Whilst these assessments are still broadly valid, this document provides more 'granularity' about the sensitivity of particular locations to wind energy developments.

SKDC Response:
See comments for WED568 and WED16

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Landscape Character Assessment 2.4.9

CommentID: WED577

Nature of Response: Commenting

Reasons:
The council intends to rescind the sections of its own Landscape Character Assessment (LCA) that refer to the sensitivity of the landscape to wind energy developments. Unless the LCA is proved to be in error, we do not agree that any of its conclusions should be rescinded. Planners, councillors and developers should be able to read the useful summary in the LCA in parallel with the more detailed guidance in the SPD.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee	Agent	Consultation Point
713807 Mr Paul Miley		Landscape Character Assessment 2.4.9

CommentID: WED595

Nature of Response: Commenting

Reasons:
Do not see any justification for rescinding the LCA. Rather the LCA should be read in consultation with any planning application and the SPD.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee
649840 Miss Philippa Brown
Fulbeck Parish Council

Agent

Consultation Point
Landscape Character Assessment
2.4.9

CommentID: WED600

Nature of Response: Commenting

Reasons:
It is not enough to say that the LCA includes a broad brush assessment of the sensitivity of seven character areas. Some ares such as the "Cliff Villages" between Leadenham and Grantham have a unique landscape with views up to the Heath and across the Trent Plain, which covers several areas whose character would be quite altered by wind turbines.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee
703325 Mr John Halton

Agent

Consultation Point
Landscape Character Assessment
2.4.9

CommentID: WED608

Nature of Response: Commenting

Reasons:
The Core Strategy has been informed by the LCA. This can only be rescinded on the basis it is replaced by a similar study. The current SPD is a generic document and does not relate to the various landscape character areas and their suitability for wind turbines. Therefore, the advice of the LCA should remain, allowing the SPD to supplement the content of the Core Stragegy.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED568

Recommended Changes:
See change for WED568.

Consultee
712930 Lady Sarah Sigurdsson Hardradi
BHATs (Billingborough & Horbling Against Turbines)

Agent

Consultation Point
Lincolnshire Statement of Intent
2.4.10

CommentID: WED239

Nature of Response: Commenting

Reasons:
We applaud the Position Statement stating that 'wind farms will only be acceptable if they meet more stringent conditions on landscape and visual impact, residential amenity and impact on the historic and natural environment.'

Changes to the draft that you consider necessary:

SKDC Response:
The SPD seeks to address and provide detailed guidance on many of the issues included in the LCC Position Statement but in a manner that is considered to respond appropriately to the circumstances of South Kesteven. However, in respect of residential amenity particularly, the LCC Position Statement employs separation distances taking a 'blanket approach' that proposals falling within the specified distance should not be allowed. The recent judgement on the legal challenge to the Milton Keynes Wind Turbine SPD highlighted that the use of separation distances should be employed positively (see response to comment WED143 on separation distances (general section)) and the LCC Position Statement would appear, therefore, to be contrary to this approach. As such, it is considered that it would be inappropriate for the Wind Energy SPD to be aligned or incorporate LCC's Position Statement on wind farms as suggested by this and other respondents.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
605225 Ms Jane Bateman		Lincolnshire Statement of Intent 2.4.10

CommentID: WED314

Nature of Response: Objecting

Reasons:
I am very disappointed at LCC's Position Statement. It is negative. Lincolnshire is a big county with a large coastline and should be encouraging more wind turbines.

Changes to the draft that you consider necessary:

SKDC Response:
Noted. However, any views on the Lincolnshire position statement should be made to LCC.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714270 Mrs W McCallin Westborough & Dry Doddington Parish Council		Lincolnshire Statement of Intent 2.4.10

CommentID: WED353

Nature of Response: Commenting

Reasons:
Para 2.4.10 The Parish Council believes that Lincs County Council is an elected body and SKDC should align its policies with LCC on wind energy.

Changes to the draft that you consider necessary:
Para 2.4.10 The Parish Council believes that Lincs County Council is an elected body and SKDC should align its policies with LCC on wind energy.

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Lincolnshire Statement of Intent 2.4.11

CommentID: WED17

Nature of Response: Commenting

Reasons:

Although LCC is not the LPA and has no jurisdiction over SKDC, it is also a democratically elected body with responsibilty for the wellbeing of local residents and the protection of the local environment. Furthermore, it has an important role in coordingating and harmonising policies whose effects cross district boundaries,. SKDC should attempt to align its policies with the county position statement whenever possible or explain why this is not possible.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED239 (paragraph 2.4.10)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Lincolnshire Statement of Intent 2.4.11

CommentID: WED82

Nature of Response: Commenting

Reasons:

Although the County Council is not the Local Planning Authority and has no jurisdiction over SKDC, it is also a democratically elected body with responsibility for the wellbeing of local residents and the protection of the local environment. Furthermore, it has an important role in coordinating and harmonising policies whose effects cross district boundaries. SKDC should attempt to align its policies with the county position statement whenever possible, or explain why this is not possible.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED239 (paragraph 2.4.10)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Lincolnshire Statement of Intent 2.4.11

CommentID: WED151

Nature of Response: Commenting

Reasons:

Although the County Council is not the Local Planning Authority and has no jurisdiction over SKDC, it is also a democratically elected body with responsibility for the wellbeing of local residents and the protection of the local environment. Furthermore, it has an important role in coordinating and harmonising policies whose effects cross district boundaries. SKDC should attempt to align its policies with the county position statement whenever possible, or explain why this is not possible.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711472 Mrs Pamela MacAllister		Lincolnshire Statement of Intent 2.4.11

CommentID: WED192

Nature of Response: Commenting

Reasons:
Although the county council has no jurisdiction over planning surely as a democratically elected body its opinion should have some bearing on SKDC decisions.

Changes to the draft that you consider necessary:
SKDC should align its policies with LCC wherever possible.

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711558 Professor Paul Ramsden		Lincolnshire Statement of Intent 2.4.11

CommentID: WED218

Nature of Response: Commenting

Reasons:
SKDC's own Core Strategy (Section EN1) commits it to maintaining “a good quality of life, health and wellbeing for everyone as well as celebrating the distinctiveness of the district’s countryside and heritage”. Not to adopt the Lincolnshire County Council Position Statement is a direct contradiction of this commitment.

Changes to the draft that you consider necessary:
SKDC should adopt the Lincolnshire County Council Position Statement. In the spirit of both the County Council's statement and SKDC's commitment (Section EN1 of the Core Strategy) it should in addition specify minimum separation distances of 2km from residential properties and schools. Such distances are consistent with European standards and conform to current research on the potentially negative effects of wind turbine vibration and noise on health.

SKDC Response:
See comments for WED239 (paragraph 2.4.10) on the Position Statement and WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
693648 Mrs Vikki Hoole		Lincolnshire Statement of Intent 2.4.11

CommentID: WED361

Nature of Response: Objecting

Reasons:
Lincolnshire County Council has considerable experience with wind farms, and it is hard for residents to understand why their position statement would be dismissed so lightly. Nick Boles MP has encouraged SKDC to adopt the Lincolnshire County Council Position Statement as part of its core policy. Stephen Phillips MP has said that separation distances are appropriate. Colin Davie from Lincolnshire County Council has said that the county will help any district councils that adopt the position statement as planning policy.

Changes to the draft that you consider necessary:
I think that SKDC's SPD should be closely aligned with the county council position.

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714277 Mr Richard Hoole		Lincolnshire Statement of Intent 2.4.11

CommentID: WED376

Nature of Response: Objecting

Reasons:
It seems astonishing given the work undertaken by LCC and the experience the county as a whole has with industrial wind farms, that their position statement could be dismissed so lightly.

Changes to the draft that you consider necessary:
Adopt the LCC position statement as part of SKDC's SPD.

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714280 Mr Roger Kingscott		Lincolnshire Statement of Intent 2.4.11

CommentID: WED404

Nature of Response: Objecting

Reasons:
The LCC position is dismissed too lightly. Residents expect SKDC to work with other district councils and the county council, especially on large industrial proposals that will inevitably have a cross-boundary impact. LCC has more experience of wind farms and has researched the subject. It is also a democratically elected body representing, in large part, the same constituents.

Changes to the draft that you consider necessary:
The SPD should, as far as possible, conform to the LCC guidance. If and where this is not possible, the reasons why should be clearly stated.

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Lincolnshire Statement of Intent 2.4.11

CommentID: WED578

Nature of Response: Commenting

Reasons:

• In para 2.4.11 the Lincolnshire County Council (LCC) position statement is dismissed. We think this is misguided. SKDC is entitled to assert its independence from LCC, but the local population also expects it to work with the County Council and other district councils as closely as possible. Nick Boles, MP for Grantham and a Planning Minister, explained to us by letter that he had written to Linda Neal, Leader of SKDC, to encourage SKDC to adopt LCC's Wind Farm Position Statement as official SKDC policy. Councillor Colin Davie, Chair of LCC's Environmental Scrutiny Committee confirmed, in a letter to the Grantham Journal published on 19th October, that LCC will support any district council that wishes to work with them to protect the countryside. We believe that SKDC should attempt to comply with the County Council guidance or fully explain why this is not possible.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED239 (paragraph 2.4.10)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
713807 Mr Paul Miley		Lincolnshire Statement of Intent 2.4.11

CommentID: WED597

Nature of Response: Commenting

Reasons:

Struggle to see why the LCC position is dismissed arbitrarily in para 2.4.11. The nature of industrial wind famrs is such that they impact onmore than one district through visual amenity. As such a County Council position is very valid. Also the planning of such large installations should be done at at least a County if not National level. If SKDC has low wind resource then LCC could prioritise certain areas over others. Of course Nick Boles and Stephen Phillips have made clear statements too and I would wish those to be taken into consideration so that there is alignment. If not I would expect a clear explanation.

Changes to the draft that you consider necessary:

SKDC Response:

See comments for WED239 (paragraph 2.4.10)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
649840 Miss Philippa Brown Fulbeck Parish Council		Lincolnshire Statement of Intent 2.4.11

CommentID: WED601

Nature of Response: Commenting

Reasons:

The County Council may have no jurisdication over the SKDC dealings with planning applications, but they area an elected body with responsibilties towards the local area and population, and it would

be nice to think SKDC were working together with LCC to maintain an environmentally and visually acceptable landscape.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED239 (paragraph 2.4.10)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26328 Mr M L Hall Barkston & Syston Parish Council		Key Considerations for Siting and Design 3

CommentID: WED266

Nature of Response: Commenting

Reasons:
Turbines are by their nature intrusive and are incongruous and dominating features in any locality, particularly in South Kesteven, which is generally flat and open in nature. Whilst these comments are generally in regard to individual (or small groups of up to 3) turbines meant for small scale eg farm use, the situation would be exacerbated by applications for full-scale wind farms.

Changes to the draft that you consider necessary:

SKDC Response:
The SPD acknowledges that the impact of wind turbines may be different depending on the number and scale proposed. The SPD seeks to identify where diffierent impacts may arise and the consequence of this for undertaking assessments of such impacts.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26382 Miss Josephine Morris-Turner Lenton, Keisby & Osgodby Parish Council		Key Considerations for Siting and Design 3

CommentID: WED307

Nature of Response: Commenting

Reasons:
Parish Council welcomes the importance placed upon the key consideration for the siting and design of wind turbines. However, it is disappointed that the draft policy does not stipulate minimum 'seperation zones' between residential properties and turbines, as other planning authorities have done. A final draft Policy is an opportunity to stipulate minimum distances to protect the quality of life for those living within the confines of South Kesteven District Council. This, along with the protecting the environment, is one of the avowed guiding principles of the Authority. By way of contrast, Lincolnshire County Councl's Wind Energy Policy talks of a two kilometre seperation zone from 'defined settlement boundaries'. Other local planning authorities around the country have adopted similar minimum distances in deciding upon 'seperation zones', and some of these are referred to in SKDC's draft policy. It would be reassuring to know that our local authority is prepared to make courageous and bold decisions and, in the first instance, listen to, and protect, the interests of people who pay its council tax.

Changes to the draft that you consider necessary:
Recommend the inclusion of 'seperation zones' such that wind turbines defined as 'small', 'medium' and 'large' (as described in Table 2.1) may not be erected within at least two kilometres of residential properties or defined settlement zones. The two kilometre zone may need to be increased when considering planning applications for 'large' turbines.

SKDC Response:
See comments for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Key Considerations for Siting and Design 3.1.1

CommentID: WED494

Nature of Response: Commenting

Reasons:
The Environmental Impact Assessment regulations and their requirements need to be referred to in this section. This sets the context for each of the topics. The key question that needs to be addressed by the EIA process is whether the development is acceptable in terms of the likely significant effects identified

Changes to the draft that you consider necessary:

SKDC Response:
Agree, the proposed change would introduce the need for EIA earlier in the document.

Recommended Changes:
Add new paragraph before 3.1.2 :
Medium to Large scale wind turbine proposals may be required to prepare an Environmental Impact Assessment (EIA) under the EIA regulations. An EIA will assess of the potential impact of the proposal on all identifed relevant matters such as landscape, biodiversity; telecommunications etc.The scope of an EIA will be established by the District Council and the applicant as part of a Scoping stage before the EIA is prepared to ensure that all relevant matters are considered. Chapter 4 of this SPD provided more information about the EIA process and how it applies to development proposals.

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Key Considerations for Siting and Design 3.1.4

CommentID: WED18

Nature of Response: Commenting

Reasons:
The SPD is not overly prescriptive so there should be no need to 'deviate from some elements of the guidance in making a decision'.

Changes to the draft that you consider necessary:
Remove sentence.

SKDC Response:
The ability to consider each application on its own merits should be retained and this sentence is essential in this regard.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Key Considerations for Siting and Design 3.1.4

CommentID: WED83

Nature of Response: Commenting

Reasons:
The SPD is not overly prescriptive, so there should be no need to ‘deviate from some elements of the guidance in making a decision’.

Changes to the draft that you consider necessary:
Delete 2nd sentence.

SKDC Response:
See comment for WED18.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Key Considerations for Siting and Design 3.1.4

CommentID: WED152

Nature of Response: Commenting

Reasons:
The SPD is not overly prescriptive, so there should be no need to 'deviate from some elements of the guidance in making a decision'.

Changes to the draft that you consider necessary:
This sentence should be removed.

SKDC Response:
See comment for WED18.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Key Considerations for Siting and Design 3.1.4

CommentID: WED240

Nature of Response: Commenting

Reasons:
It is not clear what is implied by 'deviation from some elements of the guidance in making a decision'. Given the clarity and thoroughness of the SPD on every aspect, is this necessary? What does it imply?

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED18

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Key Considerations for Siting and Design 3.1.4

CommentID: WED379

Nature of Response: Objecting

Reasons:
Why should there be overriding reasons to deviate from the policy? What might these be?

Changes to the draft that you consider necessary:
Delete this sentence.

SKDC Response:
See comments for WED18

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Key Considerations for Siting and Design 3.1.4

CommentID: WED458

Nature of Response: Commenting

Reasons:
In addition to reference to consideration set out in the SPD, there should also be reference to the fact that it should be considered against Government policies and other National Planning Guidance from time to time to include inter alia at the moment the National Planning Policy Framework.

Changes to the draft that you consider necessary:

SKDC Response:
Agree that the wording could be amended to clarify the other relevant considerations.

Recommended Changes:
At end of 1st sentence in paragraph 3.1.4 add: "in addition to the development plan and other material considerations."

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Key Considerations for Siting and Design 3.1.4

CommentID: WED527

Nature of Response: Objecting

Reasons:
The sentence 'All planning applications for wind energy development will be considered on their individual merits against considerations set out in this SPD' is misleading in that people could conclude that this is the only document used to determine applications for wind energy, which is incorrect.
The purpose of an SPD is to expand upon and provide greater detail on policies in a Development Plan Document (DPD) such as South Kesteven's adopted Core Strategy. An SPD does not hold the same weight as a DPD and does not form part of the statutory development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the provisions of the statutory development plan unless material considerations indicate otherwise. The SPD will be a material consideration in the determination of planning applications. It is important that the purpose and associated weight to be given to this SPD, in the planning application determination process, is made clear. This is partly done in Section 1 Para 1.1.2, but it does not go far enough and the sentence referred to in Para 3.1.4 reinforces the lack of clarity on this point within the SPD.
The definition of an SPD is provided in Annex 2 of the NPPF and reflects the above. Para 153 of the NPPF makes clear that SPDs 'should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development'. This should be borne in mind during the finalisation of the SPD.

Changes to the draft that you consider necessary:
Add 'in addition to the development plan and other material considerations' to the end of the first sentence at Para 3.1.4.

SKDC Response:
See comment for WED458

Recommended Changes:
See change for WED458.

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		Key Considerations for Siting and Design 3.1.4

CommentID: WED570

Nature of Response: Commenting

Reasons:
The SPD is not overly prescriptive, so there should be no need to 'deviate from some elements of the guidance in making a decision'.

Changes to the draft that you consider necessary:
'deviate from some elements of the guidance in making a decision'. should be removed.

SKDC Response:
See comments for WED18

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Key Considerations for Siting and Design 3.1.4

CommentID: WED579

Nature of Response: Commenting

Reasons:
Since so much work has gone into the Core Policy, the LCA and the wind energy SPD, it is not clear why Para 3.1.4 states that elements of the guidance may be ignored.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED18

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
517670 Natural England Natural England		Landscape and Visual Amenity 3.2

CommentID: WED7

Nature of Response: Supporting

Reasons:
Welcome this section and consider it provides detailed inforfmation on designated and local landscapes, Landscape and Visual Impact Assessments (LVIA) and key aspects of the design and siting of wind energy developments.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26328 Mr M L Hall Barkston & Syston Parish Council		Landscape and Visual Amenity 3.2

CommentID: WED267

Nature of Response: Commenting

Reasons:
The visual impact issue is particularly important, as mentioned in (2) above. In a flat landscape any size of turbine must stand out. Many turbines are sited in areas of natural beauty and while they may not be designated as such, the cumulative impact is extremely detrimental.

Changes to the draft that you consider necessary:

SKDC Response:
Visual impact issues are addressed in the SPD

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Landscape and Visual Amenity 3.2

CommentID: WED385

Nature of Response: Commenting

Reasons:
We welcome the references to the historic environment within this section. However, it is not clear whether townscapes have been properly considered within this section. There is reference to impact on settlements, but this tends to be from wind energy developments sited in the adjoining countryside. There could be greater discussion of the impact of wind energy developments within settlements, which would be particularly relevant for micro and small scale schemes. This would look at townscape character as a whole, not just those areas designated as heritage assets. The European Landscape Convention definition of landscape (which the UK is a signatory to) includes both rural and urban areas, and so landscape matters for this SPD should consider both rural and urban.

Changes to the draft that you consider necessary:

SKDC Response:
The SPD does not specifically cover micro turbines as these would be covered by permitted development rights. As the majority of planning applications and/or enquires the Council recevies are for wind turbines outside settelements, the SPD has focused on providing guidance for these circumstances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
677814 Mrs Heidi Wilson Marston Parish Council		Landscape and Visual Amenity 3.2

CommentID: WED506

Nature of Response: Commenting

Reasons:

Wind turbines disrupt the natural appearance of the landscape particularly the case in South Kesteven which geographically is relatively flat.

Changes to the draft that you consider necessary:

SKDC Response:

Section 3.2.1 acknowledges the ways in which wind turbines can impact on the landscape.

Recommended Changes:

n/a

Consultee	**Agent**	**Consultation Point**
26136 Yana Bosseva Renewable UK		Landscape and Visual Amenity 3.2

CommentID: WED556

Nature of Response: Objecting

Reasons:

In our view this section is overly prescriptive, a number of the provisions outlined in it are usually included with planning permission conditions, as and when appropriate. Additionally, if the UK is to meet its climate change aspirations and if it is to become less dependent on imported fossil fuels, some landscape change to accommodate renewable energy developments should be allowed for.

Changes to the draft that you consider necessary:

SKDC Response:

The SPD seeks to ensure that an appropriate level of technical information is submitted to enable an assessment of a proposal and its impacts to be made.

Recommended Changes:

n/a

Consultee	**Agent**	**Consultation Point**
605225 Ms Jane Bateman		Landscape and Visual Amenity 3.2.1

CommentID: WED315

Nature of Response: Objecting

Reasons:

I personally like wind turbines and would like to see more of them. They are elegant and far more attractive than pylons. Our landscape is already manmade.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted.

Recommended Changes:

n/a

Consultee	**Agent**	**Consultation Point**
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity 3.2.1

CommentID: WED459

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the first bullet point, replace "loss" with "impact" so that the first line reads "impact on existing landscape features and the ....."

SKDC Response:
It is agreed that the proposed amendment would help the bullet point to read more clearly.

Recommended Changes:
In 1st bullet point under paragraph 3.2.1 delete "the site as a result of the loss of" so it reads: "impact on existing landscape features ...."

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity 3.2.1

CommentID: WED460

Nature of Response: Commenting

Reasons:
In the second bullet point, we do not think reference to indirect is appropriate – please explain.

Changes to the draft that you consider necessary:

SKDC Response:
Agree that reference to indirect impact on the site should be removed.

Recommended Changes:
In 2nd bullet point under paragraph 3.2.1 delete 'and indirect'

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Landscape and Visual Amenity 3.2.3

CommentID: WED386

Nature of Response: Commenting

Reasons:
In paragraph 3.2.3, there are in fact 10 registered parks and gardens within or adjoining South Kesteven. The list is missing Culverthorpe Hall (Grade II) and Burghley House (of which a small part lies within the district). It would be helpful if the grade could be shown for Belton House and Grimsthorpe Castle (both Grade I). In terms of the footnote for Belton House, the setting study does not define the setting boundary of Belton House and Park. It largely focuses on the visual setting of Belton and does not consider wider setting issues such as noise etc. It would be helpful if the first sentence of the bullet point read “SKDC in conjunction with the National Trust commissioned a setting study to define and describe the visual setting of Belton House and Park”. Reference could also be made to the fact that the study considers the impact of tall structures, such as wind turbines, on Belton House and Park.

Changes to the draft that you consider necessary:
Please see above.

SKDC Response:
Burghley House is already referred to (in paragraph 3.2.4) but it is agreed that Culverthorpe Hall should also be included and the Grades for Belton and Grimesthorpe added. Agree also that the footnote relating to Belton House be amended.

Recommended Changes:
In paragraph 3.2.4 add Culverthorpe Hall; add the grades for Belton and Grimesthorpe; amend first sentence of footnote 1 to read: "South Kesteven DC in conjunction with the National Trust

commissioned a setting study to define and describe the visual setting of Belton House and Park"; add to last sentence of footnote 1 "including tall structures".

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.4

CommentID: WED160

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

Perhaps paras 3.18 and 3.19 could be moved to the "key planning considerations" section, so that this section only includes specific guidance.

SKDC Response:

It is unclear what is being sought as there are no paragraphs 3.18 or 3.19.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Landscape and Visual Amenity 3.2.6

CommentID: WED241

Nature of Response: Commenting

Reasons:

We are pleased to see that Alan McDonald's book on Wind farm Visualisation is cited in 3.2.18 section D. Developers have until very recently been prone to very distorted representation of the visual impact of turbines on the landscape, and insisting that the appropriate lenses and viewpoints are used by developers in preparing their reports and in public consultations will provide a more accurate and fairer representation.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted. Paragraph 3.2.6 currently refers to visualisations being undertaken in accordance with both the Landscape Institute Advice Note 01/11 (Photography and Photomontage in Landscape Visual Impact Assessment) and Scottish Natural Heritage's (SNH) Good Practice Guidance (2006). This is considered to be unnecessaray given that that the Landscape Institute Advice Note cross references the SNH guidance and is the most up to date on setting out specific information on selecting the most appropriate combination of lens and camera format.
The SNH good practice guidance is currently under review but there is no timetable for when this will be completed. In the circumstances it is considered that the wording of paragraph 3.2.6 and Box 1 be amended to refer to the Landscape Institute Advice Note.
It would also be appropriate to provide additional wording to clarify the Council's position on lens size for visulisations, including a reference to the guidance issued by Highland Council.

Recommended Changes:

Delete last part of first sentence and the second sentence of paragraph 3.2.6 to read: 'Any visualisations shall be undertaken in accordance with the Landscape Institute's Advice Note 01/11. This recommends the use of a 50mm lens on SLR camera (or digital alternative). However, there is emerging practice (insert footnote reference to Highland Council guidance) for single frame views of the use of 70-75mm lens on SLR camera (or digital alternatives), as this is closer to what the human eye sees and developers will be expected to follow this in preparing their submissions for proposals within South Kesteven District. It is not the intention that this should seek additional information but rather the information be presented in a particular way.'
Amend 2nd sentence of Box 1 to read: 'The required study area for the LVIA may vary depending on the size of development proposed (see Landscape Institute Advice Note 01/11 (Photography and Photomontage in Landscape Visual Impact Assessment) as a guide).
Amend third sentence to read: "Information on landscape and visual impacts shall also be provided for non-EIA development. Visualisations should be based on photography with a 70/75mm lens."

Consultee
26339 Mrs B Buttery
Billingborough Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.6

CommentID: WED254

Nature of Response: Commenting

Reasons:
The guidance quoted here for determining rules required for visualisations of proposed wind turbines in the landscape is generally out of date and much work has been undertaken since in order to make photography and printed photomontages more realistic and printed. SKDC should be using the opportunity provided by the SPD to set a standard here. It should not be afraid that it is pioneering because others have done it already. One of the best examples is "Visualisation Standards for Wind Energy Developments" by The Highland Council January 2010 (see Section 6). This provides a very detailed specification. Also the book Windfarm Visualisation: Perspective or Perception by Alan Macdonald published 29 October 2012 should be quoted and in particular emphasises the importance of using 70/75mm camera lenses if communities are not to be fooled by developer's pictures.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED241

Recommended Changes:
See change for WED241.

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Landscape and Visual Amenity
3.2.6

CommentID: WED406

Nature of Response: Objecting

Reasons:
Scottish Natural Heritage's 'Visual Representation of Wind Farms, Good Practice Guidance' is not best practice.

Changes to the draft that you consider necessary:
Use the Highland Council's Visualisation Standards for Wind Energy Developments instead.

SKDC Response:
See comments for WED241

Recommended Changes:
See change for WED241.

Consultee
26184 Mrs Wendy McCallin
Foston Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.6

CommentID: WED571

Nature of Response: Commenting

Reasons:
The Parish Council strongly object to the Scottish Natural Heritage's Visual Representation of Wind Turbines 2006 This method has been used by developers in all the local turbine applications and the results are anything but accurate. The Marston Turbine application is the most recent example of how developers produce photographs with such extreme wide angle that the images perspective becomes obliterated resulting in total deception.

The new up-dated Scottish Natural Heritage's Visual Representation of Wind Turbines should not be used unless it is found to be better than the The Highland Council for Visualization Standards for Wind energy development 2010. Until anything better is produced, The Highland Council for Visualization Standards for Wind energy development should be adopted.
The Highland Council for Visualization Standards for Wind energy development should be adopted. This is the most accurate way to date to make proper representations of wind turbines and should be adopted.

Changes to the draft that you consider necessary:
Refer to the Highland Council for Visualization Standards for Wind energy development

SKDC Response:
See comments for WED241

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Landscape and Visual Amenity 3.2.6

CommentID: WED584

Nature of Response: Commenting

Reasons:
We do not agree with Para 3.2.6 that visualisations should be undertaken in accordance with Scottish Natural Heritage's 'Visual Representation of Wind Farms, Good Practice Guidance' (2006). We are advised by a professional photographer that the Highland Council's Visualisation Standards for Wind Energy Developments provide a far more accurate representation.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED241

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Landscape and Visual Amenity 3.2.7

CommentID: WED349

Nature of Response: Supporting

Reasons:
It is crucial that proposals for what is described as 'smaller wind energy' are supported by clear and precise evidence in terms of their landscape and visual impact, as their impact will often be as great to receptors as larger wind energy schemes depending on where they are and their prominence.

Changes to the draft that you consider necessary:
There should be no situation where a Landscape and Visual Assessment/Appraisal is not required. To demonstrate that an assessment is not required, one must surely carry out a robust assessment in the first instance. Said assessment will form essential evidence in support of any proposal.

SKDC Response:
Para 4.3.5 states "Assessments that are still likely to be required include a landscape appraisal of the potential landscape and visual impacts of the proposal..."

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
Box 1

CommentID: WED19

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Change wording to read:
'... photography using a single frame and 75mm lens...'

SKDC Response:
See comment for WED241

Recommended Changes:
See change for WED241.

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
Box 1

CommentID: WED84

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Amend 4th sentence to read:
'…photography using a single frame and 75mm lens….'

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
Box 1

CommentID: WED153

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Amend wording of 3rd sentence to read:
'…photography using a single frame and 75mm lens….'

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
712210 Mrs Emma Winter Carter Jonas		Landscape and Visual Amenity Box 1

CommentID: WED230

Nature of Response: Objecting

Reasons:
The draft SKDC Wind Energy SPD states in Box 1 that visualisations/photomontages should be based on photography with 75mm lens" however there is nothing to support or explain where this statement originated from or whether it relates to single frame printed photography or panoramic images.
Paragraph 3.2.6 of the emerging SKDC Wind Energy SPD does however identify that visualisations shall be undertaken in accordance with the Landscape Institute's Advice Note 01/11 and Scottish Nature Heritage's 'Visual Representations of Wind Farms, Good Practice Guidance' (2006).
Section 4 – 152 of the Scottish Nature Heritage's 'Visual Representations of Wind Farms, Good Practice Guidance' (2006) states:
"With 35mm film, a 50mm focal length lens has been found to be a good compromise (Landscape Institute & Institute of Environmental Management & Assessment, 2002). It does not present the very finest detail visible to the human eye, but nevertheless captures much of it and is sufficient for most purposes (see Appendix C). A longer focal length lens will capture more detail, but only at the expense of reducing the vertical field of view and therefore loss of foreground and sky. A shorter length lens would result in the converse – a larger field of view, but with reduced detail".
A 75mm focal length can only be achieved using a zoom lens which the Scottish Nature Heritage's 'Visual Representations of Wind Farms, Good Practice Guidance' (2006) does not recommend. The use of a 75mm focal length would also have a telephoto effect creating greater emphasis to items in the distance. This is why a 50mm lens has been identified as standard as part of national guidance.
We are therefore at a lost as to why the SKDC Wind Energy SPD recommends a 75mm lens given that this is contradictory to Landscape Institute's Advice Note 01/11 and Scottish Nature Heritage's 'Visual Representations of Wind Farms, Good Practice Guidance' (2006).

Changes to the draft that you consider necessary:
We are therefore of the view that the wording "photography with a 75mm lens" should be removed from the document.

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Landscape and Visual Amenity Box 1

CommentID: WED255

Nature of Response: Commenting

Reasons:
Delighted that SKDC has taken the importance of lens length on board, although to me more accurate it should say 70mm/75mm. The references above would help give this some credibility.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee
713530 Mr Andrew Jenkins

Agent

Consultation Point
Landscape and Visual Amenity
Box 1

CommentID: WED330

Nature of Response: Commenting

Reasons:
There should be no presumption on reliance of developers Visual Impact assessments as these are often misleading. Consideration should be taken of visual impact in different weather conditions (eg low level sunlight against a dark sky) as commercially produced visualisations are often done in conditions most favourable to mitigating the wind farms' impact.

Changes to the draft that you consider necessary:
There should be a mechanism to challenge visualisations submitted by developers which incorrectly mitigate the effect of the wind farm development.

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee
713538 Ms Mary Marston
Windcrop

Agent

Consultation Point
Landscape and Visual Amenity
Box 1

CommentID: WED381

Nature of Response: Objecting

Reasons:
Digital technology is rapidly evolving; the requirement for a 75mm lens is overly prescriptive and inconsistent with paras 3.2.6 which references guidance under review, and 3.2.7 which states 'level of information should reflect the sensitivity of the site and the potential effects..'.

Changes to the draft that you consider necessary:
Box I should simply state that montages shall be provided using an 'appropriate' focal length

SKDC Response:
See comments for WED241

Recommended Changes:
See change for WED241.

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Landscape and Visual Amenity
Box 1

CommentID: WED461

Nature of Response: Commenting

Reasons:
As well as reference to the Good Practice Guide it should also refer to other appropriate guidance at the time as inevitably things will develop and change over time and this would be helpful to make sure that policies and guidance does not become dated.

Changes to the draft that you consider necessary:

SKDC Response:
It is agreed that over time guidance documents referred to in the SPD may be revised or replaced. It would be appropriate, therefore, to include a reference to this in the SPD.

Recommended Changes:
At end of paragraph 1.3.3 add: "Over time guidance documents referred to in this SPD may be revised or replaced and the most up to date version of the guidance documents should be used when they are published."

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Landscape and Visual Amenity Box 1

CommentID: WED529

Nature of Response: Commenting

Reasons:
With regard to the production of visualisations for wind turbine development, we are
pleased to see that the SPD refers to the most current fully endorsed best practice guidance documents of the Landscape Institute's Advice Note 01/11 and Scottish Natural Heritage's 'Visual Representation of Wind Farms, Good Practice Guidance' and we fully support this stance. However, only the SNH guidance is referenced in Box 1. The Landscape Institute's Advice Note 01/11 should follow through into Box 1 also.

Changes to the draft that you consider necessary:
Add 'Landscape Institute's Advice Note 01/11' into Box 1.

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Landscape and Visual Amenity Box 1

CommentID: WED530

Nature of Response: Objecting

Reasons:
There is a requirement for visualisations/photomontages to be based on 'photography with 75mm lens'. This is not consistent with the best practice guidance documents by the Landscape Institute and Scottish Natural Heritage and should be removed.

Changes to the draft that you consider necessary:
Remove 'based on photography with 75mm lens' from Box 1.

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		Landscape and Visual Amenity Box 1

CommentID: WED572

Nature of Response: Commenting

Reasons:
This should be more accurately stated for clarification 75mm means nothing on its own.

Changes to the draft that you consider necessary:
Single frame images should be taken with a fixed 75mm lens in landscape format on a full size 35mm format digital sensor or 35mm film and a single image should be provided for each viewpoint.

SKDC Response:
See comments for WED241.

Recommended Changes:
See change for WED241.

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED20

Nature of Response: Commenting

Reasons:
5th bullet - proximity to railway does not necessarily equate to a less remote or brownfield sites. Concentrations of railway infrastructure may well count, but a railway line can cut through countryside with little impact on the overall landscape.

Changes to the draft that you consider necessary:
Suggest deletion of 'railways'.

SKDC Response:
Agree that the wording of this particular bullet point could be clarified.

Recommended Changes:
Amend 5th bullet point to read: 'consider siting turbines in locations in close proximity to industrial areas, infrastructure corridors or on brownfield sites'

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED21

Nature of Response: Commenting

Reasons:
The phrase 'main road corridors' could be miinterpretated. Can the defintion include B or C class roads?

Changes to the draft that you consider necessary:
Suggest change to 'trunk roads'.

SKDC Response:
Agree the wording of this bullet point could be clarified

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED22

Nature of Response: Commenting

Reasons:
7th bullet - a larger structure does not have to be sitting on an elevated site in order to spoil a distincitve skyline.

Changes to the draft that you consider necessary:
Suggest change to:
'For medium and large scale wind energy development, avoid selecting sites that could impact on distinctive skylines such as ... '

SKDC Response:
This bullet does not say that distinctive skylines are always elevated - it simply gives an example of a distinctive skyline but agree that in context of South Kesteven this could also apply to medium scale turbines.

Recommended Changes:
Amend beginning of 7th bullet point to read: 'For large and medium scale wind energy .....'

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED85

Nature of Response: Commenting

Reasons:
5th bullet – proximity to a railway does not necessarily equate to a less remote or brownfield site. Concentrations of railway infrastructure may well count, but a railway line can cut through countryside with little impact on the overall landscape.

Changes to the draft that you consider necessary:
Suggest deletion of ‘railways’.

SKDC Response:
See comment for WED20.

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED86

Nature of Response: Commenting

Reasons:
5th bullet - The phrase ‘Main road corridors’ could be misinterpreted. Can the definition include B or C class roads?

Changes to the draft that you consider necessary:
Perhaps change to ‘trunk roads’.

SKDC Response:
See comment for WED21.

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED87

Nature of Response: Commenting

Reasons:
7th bullet – a large structure does not have to be sitting on an elevated site in order to spoil a distinctive skyline.

Changes to the draft that you consider necessary:
Suggest amend beginning of bullet point to read: '
For medium and large-scale wind energy development, avoid selecting sites that could impact distinctive skylines such as…..'

SKDC Response:
See comment for WED22

Recommended Changes:
See change for WED22

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED154

Nature of Response: Commenting

Reasons:
In 5th bullet, proximity to a railway does not necessarily equate to a less remote or brownfield site. Concentrations of railway infrastructure may well count, but a railway line can cut through countryside with little impact on the overall landscape.

Changes to the draft that you consider necessary:
Suggest deletion of 'railways'.

SKDC Response:
See comment for WED20

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.8

CommentID: WED156

Nature of Response: Commenting

Reasons:
The phrase "Main road corridors" could be misinterpreted. Can the definition include B or C class roads?

Changes to the draft that you consider necessary:
Perhaps change to "˜trunk roads"

SKDC Response:
See comment for WED21

Recommended Changes:
See change for WED20

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.8

CommentID: WED157

Nature of Response: Commenting

Reasons:
In 7th bullet, a large structure does not have to be sitting on an elevated site in order to spoil a distinctive skyline.

Changes to the draft that you consider necessary:
Suggest amend beginning of bullet point to read: "For medium and large-scale wind energy development, avoid selecting sites that could impact distinctive skylines such as .."

SKDC Response:
See comemnt for WED22

Recommended Changes:
See change for WED22

Consultee
711472 Mrs Pamela MacAllister

Agent

Consultation Point
Landscape and Visual Amenity
3.2.8

CommentID: WED193

Nature of Response:

Reasons:
Bullet point 7 indicates that large scale developments should avoid sites on distinctive skylines - this should include medium scale as a turbine of 100m high makes a very domineering form on a skyline - eg. Frinkley Farm - in sightline of Belmont tower and visible from a signifcantly large area in every direction.

Changes to the draft that you consider necessary:
Bullet point 7 - 'For large and medium scale wind energy...'

SKDC Response:
See comment for WED22

Recommended Changes:
See change for WED22

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Landscape and Visual Amenity 3.2.8

CommentID: WED242

Nature of Response: Commenting

Reasons:

The SPD's bullets on site selection are particularly welcome, as is the reference to the effect of windfarms on the long distance views of historic assets, and to the preservation of lines of site.

Changes to the draft that you consider necessary:

SKDC Response:

Comment noted.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
490730 Mr Alan Hubbard The National Trust		Landscape and Visual Amenity 3.2.8

CommentID: WED341

Nature of Response: Objecting

Reasons:

National Trust supports the majority of the matters identified in the bullet points in para 3.2.8, indeed the locally important considerations, such as Grantham scarp and Lincolnshire Church spires and towers, are well observed.

However, the Trust does have concerns about how the final bullet point will be interpreted in practice, especially in the context of paras 132-35 of the NPPF. Whilst the text in the draft SPD covers impacts upon features other than heritage assets it is clear that it is intended to include such assets, as evidenced by the specific reference to Conservation Areas. Unfortunately the detailed wording refers to "significant impacts", whereas the NPPF seeks to assess heritage matters in terms of harm to significance (of the asset) and it appears that the SPD wording would lead to considerable confusion for applicants, third parties and decision makers in trying to determine whether or not there were significant impacts, and more particularly if there were how they should be dealt with in the context of the advice in the NPPF.

Changes to the draft that you consider necessary:

An alternative wording for the final bullet point, more consistent with the approach in the NPPF is put forward for consideration, as follows:

"substantial harm to key views from important viewpoints (including views which are integral to the character of conservation areas), popular tourist and scenic routes (including the public rights of way network, cycle and multi-use routes, and other recreational trails with permissive access), and settlements shall be avoided; where a lesser degree of harm would occur the extent of that harm should be minimized as far as possible."

SKDC Response:

This bullet points is meant to focus on views from sensitive viewpoints and is not trying to consider harm to significance of heritage assets. Heritage matters are dealt with in section 3.4.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
693648 Mrs Vikki Hoole		Landscape and Visual Amenity 3.2.8

CommentID: WED363

Nature of Response: Commenting

Reasons:
Industrial wind turbines are massive structures which are visible for many miles around. Locating them in brownfield sites could make sense, but siting them near railways doesn't make sense at all - railways are not visible for many miles around.

Changes to the draft that you consider necessary:
Remove reference to railways.

SKDC Response:
See comment for WED20

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity 3.2.8

CommentID: WED383

Nature of Response: Objecting

Reasons:
The assertion that views of whole turbines are less distracting than blade tips may hold up for large turbines but does not apply as a generalisation to small-scale turbines

Changes to the draft that you consider necessary:
Delete bullet 3 or qualify with reference to scale

SKDC Response:
Agree that wording of the 3rd bullet point be clarified.

Recommended Changes:
Amend 3rd bullet point to read: ".. rather than blade tips only - this particularly relates to large scale turbines and may be a particular consideration...."

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Landscape and Visual Amenity 3.2.8

CommentID: WED407

Nature of Response: Commenting

Reasons:
1. Some of these are mitigating design techniques, not site selection criteria.
2. Proximity to a railway does not mean that the site is less remote.
3. A large structure does not have to be on an elevated site to spoil a distinctive skyline.

Changes to the draft that you consider necessary:
1. Move the mitigation techniques to 3.2.9
2. Delete 'railways'
3. Change 7th bullet to 'For medium and large-scale wind energy development, avoid selecting sites that could impact distinctive skylines such as.....'

SKDC Response:
All the bullet points with the exception of the 8th bullet point relate to siting. See also comments for WED20 and WED193.

Recommended Changes:
See change for WED20 and move 8th bullet point to bullet point list under paragraph 3.2.9.

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity 3.2.8

CommentID: WED462

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the fourth bullet point, the first line should be reworded to read "siting of turbines should not materially prevent the appreciation of historic ....."

SKDC Response:
It is not considered that the proposed additional wording adds anything to the bullet point

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity 3.2.8

CommentID: WED463

Nature of Response: Commenting

Reasons:
On the 7th bullet point, here it is relevant to the materiality issue. In the Fens inevitably there will be views from long distances and inevitably Church spires or towers will be visible and much more so than in other landscape settings where they will be hidden by undulations etc. Given the flatness of the landscape this should not be deemed to be a material consideration, but an impact that needs to be considered and mitigated where reasonably possible.

Changes to the draft that you consider necessary:

SKDC Response:
It is agreed that in the context stated it is not possible to avoid selecting sites in areas with church spires or towers and the wording of the bullet point could be amended to clarify this.

Recommended Changes:
Amend last part of 7th bullet point to read: "... (e.g. Grantham Scarp), or where they would overwhelm important cultural or historic landmark features."

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Landscape and Visual Amenity 3.2.8

CommentID: WED580

Nature of Response: Commenting

Reasons:
Para 3.2.8 (site selection) seems to be a mix of mitigating design techniques (which should be in para 3.2.9) and the broader consideration of what might be a suitable site. It makes a good suggestion that industrial or brownfield sites may be more suitable. However, mentioning proximity to roads and railways confuses the issue when the primary objective is to minimise the wider landscape and visual impact. Reference to roads and railways should be removed.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED20, WED21 and WED407

Recommended Changes:
See changes for WED20 and WED407

Consultee	Agent	Consultation Point
703325 Mr John Halton		Landscape and Visual Amenity 3.2.8

CommentID: WED610

Nature of Response: Commenting

Reasons:
Comment relates to 5th bullet point.
The renewable energy interactive map shows every wind farm site in the UK which is: 1). Constructed; 2). Under construction; 3). Consented planning approval.
All of the turbines appear to be located adjacent or very close to trunk roads. The reference to "main roads" in the SPD should be defined as trunk roads. The reason trunk roads are preferred are as follows;
A). Trunk roads are a manmade intervention in the landscape and already cause a degree of noise, light pollution and paraphernalia.
B). Wind turbines necessitate fabrication of very large components which are manufactured away from the site and require transportation of abnormal indivisible loads. It is unlikely that rural roads can cope with the disruption and possible reconfiguration of vehicular routes that would inevitably be required. In addition, the loss of further hedgerows complete with ecological issues should be avoided.
G) Unfortunately Lincolnshire has the worst accident record in the country. Agricultural traffic will no doubt have contributed to these statistics; further distractions to rural roads should be resisted.
The Highway Agency controls the jurisdiction over trunk toads and they have published guidelines regarding the siting of wind turbines, which should inform the SPD (http://www.dft.gov.uk/halstandards/tech_info/files/12_09_Wind_Turbines_ver3_ l.pdf)
Trunk roads are constructed to a higher road specification unlike many 60 mph rural roads which encompass awkward bends and unpredictable routes and junctions.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED21

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
703325 Mr John Halton		Landscape and Visual Amenity 3.2.8

CommentID: WED611

Nature of Response: Commenting

Reasons:
Comment relates to 5th bullet point.
Unlike trunk roads, railway lines can cut through the countryside barely unnoticed dependent on the degree of foliage and topography of the land. In addition, the lines are not illuminated and the track usage is infrequent. lnlight of these facts, I don 't feel that railway lines should be highlighted as a location that could easily accommodate wind turbines. Furthermore, railways do not provide transportation to facilitate the construction of wind turbines.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED20

Recommended Changes:
See change for WED20

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity Box 2

CommentID: WED382

Nature of Response: Objecting

Reasons:
The assertion that it is less distracting to see whole turbine than blade tips (Bullet 3) may be applicable to large scale turbines but does not hold up as a generalisation applied to small scale turbines.

Changes to the draft that you consider necessary:
Delete bullet 3 or amend to qualify with reference to scale

SKDC Response:
See comment for WED383 (section 3.2.8)

Recommended Changes:
See change for WED383

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity Box 2

CommentID: WED464

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the 2nd sentence delete the word "fits' and replace it with ".... takes into account ...."

SKDC Response:
Agree the proposed wording is more appropriate.

Recommended Changes:
In 2nd sentence amend wording to read: " .... how the location takes into account local landscape character .... "

Consultee	Agent	Consultation Point
703308 Squadron Leader Neal Henley Civil Aviation Authority		Landscape and Visual Amenity 3.2.9

CommentID: WED1

Nature of Response: Commenting

Reasons:
Additional wording to clarify and expand upon the current statement, which may create a false impression. The current wording states 'if lighting is required on turbines for aviation purposes, use infra-red lighting where possible to minimise visual impacts at night.' The following information may help reword the paragraph to ensure it accurately reflects the aviation lighting issue.

Changes to the draft that you consider necessary:
Any structure of 150 metres (The effective height of a wind turbine is the maximum height to blade tip) or more must be lit in accordance with the Air Navigation Order and should be appropriately marked. Although if an aviation stakeholder (including the MOD) made a request for the lighting of a structure below 150 meters in height it is highly likely that the Civil Aviation Authority would support such a request, particularly if the request falls under Section 47 of the Aviation Act. It is the responsibility of the aviation stakeholder requesting aviation warning lighting to define the technical specification of such lighting. Where possible infra-red lighting should be used to minimise visual impacts at night. Although infra-red lighting may satisfy MOD requirements it is unlikely to satisfy civil aviation requirements.

SKDC Response:
Agree that these comments should be incorporated into the SPD in section 3.10 and cross referred to in the landscape section.

Recommended Changes:
At end of 10th bullet point (under Layout and Design of Ancillary Features) add: "(see section 3.10 Aviation)
In section 3 add new paragraph (after paragraph 3.10.7) to read: "Any structure of 150 metres or more must be lit in accordance with the Air Navigation Order and should be appropriately marked. If an aviation stakeholder (including the MOD) made a request for the lighting of a structure below 150 meters in height it is likely that the Civil Aviation Authority would support such a request, particularly if the request falls under Section 47 of the Aviation Act. It is the responsibility of the aviation stakeholder requesting aviation warning lighting to define the technical specification of such lighting. Where possible infra-red lighting should be used to minimise visual impacts at night. Although infra-red lighting may satisfy MOD requirements it is unlikely to satisfy civil aviation requirements."

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.9

CommentID: WED23

Nature of Response: Commenting

Reasons:
Th eLGA Wind Energy Project Checklist advises that 'if more than one turbine is being installed, a space of at least 5 times the diameter of the rotor should be allowed between turbines to optimise power output by reducing wind shadowing and/or turbulence.'

Changes to the draft that you consider necessary:

SKDC Response:
Whilst this is correct it is a technical issue that the developer will consider as they will seek to maximise their power output. It is not appropriate for the SPD to set out the technical considerations that the developer should take into account.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape and Visual Amenity 3.2.9

CommentID: WED88

Nature of Response: Commenting

Reasons:
The Local Government Association (LGA) [Wind Energy Project Checklist] advises that: 'if more than one turbine is being installed, a space of at least 5 times the diameter of the rotor should be allowed between turbines to optimise power output by reducing wind shadowing and/or turbulence'.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED23

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.9

CommentID: WED159

Nature of Response: Commenting

Reasons:
The Local Government Association (LGA) [Wind Energy Project Checklist] advises that: "if more than one turbine is being installed, a space of at least 5 times the diameter of the rotor should be allowed between turbines to optimise power output by reducing wind shadowing and/or turbulence"

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED23

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26328 Mr M L Hall Barkston & Syston Parish Council		Landscape and Visual Amenity 3.2.9

CommentID: WED269

Nature of Response: Commenting

Reasons:
Other effects include intrusiveness by lighting, usually necessary in areas where low flying is typical, and also the “strobe” effect caused by turning blades when turbines are illuminated. Turbines are often situated away from other illuminated areas, common in rural Lincolnshire, and the effect on the visual amenity in areas otherwise devoid of l.ighting is considerable.

Changes to the draft that you consider necessary:

SKDC Response:
Although the impact of lights could be included as a bullet point under paragraph 3.2.1 in terms of guidance it is not considered that anything else needs to be added to that already provided.

Recommended Changes:
Under paragraph 3.2.1 add new bullet point to read: "impact of lights on rural areas at night"

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Landscape and Visual Amenity 3.2.9

CommentID: WED273

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust supports the need for ancillary features of turbine developments to be designed to have the least impact possible on the surrounding land, including by minimising the length of new tracks required and avoiding damage to hedges and flower rich verges, or any other valuable habitats which may be present. Where impact is unavoidable, mitigation should be implemented and the habitats concerned should be reinstated, and wherever possible enhanced, post-construction.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. To clarify the situation where impact is unavoidable consider it would be appropriate to add additional bullet point.

Recommended Changes:
Add new bullet point (under list headed Layout and Design of Ancillary Features) to read: 'Where impact to ecology and/or ornithology is unavoidable, mitigation should be implemented and the habitats concerned should be reinstated and, wherever possible, enhanced post-construction.'

Consultee	Agent	Consultation Point
713530 Mr Andrew Jenkins		Landscape and Visual Amenity 3.2.9

CommentID: WED331

Nature of Response: Objecting

Reasons:
Guidance on turbine colour to mitigate impact is insufficient

Changes to the draft that you consider necessary:
Include clause to the effect that white, brightly coloured or silver turbines should be prohibited as these tend to be most obtrusive. Darker grey is preferable. Colouring should include blades. Developers should have to select turbine colours which contribute most to mitigating impact. This should be a requirement of granting permissions

SKDC Response:
This is already adequately covered by the bullet point under paragraph 3.2.9.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Landscape and Visual Amenity 3.2.9

CommentID: WED408

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add Local Government Association (Wind Energy Project Checklist) advice:
If more than one turbine is being installed, a space of at least 5 times the diameter of the rotor should be allowed between turbines to optimise power output by reducing wind shadowing and/or turbulence.

SKDC Response:
See comments for WED23

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity 3.2.9

CommentID: WED416

Nature of Response: Objecting

Reasons:
The consideration of alternatives is not appropriate where EIA is not required; disagree with the second bullet as small scale turbines can often be 'lost' in the context of existing vertical features

Changes to the draft that you consider necessary:
Delete of qualify text to take account of proportionality issue identified in relation to consideration of alternatives and differentiate between turbine scale when considering siting in proximity to existing 'clutter'

SKDC Response:
It is good practice to consider options for layouts - these do not have to be alternatives in the EIA sense of the word.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity 3.2.9

CommentID: WED465

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the 16th bullet point before the word "possible" on the third line, put in "reasonably"

SKDC Response:
Agree that the amendment to the wording provides clarification.

Recommended Changes:
Amend 9th bullet point under Layout and Design of Ancillary Features to read: "... shall be underground wherever reasonably possible."

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Landscape and Visual Amenity Box 3

CommentID: WED357

Nature of Response: Supporting

Reasons:
It is essential that all aspects of a wind energy proposal are included as part of any planning application from the outset, notably the connection between the proposed turbine(s) and its connection point to buildings or to the National Grid.

Changes to the draft that you consider necessary:
There should be a requirement to show all parts of a wind energy development of any size, specifically including any connection required to transfer electricity from the wind turbines. This should be as part of any planning application for wind energy development and not as a separate subsequent planning proposal - applicants should not be allowed to delay submission of this important and essential information until a later date once planning permission is granted for the principal development in the form of turbines..

SKDC Response:
See comments for WED524 (paragraph 2.2.8).

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity Box 3

CommentID: WED432

Nature of Response: Objecting

Reasons:
Para 3.2.9 includes some inappropriate statements as previously identified - in addition a 1:1 tower - blade diameter should not apply to small-scale turbines

Changes to the draft that you consider necessary:
Amend para 3.2.9 in accordance with previous comments

SKDC Response:
Agree that this should only apply to large and medium scale turbines

Recommended Changes:
At end of 5th bullet point under paragraph 3.2.9 add: "for medium and large wind turbines"

Consultee	Agent	Consultation Point
26352 Ms Rosemary H Woolley Baston Parish Council		Landscape and Visual Amenity 3.2.10

CommentID: WED225

Nature of Response:

Reasons:
No wind turbines placed within two miles of any property whether listed or not.

Changes to the draft that you consider necessary:

SKDC Response:
It is not clear why reference to listed properties has been made in this comment but see comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711369 Mr Gary Senior		Landscape and Visual Amenity 3.2.12

CommentID: WED155

Nature of Response: Commenting

Reasons:
Unless minimum separation distances are introduced many wind farms will be "unacceptably overbearing", "oppressive" and "unpleasantly overwhelming and unavoidably present in main views".

Changes to the draft that you consider necessary:
Introduction of minimum separation distances. I would suggest 2000m as recommended by other local authorities.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity 3.2.12

CommentID: WED437

Nature of Response: Objecting

Reasons:
Object to bullet 2 text in brackets as does not apply to small turbines

Changes to the draft that you consider necessary:
Delete text in brackets

SKDC Response:
It is accepted that this is unlikely to apply to small turbines and the wording should be clarified to reflect this.

Recommended Changes:
Amend 2nd bullet point to read: "... if for example only turbine tips of large and medium scale turbines are visibile'

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity 3.2.12

CommentID: WED438

Nature of Response: Objecting

Reasons:
Object to bullet 2 text in brackets as does not apply to small turbines

Changes to the draft that you consider necessary:
Delete text in brackets

SKDC Response:
See comment for WED437

Recommended Changes:
See change for WED437

Consultee	Agent	Consultation Point
703325 Mr John Halton		Landscape and Visual Amenity 3.2.12

CommentID: WED614

Nature of Response: Commenting

Reasons:
Comment relates to 2nd bullet point:
Unclear why rotating blades above tree lines are more harmful than the effect of a full visible rotating wind turbine. Surely these matters are determined by size and distance away from the wind farm. Both visual effects may be unacceptable dependent on the setting and context.

Changes to the draft that you consider necessary:

SKDC Response:
It is not that seeing only part of the turbine blades is more harmful but that it may be more distracting.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.14

CommentID: WED24

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Paras 3.18 and 3.19 could be moved to 'key planning considerations' section so that this section only inlcudes specific guidance.

SKDC Response:
Not clear what paragraphs are being referred to as 3.18 and 3.19 are not in the document?

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.14

CommentID: WED25

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Would be useful to mention here that minimum distances are now prescribed in other countries (inlcuding Scotland) with more experience of wind farms.

SKDC Response:
See comment for WED143 (general section) on separation distances. It is not considered that the additional wording proposed would add anything to this particular section.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.14

CommentID: WED26

Nature of Response: Commenting

Reasons:
The LGA recommends firm (but inadequate) setback distances namely 'A setaback distance of at least 600-800 metres from residential properties for large wind turbines. This may be reduced for

smaller projects'.
Even a turbine manufacturer recommends a 2km setback. Website of Retexo RISP, 'Factors when planning a Wind Farm/Site Location' states:
'The location under consideration should first of all be wind - intensive during the whole year. Usually this is guaranteed on coastal sites, on open land without forests or high hills within a range of about 15km and, of course, on hill tops. Buildings, particularly housing, should not be nearer thatn 2km to the windfarm'.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED89

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Perhaps paras 3.18 and 3.19 could be moved to the 'key planning considerations' section, so that this section only includes specific guidance.

SKDC Response:
It is unclear what is being sought as there are no paragraphs 3.18 or 3.19.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED90

Nature of Response: Commenting

Reasons:
It would be useful to mention here that minimum distances are now prescribed in other countries (including Scotland) with more experience of wind farms.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED91

Nature of Response: Commenting

Reasons:

The LGA recommends firm (but inadequate) setback distances: 'A setback distance of at least 600 - 800 metres from residential properties for large wind turbines. This may be reduced for smaller projects'. Even a turbine manufacturer recommends a 2km setback (see 1 below).

1. From the website of Retexo RISP: Factors when planning a Wind Farm / Site Location:

"The location under consideration should first of all be wind - intensive during the whole year. Usually this is guaranteed on coastal sites, on open land without forests or high hills within a range of about 15 km and, of course, on hill tops. Buildings, particularly housing, should not be nearer than 2 km to the windfarm".

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED143 (general section) on separation distances.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.14

CommentID: WED163

Nature of Response: Commenting

Reasons:

The LGA recommends firm (but inadequate) setback distances: "A setback distance of at least 600 - 800 metres from residential properties for large wind turbines. This may be reduced for smaller projects". Even a turbine manufacturer recommends a 2km setback (see 1 below).

1. From the website of Retexo RISP: Factors when planning a Wind Farm / Site Location: "The location under consideration should first of all be wind - intensive during the whole year. Usually this is guaranteed on coastal sites, on open land without forests or high hills within a range of about 15 km and, of course, on hill tops. Buildings, particularly housing, should not be nearer than 2 km to the windfarm"

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED143 (general section) on separation distances.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
713497 Mr Anthony Saunders		Landscape and Visual Amenity 3.2.14

CommentID: WED306

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

Meaningful separation distances from inhabited dwellings should be adopted. The threat of legal action by wind farm developers should not deter the Council from doing what is right.

SKDC Response:

See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714264 Yvonne Kierstan		Landscape and Visual Amenity 3.2.14

CommentID: WED345

Nature of Response: Commenting

Reasons:
Pleased that South Kesteven District Council is at last doing something about the plague of wind turbines in the fens, but I am disappointed that it doesn't have the courage of other District Councils to ban any turbines within 2 km of a house.

Changes to the draft that you consider necessary:
Recommend that the Council states in its policy that no turbine should be put up within 2 km of a house, except in the limited case of a turbine for an individual house, which in any case would be much smaller.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714270 Mrs W McCallin Westborough & Dry Doddington Parish Council		Landscape and Visual Amenity 3.2.14

CommentID: WED348

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
3.2.14-16: Separation distances
The Parish Council supports the concept of minimum distances as are now prescribed in other countries with more experience of wind farms. In light of the emerging health concerns, we feel the Council should be mindful of its 'duty of care' to our residents and implement a cautious policy regarding the development of large turbines close to homes.
The Parish Council strongly supports the NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'.
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is cautious re court challenges, it should at least resolve to follow Wiltshire's example without further delay.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
714397 Mr Robert Thornton

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED440

Nature of Response: Commenting

Reasons:
Specific Separation Distances are a vital tool to ensure planners are able to protect the public in South Kesteven.

Changes to the draft that you consider necessary:
Please be assured that were SKDC to introduce specific Separation Distances of say 2km from any dwelling for a large (100m+) turbine, you would be taking a huge and courageous step towards the acceptable location of these structures. Do not be bullied by big developers threats hoping to deflect you from protecting the people of SKDC.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
714597 Louise Barrett

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED511

Nature of Response: Commenting

Reasons:
It is essential to define minimum distances from any proposed turbine and homes. Believe they should be related to the size of the turbines. The medical evidence (British Medical Journal, 8th March 2012) is clearly indicating that residents living within 2km of industrial wind farms would be exposed to a number of health risks – sleep disturbance, headaches, ringing or buzzing in the inner ear, ear pressure leading to vertigo, nausea, tachycardia. Believe SKDC has a duty of care to protect the wellbeing of its residents from such risks. In fact in the Council's Core Strategy (Section EN1) it says that they will maintain " a good quality of life, health and wellbeing for everyone…" It is hard to see how they could uphold this without setting some minimum distances. Other countries who have a longer history of onshore wind energy have indeed set minimum separation distances (Scotland, France, Australia, Italy, Germany). I hope SKDC will to seek to put the wellbeing of its residents ahead of the commercial gains of any power company. (I not bow down to the threats of legal action from wealthy corporations)

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED532

Nature of Response: Objecting

Reasons:
Para 3.2.14 – 3.2.16 discuss the relative merits of imposing a separation distance

between turbines and residential properties and other forms of development, but concludes that the Council does not intend, at the current time, to introduce a minimum separation distance as part of the SPD.
We strongly resist the potential imposition of a separation distance whether as part of this SPD or any subsequent revisions to it or other policy documents. The key reasons for this are as follows:
1. It is not considered appropriate to impose blanket restrictions on wind energy development, as this should be assessed on a site by site basis, informed by local circumstances. Merely being within a prescribed distance of a residential property does not automatically correspond to unacceptable visual (or other) effects on amenity, or indeed any effects at all. The purpose of requiring Environmental Assessment is to establish the significant effects and enable the planning decision maker to make a judgment on the evidence as to the acceptability of those effects. Use of a blanket exclusion zone could lead to refusal of proposals that would otherwise, on their merits, be acceptable, and would thus constitute an unwarranted constraint on renewables development. This would be contrary to national energy and planning policy as set out in the NPF and elsewhere. Such a blanket exclusion would serve no useful planning purpose and would not be in the public interest, especially given the high importance given by Government to increasing the deployment of renewables wherever the impacts are acceptable.
2. EN-3 considers the issue of separation distances between sensitive receptors and commercial scale wind turbines up to 150m to tip, yet does not set a specified distance for separation (paragraph 2.7.6). Instead the policy is clear that any impacts of wind turbine development can be addressed by careful design of the arrangement of wind turbines to minimise effects on the landscape and visual amenity while meeting technical and operational siting requirements and other constraints (paragraph 2.7.49), whilst the noise levels recommended by ETSU-R-97 will influence the separation of wind turbines from residential properties (paragraph 2.7.55). This confirms that the government's approach to ensuring a development is acceptable and minimises effects upon residential amenity. Decisions on acceptability should be based upon a case-by-case approach, rather than a blanket separation distance to be slavishly adhered to regardless of the actual impacts.

Changes to the draft that you consider necessary:
Delete Paras 3.2.14, 3.2.15, 3.2.16 and Appendix 1.
If it is felt necessary to reference the Council's consideration of a separation distance, we suggest the following text should be inserted – "The Council does not intend to introduce a minimum separation distance between turbines and residential dwellings as this is wholly inconsistent with national policy which requires applications to be assessed on their own merits and decisions on acceptability to be made based upon site-specific circumstances. It is important to maintain flexibility in decision-making rather than providing a blanket ban on development within an area, which could rule out acceptable schemes".

SKDC Response:
See comment for WED143 (general section) on separation distances. It is considered that it remains appropriate for separation distances to be referenced in the SPD. Should the Council decide in the future to introduce minimum separation distances then these would be the subject of public consultation.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26136 Yana Bosseva Renewable UK		Landscape and Visual Amenity 3.2.14

CommentID: WED555

Nature of Response: Objecting

Reasons:
Paragraphs 3.2.14 – 3.2.16 discuss the relative merits of imposing a separation distance between turbines and residential properties and other forms of development, but concludes that the Council does not intend, at the current time, to introduce a minimum separation distance as part of the SPD. It is our view that these should not be introduced, now or in the future, for the following reasons:
1. The planning system operates on the basis of assessing site specific impacts of a development proposal and mitigating accordingly. This approach is correct because impacts and their severity vary along many dimensions. The move towards a simplistic generic separation distance threatens this long standing principle and opens up a dangerous precedent to unnecessarily block development and economic growth.
2. The sort of impact that these arbitrary separation distances are intended to protect against are already subject to rigorous assessment as part of the planning process on a far more sophisticated site-by-site and scheme-by scheme basis.
3. Meanwhile, if we were to maintain general separation distances, we would artificially restrict developable land to such an extent as to threaten our renewable energy targets, energy security and tens of millions of pounds worth of investment.
4. Applying blunt separation distances would further restrict the ability of their communities to develop their own renewable energy projects.

SPDs are intended to elaborate and explain existing development plan policies which have been subject to independent examination and scrutiny. In the case of wind energy, the introduction of separation distances is clearly a substantial policy matter, so any attempt to do so must be made through the local plan procedure. We believe such policies run counter to requirements in the NPPF to plan positively for development/renewable energy and would not therefore stand-up
to scrutiny at a local plan examination. Indeed we note that the NPPF at para 153 states that: 'Any additional development plan documents should only be used where clearly justified. Supplementary Planning Documents should be used where they can help applicants make successful applications or aid infrastructure delivery, …'
Additionally, it should be noted that a Judicial Review has been lodged against Milton Keynes Council's SP Document.

Changes to the draft that you consider necessary:
Request that Paras 3.2.14, 3.2.15, 3.2.16 and Appendix 1 be deleted.

SKDC Response:
See comment for WED143 (general section) and WED532.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Landscape and Visual Amenity 3.2.14

CommentID: WED588

Nature of Response: Commenting

Reasons:
• Residents should not have to put up with distinctive turbine noise in their homes by day and night. Given the inadequate protection provided by the current noise regulations, we believe that a graduated series of mandatory separation distances are currently the only practical option to ensure that residential amenity is preserved.
REF calculated the noise levels from typical turbines of the appropriate sizes at the minimum distances proposed by Wiltshire Council. A 100m (tip height) turbine produced 32dB at 1.5km and a 150m turbine (tip height) produced 31dB at 2km. So, even with their proposed mandatory separation distances, the distances proposed by Wiltshire are only borderline sufficient to protect amenity based on the ETSU-R-97 principles, even without taking into account the standard margin of error and the likelihood of excess AM effects.
Separation Distances. In addition to your research in this area, we draw your attention to the following:
- Wiltshire County Council's draft Core Strategy, awaiting approval by the planning inspectorate, has proposed separation zones of 2km for turbines up to 150 metres high and 3km for anything taller.
- Both our local MPs also support separation distances. We have already referred to Nick Boles' position and Stephen Phillips MP (in whose constituency the proposed Temple Hill wind farm is located) said in a recent parliamentary debate3 : 'surely minimum separation distances are appropriate'.
- Scotland and some Australian & Italian regions specify a 2km separation distance between industrial wind turbines and residential properties, and France specifies a 3km separation distance.
- According to the front page article in The Sunday Times on 25th November, when Stratford on Avon Council went to public consultation with a proposal for 700m separation zones most respondents said this was too small, so the council proposes to increase this to 1.5km.
Noise-related Health Issues. The distinctive noise from wind turbines does not just affect residential amenity:
- Research published in the British Medical Journal4 confirmed that those living within 2km of industrial wind farms are at risk of:
• sleep disturbance
• headaches
• ringing or buzzing in the inner ear
• altered ear pressures, leading to vertigo
• nausea
• tachycardia
- This was taken up in a recent report for the Northumberland & Newcastle Society5 which confirmed that unacceptable effects on health are highly likely in a significant proportion of those living within 1.5km of industrial wind turbines.
- More recently, a fully peer-reviewed scientific study conducted by British and American scientists and published in the Noise and Health Journal 6, concluded that wind farm noise causes 'clear and significant' damage to people's sleep and mental health with the effect diminishing with increasing distances from turbines.
We understand that the issue of 'blanket' separation distances is contentious. However, with more and more evidence about the health impacts of large scale industrial wind turbines on nearby

residents, we strongly believe that South Kesteven District Council has a duty of care to protect its residents. This ethos is also enshrined in Core Strategy EN1 which says SKDC will maintain 'a good quality of life, health and wellbeing for everyone'.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
703325 Mr John Halton		Landscape and Visual Amenity 3.2.14

CommentID: WED612

Nature of Response: Commenting

Reasons:
Considering the wide spread acrimony regarding noi se, visual intrusion, blade movement and shadow flicker, I am surprised that the SPD does not include appropriate setback distances. As you are aware, there are numerous peer reviewed articl es that highlight the health issues associated with wind turbines within 2km of dwellings.
The well documented appeal case at North Dover/Langdon recognised the visual intrusion of wind turbines located close to properties. This was also highlighted at Matlock Moor. Extracts are listed below.
North Dover/Langdon
When turbines are present in such number, size and proximity that they represent an unpleasantly overwhelming and unavoidable presence in main views from a house or garden, there is every likelihood that the property concerned would come to be widely regarded as an unattractive and thus unsatisfactory (but not necessarily uninhabitable) place in which to live. It is not in the public interest to create such living conditions where they did not exist before.(p.22). This has since been labelled "The Lavender Test".
At Matlock Moor the Inspector explained that "It is not in the public interest to create living conditions that are overwhelmed by t he unavoidable presence of large structures such as wind turbines. 1 therefore consider visual impact to be an important material consideration in my assessment of living conditions." She continued "For example, at Cuckoos/one House Farm and Cuckoos/one Grange (both of which have adjacent holiday accommodation), the turbines would be clearly visible from principal views from the dwellings and gardens. The turning blades, prominent above the trees, would be about 750m away. To my mind, their proximity would mean that they would be visually intrusive features that could not be ignored. The fact that they might also be audible would compound the problem. In my view, living conditions would be unacceptably harmed. " (p.l6)
Furthermore, the character of this rural district in many locations is defined by church towers and steeples which dominate the historic landscapes. These distinctions are almost certainly in danger of being eradicated by the installation of large industrial rotating components domineering the landscape and views. A large proportion of the rural communi ties are diminutive and nucleated with small populations. The spaces between the villages are important landscape separations. Wind turbines should not endanger the autonomy of each villagelhamlet and erode the historical settings. Trust that the SPD will ensure that the result of wind farms does not visually unite individual villages and hamlets creating a perception that the settlements are joined together.
Understanding of the Localism Act is that it does devolve power to district council's and communities to establish planning policy. I note with interest that there has been no call for evidence regarding setback distances of less than 800 metres (Cherwell District Council) or say 400 metres protection zones from sewage works which regularly form part of Local Government legislation. It appears that once setback distances of 1.5km are mentioned the energy industry threatens legal action. Strongly advise that the council adopt the views of the large majority of the rural communities that require protection and impose set back distances similar to those listed in the Milton Keynes SPD. The purpose of this SPD is to establish principles for future wind farm development. A failure to prescribe these setback limits will weaken the council's chances of success at subsequent appeals.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
26348 Mrs Andrea smith
Caythorpe Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.14

CommentID: WED620

Nature of Response: Commenting

Reasons:
The Parish Council considered the consultation document which generally followed the terms of the council's previously agreed policy on this issue. The Council also considered correspondence concerning this matter from the REVOLT pressure Group. After discussion it was AGREED to support the proposed policy but request that SKDC consider being more specific with regard to separation distances between large turbines and dwellings.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.15

CommentID: WED27

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Clarify that the threat of legal challenge is from wind farm developers not government.

SKDC Response:
Agree that sentence should be amended to refer to fact legal challenge was made by wind farm developers and also updated to reflect that the legal challenge has now been completed.

Recommended Changes:
At end of 2nd sentence add: "... examined or have been the subject of legal challenge by wind farm developers."

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.15

CommentID: WED92

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Clarify that the threat of legal challenge is from wind farm developers, not government.

SKDC Response:
See comment for WED27.

Recommended Changes:
See change for WED27

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.15

CommentID: WED164

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Clarify that the threat of legal challenge is from wind farm developers, not government.

SKDC Response:
See comment for WED27.

Recommended Changes:
See change for WED27

Consultee	Agent	Consultation Point
711472 Mrs Pamela MacAllister		Landscape and Visual Amenity 3.2.15

CommentID: WED194

Nature of Response: Objecting

Reasons:
sI would urge SKDC to consider implementing minimum separation distances.
There are many indications and publications outlining of the detrimental effects on wind turbines to the health and well being of residents in the near vicinity to the sites, including the discreditation of the ETSU noise assessments adopted by the industry which sets noise levels higher than those that would be allowed for any other industry. For example, ETSU allows upto 43dB noise at night, whereas a noisy neighbour creating over 31dB of noise can warrant having an ASBO imposed. Bearing these issues in mind surely the council have a responsibility to ensure that residents quality of life is maintained.
Other countries (including Scotland) have recognised the need for minimum separation distances and they are recommended by the county council, so why can't SKDC adopt them.

Changes to the draft that you consider necessary:
Include minimum separation distances of at least 2km for larger turbines.

SKDC Response:
See comment for WED143 (general section). It should be noted that ETSU guidance is accepted by Planning Inspectors as the correct guidance to be used as the basis for noise impact assessment.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713817 Mr Nigel Redmile		Landscape and Visual Amenity 3.2.15

CommentID: WED327

Nature of Response: Commenting

Reasons:
The lack of a minimum separation distance is a weakness in the process and leaves in law leaves the whole process open to wide variations in the way that planning decisions are made. The implementation of a reasonable minimum separation distances (as defined by residents) would seem to be a fair way to asses plans and grant or reduce permission based on a set (and known criteria)

Changes to the draft that you consider necessary:
2km from the nearest residential property seems a reasonable distance that I would like to see adopted in Lincolnshire

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
714270 Mrs W McCallin
Westborough & Dry Doddington Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.15

CommentID: WED350

Nature of Response: Objecting

Reasons:
3.2.14-16: Separation distances
The Parish Council supports the concept of minimum distances as are now prescribed in other countries with more experience of wind farms. In light of the emerging health concerns, we feel the Council should be mindful of its 'duty of care' to our residents and implement a cautious policy regarding the development of large turbines close to homes.
The Parish Council strongly supports the NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'.
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is cautious re court challenges, it should at least resolve to follow Wiltshire's example without further delay.

Changes to the draft that you consider necessary:
3.2.14-16: Separation distances
The Parish Council supports the concept of minimum distances as are now prescribed in other countries with more experience of wind farms. In light of the emerging health concerns, we feel the Council should be mindful of its 'duty of care' to our residents and implement a cautious policy regarding the development of large turbines close to homes.
The Parish Council strongly supports the NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'.
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is cautious re court challenges, it should at least resolve to follow Wiltshire's example without further delay.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Landscape and Visual Amenity
3.2.15

CommentID: WED409

Nature of Response: Commenting

Reasons:
It would be useful to mention here that minimum distances are now prescribed in other countries (including Scotland) with more experience of wind farms.
It should be made clear that the legal challenge mentioned has come from an energy company with a financial interest, not from government or any other elected or responsible body.

Changes to the draft that you consider necessary:
Clarify as above

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714397 Mr Robert Thornton		Landscape and Visual Amenity 3.2.15

CommentID: WED443

Nature of Response: Commenting

Reasons:
SKDC should introduce policies it beleives to be correct and not be deflected fro mtheir beliefs by theTHREAT of legal action.

Changes to the draft that you consider necessary:
Introduction of specific Separatin Distances.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.16

CommentID: WED28

Nature of Response: Commenting

Reasons:
We understand the Council's wariness about adopting setback distances whilst other councils are being threatened with legal action by well-financed international companies. However, given the current doubts about the credibility and reliability of the ETSU-97 noise regulations and concerns about the wider health effects of wind turbines (see later) the Council should be mindful of its duty of care to residents and implement a cautious policy regarding the development of large turbines close to homes.
It is an NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'. There's nothing here about local interests having to be subverted by national targets.
Indeed the NPPF core principles require that planning should: 'always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings' and also 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it'

Changes to the draft that you consider necessary:
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is not prepared to take the lead itself, it should at least resolve to follow Wiltshire's example without further delay.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape and Visual Amenity 3.2.16

CommentID: WED93

Nature of Response: Commenting

Reasons:
We understand the Council's wariness about adopting a setback distances whilst other councils are being threatened with legal action by well-financed international companies. However, given the current doubts about the credibility and reliability of the ETSU-97 noise regulations and concerns about the wider health effects of wind turbines (see later) the Council should be mindful of its duty of care to residents and implement a cautious policy regarding the development of large turbines close to homes.
It is an NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'. There's nothing here about local interests having to be subverted by national targets.
Indeed the NPPF core principles require that planning should: 'always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings' and also 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it'
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is not prepared to take the lead itself, it should at least resolve to follow Wiltshire's example without further delay.
It should also be noted that as Lincolnshire already has many wind turbines, LCC have considerable practical knowledge of their impact which has been fully assessed and hence they have been able to produce clear recommendations that any wind farm should be at least 2KM (1.2 miles) from any dwelling

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Landscape and Visual Amenity 3.2.16

CommentID: WED165

Nature of Response: Commenting

Reasons:
We understand the Council's wariness about adopting a setback distances whilst other councils are being threatened with legal action by well-financed international companies. However, given the current doubts about the credibility and reliability of the ETSU-97 noise regulations and concerns about the wider health effects of wind turbines (see later) the Council should be mindful of its duty of care to residents and implement a cautious policy regarding the development of large turbines close to homes. It is an NPPF core principle that planning should be "genuinely plan-led, empowering

local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area". Another NPPF principle is that planning should "be a creative exercise in finding ways to enhance and improve the places in which people live their lives". There's nothing here about local interests having to be subverted by national targets. Indeed the NPPF core principles require that planning should: "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildingsâ€™ and also â€˜take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it". SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is not prepared to take the lead itself, it should at least resolve to follow Wiltshire's example without further delay.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Landscape and Visual Amenity 3.2.16

CommentID: WED244

Nature of Response: Commenting

Reasons:
BHATs, with its knowledge of the many negative impacts on adjacent communities, would encourage South Kesteven District Council to be bold in pushing for minimum separation distances. These make everything simpler and less time consuming for both the local planning authority and developers. They save so much work by avoiding going back to square one with every application. We are aware that a number of authorities have adopted or are in an advanced state of preparation in prescribing separation distances including Milton Keynes, Wiltshire, Cherwell, Stratford Upon Avon. This is supplemented by similar guidance from the County Councils of Lincolnshire and Staffordshire. Quite apart from this tool contradicting national energy guidance, CLG ministers have openly encouraged local planning authorities to adopt their own wind energy policies, not discounting separation distances, using the proper machinery in place, ie Local Plans and SPDs.
Our advice would be that SKDC follow other Councils who have stated that there should be a minimum separation distance of of 2km. between medium and large turbines and homes. This would have the advantage of embracing both visual amenity and noise considerations, thus removing endless argument. We would encourage SKDC to take into account some of the very latest research on health and setback distances, based on subjects living close to 1.5-megawatt industrial wind turbines in Maine, USA. http://www.wind-watch.org/news/2012/11/10/study-finds-physical-mental-health-effects-from-wind-turbines/

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Landscape and Visual Amenity 3.2.16

CommentID: WED256

Nature of Response: Commenting

Reasons:
SKDC should seize the opportunity to introduce minimum separation distances between homes/villages and turbines of different sizes. The Council has clearly researched what others are doing and it should have the courage of setting its own standards and not be afraid of legal challenges from the powerful wind farm industry. There is nothing illegal about this. The fact that these distances have

not been set nationally does not prevent a local planning authority from having them. The wind farm industry will always say that each development should be considered on its merits – but it is then in a far more powerful position with its expert advisers than a small local authority which does not have the same resources. Having minimum distance will save a lot of work on both sides and note that they are 'minimum' distances which means that all the other tests in the SPD would apply beyond the relevant distance limits so a visual, noise or heritage concern could still be presented beyond the set distances. It is a shame that SKDC wishes to be a follower rather than a leader.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714270 Mrs W McCallin Westborough & Dry Doddington Parish Council		Landscape and Visual Amenity 3.2.16

CommentID: WED351

Nature of Response: Objecting

Reasons:
3.2.14-16: Separation distances
The Parish Council supports the concept of minimum distances as are now prescribed in other countries with more experience of wind farms. In light of the emerging health concerns, we feel the Council should be mindful of its 'duty of care' to our residents and implement a cautious policy regarding the development of large turbines close to homes.
The Parish Council strongly supports the NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'.
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is cautious re court challenges, it should at least resolve to follow Wiltshire's example without further delay.

Changes to the draft that you consider necessary:
3.2.14-16: Separation distances
The Parish Council supports the concept of minimum distances as are now prescribed in other countries with more experience of wind farms. In light of the emerging health concerns, we feel the Council should be mindful of its 'duty of care' to our residents and implement a cautious policy regarding the development of large turbines close to homes.
The Parish Council strongly supports the NPPF core principle that planning should be 'genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. Another NPPF principle is that planning should 'be a creative exercise in finding ways to enhance and improve the places in which people live their lives'.
SKDC should prepare to introduce a setback distance as soon as possible (with some flexibility in the case of turbine owners and shared ownership schemes). If the Council is cautious re court challenges, it should at least resolve to follow Wiltshire's example without further delay.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Landscape and Visual Amenity 3.2.16

CommentID: WED354

Nature of Response: Objecting

Reasons:
We wish to see minimum separation distances included in the SPD with no turbines of between 15m and 50m in height proposed within 1500m of a dwelling, a local business or a local amenity. This distance should increase to 2,000m where turbines are of a height in excess of 50m.

Changes to the draft that you consider necessary:
Include a section on separation distances to inform applicants and developers and to provide comfort to home owners, to be recognised in Box 4.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
693648 Mrs Vikki Hoole		Landscape and Visual Amenity 3.2.16

CommentID: WED365

Nature of Response: Objecting

Reasons:
Our own County Council has considerable experience with wind farms, as does Scotland. Both have policies for 2km separation distances. As do many other countries and as do several other English counties. Both local MPs - Nick Boles & Stephen Phillips - have publicly stated support for separation distances.
The reasons for separation distances are many. Visual impact, residential amenity and most importantly health. Peer-reviewed articles have shown that the impact from the noise and vibrations from large turbines is significant.
I therefore believe that SKDC is failing in its duty of care to residents not to give this issue much more serious consideration.

Changes to the draft that you consider necessary:
The SPD should include prescribed separation distances of 2km between industrial scale wind turbines (100m or more) and homes.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714277 Mr Richard Hoole		Landscape and Visual Amenity 3.2.16

CommentID: WED378

Nature of Response: Objecting

Reasons:
Our own county council, many other councils, and many other countries all advocate separation distances between industrial wind turbines (over 50m) and residential properties. These councils and countries have lots of experience. There are lots of reports indicating the problems associated with siting large turbines close to people's homes. Residential amenity and noise, health impacts including sleeplessness, headaches, tinnitus and depression. It seems astonishing that the issue of separation distances should be given such scant attention.

Changes to the draft that you consider necessary:
Introduce separation distances of 2km between homes and turbines over 50m in height. This is the only way to protect residents.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714397 Mr Robert Thornton		Landscape and Visual Amenity 3.2.16

CommentID: WED445

Nature of Response: Objecting

Reasons:
The council SHOULD introduce minimum separation distances.

Changes to the draft that you consider necessary:
"There should be a minimum of 2KM separation from any large (>100m) wind trubine and any residence."

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Landscape and Visual Amenity 3.2.16

CommentID: WED581

Nature of Response: Commenting

Reasons:
• Para 3.2.16 suggests a 2km radius 'study area' for the assessment of residential visual amenity. We support this approach if further guidance can be provided on what would be considered "unacceptably overbearing, oppressive or overwhelming". Presumably it is the highly subjective nature of these judgments (and more extensive experience) that has led other councils and other countries to implement fixed separation distances. Again, we refer the council to the county council's research and conclusions in this area.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
649840 Miss Philippa Brown Fulbeck Parish Council		Landscape and Visual Amenity 3.2.16

CommentID: WED602

Nature of Response: Commenting

Reasons:
SKDC says it does not intend, at present to introduce or use minimum seperation distances between homes and turbines. Surely, these distances should be set as soon as possible, and be consistent with other UK planning authorities to avoid turbines, should they gain planning permission, being placed too close to residential homes.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711369 Mr Gary Senior		Landscape and Visual Amenity Box 4

CommentID: WED158

Nature of Response: Objecting

Reasons:
I believe minimum separation distances between houses and turbines should be included to reduce the risk of wind farm developments being overbearing. Other countries do this, and other UK local authorities have proposed them. Even Lincolnshire County Council recommends them. I think SKDC have a duty to protect residents.

Changes to the draft that you consider necessary:
Introduction of a minimum separation distance of 2000m between houses and turbines.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Landscape and Visual Amenity Box 4

CommentID: WED372

Nature of Response: Commenting

Reasons:
Concerned about lack of reference to separation distances.

Changes to the draft that you consider necessary:
Minimum separation distances should be included in Box 4 to provide clarity and certainty. The minimum distances should apply to specific turbine heights.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Landscape and Visual Amenity Box 4

CommentID: WED531

Nature of Response: Objecting

Reasons:
Para 3.2.13 and Box 4 require a minimum study area of 2km for residential visual amenity assessments. This may not always be necessary. The study area should be determined based on the specific nature of the site and through consultation with the local planning authority. The determining factor should be to include all properties where there is a potential impact on visual amenity that could be so great as to materially affect living conditions.

Changes to the draft that you consider necessary:
Delete 'covering a study area of at least 2km from any turbine' from Box 4 and add 'the size of the study area is to be defined through consultation with the local planning authority'.

SKDC Response:
For large/medium scale developments it is considered that the 2km study area is appropriate. However, it is agreed that the wording should be amended to indicate the study area should be agreed with the LPA.

Recommended Changes:
At end of paragraph 3.2.13 'The study area should be agreed with the Planning Authority at the earliest opportunity.'
At end of Box 4 add: "The study area should be agreed with the Planning Authority."

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity 3.2.17

CommentID: WED441

Nature of Response: Objecting

Reasons:
The SNH guidance is not applicable to small-scale turbines.

Changes to the draft that you consider necessary:
Include statement that cumulative impact requires a proportionate approach, tailored to scale of turbine

SKDC Response:
Agree that this could be clarified.

Recommended Changes:
Amend beginning of 2nd sentence to read: "Cumulative imapact assessment requires a proportionate approach, tailored to the scale of turbine and should be undertaken ...."

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.18

CommentID: WED29

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The first bullet ('shall not obscure distinctive landforms and be in scale with ridges and hills') should also be applicable to single developments.

SKDC Response:
Multiple developments could apply to a number of single turbine development equally as developments of several turbines.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.18

CommentID: WED30

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
3rd bullet – replace 'surrounding' with 'dominating', as the former implies a near-360° aspect.

SKDC Response:
The purpose of using the word 'surrounding' was that it is related to cumulative effects; 'dominating' is not necessarily specific to cumulative effects. However, it is agreed that dominating might be appropriate in this context.

Recommended Changes:
In 3rd bullet point, replace 'surrounding' with 'dominating'.

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Landscape and Visual Amenity 3.2.18

CommentID: WED31

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Sources of further information – add CPRE

SKDC Response:
The Sources of Further Information refer to specific relevant documents and as no specific CPRE document is being suggested it would be inappropriate to include just a refernce to CPRE. They are in anycase included in the list of consultees in Table 4.1.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Landscape and Visual Amenity 3.2.18

CommentID: WED94

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The first bullet ('shall not obscure distinctive landforms and be in scale with ridges and hills') should also be applicable to single developments.

SKDC Response:
See comment for WED29

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.18

CommentID: WED95

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
3rd bullet – replace 'surrounding' with 'dominating', as the former implies a near-360° aspect.

SKDC Response:
See comment for WED30

Recommended Changes:
See change for WED30

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.18

CommentID: WED96

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Sources of further information – add CPRE.

SKDC Response:
See comment for WED31

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.18

CommentID: WED166

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The first bullet ("shall not obscure distinctive landforms and be in scale with ridges and hills") should also be applicable to single developments.

SKDC Response:
See comment for WED29.

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Landscape and Visual Amenity
3.2.18

CommentID: WED167

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 3rd bullet replace ˜surrounding" with ˜dominating", as the former implies a near-360 degree aspect.

SKDC Response:
See comment for WED30

Recommended Changes:
See change for WED30

Consultee
712930 Lady Sarah Sigurdsson Hardradi
BHATs (Billingborough & Horbling Against Turbines)

Agent

Consultation Point
Landscape and Visual Amenity
3.2.18

CommentID: WED245

Nature of Response: Commenting

Reasons:
We note that there is reference to 'an overbearing or overwhelming presence of turbines' and to seek to avoid … dominating [historic towns, villages and assets] with turbines at close quarters. There is also, of course, the impact of an overwhelming presence on the nature and perceived 'value' of the community. Some villages have a wealth of listed buildings, which have been preserved and protected for many years, and which add to the overall richness of village community and value of property in these communities generally, as well as to the character of South Lincolnshire as a whole. (Also, Paragraph 3.4.11: Box 11: There will be a presumption in favour of preserving heritage assets intact and in situ.) There is potential damage to listed and other properties in historic villages along the delivery route from the size of machinery being transported, and from vibration from heavy construction traffic. Whilst Paragraph 3.8.2 refers to wind energy installations….offering 'a lucrative diversification option for farmers and landowners' the opposite side of the coin – the impact on local inhabitants – should not be overlooked. Whilst there is no recourse to local inhabitants to argue against wind turbines simply because their presence will impact upon their quality of life, it should not be forgotten that a large wind farm immediately adjacent to (and dominating) what was formerly an unspoilt and attractive village will inevitably cause the value of property to plummet. SKDC needs to be aware of the financial hardship that this will cause very large numbers of families who will face negative equity in mortgages, and/or the inability to sell properties as a result. For those families who have no choice to remain in close proximity to what instantly becomes a massive industrialised landscape, there is also the prospect of television and telecommunications interference. (3.11 Telecommunications), damaging to both work and home life. A large wind farm placed in an inappropriate setting very close to village settlements could essentially damage those villages irrevocably.
We realise that property values have been ruled not to be a planning matter, but they are a matter for your councillors as a whole. There have been recent cases where rateable values for Council Tax have been reduced in places close to wind farms.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted, however, no change to the paragraph is considerd necessary.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Landscape and Visual Amenity 3.2.18

CommentID: WED410

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The first bullet should also be applicable to single turbines.
Add CPRE to 'sources of information'.

SKDC Response:
See comments for WED29 and WED31.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Landscape and Visual Amenity Box 5

CommentID: WED358

Nature of Response: Supporting

Reasons:
Strongly support the need to consider cumulative impact of wind turbines, as there has been a proliferation of schemes that will result in an accumulation of wind turbines in the South Kesteven District. Consideration should include an assessment of extant planning permissions, Scopting Opinions issued by the Authority and current planning proposals not yet determined. This will ensure a comprehensive view is taken on the issue.

Changes to the draft that you consider necessary:

SKDC Response:
It is considered that the current wording already covers the points made.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Landscape and Visual Amenity Box 5

CommentID: WED442

Nature of Response: Supporting

Reasons:
Welcome recognition of need for proportionality

Changes to the draft that you consider necessary:
no change

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Landscape and Visual Amenity Box 5

CommentID: WED467

Nature of Response: Commenting

Reasons:
In last sentence it is inappropriate to specify distances. Each case must be considered on its merits and in consultation with the Planning Authority.

Changes to the draft that you consider necessary:

SKDC Response:
The wording only refers to 'may' but it would be appropriate to clarify that the study area should be agreed with the Planning Authority.

Recommended Changes:
Amend last sentence to read: "... as required by the EIA Regulations. The study area will need to be agreed with the Planning Authority but may need to be .... "

Consultee	Agent	Consultation Point
517670 Natural England Natural England		Ecology and Ornithology (Birds) 3.3

CommentID: WED8

Nature of Response: Supporting

Reasons:
Pleased to acknowledge that this section provides detailed coverage on Natural England's interests including the impact of wind energy developments on European and national nature conservation sites, on protected species and bird populations.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26328 Mr M L Hall Barkston & Syston Parish Council		Ecology and Ornithology (Birds) 3.3

CommentID: WED268

Nature of Response: Commenting

Reasons:
Impact on wildlife, both ground based and flying. The effect on the flight paths of birds and foraging areas of bats is well known. In one local case (Frinkley Lane) local residents have noticed an effect on flightpaths in that area, the birds are not there in the areas they were previously, and there are no other reasons for this change.

Changes to the draft that you consider necessary:

SKDC Response:
Impacts on ecology and ornithology are covered in Section 3.3

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3

CommentID: WED292

Nature of Response: Commenting

Reasons:
D. Sources of Further Information
We would recommend that this list is amended to include Natural England's Technical Information Note TIN069 and the Bat Conservation Trust guidance Bat Surveys – Good Practice Guidelines 2nd Edition: Surveying for onshore wind farms.

Changes to the draft that you consider necessary:

SKDC Response:
The Bat Conservation Trust guidance is already referenced in paragraph 3.3.20 but it is agreed it should also be included, along with TIN069, in the list of Sources of Further Information.

Recommended Changes:
In 5th bullet point add reference to TIN069. Add new bullet point to read: "Bat Conservation Trust guidance Bat Surveys – Good Practice Guidelines 2nd Edition: Surveying for onshore wind farms."

Consultee	Agent	Consultation Point
490730 Mr Alan Hubbard The National Trust		Ecology and Ornithology (Birds) 3.3

CommentID: WED342

Nature of Response: Supporting

Reasons:
National Trust considers that the advice set out on ecological matters, including designated sites and protected species, is both appropriate and proportionate.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) 3.3

CommentID: WED503

Nature of Response: Commenting

Reasons:
Natural England's Technical Information Note TIN069 'Assessing the effects of onshore wind farms on birds' needs to be included in the reference section and referred to in the appropriate parts of the document.

Changes to the draft that you consider necessary:
Add reference to TIN069

SKDC Response:
See comments for WED292.

Recommended Changes:
See change for WED292

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Ecology and Ornithology (Birds) 3.3

CommentID: WED539

Nature of Response: Commenting

Reasons:
Reference for the BCT guidelines is missing from the reference list despite being noted in Para 3.3.20.

Changes to the draft that you consider necessary:
Add 'Bat Conservation Trust (2012). Bat Surveys - Good Practice Guidelines - 2nd Edition Surveying for onshore wind farms. BCT, London (March 2012)' to reference list.

SKDC Response:
See comments fort WED292.

Recommended Changes:
See change for WED292

Consultee	Agent	Consultation Point
26136 Yana Bosseva Renewable UK		Ecology and Ornithology (Birds) 3.3

CommentID: WED557

Nature of Response: Objecting

Reasons:
This section is overly prescriptive. A number of the concerns raised are already covered by the EIA process. Additionally, it should be noted that requiring a minimum separation distance of 50 m from hedgerows for small wind turbines is not appropriate. This is because small turbines are often installed on farms and other sites which are spatially constrained in some way, thus having such a wide buffer distance would rule out a number of opportunities for renewable energy installations, farm diversification and community renewables.

Changes to the draft that you consider necessary:

SKDC Response:
The seperation distance for small turbines has been clarified in response to a representation (WED453) to paragraph 3.3.22.

Recommended Changes:
See change for WED453

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED32

Nature of Response: Commenting

Reasons:
1st sentence - covered by the preamble about carbon reduction (para 2.3.1).

Changes to the draft that you consider necessary:

SKDC Response:
This sentence seeks to make the link between carbon reduction, climate change and biodiversity. Reference to biodiversity is not made in para 2.3.1.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED33

Nature of Response: Commenting

Reasons:
2nd sentence – we can't think of any circumstances in which a wind energy development could enhance biodiversity or nature conservation.

Changes to the draft that you consider necessary:

SKDC Response:
There are opportunities for wind farms to enhance biodiversity and nature conservation through the preparation and implementation of habitat management plans (HMPs). There are several examples of HMPs which have been implemented as a result of wind farm developments which have led to nature conservation.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED34

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
3rd sentence – needs a semi-colon or dash after 'compound' (or delete 'i.e. the access roads, construction compounds').

SKDC Response:
Agree punctution is needed

Recommended Changes:
Insert comma after "compounds" in third sentence.

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.1

CommentID: WED97

Nature of Response: Commenting

Reasons:
1st sentence - covered by the preamble about carbon reduction (para 2.3.1).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED32

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.1

CommentID: WED98

Nature of Response: Commenting

Reasons:
2nd sentence – we can't think of any circumstances in which a wind energy development could enhance biodiversity or nature conservation.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED33

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.1

CommentID: WED99

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
3rd sentence – needs a semi-colon or dash after 'compound' (or delete 'i.e. the access roads, construction compounds').

SKDC Response:
See comment for WED34

Recommended Changes:
See change for WED34

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.1

CommentID: WED169

Nature of Response: Commenting

Reasons:
1st sentence - covered by the preamble about carbon reduction (para 2.3.1).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED32

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.1

CommentID: WED170

Nature of Response: Commenting

Reasons:
2nd sentence - we cannot think of any circumstances in which a wind energy development could enhance biodiversity or nature conservation.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED33

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.1

CommentID: WED171

Nature of Response: Commenting

Reasons:
3rd sentence needs a semi-colon or dash after ˜compound" (or delete i.e. the access roads, construction compounds).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED34

Recommended Changes:
See change for WED34

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED274

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust welcomes the recognition of both direct and indirect impacts of wind energy developments on ecology, including both habitats and species. We also strongly support the inclusion of opportunities for habitat management and enhancement as a key planning consideration.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED316

Nature of Response: Objecting

Reasons:
The RSPB has change its stance on wind turbines and no longer objects to them in relation to their effect on birds. Mobile phone masts are put up and tall buildings are built with birds adapting to them so there is no reason to deal with wind turbines differently.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted, however, the RSPB have provided comments on the draft SPD.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED495

Nature of Response: Commenting

Reasons:
The 3rd sentence should be reworded to make clear that it is the operation of the turbines that create the main ecological impact – not the site infrastructure.

Changes to the draft that you consider necessary:

SKDC Response:
Disagree, the operation of turbines can have an impact on birds and bats but it is the construction of the turbines and associated infrastructure that can have the biggest impact on ecology - ie mammals, habitats, reptiles etc.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) 3.3.1

CommentID: WED496

Nature of Response: Commenting

Reasons:
In respect of the 4th sentence, siting of the turbines is the key consideration to take into account given the variability of bird flight. There is also currently limited research available to understand the impacts of smaller turbines (<15m in height) on birds. In order for this documents to remain valid and relevant there should be additional emphasis given to the fact that as more research is undertaken the impacts on wildlife will become clearer.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. However, it would be expected that relevant guidance notes would be updated to take account of additional research and understanding of impacts on wildlife. A change to the wording of paragraph 1.3.3 to reflect the updating of guidance is proposed.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
517670 Natural England Natural England		Ecology and Ornithology (Birds) 3.3.3

CommentID: WED9

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Suggest under this section may wish to highlight the need for wind energy applications to consider impacts on local sites such as Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and other sites of high biodiversity value.

SKDC Response:
Agree this could be added.

Recommended Changes:
At end of first sentence add: "as well as Local Wildlife Sites, Local Geological Sites and other sites of high biodiversity value."

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Ecology and Ornithology (Birds) 3.3.3

CommentID: WED246

Nature of Response: Commenting

Reasons:
In the face of those who would argue that the Fens are areas where turbines would have only low visual impact (as the misguided author of the Landscape Character Assessment did) we would draw SKDC's attention to the recent publication Fenland study: 'The Fens of the Future' completed by the University of East Anglia. This shows what a rare and precious landscape the Fens are. They are unique within the British Isles, and should be referred to as such even if they do not have an official designation. Within the Fens one of the least damaged areas is that which lies west of the 40 Foot Drain and wholly within South Kesteven.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Ecology and Ornithology (Birds) 3.3.3

CommentID: WED257

Nature of Response: Commenting

Reasons:
The importance of the Fen habitat generally should be referred to here.

Changes to the draft that you consider necessary:

SKDC Response:
As this section refers to designated areas it would be inappropriate to refer to other general habitat types.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.4

CommentID: WED275

Nature of Response: Commenting

Reasons:
Designated areas should include reference not only to statutorily designated nature conservation sites such as SSSIs and SACs, but also non-statutory sites. These are sites of county importance for their wildlife interest and are known in Lincolnshire as Local Wildlife Sites (LWSs), designated by the Greater Lincolnshire Nature Partnership, or Sites of Nature Conservation Importance (SNCIs), which may have been designated some time ago and should be resurveyed using the LWS criteria.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED9.

Recommended Changes:
See change for WED9

Consultee
714593 Anne Casey
RSPB

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.4

CommentID: WED497

Nature of Response: Commenting

Reasons:
Last sentence needs to be updated and corrected to read as suggested.

Changes to the draft that you consider necessary:
Proposals for wind energy development will need to demonstrate that they would not adversely affect the conservation value/ integrity of a designated site, or habitats and protected species listed in the appropriate schedules of Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2010 (as amended) (the "Habitats Regulations") or the Protection of Badgers Act 1992

SKDC Response:
Agree that references should be updated.

Recommended Changes:
Amend final part of third sentence to read: "... Wildlife and Countryside Act 1981, the Conservation and Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) or the Protection of Badgers Act 1992.

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.4

CommentID: WED533

Nature of Response: Commenting

Reasons:
The legislation referenced is not fully up to date or complete.

Changes to the draft that you consider necessary:
Update reference Conservation and Habitats and Species Regulations 2010 (currently 1994 is referenced). Add Natural Environment and Rural Communities Act 2006.

SKDC Response:
See comment for WED497

Recommended Changes:
See change for WED497

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.5

CommentID: WED276

Nature of Response: Commenting

Reasons:
The Lincolnshire Wildlife Trust supports the requirement for all large and medium scale wind energy developments to submit an ecological impact assessment. Some form of ecological assessment should also be submitted for all small developments to assess potential impacts on statutory and non-statutory designated sites, sensitive habitats and features which may support species protected under the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010 or the Protection of Badgers Act 1992. Further ecological survey and assessment

may be required for small developments where potential impacts on protected or notable sites or species are identified.

Changes to the draft that you consider necessary:

SKDC Response:
Reference is made to ecological assessments for small scale wind energy proposals.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Ecology and Ornithology (Birds) 3.3.5

CommentID: WED360

Nature of Response: Supporting

Reasons:
All applications for wind energy projects should be accompanied by an ecological assessment.

Changes to the draft that you consider necessary:
Bird surveys should be carried out during all four seasons of the year to properly demonstrate the potential impact on bird activity.

SKDC Response:
The requirement for bird surveys is clearly set out in paragraph 3.3.15 along with the guidance to be used in undertaking surveys and the appropriate times for carrying them out.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) 3.3.5

CommentID: WED498

Nature of Response: Commenting

Reasons:
We agree with the principles in this statement but the Environmental Impact Assessment Regulations Schedule 2 outlines the threshold criteria for which a wind farm application will need to undertake an EIA which includes an EcIA. There is reference to height and number of turbines which may include what South Kesteven has defined as 'small' developments.
Comment also applies to Box 6.

Changes to the draft that you consider necessary:
Statement about small developments needs to be amended to clarify this.

SKDC Response:
Comment is noted. However, even small scale developments may need to be subject to an assessment if there is a reasonable possibility of ecology being affected. A change to the wording of paragraph 3.2.8 and Box 6 is proposed to clarify this.

Recommended Changes:
Amend end of first sentence of paragraph 3.3.8 ro read: "….Ecological Impact Assessment for large and medium scale developments. Small schemes may need an assessment if there is a reasonable possibility of ecology being affected and this should be discussed and agreed with the South Kesteven Development Management team"
Amend Box 6 to read: "An ecological impact assessment in accordance with the IEEM guidelines shall be undertaken for large and medium scale wind energy developments. Natural England, RSPB and the South Kesteven Development Management Team shall be consulted on the scope of the assessments required. Small wind energy proposals may also require an ecological assessment to ensure there are no sensitive features affected, the scope of which should be agreed with South Kesteven Development Management Team."

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.6

CommentID: WED277

Nature of Response: Commenting

Reasons:

We welcome the promotion of the use of industry best practice guidelines. We consider that assessments of potential impacts should include reference to construction, operation and decommissioning of the turbines and associated infrastructure.

Changes to the draft that you consider necessary:

SKDC Response:

Agree that decommissioning should be added.

Recommended Changes:

At end of paragraph 3.3.6 add: 'The assessment of impacts of decommissioning will be controlled through the imposition of a planning condition on a planning permission.'

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Ecology and Ornithology (Birds) 3.3.6

CommentID: WED444

Nature of Response: Objecting

Reasons:

IEEMA guidance published in 2006 will not necessarily reflect best practice in 2013. Scientific literature and legal precedent has moved on since to 2006.

Changes to the draft that you consider necessary:

Delete text in first sentence after best practice guidelines.

SKDC Response:

The 2006 guidance is currently under review but forms the most comprehensive guidance available for ecologist to use at the present time. When revised guidance is published then it would be expected that this would supersede the 2006 guidance.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) 3.3.6

CommentID: WED499

Nature of Response: Commenting

Reasons:

Assessment of impacts also needs to be related to the decommissioning stage of the development.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED277.

Recommended Changes:
See change for WED277

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.8

CommentID: WED278

Nature of Response: Supporting

Reasons:
We strongly support the requirement for developers to contact the Lincolnshire Environmental Records Centre to inform the desk study of any Ecological Impact Assessment. Records of any protected or notable species in the vicinity of the proposed works should be requested, along with information on any non-statutorily designated wildlife sites (LWSs or SNCIs). Information on non-statutory sites is only available through LERC and cannot be found on commonly used websites such as MAGIC, Nature on the Map, or NBN.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Ecology and Ornithology (Birds) 3.3.8

CommentID: WED446

Nature of Response: Objecting

Reasons:
The consultation requirement is overly prescriptive and the LERC records are not a reliable guide when scoping a risk assessment. Cllr 06/2005, para 99 and NE guidance provide an appropriate framework for scoping.

Changes to the draft that you consider necessary:
Delete or revise text.

SKDC Response:
It is agreed that information from the LERC will be useful for undertaking ecological impact assessments but not the scoping of such assessments. The text should be clarified to reflect this.

Recommended Changes:
Amend second sentence to read: "The Lincolnshire Environmental Records Centre holds information on non-statutory sites not available elsewhere and they should be contacted to provide information for assessments on the prescence and siting ...."

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Ecology and Ornithology (Birds) Box 6

CommentID: WED362

Nature of Response: Commenting

Reasons:
Support requirement, but suggest this should include small projects alongside large and medium scale proposals, particularly turbines of 15m and higher.

Changes to the draft that you consider necessary:
Box 6 should apply to Large, Medium and Small scale wind energy developments and not provide a qualifying section for Small scale projects, as this is a matter to be deal with through individual submissions.

SKDC Response:
This would be overly onerous as it may not be necessary for a small scale turbine attached to a building etc.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Ecology and Ornithology (Birds) Box 6

CommentID: WED447

Nature of Response: Objecting

Reasons:
The scoping consultation requirement is overly prescriptive for small-scale development

Changes to the draft that you consider necessary:
Delete final sentence

SKDC Response:
It is unlikely that either Natural England or the RSPB would wish to be consulted on the scoping assessments for small scale developments and the wording should, therefore, be clarified to reflect this.

Recommended Changes:
Amend Box 6 to read: 'An ecological impact assessment in accordance with the IEEM guidelines shall be undertaken for large and medium scale wind energy developments. Natural England, RSPB and the South Kesteven Development Management Team shall be consulted on the scope of the assessments required. Small wind energy proposals may also require an ecological assessment to ensure there are no sensitive features affected, the scope of which should be agreed with the South Kesteven Development Management Team'

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.9

CommentID: WED279

Nature of Response: Commenting

Reasons:
Although there are no Special Protection Areas (SPAs) located within the South Kesteven authority boundary, there is a possibility that wind energy developments located on bird migration routes or regular flight paths may adversely affect the integrity of the Wash or Humber Estuary SPAs if qualifying or cited bird species are involved. In this way Habitats Regulations Assessments may be required even when the designated site is not located in close proximity to the development.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. However, reference to migration routes is included under paragraph 3.3.16.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Ecology and Ornithology (Birds) 3.3.9

CommentID: WED468

Nature of Response: Commenting

Reasons:

There should be clarity over what is intended by the words ".... within their vicinity ...." in the first sentence.

Changes to the draft that you consider necessary:

SKDC Response:

It is not possible to be prescriptive about the distance as it will depend on the qualifying interests of the site and the nature/ scale of the development but it is agreed that the text could be amended to clarify this.

Recommended Changes:

Amend 1st sentence to read; "... within their vicinty, which will depend on the qualifying interests of the site and the nature/scale of the development, will need to .... "

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.10

CommentID: WED280

Nature of Response: Commenting

Reasons:

We strongly support the commitment to protect nationally important nature conservation sites. We would recommend that another paragraph is inserted following this one which makes reference to non-statutory designated sites. For example this could read, 'For local sites, wind energy schemes will need to demonstrate that they will not have an adverse effect on a Local Wildlife Site, Site of Nature Conservation Importance or other county level designation. Strict measures would be taken to ensure that harmful effects on local sites are avoided or mitigated against.'

Changes to the draft that you consider necessary:

SKDC Response:

Agree reference should be made to local sites as suggested.

Recommended Changes:

At end of paragraph 3.3.10 add: "For local sites, wind energy schemes will need to demonstrate that they will not have a material adverse effect on a Local Wildlife Site, Site of Nature Conservation Importance or other county level designation. Strict measures should be taken to ensure that harmful effects on local sites are avoided, minimised or mitigated against."

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Ecology and Ornithology (Birds) 3.3.10

CommentID: WED469

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

Add the word "material" before the word "adverse" on the first sentence. Also, at the end it would probably be appropriate to say that in addition to be being avoided where reasonably possible, they should be minimised or mitigated against.

SKDC Response:
Agree suggested wording changes would add clarification on this issue.

Recommended Changes:
Amend first sentence of paragraph 3.3.10 to read: "... will not have a material adverse effect on ...".
Amend second sentence to read: "... on SSSIs are avoided, minimised or mitigated against."

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.11

CommentID: WED281

Nature of Response: Supporting

Reasons:
We strongly support the recognition that wind energy developments can impact protected species and that avoidance or mitigation of harm should be implemented as appropriate. Where impacts cannot be avoided, opportunities for compensation and enhancement of habitats used by the species should be investigated and agreed with Natural England.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.12

CommentID: WED282

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust strongly supports the recognition that non-designated sites and species not covered by legislation can also be of value and should be considered in the context of wind energy developments. These may include UK Biodiversity Action Plan priority habitats and species, habitats and species identified in the Lincolnshire Biodiversity Action Plan, or those identified as of principal importance in Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Changes to the draft that you consider necessary:

SKDC Response:
Agree that for completeness reference should also be made to Section 41 of NERC.

Recommended Changes:
At end of second sentence of paragraph 3.3.12 add: '... and those identified as of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.'

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Ecology and Ornithology (Birds) 3.3.12

CommentID: WED450

Nature of Response: Objecting

Reasons:
The consideration of all species impacts needs to reflect the likely risk

Changes to the draft that you consider necessary:
The final sentence is inconsistent with para 3.3.14 and 'any scheme' should be amended to 'medium or large scale scheme'.

SKDC Response:
Do not agree there is inconsistency between the two paragraphs, as even small scale development may have impacts.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Ecology and Ornithology (Birds) 3.3.13

CommentID: WED35

Nature of Response: Commenting

Reasons:
Are there any peat wetlands or moorlands in South Kesteven?

Changes to the draft that you consider necessary:

SKDC Response:
There are some small areas managed as peat wetland but not moorland. The text should be amended to refelct this.

Recommended Changes:
In first sentence delete 'or moorlands'

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Ecology and Ornithology (Birds) 3.3.13

CommentID: WED100

Nature of Response: Commenting

Reasons:
Are there any peat wetlands or moorlands in South Kesteven?

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED35

Recommended Changes:
See change for WED35

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Ecology and Ornithology (Birds) 3.3.13

CommentID: WED172

Nature of Response: Commenting

Reasons:
Are there any peat wetlands or moorlands in South Kesteven?

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED35

Recommended Changes:
See change for WED35

Consultee
26296 Mr N Sandford
Woodland Trust

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.13

CommentID: WED347

Nature of Response: Commenting

Reasons:
Subject to that qualification, Woodland Turst support renewable energy as a means of tackling the threat of climate change and welcome the commitment not to put a wind farm development on an area of ancient woodland.

Changes to the draft that you consider necessary:
Request that the wording be expanded to refer to not having a wind farm development in close proximity to ancient woodland where, particularly in the construction phase, there may be significant adverse effects particularly along the edge of the ancient woodland. This section could also make reference to avoiding damaging effects on ancient or veteran trees.

SKDC Response:
Agree proposed wording would be beneficial.

Recommended Changes:
At end of paragraph add: "Wind farm developments in close proximity to ancient woodland where, particularly in the construction phase, there may be significant adverse effects particularly along the edge of the ancient woodland may also be unacceptable."

Consultee
235539 Mr Clifford Bacon
Clipsham Parish Meeting

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.14

CommentID: WED139

Nature of Response: Commenting

Reasons:
It seems that the document does not recommend separation distances between turbines and settlements or individual dwellings. We would suggest that recommended separation distances would be of assistance to your Planning Officers and Planning Committee to reach consistent decisions. Separation distances can be quoted for guidance thus allowing individual consideration of applications but they do also provide a consistent basis for evaluation of an application.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.14

CommentID: WED162

Nature of Response: Commenting

Reasons:
It would be useful to mention here that minimum distances are now prescribed in other countries (including Scotland) with more experience of wind farms.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
714593 Anne Casey
RSPB

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.14

CommentID: WED500

Nature of Response: Commenting

Reasons:
This is a very broad and general statement given the range of heights and sizes included in the definition of “small” wind turbine. In order for this document to remain relevant there should be more context of current knowledge about impacts on birds to qualify this statement.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED496 (paragraph 3.3.1)

Recommended Changes:
n/a

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Ecology and Ornithology (Birds)
Box 7

CommentID: WED283

Nature of Response: Commenting

Reasons:
We would recommend that the term ‘biodiversity sites’ is replaced to specifically mention both statutory and non-statutorily designated nature conservation sites.

Changes to the draft that you consider necessary:

SKDC Response:
Agree proposed change would more clearly reflect terminology used.

Recommended Changes:
In 1st sentence replace "biodiversity sites" with "statutory and non-statutorily designated nature conservation sites"

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Ecology and Ornithology (Birds) Box 7

CommentID: WED470

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
There should be reference on the first sentence to minimising the effect as it is not always possible to avoid.

SKDC Response:
Agree wording provides clarification.

Recommended Changes:
Amend 1st sentence to read: "... identify measures to avoid, minimise or mitigate harm ... "

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) Box 7

CommentID: WED501

Nature of Response: Commenting

Reasons:
Developers do not carry out the Appropriate Assessment. See below for more appropriate wording.
The construction of wind turbines may have a likely significant effect upon features of SPA's or SAC's in the vicinity. Consequently, the potential impacts of the development upon the conservation interest of the SPA or SAC would require an Appropriate Assessment under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the "Habitats Regulations").
This being the case, the developer would need to supply sufficient information (in line with Regulation 61 (2)) to the Local Authority in order to enable an AA to be carried out.

Changes to the draft that you consider necessary:

SKDC Response:
Agree the comment made is correct and the text should be amended accordingly.

Recommended Changes:
Amend last sentence to read: "Where a scheme, alone and in combination with other plans and projects, could have an impact on an internationally designated sites, developers must provide the local authority with enough information on the likely significant effects of the scheme to enable the local authority to complete an assessment in accordance with the Habitats Regulations"

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Ecology and Ornithology (Birds) Box 7

CommentID: WED534

Nature of Response: Objecting

Reasons:
Text relating to developers carrying out an assessment of significant effects in according with the Habitats Regulations is misleading, as it reads as if the developer is obligated to carry out this assessment. This is not correct; the responsibility for this lies with the local authority as the competent authority. The developer is only required to provide the local authority with enough information as is reasonable to allow them to complete this assessment.

Changes to the draft that you consider necessary:
Amend text to read:
"Where a scheme, alone and in combination with other plans and projects, could have an impact on an internationally designated sites, developers must provide the local authority with enough information on the likely significant effects of the scheme to enable the local authority to complete an assessment in accordance with the Habitats Regulations"

SKDC Response:
See comment for WED534

Recommended Changes:
See change for WED534

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.15

CommentID: WED466

Nature of Response: Commenting

Reasons:
We support the fact that there should be no specified minimum separation distances. The case and the detail is unproven and Members Bills have not been pursued. At this stage it is inappropriate and can be considered if there is other evidence that comes forward in support of this.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.15

CommentID: WED471

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
At start of 7th sentence after "consultation" add the words "where appropriate"

SKDC Response:
Agree proposed change.

Recommended Changes:
At start of 7th sentence add: "Where appropriate consultation shall be ... "

Consultee
677814 Mrs Heidi Wilson
Marston Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.15

CommentID: WED507

Nature of Response: Commenting

Reasons:
Wind turbines contribute to avian fatality rates.

Changes to the draft that you consider necessary:

SKDC Response:
The paragraph contains a statement to this effect already.

Recommended Changes:
n/a

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.16

CommentID: WED284

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust strongly supports the requirement for details of migration routes to be requested for turbines over 15m. This will help in the identification of any potential impacts on SPA birds associated with either the Humber Estuary or Wash populations and give an indication of whether Habitats Regulations Assessment may be required.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.17

CommentID: WED285

Nature of Response: Supporting

Reasons:
We welcome recognition of this report and the information contained within it should be used to guide decisions to avoid inappropriate siting of wind energy developments within areas highlighted as being particularly sensitive for important bird populations.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.18

CommentID: WED168

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Under Sources of further information add CPRE.

SKDC Response:
See comment for WED31 (paragraph 3.3.18)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.18

CommentID: WED286

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust would support the use of local specialists who should have a greater knowledge and understanding of the local ecology context and any issues or opportunities which may be relevant.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) Box 8

CommentID: WED287

Nature of Response: Supporting

Reasons:
We support the need for ornithological assessments to be carried out when it is considered that impacts may occur. Surveys and assessments should be carried out in line with current guidance issued by Natural England (eg TIN069) or Scottish Natural Heritage where appropriate, or other peer reviewed and accepted guidance which may become available.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. Additional references to available guidance has been added under Further Information.

Recommended Changes:
n/a

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Ecology and Ornithology (Birds)
Box 8

CommentID: WED472

Nature of Response:

Reasons:

Changes to the draft that you consider necessary:
Also refer to Scottish National Heritage and any other guidance which from time to time is appropriate

SKDC Response:
Reference is already made to the Scottish National Heritage guidance. A change to the wording of paragraph 1.3.3 to reflect the updating of guidance is proposed.

Recommended Changes:
n/a

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Ecology and Ornithology (Birds)
Box 8

CommentID: WED535

Nature of Response: Objecting

Reasons:
Only Scottish Natural Heritage guidance is referenced within Box 8. This appears to be an oversight as British Wind Energy Association (2006) (updated by Percival (2007)) is correctly noted in 3.3.15.

Changes to the draft that you consider necessary:
Add British Wind Energy Association (2006) (updated by Percival (2007)) to the end of
the text in Box 8.

SKDC Response:
As the additional guidance is referred to in the related text it would be appropriate to also inclulde it in the box for consistency.

Recommended Changes:
At end of final sentence add: " ... and the British Wind Energy Association."

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.3.19

CommentID: WED288

Nature of Response: Commenting

Reasons:
We would recommend that the first sentence is amended to read ‘All bats and their places of shelter are protected under UK and European legislation…’. We strongly support the requirement for a bat survey to be carried out where bat activity is likely. The level of work to be undertaken is likely to be a reflection of the size of the development, the habitats which are in the surrounding area and the distance of the turbines from any features which may be used by bats, and should be carried out by suitably experienced and licenced ecologists.

Changes to the draft that you consider necessary:

SKDC Response:
Agree that the first sentence should be amended to clarify that bat roosts are also protected.

Recommended Changes:
Amend first sentence to read: "All bats and their places of shelter are protected under UK and European legislation. A bat survey ... "

Consultee	Agent	Consultation Point
677814 Mrs Heidi Wilson Marston Parish Council		Ecology and Ornithology (Birds) 3.3.19

CommentID: WED508

Nature of Response: Commenting

Reasons:
The low air pressure surrounding a wind turbine is believed to be the reason why bat mortality rates are high. Bats have very delicate lungs and the low air pressure may cause them to expand bursting blood vessels resulting in death.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Ecology and Ornithology (Birds) 3.3.19

CommentID: WED537

Nature of Response: Objecting

Reasons:
Suggest these two paragraphs are combined and edits made to the text to clarify when bat surveys are required and the guidance to be followed. The reference to a bat survey being required when turbines are proposed within 50m of features used for commuting, foraging, and roosting appears to be confused with siting guidelines. In any event it is unnecessary as the remaining text establishes that bat surveys are to be carried out in accordance with the latest BCT guidance which gives clear guidance on when surveys are required and the level/type of survey effort needed.

Changes to the draft that you consider necessary:
Paras 3.3.19 and 3.3.20 are amalgamated and amended to read:
All bats are protected species and work will need to be carried out to establish whether roosts, flight lines, feeding areas, hibernation or swarming sites are in the vicinity of a proposal and have the potential to be affected by the development. Bat surveys shalll be completed if the proposed development is to take place in an area where bat activity is considered likely and should be carried out with reference to the Bat Conservation
Trust's guidance "Good practice guidelines for surveying onshore wind farms (2012)". For single turbine schemes (of all scales), Natural England's Technical Information Note TIN051 and TIN059 shall be used to inform the assessment. The cumulative impacts on bats must also be assessed in relation to other proposed, approved or operational wind energy schemes."

SKDC Response:
It is not considered necessary to combine the two paragraphs as suggested. It should be noted that Lincolnshire Wildlife Trust (WED289, paragraph 3.3.20) support surveys within 50m of features but that in any case the text only indicates that such surveys 'may' be required.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714695 Jo Higson Bats Conservation Trust		Ecology and Ornithology (Birds) 3.3.19

CommentID: WED599

Nature of Response: Commenting

Reasons:

Due to declining populations, bats and their roosts are protected by law throughout the UK, whether occupied or not. It is illegal to damage, destroy or disturb any bats or roosts without having taken the necessary precautions. A roost is defined as any place that a wild bat uses for shelter or protection, and the roost is protected whether bats are present in it or not.
There is also government planning policy and guidance for protected species, which stipulates that the presence of bats be considered as a material consideration when a planning application is submitted.
If bats are discovered after planning permission is granted, the planning permission is considered sterile and the developer must apply for a licence before undertaking any work which may disturb the bats. If bats are present on a site, it is the developer's duty to ascertain the impacts of the proposal on protected species and to ensure that bats are not affected by the development.
A useful guide on the decision making process for determining planning permission can be found at: http://www.biodiversityplanningtoolkit.com/bats/bio_bats.html. Also available is a trigger document that contains a list of the suggested criteria and thresholds used to assess whether a protected species survey and report is necessary for an application.
Specific factors which can have a significant impact on bats to consider as part of a development include: lighting, the removal of surrounding vegetation, noise, and the changing of internal temperature. Information on all of these can be found on the BCT website (www.bats.org.uk) and can be discussed with either a qualified consultant or representative from your Statutory Nature Conservation Organisation.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted. It is proposed to include reference to the Bats Conservation Trust guidance in the Further Information section.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.20

CommentID: WED289

Nature of Response: Supporting

Reasons:

We strongly support the requirement for bat surveys to be carried out where turbine blades will be located within 50m of any features which may be used by commuting, foraging or roosting bats. This will include inter alia, linear habitat features used for commuting such as hedgerows, rivers, ditches, woodland edges, potential foraging habitats such as woodland, grassland, watercourses or waterbodies and potential roost sites such as mature trees or buildings. We welcome the reference to current best practice guidance produced by the Bat Conservation Trust and Natural England's Technical Information Notes TIN051 and TIN059.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) Box 9

CommentID: WED290

Nature of Response: Commenting

Reasons:
The Lincolnshire Wildlife Trust strongly supports the requirement for cumulative impacts on bats and birds (and potentially other ecological receptors as necessary) to be assessed, taking into account proposed, consented and operational wind energy developments. In some cases it may also be necessary to take into consideration in combination effects with other non-wind energy developments, direction should be taken from Natural England on the scope of these assessments.

Changes to the draft that you consider necessary:

SKDC Response:
Agree final sentence could be amended to reflect comments.

Recommended Changes:
Amend last sentence to read: "... wind energy schemes and other developments."

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Ecology and Ornithology (Birds) Box 9

CommentID: WED451

Nature of Response: Objecting

Reasons:
Cllr 06/2005, para 99 refers to 'likelihood of the species being present and affected by the development'

Changes to the draft that you consider necessary:
Revise first sentence in accordance with Cllr 6/05

SKDC Response:
Comment noted but not considered necessary to make any amendment.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714593 Anne Casey RSPB		Ecology and Ornithology (Birds) Box 9

CommentID: WED502

Nature of Response: Commenting

Reasons:
The reference to the assessment of cumulative impact is a key issue relating to birds. There needs to be a clear statement of requirement in the section on birds – not just as a small add-on in the bat section. The in combination effect of the application and other turbines in the area needs to also be considered.

Changes to the draft that you consider necessary:
Suggested wording is:
Other operational wind farms, projects that have been developed in, or are planned for, the area surrounding the proposed development site, as required under the Habitat Regulations, need to be included in an assessment of cumulative and in-combination impact.

SKDC Response:
Agree that it is confusing to mention birds in a section related to bats and the text of Box 8 and Box 9, and supporting paragraphs, should be amended as suggested.
It is unclear what is meant by 'in-combination effect' as this would be covered by cumulative impacts.

Recommended Changes:
In last sentence of paragraph 3.3.20 and 3rd sentence of Box 9 delete "(and birds)". At end of paragraph 3.3.15 and Box 8 add: "The cumulative impacts on birds must also be assessed in relation to

other proposed, approved or operational wind energy schemes."

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Ecology and Ornithology (Birds) Box 9

CommentID: WED536

Nature of Response: Commenting

Reasons:

The reference to birds in Box 9, in relation to assessing cumulative impacts, seems misplaced in the 'bat' section of the SPD. It is suggested that this is referenced in a 'Box 8' which deals specifically with birds.

Changes to the draft that you consider necessary:

Remove '(and birds)' from Box 9 and add 'The cumulative impacts on birds must also be assessed in relation to other proposed, approved or operational wind energy schemes' to Box 8.

SKDC Response:

See comment for WED502

Recommended Changes:

See change for WED502

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED36

Nature of Response: Commenting

Reasons:

The Local LGA guidance should be added as suggested.

Changes to the draft that you consider necessary:

Hedgerows and woodland areas need to be avoided to reduce the potential impact on bats. Separation distances of around 50m for hedgerows and 100m for woodland may be required for large turbines.

SKDC Response:

The separation distance of 50m is stated in the second bullet and is taken from Natural England guidance. It is not clear what basis there is for the 100m buffer. It would be highly unlikely that a wind turbine developer would place a large turbine within 100m of woodland because on the impact on wind speeds.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED101

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The following Local LGA guidance should be added:
'Hedgerows and woodland areas need to be avoided to reduce the potential impact on bats. Separation distances of around 50m for hedgerows and 100m for woodland may be required for large turbines.'

SKDC Response:
See comment for WED36

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED173

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The following Local LGA guidance should be added: 'Hedgerows and woodland areas need to be avoided to reduce the potential impact on bats. Separation distances of around 50m for hedgerows and 100m for woodland may be required for large turbines.'

SKDC Response:
See comment for WED36

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED291

Nature of Response: Commenting

Reasons:
The Lincolnshire Wildlife Trust welcomes the recognition that wind energy developments should be carefully sited and designed in order to reduce any impacts on biodiversity.
We support the intention that wind energy developments should be sited on 'less sensitive' habitats, but consider that this could be worded more strongly to refer to avoiding designated sites, for example 'wind energy developments shall not be located on sites designated for their nature conservation importance at international, national or local levels or sites meeting LWS criteria, or BAP priority habitats, and shall not be directly adjacent to sites which are designated for populations of bird or bat species, or features that are likely to support bird or bat populations, such as woodlands, hedgerows, rivers and waterbodies.'
We welcome the use of micro-siting of wind turbines to maximise separation distances and to avoid potential impacts on sensitive habitats and species, for instance avoiding areas of bird or bat activity. Whilst we support the restoration and enhancement of habitats, this should be carefully sited so that sensitive species are not attracted into close proximity with turbines which may place them at risk of collision or barotrauma. Translocation of species should only be carried out as a last resort when no other options to avoid or mitigate harm are available. Any translocation scheme needs to be carefully designed by suitably experienced and licenced ecologists to ensure the greatest chance of the population surviving at the new receptor site.
We support reference to avoiding vegetation clearance works during the bird breeding season but would suggest removal of the reference to bats in this statement. Whilst bats may be affected by vegetation removal, such as mature trees which may have features used as bat roosts, these could be used at any time of year. If any mature trees are to be removed, they should be assessed by an ecologist for their potential to support bats. If they are found to have suitable features, further surveys may be required and if a roost is found to be present, a licence from Natural England will be required to permit works.

Changes to the draft that you consider necessary:

SKDC Response:

Issues related to siting of turbines in relation to designated and non-statutory nature conservation sites is covered earlier in the section. The first bullet states that wind energy development should not be adjacent to features that are likely to support bird or bat populations eg woodlands hedgerows etc. In hindsight this bullet is overly restrictive and should be amended to state that any impacts on these features should be minimised (rather than they shouldn't be adjacent to these features).
Agree reference to bats in 6th bullet point should be removed for reasons given and that reference be made to restoration and translocation.

Recommended Changes:

Amend 1st bullet point to read: "wind energy developments shall be located on less sensitive habitats and impacts on sites which are designated for .... and water bodies should be minimised."
In 6th bullet point delete reference to bats.
Add new bullet point to read: "the restoration and enhancement of surrounding habitats should be carefully considered so that sensitive species are not attracted into close proximity with turbines which may place them at risk of collision or barotrauma. Translocation of species should only be carried out as a last resort when no other options to avoid or mitigate harm are available."

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED411

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

Add the following Local Governent Association guidance:
Hedgerows and woodland areas need to be avoided to reduce the potential impact on bats. Separation distances of around 50m for hedgerows and 100m for woodland may be required for large turbines.

SKDC Response:

See comment for WED36.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
713538 Ms Mary Marston Windcrop		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED453

Nature of Response: Objecting

Reasons:

NE TIN 51 states that the recommended 50m buffer is not applicable to small turbines - recent evidence shows 25m is more appropriate.

Changes to the draft that you consider necessary:

Qualify the 50m buffer as applicable to medium and large scale turbines only and add reference to 25m as sufficient for small-scale turbines

SKDC Response:

Agree the wording of this bullet point in relation to small turbines should be clarified.

Recommended Changes:

Amend 2nd bullet point to read: '… from linear features, except in the case of small turbines, in accordance with ….”
'

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Ecology and Ornithology (Birds) 3.3.22

CommentID: WED538

Nature of Response: Objecting

Reasons:

In respect of bullet point 1, the wording 'directly adjacent' with respect to restricting development adjacent to designated sites for birds or features that support bird or bat populations is not sufficiently clear, nor does it give the opportunity to determine an appropriate buffer from such features that is reflective of their value and the potential for adverse effects from the proposed development. Features such as woodlands, hedgerows, rivers and water bodies will be present on nearly all sites so to restrict wind energy development adjacent to them is overly restrictive. Furthermore the requirement to be located on less sensitive habitats is not warranted. What is required is that effects should be assessed, and that the residual effects (after taking into account any mitigation proposed) should be acceptable.

Changes to the draft that you consider necessary:

Amend wording of bullet point to read:
'wind energy developments shall maintain appropriate buffers from sites which are designated for populations of bird species, or features such as woodlands, hedgerows, rivers and water bodies that are likely to be of high value to bird or bat populations at risk from wind farm development. Effects on habitats and protected species should be assessed, and the residual effects (after taking into account any mitigation proposed) should be acceptable.

SKDC Response:

See comment for WED291. Wind turbines should avoid sensitive habitats therefore do not agree that this should be deleted.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
703325 Mr John Halton		Historic Environment 3.4

CommentID: WED4

Nature of Response: Objecting

Reasons:

When assessing critieria for wind farms one serious factor is the presence of heritage assets which may be affected by wind farm proposals. The setting of listed buildings and parks, conservation areas and scheduled ancient monuments is a crucial part of the planning process and schemes which have the potetnial to spoil scenes and established views should be resisted.
South Kesteven boasts a large number of historic assets. In comparison to other regions of Lincolnshire it is clear that this District contains noticeably more listed structures and conservation areas thus indicating that the District is likely to be less viable than other districts to accommodate industial sized wind farm developments.
South Kesteven thereforee has an unsually dense historic fabric with more listed buildings and conservation areas by a signficant margin. This trend was also identified by the appeal officer at Thackson's Well Farm, when observing the Trent and Belvoir Vale.
Belton House and its grounds are both Grade I listed and forms a historic asset of national and international importance. The setting of Belton House is particularly relevant to wind farm proposals. In the Belton House and Park Setting Study there is clear criteira outlining the protection of key vistas.

Changes to the draft that you consider necessary:

In order that the District can adequately protect the heritage assets we strongly believe that the policy should incorporate such statements as those listed below:
A. Large scale wind turbines that are demonstrated to have signfiicant adverse impacts on designated heritage assets within 2km radius will be considered unacceptable.
B. Due to the topography of the land in SKDC significant impacts are likely up to a distance of 10km. Therefore a detailed assessment will need to be undertaken to ensure no harm is caused to designated heritage assets within this distance.
C. Principle vistas from the grounds of Belton House, Bellmount Tower and Belton House roof top should be protected in accordance with the Belton House and Park Setting Study.

SKDC Response:
It is not appropriate to state that significant adverse impacts on heritage assets within 2km will be considered unacceptable as it will depend on the asset in question and the value of that asset. it is for the EIA to assess what is a significant impact or not based on a detailed assessment. The acceptability of impacts also have to be weighted up in the round with the potential benefits of the scheme.
It is considered unlikely that significant impacts will occur up to a distance of 10km. The draft SPD indicates that assets with theoretical visibility of the proposed development within 5km are to be assessed for potential impacts on their setting, this to be applied flexibly in line with the proposed scale and likely visibility of schemes. For large scale wind energy developments, an outer study area of 10km radius should be examined for significant assets with particular sensitivity to visual impacts – such as designed landscapes with key structured views. Reference to the Belton House study is included in section D.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Historic Environment 3.4

CommentID: WED585

Nature of Response: Commenting

Reasons:
Should emphasise the importance of the Belton House and Park Study.

Changes to the draft that you consider necessary:

SKDC Response:
It is not considered necessary to include additional references to the Study to those already include in Section 3.4 and 3.2.3, which 'strongly advises' applicants to consult the study.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Historic Environment 3.4.1

CommentID: WED387

Nature of Response: Commenting

Reasons:
In paragraph 3.4.1, although the references to the NPPF are helpful, it should be stated that great weight should be given to the conservation of heritage assets as required by paragraph 132 of the Framework. The section also switches between the phrase “heritage assets” and “historic assets”. In order to be consistent with national policy, the phrase “heritage assets” should only be used (including Box 12).
It would be helpful for the Key Planning Considerations section to note that even single wind turbines can have a substantial effect if sited in the wrong place, and cumulatively a number of single turbines can be very damaging. It is not just the medium and large scale developments that can be harmful.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
The paragraph already states that the NPPF highlights priority is given to the conservation of designated assets. Agree, however, that the term heritage assets should be used consistently.
Do not agree that it is necessary to state that single turbines can have substantial impact.

Recommended Changes:
Amend references to 'historic assets' to read 'heritage assets'.

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Historic Environment 3.4.3

CommentID: WED388

Nature of Response: Objecting

Reasons:
The bullet points in paragraph 3.4.3 focus largely on direct physical and visual impacts on heritage assets. Some recognition should also be given to the impact of noise, vibration and movement. In the second sub-bullet of the third bullet point, we would prefer to use the word “prominence” rather than “dominance” (i.e. “changes in the perceived scale and visual prominence of heritage assets – for example historic church spires and towers”).

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
Reference to noise and vibration is a secondary issue and it is not considered necessary to include it in this section.
Agree that the term 'prominence' should be used in the 2nd sub bullet point rather than 'dominance'.

Recommended Changes:
In 2nd sub bullet point replace 'dominance' with 'prominence'.

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Historic Environment 3.4.4

CommentID: WED37

Nature of Response: Commenting

Reasons:
Apart from the first sentence, the remainder of this paragraph is probably best left to the LCA (which should be retained).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED102.

Recommended Changes:

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.4

CommentID: WED102

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Apart from the first sentence, the remainder of this paragraph is probably best left to the LCA (which should be retained).

SKDC Response:
Disagree, it is considered appropriate for the SPD to provide some information on the historic landscape character of the District.

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Historic Environment
3.4.4

CommentID: WED174

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Apart from the first sentence, the remainder of this paragraph is probably best left to the LCA (which should be retained).

SKDC Response:
See comment for WED102

Recommended Changes:
n/a

Consultee
26339 Mrs B Buttery
Billingborough Parish Council

Agent

Consultation Point
Historic Environment
3.4.4

CommentID: WED258

Nature of Response: Commenting

Reasons:
The last sentence should be preceded by the words “In the Fen area…..”. Without this addition it is not crystal clear which area it is referring to.

Changes to the draft that you consider necessary:
Start the last sentence with: “In the Fen area…..”.

SKDC Response:
Agree that the additional wording would clarify the area being referred to.

Recommended Changes:
At beginning of last sentence of paragraph 3.4.4 add: “In the Fen area …..”

Consultee
713810 Suzanne Williams
Spring Wells Heritage Group

Agent

Consultation Point
Historic Environment
3.4.4

CommentID: WED335

Nature of Response: Commenting

Reasons:
Springwells Heritage Group welcomes the Draft Wind Energy Supplementary Document as it recognises the importance of our local heritage in its many different forms, and specifically because it aims

to protect our treasured heritage within an unspoilt landscape. And furthermore we welcome the fact that in para 3.4.4 it acknowledges the importance of the fens and fen margins as special and valuable landscapes.

Changes to the draft that you consider necessary:
To make it crystal clear that the last sentence in para 3.4.4 applies to the Fens propose that the words "In the fen landscape…" are added at the start of it.

SKDC Response:
See comment for WED258

Recommended Changes:
See change for WED258

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Historic Environment 3.4.5

CommentID: WED38

Nature of Response: Commenting

Reasons:
No need to list Claypole and Billingborough as examples.

Changes to the draft that you consider necessary:
Last line – replace 'may be' with 'are'.

SKDC Response:
It is not clear why reference to Claypole and Billingborough should be removed as they are only examples intended to illustrate the point made. Agree that last sentence should be amended as suggested.

Recommended Changes:
In last sentence replace 'may be' with 'are'.

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.5

CommentID: WED103

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
No need to list Claypole and Billingborough as examples.

SKDC Response:
See comment for WED38

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.5

CommentID: WED104

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Last line – replace 'may be' with 'are'.

SKDC Response:
See comment for WED38.

Recommended Changes:
See change for WED38

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Historic Environment 3.4.5

CommentID: WED175

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
No need to list Claypole and Billingborough as examples.

SKDC Response:
See comment for WED38

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Historic Environment 3.4.5

CommentID: WED176

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Last line replace ˜may be" with ˜are".

SKDC Response:
See comment for WED38.

Recommended Changes:
See change for WED38

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against		Historic Environment 3.4.5

Turbines)

CommentID: WED243

Nature of Response: Commenting

Reasons:
BHATs applauds the mention in the SPD of named churches (such as Claypole and Billingborough, with its 10km+ long-distance views and high visual impact, together with the examples of designed landscapes at Belton and Grimsthorpe. These examples bring the document to life by illustrating otherwise theoretical influences.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Historic Environment 3.4.5

CommentID: WED259

Nature of Response: Commenting

Reasons:
Welcome the use of examples to illustrate points throughout the document and here the reference to particular example church spires such as Billingborough and historic landscapes.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
490730 Mr Alan Hubbard The National Trust		Historic Environment 3.4.5

CommentID: WED343

Nature of Response: Objecting

Reasons:
It is considered that the final sentence of this paragraph requires review. It is apparent that where there are Registered Historic Parks and Gardens that are both Grade I designated (i.e. "of exceptional interest" - English Heritage) and containing designed views that they are indeed particularly sensitive to visual intrusion. Appropriate changes to the detailed wording are suggested.

Changes to the draft that you consider necessary:
Amend the final sentence of para 3.4.5. to read as follows:
"Some, such as Grade I Registered Parks and Gardens at Belton House and Grimsthorpe Castle that are by definition of exceptional interest, are laid out with a series of designed views that are particularly sensitive to visual intrusion."

SKDC Response:
It is not considered that the amendment proposed relating to the interest of the Registered Parks and Gardens adds anything additional to the sentence.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Historic Environment 3.4.6

CommentID: WED39

Nature of Response: Commenting

Reasons:
We understand that the Lincolnshire Historic Landscape Characterization Project will initially concentrate on other areas since South Kesteven already has a LCA.
Attention should be drawn here to the Belton House and Park Study and Policy Development document, which still applies.

Changes to the draft that you consider necessary:

SKDC Response:
It should be noted that the Historic Landscape Characterisation Project has been completed. Agree reference should be made to the Belton House study in this section.

Recommended Changes:
At end of paragraph 3.4.5 add: "(see the Belton House and Park Setting Study)".

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.6

CommentID: WED105

Nature of Response: Commenting

Reasons:
We understand that the Lincolnshire Historic Landscape Characterization Project will initially concentrate on other areas since South Kesteven already has a LCA.
This may be a good place to draw attention to the Belton House and Park Study and Policy Development document, which still applies.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED39

Recommended Changes:
See change for WED39

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Historic Environment 3.4.6

CommentID: WED177

Nature of Response: Commenting

Reasons:
We understand that the Lincolnshire Historic Landscape Characterization Project will initially concentrate on other areas since South Kesteven already has a LCA. This may be a good place to draw attention to the Belton House and Park Study and Policy Development document, which still applies.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED39

Recommended Changes:
See change for WED39

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Historic Environment 3.4.6

CommentID: WED412

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add reference to the Belton House and Park Study

SKDC Response:
See comment for WED39

Recommended Changes:
See change for WED39

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Historic Environment 3.4.7

CommentID: WED389

Nature of Response: Commenting

Reasons:
To ensure consistency with paragraph 3.2.3, the number of registered parks and gardens should read as ten (2 Grade I, 3 Grade II* and 5 Grade II). Our date for South Kesteven shows that there are 110 Grade I, 195 Grade II* and 1843 Grade II listed buildings.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
Agree figures should be updated to reflect latest available information.

Recommended Changes:
Update figures as set out in representation.

Consultee	Agent	Consultation Point
711472 Mrs Pamela MacAllister		Historic Environment 3.4.9

CommentID: WED195

Nature of Response: Commenting

Reasons:
Should National Trust be named and the 'Belton House and Park Study' be referred to as this is a significant document for the Belvoir/Trent valley sites visible from Belton House roof and Belmont

Tower.

Changes to the draft that you consider necessary:
Include National Trust as a consultee and Belton House and Park Study as document for referral.

SKDC Response:
Agree National Trust could be included in list. Reference to the Belton House study is already made elsewhere in section D.

Recommended Changes:
Add National Trust to bullet point list.

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Historic Environment 3.4.10

CommentID: WED540

Nature of Response: Objecting

Reasons:
The assessment of a heritage assets' significance should be based upon the four strands of heritage interest specified in the NPPF Annex 2 (archaeological, architectural, artistic and historic), rather than the heritage values in Conservation Principles.

Changes to the draft that you consider necessary:
Reword to read:
"Any assessment of impact on heritage assets – whether physical or related to effects on setting – must be guided by and focussed on the affected assets' heritage significance. The assessment of a heritage assets' significance should be based upon the four strands of heritage interest specified in the NPPF Annex 2 (archaeological, architectural, artistic and historic).

SKDC Response:
Although it is not considered necessary to include the additional wording suggested in this specific paragraph, it could be included in the proposed glossary.

Recommended Changes:
Include in glossary.

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Historic Environment 3.4.13

CommentID: WED390

Nature of Response: Objecting

Reasons:
There appears to be a heading missing before paragraph 3.4.13 to read "Non-physical impacts", as the paragraphs which follow refer to setting issues.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
Agree that heading should be added. In the 2nd sentence the Heritage Trust for Lincolnshire should be identified as the Council's archaeological adviser.

Recommended Changes:
Add heading before paragraph 3.4.13 to read: 'Non-physical impacts'.
In 2nd sentence of paragraph replace "historic environment" with "archaeological"

Consultee
713800 Mr Michael Worth

Agent
713774 Mr Robert Doughty
RDC Ltd

Consultation Point
Historic Environment
Box 12

CommentID: WED364

Nature of Response: Supporting

Reasons:
Support requirement for an assessment of assets, particularly where there is the need to consider the setting of Grade I Listed Buildings, such as local landmarks, which are often village Churches.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Historic Environment
Box 12

CommentID: WED473

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the first line before "assets" add "heritage"

SKDC Response:
Agree that appropriate to add 'heritage' as suggested to provide consistency throughout section (as set out in comment on WED387). In the last sentence it would be appropriate to replace "of works" with assessment to reflect the earlier reference in the Box.

Recommended Changes:
In 1st sentence add 'heritage' before 'assets'. In last sentence replace "of works" with "for an assessment"

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Historic Environment
3.4.15

CommentID: WED40

Nature of Response: Commenting

Reasons:
Given the size and prominence of wind turbines, and the distant views that are intrinsic to many parts of the district, the outer study area should be ‘at least 10km’ (or nominate a higher figure). Where topography means that an asset is clearly unaffected by a development, this could be easily factored in and no further assessment would be required.

Changes to the draft that you consider necessary:

SKDC Response:
It is considered that in general it is unlikely that significant impacts will occur up to a distance of 10km. Although it is recognised that there may be views beyond 10km, the assessment most focus on assessing significant impacts in accordance with EIA regulations.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.15

CommentID: WED106

Nature of Response: Commenting

Reasons:
Given the size and prominence of wind turbines, and the distant views that are intrinsic to many parts of the district, the outer study area should be 'at least 10km' (or nominate a higher figure). Where topography (for example) means that an asset is clearly unaffected by a development, this could be easily factored in and no further assessment would be required.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED40

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Historic Environment 3.4.15

CommentID: WED178

Nature of Response: Commenting

Reasons:
Given the size and prominence of wind turbines, and the distant views that are intrinsic to many parts of the district, the outer study area should be ˜at least 10km" (or nominate a higher figure). Where topography (for example) means that an asset is clearly unaffected by a development, this could be easily factored in and no further assessment would be required.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED40

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Historic Environment 3.4.15

CommentID: WED247

Nature of Response: Commenting

Reasons:
We welcome paragraph 3.4.15's reference to a need for a 10km radius for the study area in the case of large wind farms.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Historic Environment 3.4.15

CommentID: WED260

Nature of Response: Commenting

Reasons:
Applaud the measure for the 5km and 10km investigation zones with regard to historic assets. But it needs to be made clearer about the different sizes of turbines the two will relate to. (This comment also applies to Box 13.)

Changes to the draft that you consider necessary:

SKDC Response:
Agree that clarification of size of turbine to which the zones apply would be useful.

Recommended Changes:
In 2nd sentence clarify that this applices to large and medium scale developments.

Consultee	Agent	Consultation Point
713810 Suzanne Williams Spring Wells Heritage Group		Historic Environment 3.4.15

CommentID: WED336

Nature of Response: Commenting

Reasons:
It is noted that for smaller wind turbine plans an impact assessment will be required only within a 5 km radius, while for larger ones a 10km assessment will be required. The Group's view is that all plans should require a 10km assessment under the "Historic Environment" considerations as the impact in a flat landscape of turbines defined as "small" which, according to the definition in para 2.2.3, can be up to 50m tall, can be dramatic and can ruin the setting of a heritage asset. Alternatively SKDC needs to refine the definition of "small" turbines downwards in height terms to say 25 metres because in heritage terms it is the height of small turbines rather than their power which is likely to do damage.

Changes to the draft that you consider necessary:

SKDC Response:
Do not agree that it is necessary to look at impacts up to 10km away for small scale turbines. This is too onerous and it is highly unlikely that a small wind turbine would have a significant impact at this distance. See also comment for WED260.

Recommended Changes:
See change for WED260

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Historic Environment 3.4.15

CommentID: WED391

Nature of Response: Objecting

Reasons:
With regards to paragraph 3.4.15 and Box 13, our Wind Energy guidance states that turbines over 60 metres in height may have a zone of theoretical visibility of more than 10km in radius. However, paragraph 3.4.15 and Box 13 state that only large scale wind energy developments (more than 100m in height) need to have a study area of 10km. We recommend that this is reconsidered, as 5km may not be sufficient for all medium sized developments. It is risky for the Council to have such standard requirements, as the assessment of any scheme should be tailored to the specific circumstances of the site and its surroundings. Matters such as topography and landscaping will affect the potential setting impacts and the Council should be able to tailor assessment requirements accordingly. It is worth noting that the Bellmount Tower at Belton House is more than 10km away from Thackson's Well Farm, and yet the impact on views from this heritage asset was an important factor in dismissing the wind farm appeal in 2008.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
The guidance clearly states that in para 3.4.15 that a flexible approach will be adopted in line with the proposed scale and likely visibility of schemes. See also comment for WED260.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
713538 Ms Mary Marston Windcrop		Historic Environment 3.4.15

CommentID: WED454

Nature of Response: Commenting

Reasons:
A 5 Km assessment threshold is not appropriate for small-scale turbines

Changes to the draft that you consider necessary:
The reference to scale should inform Box 13

SKDC Response:
As the supporting paragraph (3.4.15) makes reference to this threshold being applied flexibility it is agreed that for consistency this should also be reflected in Box 13.

Recommended Changes:
Amend Box 13 to read: "... within 5km to be assessed for potential impacts, this to be applied flexibily in line with the proposed scale and likely visiblity of the scheme, and within 10km ..."

Consultee	**Agent**	**Consultation Point**
713810 Suzanne Williams Spring Wells Heritage Group		Historic Environment Box 13

CommentID: WED337

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Box 13 needs to refer to "heritage assets" rather than just "assets".

SKDC Response:
Agree, it is proposed to change the terminology throughout this section (see comments for WED387 (paragraph 3.4.1)).

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Historic Environment Box 13

CommentID: WED413

Nature of Response: Objecting

Reasons:
Given the size and prominence of wind turbines, and the distant views that are intrinsic to many parts of the district, the outer study area should be AT LEAST 10km and often more. Where topography means that an asset is clearly unaffected by a development, this could be easily factored in and no further assessment would be required.

Changes to the draft that you consider necessary:
Expand the radius for consideration, or change 'within' to 'at least'.

SKDC Response:
See comment for WED40 (paragraph 3.4.15).

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Historic Environment Box 13

CommentID: WED541

Nature of Response: Objecting

Reasons:
The context provided in Para 3.4.15 needs to follow through into Box 13 with respect to defining an appropriate study area.

Changes to the draft that you consider necessary:
Add ‘for significant assets with particular sensitivity to visual impacts’.

SKDC Response:
As the supporting paragraph (3.4.15) makes reference to the wording proposed it is agreed that for consistency this should also be reflected in Box 13.

Recommended Changes:
Amend Box 13 to read: '... wind energy developments for significant heritage assets with particular sensitivity to visual impacts'

Consultee	Agent	Consultation Point
26184 Mrs Wendy McCallin Foston Parish Council		Historic Environment Box 13

CommentID: WED573

Nature of Response: Commenting

Reasons:
Foston Parish Council believes that 5km is not far enough to assess Heritage Assetts for small turbines. Turbines which are taller than 18 metres should be assessed within a minimum of 10 kilometres and should include all turbines over 18 metres and under 40 metres when assessing turbine applications. 15km should be adopted with turbines over 40 metres to blade tip. Visibility in certain areas is immense and Frinkley Farm Turbine, Hougham and Allington Turbine can be seem from Belovir and they are approximately 8 kilometers and 14 kilometers away respectively.
Foston's Church is easily seen from the Downtown roundabout ant that is only 17 metres tall and 4 kilometers away. Therefore anything above 18 metres should be assessed for full 10 kilometres
From Great Gonerby you can see the Turbine the other side of Newark which is over 20 kilometers away.

Changes to the draft that you consider necessary:
Turbines up to 18 metres should have heritage assets assessed within 5 kilometers
Turbines above18 metres to 40 metres should have heritage assets assessed within10 kilometers
Turbines above 40 metres should have heritage assets assessed within15 kilometers

SKDC Response:
The guidance clearly states that in para 3.4.15 that a flexible approach will be adopted in line with the proposed scale and likely visibility of schemes. See also comment for WED260.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Historic Environment Box 13

CommentID: WED582

Nature of Response: Commenting

Reasons:
The distances laid down in Box 13 seem very small considering the 'long' views enjoyed in many parts of the district.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED40 (paragraph 3.4.15)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Historic Environment Box 14

CommentID: WED392

Nature of Response: Commenting

Reasons:
Box 14 should refer to "the District's historic landscapes" rather than just historic.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
Agree that reference should be made to 'historic landscapes'

Recommended Changes:
At end of sentence add 'historic' before 'landscapes'

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Historic Environment Box 14

CommentID: WED474

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Change "conserve" to "reflect"

SKDC Response:
The wording as drafted is considered appropriate.

Recommended Changes:
n/a

Consultee
372928 Mr Tom Gilbert-Wooldridge
English Heritage

Agent

Consultation Point
Historic Environment
3.4.20

CommentID: WED395

Nature of Response: Objecting

Reasons:
The sixth bullet point in paragraph 3.4.21 is helpful in terms of considering designed views from heritage assets, but there may be other important views that are not designed. Some may be fortuitous or have been made more significant over time (such as a view portrayed in a famous painting). There is also a need to consider the impact of development on views towards heritage assets. We therefore feel that the bullet point should be reworded as follows: “avoid harm to designed and other significant views from and towards parks, gardens, designed landscapes and historic buildings – particularly those where visibility/extensive views were necessary to their function”.

Changes to the draft that you consider necessary:
We therefore feel that the bullet point should be reworded as follows: “avoid harm to designed and other significant views from and towards parks, gardens, designed landscapes and historic buildings – particularly those where visibility/extensive views were necessary to their function”.

SKDC Response:
Agree the wording change proposed would add clarification on this point.

Recommended Changes:
Amend 6th bullet point to read: "avoid unacceptable harm to designed and other significant views from and towards parks,..."

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Ecology and Ornithology (Birds)
3.4.21

CommentID: WED41

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
6th bullet – replace ‘necessary’ with ‘intrinsic’

SKDC Response:
Agree proposed change.

Recommended Changes:
In 6th bullet point replace ‘necessary’ with ‘intrinsic’

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Historic Environment
3.4.21

CommentID: WED107

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
6th bullet – replace 'necessary' with 'intrinsic'.

SKDC Response:
See comment for WED41

Recommended Changes:
See change for WED41

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Historic Environment
3.4.21

CommentID: WED179

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
6th bullet replace "necessary" with ˜intrinsic"

SKDC Response:
See comment for WED41

Recommended Changes:
See change for WED41

Consultee
605225 Ms Jane Bateman

Agent

Consultation Point
Historic Environment
3.4.21

CommentID: WED317

Nature of Response: Objecting

Reasons:
I am very disappointed to see so many areas listed as places to be avoided. This paragraph is far too negative and should be changed to be more encouraging of wind turbines being built.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted, however, in light of comments made by English Heritage it is proposed to reword the bullet points to refer to 'avoid unacceptable harm'.

Recommended Changes:
n/a

Consultee
372928 Mr Tom Gilbert-Wooldridge
English Heritage

Agent

Consultation Point
Historic Environment
3.4.21

CommentID: WED393

Nature of Response: Objecting

Reasons:
In terms of site selection in paragraph 3.4.21, the use of the word “avoid” in many of the bullet points is too vague. It is not clear how development would avoid the various elements mentioned and suggests that development only needs to avoid them in terms of direct physical impacts. It would be clearer and consistent with national policy to state “avoid harm to…”, which would incorporate setting as well as direct physical impacts.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
Agree that to more clearly reflect national planning guidance the wording of the bullet points could be amended.

Recommended Changes:
In bullet points change term 'avoid' to 'avoid unacceptable harm to'

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Historic Environment
3.4.21

CommentID: WED542

Nature of Response: Objecting

Reasons:
The implication that wind energy developments should avoid historic landscapes and settlements where views and settings are likely to be extensive and where settings are unaltered would if put into practice, preclude wind farm development in the majority of the South Kesteven district and in other areas of the UK where wind farms and heritage assets sit together in the landscape. It is particularly important to note that there is no expectation in national guidance that significant harm should be avoided altogether, or that the presence of significant harm would justify refusal of a renewable energy scheme. The test is whether the harm is acceptable when applying the planning balance and considering the wider benefits of the proposal and the need for renewable energy.
There is concern that setting out the 8 points under paragraph 3.64 without any
acknowledgement that avoiding any impacts may not be possible would be misleading to
the public in that they would expect wind energy projects to avoid large areas of the
landscape because it demonstrates historic attributes.

Changes to the draft that you consider necessary:
Add ‘where possible’ before the bullet pointed list starts in Para 3.4.21 and at the end of the text in Box 15.

SKDC Response:
Agree that the wording of the bullet points should be clarified (see comment for WED393). In light of this, the change suggested to the wording of Box 15 is not considered necessary.

Recommended Changes:
See change for WED393.

Consultee
372928 Mr Tom Gilbert-Wooldridge
English Heritage

Agent

Consultation Point
Historic Environment
Box 15

CommentID: WED394

Nature of Response: Commenting

Reasons:

There should also be some distinction between designated and undesignated heritage assets in paragraph 3.4.21, with a general presumption that designated heritage assets are more significant than undesignated assets.

Changes to the draft that you consider necessary:

Please see above

SKDC Response:

Comment noted. However, the section on 'Key Planning Considerations' refers to the importance of the conservation of designated assets, which could be amplified in the proposed glossary. Given this, it is not considered necessary to include a further reference to this here.

Recommended Changes:

n/a

Consultee	**Agent**	**Consultation Point**
26104 Mr M Herbert Brown & Co		Historic Environment Box 15

CommentID: WED475

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

In 3rd sentence delete "adhered to" and replace with "taken into consideration"

SKDC Response:

See comment for WED542 (paragraph 3.4.21)

Recommended Changes:

n/a

Consultee	**Agent**	**Consultation Point**
26104 Mr M Herbert Brown & Co		Historic Environment Box 16

CommentID: WED476

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

After turbines on the first line delete the words alternative through to the on the second line and on the third line after development insert .... shall .... and to now read development shall be taken into account....

SKDC Response:

Although it is not a mandatory requirement (yet) for developers to consider alternatives in an EIA, would be likely to consider these during the development of their proposals.

Recommended Changes:

n/a

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Historic Environment
3.4.24

CommentID: WED477

Nature of Response: Commenting

Reasons:
In 1st bullet point it is not always possible for tracks to "follow" because of the swept path that is needed for turbine construction, delivery, etc.

Changes to the draft that you consider necessary:
In the first bullet point delete "and follow"

SKDC Response:
Agree with the point made but consider and the wording should be clarified.

Recommended Changes:
Amend 1st bullet point to read: "... tracks respect, and where possible follow, the grain ..."

Consultee
26104 Mr M Herbert
Brown & Co

Agent

Consultation Point
Historic Environment
3.4.24

CommentID: WED478

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the second bullet point replace the word "avoid" with "minimise"

SKDC Response:
Agree wording should be clarified but do not consider it necessary to omit 'avoid'.

Recommended Changes:
Amend 2nd bullet point to read: "... tracks to avoid or minimise physical impacts ..."

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Historic Environment
3.4.25

CommentID: WED42

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The cumulative effect should include developments in scoping (for consistency with para 3.22).

SKDC Response:
Agree that the SPD needs to be consistent with references to cumulative assessment elsewhere in the document which require schemes at the scoping stage to be included.

Recommended Changes:
Amend first sentence to read: "... consented, the subject of a valid planning application or formally notified at scoping stage (within and outside South Kesteven)..."

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Historic Environment 3.4.25

CommentID: WED43

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet – replace 'surrounding' with 'dominating', as the former implies a near-360° aspect.

SKDC Response:
As the text already states that "...they should seek to avoid 'surrounding' or 'dominating' them…" it is not clear why the proposed change has been suggested as the text already uses the term 'dominating'.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.25

CommentID: WED108

Nature of Response: Commenting

Reasons:
The cumulative effect should include developments in scoping (for consistency with para 3.22).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED42

Recommended Changes:
See change for WED42

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Historic Environment 3.4.25

CommentID: WED109

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet – replace 'surrounding' with 'dominating', as the former implies a near-360° aspect.

SKDC Response:
See comment for WED43

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Historic Environment
3.4.25

CommentID: WED180

Nature of Response: Commenting

Reasons:
The cumulative effect should include developments in scoping (for consistency with para 3.22).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED42

Recommended Changes:
See change for WED42

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Historic Environment
3.4.25

CommentID: WED181

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet replace ˜surrounding" with ˜dominating", as the former implies a near-360 degree aspect.

SKDC Response:
See comment for WED43

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Historic Environment
3.4.25

CommentID: WED414

Nature of Response:

Reasons:
The cumulative effect should include developments in scoping (for consistency with para 3.2.18).
The final sentence in the box 'However, it is unlikely that significant cumulative effects will be generated beyond 5-10km' is dubious and unnecessary.

Changes to the draft that you consider necessary:
Add 'in scoping' to the first sentence.
Delete 2nd sentence of box.

SKDC Response:
See comments for WED42 and WED110

Recommended Changes:
See change for WED42

Consultee | **Agent** | **Consultation Point**

472273 Mr John Hannam
Colsterworth and District Parish Council

Historic Environment
Box 18

CommentID: WED44

Nature of Response: Commenting

Reasons:
The final sentence 'However, it is unlikely that significant cumulative effects will be generated beyond 5-10km' is dubious and unnecessary.

Changes to the draft that you consider necessary:
The sentence should be deleted.

SKDC Response:
Agree sentence should be deleted.

Recommended Changes:
Delete last sentence of Box 18.

Consultee | **Agent** | **Consultation Point**

26373 Mrs Gillian Wilson
Stubton Parish Council

Historic Environment
Box 18

CommentID: WED110

Nature of Response: Commenting

Reasons:
The final sentence 'However, it is unlikely that significant cumulative effects will be generated beyond 5-10km' is dubious and unnecessary.

Changes to the draft that you consider necessary:
Delete sentence.

SKDC Response:
See comment for WED44

Recommended Changes:
See change for WED44

Consultee | **Agent** | **Consultation Point**

26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Historic Environment
Box 18

CommentID: WED182

Nature of Response: Commenting

Reasons:
The final sentence "However, it is unlikely that significant cumulative effects will be generated beyond 5-10km" is dubious and unnecessary.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED44

Recommended Changes:
See change for WED44

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Historic Environment Box 18

CommentID: WED583

Nature of Response: Commenting

Reasons:
The distances laid down in Box 18 seem very small considering the 'long' views enjoyed in many parts of the district.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED40 (paragraph 3.4.15)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Hydrology 3.5

CommentID: WED248

Nature of Response: Commenting

Reasons:
The potential impact of turbine installation on groundwater, water supplies and aquifers cannot be understated.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5

CommentID: WED514

Nature of Response: Commenting

Reasons:
Welcome this SPD which provides clear guidance on planning applications for wind energy. We consider that the section on Hydrology is extensive and highlights the key issues.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
521755 Mrs Laura Brackenbury
Environment Agency

Agent

Consultation Point
Hydrology
3.5

CommentID: WED522

Nature of Response: Commenting

Reasons:
The maximum acceptable depth for infiltration Sustainable Drainage System's (SuDS) is 2.0m below ground level, with a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. We consider that deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). Deep soakaways increase the risk of groundwater pollution.
We recommend that the above information is contained within the SPD. In order to do this is may be useful to add a section under 'C. Guidance' entitled impacts on groundwater. This section could also include a statement advising that the potential risk posed to controlled waters from piling should be considered.

Changes to the draft that you consider necessary:

SKDC Response:
It has been clarified with the Environment Agency that the wording suggested is included as a standard response to consultations and not necessarily applicable in its entirety to wind turbine development. The reference to piling does, however, remain relevant and should be referenced.

Recommended Changes:
Amend paragraph before paragraph 3.5.6 to read 'Impacts on watercourses and groundwater'
After paragraph 3.5.6 add new paragraph to read: 'The potential risk posed to controlled waters from piling should be considered, particularly where the wind turbine(s) is located on brownfield land or is located over a vulnerable aquifer."

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Hydrology
3.5.1

CommentID: WED293

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust supports the need for impacts on hydrology to be assessed as this could affect any nature conservation sites which may be in the vicinity.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Hydrology
3.5.2

CommentID: WED294

Nature of Response: Commenting

Reasons:
We would support the use of construction and environmental management plans to set out measures to mitigate construction impacts, such as run-off and soil disturbance, on ecological receptors.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. Environmental Management Plans are referred to in section 3.5.10.

Recommended Changes:
n/a

Consultee
521755 Mrs Laura Brackenbury
Environment Agency

Agent

Consultation Point
Hydrology
3.5.3

CommentID: WED515

Nature of Response: Commenting

Reasons:
This section states that “the Environment Agency shall be consulted in relation to all wind energy developments”. However, EA are not a statutory consultee for all wind energy developments. Specifically, single turbines less than 15 metres where there are no other constraints within our remit (see the General Development Procedure Order 1995 for further details).
Additionally, due to the level of guidance within this SPD consider that small scale wind turbines could be dealt with without the need to consult EA as would only provide advisory flood risk comments (e.g. that all sensitive electrical equipment is installed above the predicted flood level). Therefore, it is not necessary to consult EA on applications for small numbers (less than 10 turbines) of small scale (up to 20 metres in height up to hub) wind turbines unless:
The turbine would be within 20m of a watercourse or flood defence within our jurisdiction.
The site could be contaminated and overlies an aquifer/ is located within 50m of a surface watercourse.
Land raising greater than 100 square metres is proposed.
The development is classed as Essential Infrastructure (see Table 2 of the Technical Guidance to the National Planning Policy Framework).
Your authority has specific environmental concerns with the development proposal that you want us to provide comment on.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. Agree that the text should be amended to clarify the circumstances in which the Environment Agency should be consulted.

Recommended Changes:
Amend last sentence to read: "... Flood Zones 1, 2 or 3. The Environment Agency should be consulted in relation to all large and medium scale wind energy developments. For small scale proposals they would be consulted where certain criteria are met."
Add footnote to read: "EA does not need to be consulted on applications for small numbers (less than 10 turbines) of small scale (defined by EA as up to 20 metres in height up to hub) wind turbines unless: The turbine would be within 20m of a watercourse or flood defence within the EA's jurisdiction; the site could be contaminated and overlies an aquifer/is located within 50m of a surface watercourse; land raising greater than 100 square metres is proposed; the development is classed as Essential Infrastructure (see Table 2 of the Technical Guidance to the National Planning Policy Framework); there are specific environmental concerns with the development proposal"

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Hydrology 3.5.3

CommentID: WED543

Nature of Response: Objecting

Reasons:

National policy related to flood risk is set out in the NPPF, the Technical Guidance to the NPPF, extant Practice Guide to PPS25, and NPS EN-3. Wind turbines are considered to comprise 'essential infrastructure' (see Table 2 in the NPPF Technical Guidance). They are therefore an appropriate land use within flood zones 1 and 2, and also 3 subject to passing the exceptions test (see Table 3 of the Technical Guidance), provided that the development is designed and constructed to remain operational and safe for users in times of flood and does not lead to increased flood risk on the site or elsewhere.

The NPPF and accompanying Technical Guidance do not provide any specific exemptions to the Sequential and Exception tests for wind turbines; however further detail is provided in EN-3. It states at paragraph 2.5.36 that 'as most renewable energy resources can only be developed where the resource exists and where economically feasible, the [decision-maker] should not use a sequential approach in the consideration of renewable energy projects'. This mirrors the still extant Practice Guide to PPS25, which confirms at paragraph 4.39 that LPAs should not use a sequential approach in the consideration of renewable energy proposals. It also sets out that in respect of the Exception Test, the requirement to be sited on previously developed land does not apply to wind turbine developments.

However, a sequential approach to designing the layout of the development should still be encouraged, with turbines and associated infrastructure sited outside of flood zones 2 and 3 where possible.

Changes to the draft that you consider necessary:

Delete 'and apply the Sequential Test when identifying sites for development'.

SKDC Response:

Agree that the text should be amended to reflect guidance in the NPPF. The location of associated infrastructure is covered by paragraph 3.5.7

Recommended Changes:

Amend end of 1st sentences to read: " ... flood risk will be increased elsewhere and only consider development appropriate in areas at risk of flooding."

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5.6

CommentID: WED516

Nature of Response: Commenting

Reasons:

The culverting or diverting of a watercourse will not always require the permission of the Environment Agency. EA only issue Flood Defence Consents on Main Rivers. For Ordinary Watercourses these consents are the responsibility of the Lead Local Flood Authority who have at the moment given these powers to the relevant local Internal Drainage Boards. For clarity:

The Environment Agency seeks to maintain a 9m buffer between the landward toe of fluvial flood defences or from the bank crest of a main river. The Environment Agency has jurisdiction over main river under the Water Resources Act 1991 (WRA) and the Land Drainage and Sea Defence Byelaws. Under the above legislation, Flood Defence Consent is required prior to the erection of any structure in, over or under a watercourse which is part of a main river and any work carried out within 9m metres of the bank of a main river. This is to ensure that they might interfere with our work, nor adversely affect the environment, fisheries, wildlife and flood defence in the locality.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5.7

CommentID: WED517

Nature of Response: Commenting

Reasons:
The wording should be changed to remove the requirement for consultation with the Environment Agency to determine whether a Flood Risk Assessment (FRA) is required. The Environment Agency is responsible for assessing flood risk from tidal and designated main river flood risk sources only. Therefore, the need for a FRA should be determined based on guidance within the National Planning Policy Framework. We are happy to be consulted but consider that the ultimate decision should be made by the LPA.

Changes to the draft that you consider necessary:

SKDC Response:
Agree the proposed change is reasonable for the reasons set out in the representation.

Recommended Changes:
Delete 1st sentence.

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5.7

CommentID: WED518

Nature of Response: Commenting

Reasons:
Recommend that additional wording is added to ensure that applicants provide confirmation of whether the development is Less Vulnerable or Essential Infrastructure. This distinction is important as it will determine whether the development is appropriate within Flood Zone 3b functional floodplain (subject to the Exceptions Test).

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted, however, it is not considered necessary to include this level of detail.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5.7

CommentID: WED519

Nature of Response: Commenting

Reasons:
Recommend that this section is amended to provide further guidance on mitigation.

Changes to the draft that you consider necessary:
The following wording is suggested:
'Where this is not possible, the applicant should consider the flood resilience of the development and in particular ensuring that all sensitive electrical equipment is installed above the predicted flood levels. This will ensure the development remains operational during flood events. If this is to be done by land raising, greater than 100 square metres, an assessment of the impacts on third parties

from any displacement of flood water or interruption of flood flow routes will be required'. The Environment Agency shall be consulted on this assessment.'

SKDC Response:
Agree additional wording would provide clarification.

Recommended Changes:
Add: 'Where this is not possible, applicants should consider the flood resilience of the development and in particular ensure that all sensitive electrical equipment is installed above the predicted flood levels. This will ensure the development remains operational during flood events. If this is to be done by land raising greater than 100 sqm, an assessment of impacts on third parties from any displacement of flood water or interruption of flood flow routes will be required. The Environment Agency shall be consulted on this assessment.'

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5.8

CommentID: WED520

Nature of Response: Commenting

Reasons:
This section could be expanded to include further advice. For example mitigation measures include minimising impermeable areas or ensuring access roads are constructed using permeable materials where possible.

Changes to the draft that you consider necessary:

SKDC Response:
Agree inclusion of suggested additional wording.

Recommended Changes:
Amend 2nd sentence to read: "... appropriate mitigation measures, which may inlcude minimising impermeable areas or ensuring access roads are constructed using permeable materials where possible, in consultation ..."

Consultee	Agent	Consultation Point
521755 Mrs Laura Brackenbury Environment Agency		Hydrology 3.5.9

CommentID: WED521

Nature of Response: Commenting

Reasons:
Recommend that wording is added to this section to make it clear that soakaways should not be located in potentially contaminated land.

Changes to the draft that you consider necessary:

SKDC Response:
As it is unlikely that soakaways would be used in wind turbine developments the suggested wording is unnecessary.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Hydrology 3.5.10

CommentID: WED295

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust would support the implementation of Environmental Management Plans.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
605225 Ms Jane Bateman

Agent

Consultation Point
Traffic and Transport
3.6

CommentID: WED318

Nature of Response: Commenting

Reasons:
It should be made more clear than these traffic and transport considerations are temporary, and not permanent.

Changes to the draft that you consider necessary:

SKDC Response:
Agree with comment and additional wording to clarify this is proposed.

Recommended Changes:
At end of paragraph 3.6.1 add: ".... although these may largely be temporary and not permanent."

Consultee
714597 Louise Barrett

Agent

Consultation Point
Traffic and Transport
3.6

CommentID: WED512

Nature of Response: Commenting

Reasons:
Concerned about the impact of the construction (and decommissioning) of large industrial sized wind turbines on rural communities. This section emphases the problems, but does not highlight the safety issues for local residents and road users. Given that this is mostly a rural area I think that the highway safety issue should be given a much greater priority. Industrial sized wind turbines would be far better sited on brown field sites and industrial areas, which are served by appropriately sized roads and access, without compromising the safety of a rural community

Changes to the draft that you consider necessary:

SKDC Response:
Any developer constructing a large scale wind farm will have to undertake detailed consideration of traffic and transport issues as part of the preparation of the EIA. Para 3.6.10 requires the developers to provide assessments based on a worse case scenario and this is considered adequate

Recommended Changes:
n/a

Consultee
714273 Vikki Hoole
reVOLT

Agent

Consultation Point
Traffic and Transport
3.6

CommentID: WED586

Nature of Response: Commenting

Reasons:
Emphasises the problems likely to be met in construction, but does not attach sufficient importance to the danger of distraction once a wind turbine is operating. Given the pastoral nature of the district, the size and movement of large wind turbines and the dangers already present on our rural roads (bends, potholes, tractors, horses, dykes etc.), we think that the highway safety considerations should be given more weight. An NPPF requirement to encourage renewable energy does not trump the need to save lives.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. The issue raised is covered by the section on site selection. See also comment for WED45 (paragraph 3.6.12)

Recommended Changes:
n/a

Consultee
713807 Mr Paul Miley

Agent

Consultation Point
Traffic and Transport
3.6

CommentID: WED596

Nature of Response: Commenting

Reasons:
Section 3.6 talks about highways in connection with construction, but not road safety. Any application should consider the dangerous nature of adjacent roads, sight lines, shadow fall across highways and early/late sunshine (low angles) causing driver distraction. Renewable energy schemes should not cause additional risk to life.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED586

Recommended Changes:
n/a

Consultee
649840 Miss Philippa Brown
Fulbeck Parish Council

Agent

Consultation Point
Traffic and Transport
3.6.1

CommentID: WED603

Nature of Response: Commenting

Reasons:
What defines an "abnormal load"? Weight, length, width, LCC highways acceptance, need for police escort? This requires clearer definition including assessment of preferred route selection especially in remote areas with narrow roads and bad accessibiity.

Changes to the draft that you consider necessary:

SKDC Response:
An ‘abnormal load’ is a vehicle that has any of the following:

a weight of more than 44,000 kilograms; an axle load of more than 10,000 kilograms for a single non-driving axle and 11,500 kilograms for a single driving axle; a width of more than 2.9 metres; a length of more than 18.65 metres

Recommended Changes:
Include definition of abnormal load in proposed Glossary

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Traffic and Transport 3.6.8

CommentID: WED479

Nature of Response: Commenting

Reasons:
In 1st sub bullet point over-riding criteria to minimise road haulage distances, reduce impacts and costs will cover this point and is not always possible because of commercial reasons to deliver to the closet suitable port

Changes to the draft that you consider necessary:
Rather that "closest suitable sea port" replace with "available sea port".

SKDC Response:
It is considered the use of 'suitable' is appropriate wording.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Traffic and Transport 3.6.12

CommentID: WED45

Nature of Response: Commenting

Reasons:
6th bullet – Highways Agency advice on visual distraction is clear: wind farms should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists.

Changes to the draft that you consider necessary:
The bullet should read:
Locations where motorists need to pay particular attention shall be avoided. These include road junctions, sharp or unexpected bends, pedestrian crossings and stretches of road where horse riders or slow moving agricultural vehicles may be encountered with little warning, due to restricted sightlines. Information on existing ‘accident black-spots’ can be obtained from the Police service;

SKDC Response:
Agree text should be amended to reflect Highways Agency advice.

Recommended Changes:
Combine and amend 6th and 7th bullet points to read: 'Avoid siting turbines where motorists need to pay particular attention to driving such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists. The associated road network should be reviewed with particular attention being paid to the complexity of junctions, traffic flows and the possible presence of short headways between vehicles. Information on existing 'accident black-spots' can be obtained from the police service.'

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Traffic and Transport 3.6.12

CommentID: WED111

Nature of Response: Commenting

Reasons:
6th bullet – Highways Agency advice on visual distraction is clear: (Wind farms should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists).

Changes to the draft that you consider necessary:
Considering the South Kesteven context, the bullet should read:
Locations where motorists need to pay particular attention shall be avoided. These include road junctions, sharp or unexpected bends, pedestrian crossings and stretches of road where horse riders or slow moving agricultural vehicles may be encountered with little warning, due to restricted sightlines. Information on existing 'accident black-spots' can be obtained from the Police service;

SKDC Response:
See comment for WED45

Recommended Changes:
See change for WED45

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Traffic and Transport 3.6.12

CommentID: WED183

Nature of Response: Commenting

Reasons:
In the 6th bullet Highways Agency advice on visual distraction is clear: (Wind farms should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists).

Changes to the draft that you consider necessary:
Considering the South Kesteven context, the bullet should read: Locations where motorists need to pay particular attention shall be avoided. These include road junctions, sharp or unexpected bends, pedestrian crossings and stretches of road where horse riders or slow moving agricultural vehicles may be encountered with little warning, due to restricted sightlines. Information on existing ˜accident black-spots" can be obtained from the Police service;

SKDC Response:
See comment for WED45

Recommended Changes:
See change for WED45

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Traffic and Transport 3.6.12

CommentID: WED415

Nature of Response: Commenting

Reasons:
This does not attach sufficient importance to the danger of distraction once a wind turbine is operating. Given the nature of the district, the size and movement of large wind turbines and the dangers already present on our rural roads (bends, potholes, tractors, horses, dykes etc.), the highway safety considerations should be given more weight.
Highways Agency advice on visual distraction is clear - Wind farms should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists.

Changes to the draft that you consider necessary:
Amend 6th bullet point:
Locations where motorists need to pay particular attention shall be avoided. These include road junctions, sharp or unexpected bends, pedestrian crossings and stretches of road where horse riders or slow moving agricultural vehicles may be encountered with little warning, due to restricted sightlines. Information on existing 'accident black-spots' can be obtained from the Police service.

SKDC Response:
See comment for WED45

Recommended Changes:
See change for WED45

Consultee	Agent	Consultation Point
714397 Mr Robert Thornton		Traffic and Transport 3.6.12

CommentID: WED448

Nature of Response: Commenting

Reasons:
To minimise disruption in the construction phase.

Changes to the draft that you consider necessary:
With many rural routes in SKDC being compromised by tight angled bends to follow original field lines such routes, particularly where they pass through settlements with properties close to the edges of the roads should be specifically avoided.

SKDC Response:
Comments noted. The section refers to avoiding, where possible, settlements particularly those with narrow streets.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Traffic and Transport 3.6.12

CommentID: WED480

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In the fourth bullet point at the start delete "avoid" and replace with "minimise"

SKDC Response:
Agree proposed change

Recommended Changes:
Amend 4th bullet point to read: "Minimise impacts on key ...."

Consultee	Agent	Consultation Point
714397 Mr Robert Thornton		Traffic and Transport 3.6.13

CommentID: WED449

Nature of Response: Commenting

Reasons:
Footpaths and bridleways should be included.

Changes to the draft that you consider necessary:
Please add "footpaths and bridalways" to the highways mentioned in the draft SPD

SKDC Response:
This is covered in Box 24

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713817 Mr Nigel Redmile		Traffic and Transport 3.6.14

CommentID: WED328

Nature of Response: Commenting

Reasons:
Minimum set back distances seem like a good idea

Changes to the draft that you consider necessary:
Minimum set back distances should be evidence based and should put local residents first

SKDC Response:
The set back distance referred to is that recommended by the Highway Agency in their planning advice note for wind turbines near to trunk roads.
See comment for WED143 (general section) on separation distances generally.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710237 Western Power Distribution Western Power Distribution	710236 Ms Rhianon Boulton Turley Associates	Traffic and Transport Box 22

CommentID: WED74

Nature of Response: Commenting

Reasons:
WPD consider the wording set out in Box 22 is unclear. WPD question whether the Council are referring to the distance of new turbines to overhead lines or that the separation distance of new overhead lines to new highways should be the height of power lines plus a distance. Should this be the latter, WPD object to this, as overhead lines have to cross highways or run parallel to them in many circumstances. This policy may be subject to challenge and we therefore request that the wording as it currently stands be amended to reflect the above comments.

Changes to the draft that you consider necessary:

SKDC Response:
The text refers to distance between turbines and highways not overhead powerlines.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Traffic and Transport Box 22

CommentID: WED481

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
A the end add " unless otherwise agreed with the appropriate authorities" as in some cases the authorities do accept a different position

SKDC Response:
Agree change to wording would reflect position of relevant authorities.

Recommended Changes:
At end of Box 22 add: ".. unless otherwise agreed with the appropriate authorities"

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Traffic and Transport Box 22

CommentID: WED544

Nature of Response: Objecting

Reasons:
Whilst the separation distances between roads, railways and overhead lines as defined in Box 22 are broadly consistent with accepted siting guidelines, there are sometimes site specific circumstances where such distances may not be required. In such cases a risk assessment should be provided to demonstrate that shorter separation distances will not lead to unacceptable health and safety risks.

Changes to the draft that you consider necessary:
Add 'unless a site specific risk assessment is submitted that demonstrates a shorter separation distance will not lead to unacceptable health and safety risks'.

SKDC Response:
As any shorter set back distance would likely have to be agreed with the relevant authority i.e Highway Agency for trunk roads, then the amendment to the wording (see comment for WED481), would cover the point made.

Recommended Changes:
See change for WED481

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Traffic and Transport 3.6.15

CommentID: WED261

Nature of Response: Commenting

Reasons:
The SPD makes an important point here with regard to not over-designing any temporary construction roads and in particular not using concrete kerbs which then provide a temptation to leave the roads in place thus creating an urban effect in rural areas. SKDC will need to stand up to Highways engineers and their design requirements here.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Traffic and Transport 3.6.16

CommentID: WED262

Nature of Response: Commenting

Reasons:
Very much support the importance of the removal of site construction roads following construction as these have the ability to despoil rural landscapes further than the turbines themselves

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Traffic and Transport 3.6.16

CommentID: WED296

Nature of Response: Commenting

Reasons:
Plans for any road widening or construction should be included in the ecological assessment. Road verges can include remnant areas of good quality grassland habitats. Within Lincolnshire some of these are recognised as Roadside Nature Reserves and are managed for nature conservation by the Lincolnshire Wildlife Trust in partnership with Lincolnshire County Council. Many botanically rich road verges have also been identified through the Life on the Verge project and have been designated as Local Wildlife Sites. Work which may affect any of these designated sites should be avoided.

Changes to the draft that you consider necessary:

SKDC Response:
Developers undertaking an EIA will have to survey all areas that may be affected by the proposed development.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26328 Mr M L Hall Barkston & Syston Parish Council		Noise and Vibration 3.7

CommentID: WED270

Nature of Response: Commenting

Reasons:
Noise is an issue, particularly for walkers and horse riders on paths and bridleways in the vicinity of turbines.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Noise and Vibration 3.7

CommentID: WED319

Nature of Response: Objecting

Reasons:
This section is scaremongering. Modern wind turbines are much quieter than they used to be. Evidence shows that even when wind turbines are built local people and even objectors are surprised how quiet they are.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
693648 Mrs Vikki Hoole		Noise and Vibration 3.7

CommentID: WED371

Nature of Response: Commenting

Reasons:
ETSU 97 is widely regarded as being outdated and flawed. It was written many years ago when wind turbines were considerably smaller. It allows for levels of background noise that would be unacceptable from any other form of industrial installation. When this level of noise is introduced into a rural area with very low pre-existing levels of background noise it would quite simply be unbearable. Many peer-reviewed studies have shown the impact of noise on sleep, with other resulting health complaints.

Changes to the draft that you consider necessary:
The only way to adequately protect residents from noise is to introduce separation distances of 2km between industrial wind turbines and homes.

SKDC Response:
The comments made by this and other representations to the noise and vibration section are noted. It is acknowledged that there are a wide range of views regarding the limitations and/or effectiveness of ETSU-R-97. However, the application of ETSU is endorsed by national policy in NPS EN-3 Renewable Energy which states: "The applicant's assessment of noise from the operation of the wind turbines should use ETSU, taking account of the latest industry good practice. This should include any guidance on best practice that the Government may from time to time publish."
It would be inappropriate to take into account studies or other documents that were not endorsed as industry good practice or for the Council to seek to set its own guidelines. The Institute of

Acoustics has prepared a good practice guide to accompany ETSU, which when published (it is due to be launched on the 21st May 2013) should be used to supplement ETSU (this is highlighted in paragraph 3.7.7 of the SPD). However, until ETSU is revised/replaced it remains the definitive document to which the SPD should refer and which should be followed in undertaking assessments.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
677814 Mrs Heidi Wilson Marston Parish Council		Noise and Vibration 3.7

CommentID: WED509

Nature of Response: Commenting

Reasons:

Wind turbines contribute to noise pollution for residents, walkers and horse riders in the locality of the turbine.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Noise and Vibration 3.7

CommentID: WED587

Nature of Response: Commenting

Reasons:

The Renewable Energy Foundation has published a number of research notes on this subject. To summarise their advice on amenity:

ETSU-R-97 and Amenity

Wind farm noise assessments are conducted according to ETSU-R-97. Although 16 years old, this guidance has been endorsed by Government in recent policy (EN-3), although clearly with some reservations as the Institute of Acoustics has been tasked with writing a supplementary best practice guide to decode ETSU-R-97 (although this doesn't address the fundamental flaws).

When ETSU-R-97 was written the authors defined the maximum noise level which, in the absence of masking noise, would protect neighbouring amenity as 33dBA. This was based on the 1980 World Health Organisation (WHO) Environmental Health Criteria which stated "a level of less than 35 dBA Leq is recommended to preserve the restorative process of sleep".

The authors of ETSU-R-97 reasoned "…there is no need to restrict noise levels below a lower absolute limit of LA90,10 min = 33dB(A); if an environment is quiet enough so as not to disturb the process of falling asleep or sleep itself then it ought to be quiet enough for the peaceful enjoyment of one's patio or garden."

However, the WHO criteria were subsequently revised downward by 5dB in 1999; thus the revised criteria for levels quiet enough for sleep became LA90,10 min = 28dB(A). Therefore, adhering to the original reasoning, the maximum noise level for preservation of amenity should be nearer 28 than 33 dB(A).

AM Penalty

A further consideration is that the amenity noise level assumes the noise has no character. Any noise with a distinctive beating or tonal character is more annoying to the listener than anonymous, random noise. ETSU-R-97 recognises that wind turbine noise includes blade swish noise; i.e. the regular amplitude modulation (AM) of the aerodynamic noise of the blades which leads to swishing or thumping noises at blade passing frequency. The noise levels recommended in ETSU-R-97 assume a variation in overall noise level of up to 2-3 dB(A) attributed to blade swish.

However, in the 16 years since ETSU-R-97 was written, turbine heights have doubled, with an associated increase in turbine noise levels and a shift in the noise profile to lower frequencies. The variation in AM now commonly exceeds 2-3dB.

ETSU-R-97 refers to the main UK environmental noise standard, BS4142, which applies a penalty of 5dB if the industrial noise source is irregular in character with noticeable tones or thumps. Such a penalty was one of the draft recommendations to Government of a report by the Hayes McKenzie Partnership in 2006. Applying such a penalty would reduce the existing ETSU-R-97 indicative daytime

levels to 28 dB(A). Applying such a penalty to the level described above to protect amenity would reduce the acceptable range to 23-28 dB(A).
Suggestions that turbine noise is masked by environmental noise are largely incorrect for large turbines (100m+) because the frequencies making up the sound profile are quite different from the wind-induced noise in vegetation.
Conclusion
However, the ETSU-R-97 guidance does not set out to protect neighbourhood amenity; it provides a framework for measurement of background and wind farm noise and gives indicative noise levels which were considered (16 years ago) to offer a reasonable degree of protection to residents without unduly restricting wind farm development. Hence the noise limits for wind farms are higher than the maximum level for preserving amenity.
ETSU-R-97 deems levels of wind farm noise at night time acceptable if they are no more than 5dB above the night-time curve or 43dB, whichever is the greater.
It seems that wind farms are exempt from the Noise Act 1996, which makes it an offence if noise from neighbours is 35 dB(A) or above and at least 10 dB(A) above the underlying level between the hours of 23:00 and 07:00.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714660 Mo Caswell		Noise and Vibration 3.7

CommentID: WED593

Nature of Response: Commenting

Reasons:
It is extremely concerning that the draft SPD guidance is providing wholly inadequate protection for residents who may find themselves near to wind turbine developments.
2. Wind turbine noise is a subject where there are still many variables which are not fully understood, even by professionals. It is a very controversial subject and where problems occur, they can be extremely serious for the residents concerned.
3. The draft SPD acknowledges that aspects of turbine noise (amplitude modulation); “occurrence at any particular site cannot at present be predicted with a high degree of certainty”. (My emphasis)
4. For SKDC to adopt the draft SPD without offering any reasonable protection, after acknowledging limitations of noise prediction is morally wrong and infringes residents’ human rights.
5. There is an overwhelming amount of evidence demonstrating that wind turbine neighbours feel the noise, as well as simply hearing the audible noise.
6. The evidence points strongly to lower frequency noise being a major contributory factor to noise nuisance from wind turbines. It is a matter of fact that ETSU R 97 solely monitors noise in terms of the dB A weighted scale, which does not address or account for low frequency noise.
It should be noted that even DECC Ministers of State have acknowledged that adverse effects from wind turbine noise are widely felt far beyond the distance which the Government guidelines suggest is safe. The epidemiological evidence is not there to support the current guidelines. A 2012 Freedom of Information request (DECC reference: EIR 12-0938 Wind turbine noise: Amplitude Modulation) clearly showed that DECC was clearly aware of severe noise nuisance occurring at a property far beyond the current wind turbine guidelines for setbacks (over 1,000m from 100m turbines), clearly demonstrating that their “duty of care” is being neglected. This should not be the case with the SKDC SPD.
8. Therefore the SKDC SPD must recognise the real risk to residents and acknowledge that ETSU R 97 does not assess or address lower frequency noise from wind turbines in any meaningful way.
9. Given the present level of knowledge, incomplete noise assessment guidance and the inherent uncertainty in terms of wind turbine noise prediction, which is fully known by SKDC, the only way to provide a minimum level of protection would be to instigate a turbine setback system such as the Wiltshire example.
10.It is essential that the SPD takes into account additional information and recent studies which demonstrate the effects neighbours of wind turbines; which will be long-term and devastating for

some.
11.In particular I wish to put on public record the following documents;
MC App 1) Wind Turbine Noise Impact Assessment: Where ETSU is Silent
MC APP 2) Wind Turbine Noise, Sleep and Health
MC APP3) Numerical simulation of infrasound perception, with reference to prior reported laboratory effects.
MC APP 4) Low-frequency noise: a biophysical phenomenon
MC APP 5) Wind farms: List of symptoms and medical problems
and
MC APP 6) Renewable Energy Foundation Response to: Wiltshire Council
consultation on Separation Distances
(Sent as separate pdf files;)
12.I personally have felt ill in the proximity of wind turbines and have subsequently met others who experience similar ill effects and have no
doubt other persons may find themselves trapped in a similar predicament should SPD not adopt a proper setback from wind turbine developments.
13.These issues are far too important not to be properly addressed within the SKDC SPD concerning wind turbines and I trust you will take full account of information submitted.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED587

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714663 H R Shaw		Noise and Vibration 3.7

CommentID: WED594

Nature of Response: Objecting

Reasons:
I wish to raise my concerns about the criteria currently being used to assess applications for wind farms. I believe that there is insufficient scientific knowledge about the range of problems relating to Large Turbines in particular the consequences of Infrasound (IS) and Low Frequency Noise (LFN) and also there is almost no knowledge of short lasting micro environmental events occurring 50 plus metres above ground level. Generalised information about wind shear can be obtained by SODAR, but this does not provide information about extreme events occurring at the rotors. Structural failure results from equipment failing to cope with PEAK stresses – average stresses are a totally irrelevant factor. The failure rate of turbines in Germany averages at 3 times per turbine per year. This is clear evidence that the Design, Manufacture and Maintenance is chronically substandard.
The sound measurement procedures and the interpretation of the data collected is irrational as it measures the quietest 10% when it is the peak sound pressure that causes health problems. It also uses an algorithm to substantially devalue IS and LFN despite the fact that there is now a massive body of evidence throughout the World that associates these with Public Health issues.
Large turbines create more noise, the noise travels further and there is a lower silencing effect so traditional assumptions have absolutely no validity as the:
1 Source of the noise is very high and so can travel further (People shout from the roof tops to be heard further away!)
2 Wind speed at the noise source is very high so the sound travels further down wind
3 Ground roughness creates turbulence and quietens noise, but it is further from the sound source so less effective
4 Power harvested from the wind is much greater and so is the noise and vibrations generated.
The rural residents of Lincolnshire need the same protection from harmful noise as residents in cities throughout the UK.
There have been many applications which have failed to produce accurate or meaningful data especially regarding the time of day or night when data was collected. It also looks as though detrimental data has been ditched and selectivity like this has to be prevented by specifying data collection times and explanations for gaps should be demanded.
Photomontages have been supplied that are so pixelated; nobody can see the full impact of the turbines (which is the actual intention). All information must be made available to the Public for scrutiny and there should be an opportunity for the Public to complain about the lack of data or the quality of the data and there should be some form of adjudication to halt the application procedures until all the required data is made available.

There is a potential plan to modify turbines to generate Hydrogen and then convert it back to electricity when the power is actually needed. This would add a further danger to residents and legislation against such proposals needs to be introduced now.
Wind Shear is an important issue and not much accurate information exists about short lasting micro environmental events that exist when there is a gust of wind 50+ m above ground level. These are situations that can cause structural failure and a danger to the public. Structural failure is dependent on PEAK and not AVERAGE loading/stress levels.
The priority is to protect the Public and if there is any uncertainty, then the Planning decision must err on the side of caution.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371.
In respect of the comment regarding wind turbine failure, between 2000-2010 there have been four members of the public reported killed worldwide in incidents associated with wind turbines, and none due to the structural failure of a wind turbine.

Recommended Changes:
n/a

Consultee
703325 Mr John Halton

Agent

Consultation Point
Noise and Vibration
3.7

CommentID: WED618

Nature of Response: Commenting

Reasons:
If large wind turbines are built close to homes (w ithin 2km) noise complaints and health issues may occur. Recent peer reviewed research has confirmed that wind farms within 1 .4km harm sleep and health (report in Daily Telegraph 03/11/2012 - http://www.telegraph.eo.uk/earth/energy/windpower/9653429/Wind-farm-noise-does-harm- sleep-and-health-say-scientists.htmI)

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED317

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.4

CommentID: WED46

Nature of Response: Commenting

Reasons:
3rd bullet – wind shear isn't another impact, it is an exacerbating factor.
The ETSU guidance only provides a minimum level of protection and has been widely criticised. Evidence obtained under the Freedom of Information Act revealed that a report on wind turbine noise had been amended to remove a recommendation to reduce ETSU night time limits in accordance with World Health Organisation (WHO) sleep disturbance limits and to add a 5dB penalty for AM noise (see 1 below).
Moreover, 'a large body of evidence now exists to suggest that wind turbines disturb sleep and impair health at distances and external noise levels that are permitted in most jurisdictions, including the UK (see 2 below).
A recent report (Jul 2012) confirmed that unacceptable levels of sleep disturbance and consequent adverse effects on health are highly likely in a significant proportion of those living within 1.5km of industrial wind turbines or at external noise levels in excess of 32dBA.
Another recent report (Oct 2012) concluded that residents living within 1.4km of industrial wind turbines had worse sleep, daytime sleepiness and impaired mental health compared to those living

further away.
1. Civil servants have suppressed warnings that wind turbines can generate noise damaging people's health for several square miles around. The guidance from consultants indicated that the sound level permitted from spinning blades and gearboxes had been set so high—43dB—that local people could be disturbed whenever the wind blew hard. The noise was also thought likely to disrupt sleep. The report said the best way to protect locals was to cut the maximum permitted noise to 38dB, or 33dB if the machines created discernible "beating" noises as they spun. It has now emerged that officials removed the warnings from the draft report in 2006 by Hayes McKenzie Partnership, the consultants. The final version made no mention of them. It means that hundreds of turbines at wind farms in Britain have been allowed to generate much higher levels of noise, sparking protests from people living near them. [Sunday Times, 13 December 2009]
2. British Medical Journal editorial, 8 Mar 2012.

Changes to the draft that you consider necessary:

SKDC Response:
It is agreed that there is some inconsistency in the layout of this section which needs to be resolved i.e. paragraph 3.7.4 refers to two types of noise but there are 4 bullet points underneath.
See comment for WED317 (section 3.7)

Recommended Changes:
Revise layout of bullet points under paragraph 3.7.4

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Noise and Vibration 3.7.4

CommentID: WED112

Nature of Response: Commenting

Reasons:
3rd bullet – wind shear isn't another impact, it is an exacerbating factor.
The ETSU guidance only provides a minimum level of protection and has been widely criticised. Evidence obtained under the Freedom of Information Act revealed that a report on wind turbine noise had been amended to remove a recommendation to reduce ETSU night time limits in accordance with World Health Organisation (WHO) sleep disturbance limits and to add a 5dB penalty for AM noise (see 1 below).
Moreover, 'a large body of evidence now exists to suggest that wind turbines disturb sleep and impair health at distances and external noise levels that are permitted in most jurisdictions, including the UK (see 2 below).
A recent report (Jul 2012) confirmed that unacceptable levels of sleep disturbance and consequent adverse effects on health are highly likely in a significant proportion of those living within 1.5km of industrial wind turbines or at external noise levels in excess of 32dBA.
Another recent report (Oct 2012) concluded that residents living within 1.4km of industrial wind turbines had worse sleep, daytime sleepiness and impaired mental health compared to those living further away.
1, Civil servants have suppressed warnings that wind turbines can generate noise damaging people's health for several square miles around. The guidance from consultants indicated that the sound level permitted from spinning blades and gearboxes had been set so high—43dB—that local people could be disturbed whenever the wind blew hard. The noise was also thought likely to disrupt sleep. The report said the best way to protect locals was to cut the maximum permitted noise to 38dB, or 33dB if the machines created discernible "beating" noises as they spun. It has now emerged that officials removed the warnings from the draft report in 2006 by Hayes McKenzie Partnership, the consultants. The final version made no mention of them. It means that hundreds of turbines at wind farms in Britain have been allowed to generate much higher levels of noise, sparking protests from people living near them. [Sunday Times, 13 December 2009]
2. British Medical Journal editorial, 8 Mar 2012.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED317 (section 3.7) and WED46

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Noise and Vibration 3.7.4

CommentID: WED184

Nature of Response: Commenting

Reasons:

In 3rd bullet wind shear is not another impact, it is an exacerbating factor. The ETSU guidance only provides a minimum level of protection and has been widely criticised. Evidence obtained under the Freedom of Information Act revealed that a report on wind turbine noise had been amended to remove a recommendation to reduce ETSU night time limits in accordance with World Health Organisation (WHO) sleep disturbance limits and to add a 5dB penalty for AM noise (see 1 below).

Moreover, "a large body of evidence now exists to suggest that wind turbines disturb sleep and impair health at distances and external noise levels that are permitted in most jurisdictions, including the UK" (see 2 below).

A recent report (Jul 2012) confirmed that unacceptable levels of sleep disturbance and consequent adverse effects on health are highly likely in a significant proportion of those living within 1.5km of industrial wind turbines or at external noise levels in excess of 32dBA.

Another recent report (Oct 2012) concluded that residents living within 1.4km of industrial wind turbines had worse sleep, daytime sleepiness and impaired mental health compared to those living further away.

1, Civil servants have suppressed warnings that wind turbines can generate noise damaging people's health for several square miles around. The guidance from consultants indicated that the sound level permitted from spinning blades and gearboxes had been set so high 43dB that local people could be disturbed whenever the wind blew hard. The noise was also thought likely to disrupt sleep. The report said the best way to protect locals was to cut the maximum permitted noise to 38dB, or 33dB if the machines created discernible "beating" noises as they spun. It has now emerged that officials removed the warnings from the draft report in 2006 by Hayes McKenzie Partnership, the consultants. The final version made no mention of them. It means that hundreds of turbines at wind farms in Britain have been allowed to generate much higher levels of noise, sparking protests from people living near them. [Sunday Times, 13 December 2009] 2. British Medical Journal editorial, 8 Mar 2012.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED317 (paragraph 3.7) and WED46

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Noise and Vibration 3.7.4

CommentID: WED263

Nature of Response: Commenting

Reasons:

Pleased to see Amplitude Modulation and Wind Shear defined as distinct possible adverse effects of turbines

Changes to the draft that you consider necessary:

SKDC Response:

Comment noted.

Recommended Changes:

n/a

Consultee
713807 Mr Paul Miley

Agent

Consultation Point
Noise and Vibration
3.7.4

CommentID: WED326

Nature of Response: Commenting

Reasons:
two types mentioned and four given

Changes to the draft that you consider necessary:
Minimum separation distances to mitigate errors in noise modelling, inadequacy of ETSU 97 and unexpected noise (e.g. overdue maintenance on noisy bearings)

SKDC Response:
See comments for WED317 and WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Noise and Vibration
3.7.4

CommentID: WED417

Nature of Response: Supporting

Reasons:
Wind shear isn't another impact, it is an exacerbating factor.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted. It is proposed to revised the text as appropriate (see comment for WED46)

Recommended Changes:
n/a

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Noise and Vibration
3.7.4

CommentID: WED545

Nature of Response: Objecting

Reasons:
ETSU-R-97 is the technical guidance to refer to when undertaking noise assessments for wind farms and readers of the SPD should be directed to it for definitions for key noise terms (see pg 117 – 120).
The application of ETSU-R-97 is endorsed by national policy, specifically NPS EN-1.
The definitions of different noise impacts currently provided are potentially misleading and furthermore wind shear is incorrectly classified as a noise impact. For clarity the definitions provided in the ETSU-R-97 glossary (Section 11 pg 117-120) for the terms currently defined in para 3.7.4 are as follows:
Aerodynamic Noise – Noise emitted by a wind turbine due to the passage of air over the blades.
Mechanical Noise – Noise emitted by a wind turbine from machinery usually within the nacelle.
Wind Shear – A description of the increase in wind speed with height above ground level.

Modulation – Periodic variation in phase, frequency, or amplitude but most commonly in amplitude when associated with wind turbine noise.
Blade Swish – the modulation of broadband noise at blade passing frequency.
Amplitude modulation is an inherent characteristic of all wind turbine noise, as
acknowledged in ETSU-R-97 (p12, p68) which states;
'The noise levels recommended in this report take into account the character of noise described in Chapter 3 as blade swish. Given that all wind turbines exhibit blade swish to a certain extent we feel this is a more common-sense approach given the current level of knowledge….'

Changes to the draft that you consider necessary:
Delete paragraph 3.7.4

SKDC Response:
Do not agree that the paragraph should be deleted but inconsistency in the layout of this section needs to be resolved (see comment for WED46).

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Noise and Vibration 3.7.5

CommentID: WED47

Nature of Response: Commenting

Reasons:
Doctors have noted a common set of ill health effects among people living near large wind turbines, including: sleep disturbance, headache, tinnitus, ear pressure, dizziness, vertigo, nausea, visual blurring, tachycardia, irritability, loss of concentration and memory, and panic episodes. It is believed that the primary cause is the effect of low-frequency wind turbine noise ('infrasound') on the inner ear. Dr. Pierpont of New York recommends a separation distance of 1.25 miles (2 km) for large wind turbines from homes. A French doctor has recommended a setback distance of 5km.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED317, although it is proposed to reference that many people do not consider that ETSU takes account of effects on health.

Recommended Changes:
At end of paragraph 3.7.6 add: "…, although many people consider that ETSU does not take account of the adverse health effects of low frequency noise."

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Noise and Vibration 3.7.5

CommentID: WED113

Nature of Response: Commenting

Reasons:
Doctors have noted a common set of ill health effects among people living near large wind turbines, including: sleep disturbance, headache, tinnitus, ear pressure, dizziness, vertigo, nausea, visual blurring, tachycardia, irritability, loss of concentration and memory, and panic episodes. It is believed that the primary cause is the effect of low-frequency wind turbine noise ('infrasound') on the inner ear. Dr. Pierpont of New York recommends a separation distance of 1.25 miles (2 km) for large wind turbines from homes. A French doctor has recommended a setback distance of 5km.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED317 and WED47

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Noise and Vibration 3.7.5

CommentID: WED185

Nature of Response: Commenting

Reasons:
Doctors have noted a common set of ill health effects among people living near large wind turbines, including: sleep disturbance, headache, tinnitus, ear pressure, dizziness, vertigo, nausea, visual blurring, tachycardia, irritability, loss of concentration and memory, and panic episodes. It is believed that the primary cause is the effect of low-frequency wind turbine noise (˜infrasound") on the inner ear. Dr. Pierpont of New York recommends a separation distance of 1.25 miles (2 km) for large wind turbines from homes. A French doctor has recommended a setback distance of 5km.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED317 and WED47

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Noise and Vibration 3.7.5

CommentID: WED546

Nature of Response: Objecting

Reasons:
The comment 'there is no doubt that large turbines can potentially cause vibration through
the ground or through the walls of nearby buildings' is in our understanding wrong – at least if the implication is that significant vibrations can be caused (which is what the casual reader will infer from the statement). To our knowledge the most up to date research on vibrations from turbines found that:
'the levels of vibration from wind turbines are so small that only the most sophisticated instrumentation and data processing can reveal their presence, and they are almost impossible to detect […] To put the level of vibration into context, they are ground vibrations with amplitudes of about one millionth of a millimetre. There is no possibility of humans sensing the vibration and absolutely no risk to human health.'((PROF) PETER STYLES, President, Geological Society of London, SAM TOON, Keele University, Staffordshire 2005)

Changes to the draft that you consider necessary:
Reword paragraph to read:
"Vibration is a separate consideration from noise. Research has shown that vibration levels from operational wind turbines are extremely small and that impacts during operation are undetectable to humans and do not pose risk to human health."

SKDC Response:
Comments noted, however, no change to the paragraph is considered necessary.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against		Noise and Vibration 3.7.6

Turbines)

CommentID: WED249

Nature of Response: Commenting

Reasons:
We appreciate the attention to detail and the reference to ETSU-R-97, but draw SKDC's attention to the most recent thinking on noise impact assessments. Many would argue that BS4142 should apply instead of ETSU-R-97, as the latter measures the quietest minute in a 10 minute period and can reuse this quiet minute up to 9 times in different 10 minute slots. Given the high risk of potential sleep problems and associated medical problems which are affected both by noise levels and the nature of the noise, we would urge SKDC to place the health and well-being of Lincolnshire residents high on the agenda.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371 (section 3.7)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26339 Mrs B Buttery Billingborough Parish Council		Noise and Vibration 3.7.6

CommentID: WED264

Nature of Response: Commenting

Reasons:
Believe that the ETSU noise guidance produced as long ago as 1997 when wind turbines were relatively small and new is very much out of date and the Government is only clinging to it as a result of lobbying from the powerful wind energy industry. The latest research referred to (Hayes McKenzie etc.) should be embodied into a complete review of the ETSU guidance rather than used to post-justify it. SKDC should be lobbying the Government to this effect.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371 (section 3.7). Hayes McKenzie are involved in preparing the good practice guide in association with the Institute of Acoustics which will be published in May as a companion guide to ETSU. This is referred to in paragraph 3.7.7.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713807 Mr Paul Miley		Noise and Vibration 3.7.6

CommentID: WED598

Nature of Response: Commenting

Reasons:
There seems to be no reference to the detail of ETSU-97, updates and the health papers that have been published more recently. These should be used as source material and referenced in the SPD. The SPD cannot be selective in resources used to compile it. ETSU 97 was based on smaller turbines and anything larger than those should have separate noise modelling against BS4142 for environmental noise. Although contentious I would argue that separation distances should be mandated unless mitigating circumstances are presented e.g. those closest residents may all support an installation in which case the distance can be ignored. Without a separation distance the developer can 'impose' and residents (who have limited or no resources to argue) are impacted. This cannot be the right emphasis.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371 (section 3.7)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711369 Mr Gary Senior		Noise and Vibration 3.7.7

CommentID: WED161

Nature of Response: Objecting

Reasons:
Having heard the experiences of people living close to wind farms, it is clear that the ETSU-R-97 limits are set too high. The allowable noise is higher than that from other industries. This is a very quiet area and the impact could be severe. SKDC should insist that wind farms are not audible in homes and gardens.

Changes to the draft that you consider necessary:
SKDC should insist that wind farms are not audible in homes and gardens.

SKDC Response:
See comment for WED371 (section 3.7)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Noise and Vibration 3.7.7

CommentID: WED439

Nature of Response: Commenting

Reasons:
Although the implementation of ETSU-R-97 certainly needs improvement, the council should recognise that the regulations are not intended to preserve neighbourhood amenity. So noise levels deemed acceptable under ETSU-R-97, especially at night, will still be audible, will still cause a nuisance and would not be acceptable under other circumstances. The council should mandate its own standards in the interests of residents and not rely on the minimal protection provided by national guidance.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371 (section 3.7)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Noise and Vibration 3.7.8

CommentID: WED482

Nature of Response: Commenting

Reasons:
In the second bullet point on the second line the wording should be amended to cater for a situation where the owner of the site may not consent the arrangement and there is no statutory means to enforce this

Changes to the draft that you consider necessary:
Change wording to read: "will use reasonable endeavours to obtain permission from the selected sites and if permission is not secured despite reasonable endeavours as close as is reasonably possible .... "

SKDC Response:
As drafted the wording is considered appropriate.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Noise and Vibration 3.7.8

CommentID: WED547

Nature of Response: Objecting

Reasons:
The guidance given in this paragraph does not reflect good practice in a number of respects:
1. It may not be appropriate to install weather stations alongside noise monitoring equipment, as the requirements of both are dissimilar. The noise equipment should be sited within the amenity area of a dwelling, usually close to the property but no closer than 3.5m to any vertical reflecting surface. Wind masts and rain gauges need to be sited in clear areas, away from obstructions, typically 6-9 times the height of the nearest obstruction. Furthermore this is not a requirement in ETSU-R-97.
2. There is no requirement in ETSU-R-97 to measure background noise across a year and this is not practicable.
3. The principle of providing noise survey data in the interests of transparency is accepted. However, it is not practical to provide copies prior to dismantling equipment, as the raw data files need to be transcribed into a readable format and that is not done in the field. In addition obtaining the correlated meteorology data can often take some time. It is unnecessarily onerous and inappropriate for the requirement for the provision of this data to be requested through the SPD. It should be subject to an individual request from the residents involved in the surveys or the local authority if required so that the timescales and format of the data to be provided can be agreed.
4. Proposed turbines are only ever candidate turbines.

Changes to the draft that you consider necessary:
Bullet point 3 under paragraph 3.7.8 is reworded to read:
"'measure the background noise levels as a function of site wind speed at the nearest neighbours, or a representative sample of the nearest neighbours. Wind measured on the proposed site should be correlated with the background noise measurements at the nearest receptor. A rain gauge should be provided in an appropriate location free of obstruction to record rainfall during the period of noise monitoring.

SKDC Response:
The Council consider that this information should be provided.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Noise and Vibration 3.7.9

CommentID: WED48

Nature of Response: Commenting

Reasons:
All noise calculations should be based on a precautionary approach, using the more damaging (e.g. 5% worst) of the statistical data, rather than the average, and adding additional tolerances to cater for mechanical wear and tear and uncertainties in the modeling. Calculations (including AM and infrasound) should include the cumulative synchronous/asynchronous effects of multiple turbines.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED371 (section 3.7).

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Noise and Vibration 3.7.9

CommentID: WED114

Nature of Response: Commenting

Reasons:
All noise calculations should be based on a precautionary approach, using the more damaging (e.g. 5% worst) of the statistical data, rather than averages, and adding additional tolerances to cater for mechanical wear and tear and uncertainties in the modeling. Calculations (including AM and infrasound) should include the cumulative synchronous/asynchronous effects of multiple turbines.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED371 (section 3.7).

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Noise and Vibration 3.7.9

CommentID: WED186

Nature of Response: Commenting

Reasons:
This guidance should be reinforced in light of the comments against para 3.7.5. Assessment should not be left to the developer.

Changes to the draft that you consider necessary:

SKDC Response:
In combination with the guidance set out in the rest of this section, the wording as currently drafted is considered to be appropriate.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Noise and Vibration 3.7.9

CommentID: WED436

Nature of Response: Objecting

Reasons:

The council should not accept the ETSU-R-97 noise levels as acceptable in terms of residential amenity.
A recent report confirmed that unacceptable levels of sleep disturbance and consequent adverse effects on health are highly likely in a significant proportion of those living within 1.5km of industrial wind turbines or at external noise levels in excess of 32dBA (ETSU-R-97 allows 43dBA).
Another recent report (Oct 2012) concluded that residents living within 1.4km of industrial wind turbines had worse sleep, daytime sleepiness and impaired mental health compared to those living further away.
Residents should not have to put up with distinctive turbine noise in their homes by day and night, nor should their health be threatened. The council has a duty of care to protect residents.

Changes to the draft that you consider necessary:

Given the inadequate protection provided by the current noise regulations, a graduated series of mandatory separation distances is the only practical option to ensure that residential amenity is preserved.

SKDC Response:

see comment WED371 (section 3.7)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Noise and Vibration 3.7.11

CommentID: WED49

Nature of Response: Commenting

Reasons:

Pending the imposition of a minimum setback distance for noise (see 1 below), the Council should heed the earlier advice and mandate the WHO limit, with the 5dB penalty for AM, making the maximum permitted nighttime noise in quiet areas 33dB; recognising that (especially for sources with low frequency components) exposure below 30dB may still disturb sleep according to WHO guidelines.
1. The French Academy of Medicine and the U.K. Noise Association recommend a minimum of 1.5 km between large wind turbines and homes.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED371 (section 3.7)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Noise and Vibration 3.7.11

CommentID: WED115

Nature of Response: Commenting

Reasons:

Pending the imposition of a sufficient setback distance for noise (see 1 below), the Council should heed the earlier advice and mandate the WHO limit, with the 5dB penalty for AM, making the maximum permitted nighttime noise in quiet areas 33dB; recognising that (especially for sources with low frequency components) exposure below 30dB may still disturb sleep according to WHO guidelines.

1. The French Academy of Medicine and the U.K. Noise Association recommend a minimum of 1.5 km between large wind turbines and homes.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED371 (section 3.7)

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Noise and Vibration 3.7.11

CommentID: WED187

Nature of Response: Commenting

Reasons:

Add a condition to decommission and remove any turbine found to generate unacceptable levels of noise and/or vibration.

Changes to the draft that you consider necessary:

SKDC Response:

Planning approvals for wind turbines are subject to conditions specifying agreed noise levels. Should these be exceeded then enforcement action can be taken.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26352 Ms Rosemary H Woolley Baston Parish Council		Noise and Vibration 3.7.11

CommentID: WED227

Nature of Response: Commenting

Reasons:

The document should show greater observance of studies done on low noise impact on people and animals.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED371 (section 3.7)

Recommended Changes:

n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Noise and Vibration
3.7.11

CommentID: WED435

Nature of Response: Objecting

Reasons:
The ETSU guidance does adequately protect residents, especially from the effects of large modern turbines whose sound profile is different from that considered when the guidance was written. Given their limited terms of reference, the revised IOA guidance is unlikely to satisfactorily protect residential amenity.

Changes to the draft that you consider necessary:
The council should take a precautionary approach for noise and vibration and implement minimum setback distances. Failing this the Council should implement World Health Organisation limits for night time noise, with an additional 5dB penalty for AM.

SKDC Response:
See response to WED371 (section 3.7)

Recommended Changes:
n/a

Consultee
649840 Miss Philippa Brown
Fulbeck Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.11

CommentID: WED604

Nature of Response: Commenting

Reasons:
The Council need to set definite guidelines on "amplitude modulation" i.e. noise, especially at night, and be guided by the WHO recommendations.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED371 (section 3.7)

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.12

CommentID: WED50

Nature of Response: Commenting

Reasons:
This guidance should be reinforced in light of our comments against para 3.7.5. Assessment should not be left to the developer.

Changes to the draft that you consider necessary:

SKDC Response:
In combination with the guidance set out in the rest of this section, the wording as currently drafted is considered to be appropriate. Submitted assessments will be reviewed by the Council and, if

appropriate, additional information sought.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.12

CommentID: WED116

Nature of Response: Commenting

Reasons:
This guidance should be reinforced in light of the comments against para 3.7.5. Assessment should not be left to the developer.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED50

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.12

CommentID: WED188

Nature of Response: Commenting

Reasons:
This guidance should be reinforced in light of the comments against para 3.7.5. Assessment should not be left to the developer.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED50

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Noise and Vibration
3.7.12

CommentID: WED434

Nature of Response: Commenting

Reasons:
Any detectable (by humans) noise or vibration is likely to cause irritation and may affect sleep. Assessment should not be left to the developer.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED50.

Recommended Changes:
n/a

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Noise and Vibration
3.7.12

CommentID: WED548

Nature of Response: Objecting

Reasons:
Vibration is a potential concern only during certain elements of construction, for example the potential vibration effects from piled foundations or HGV's travelling on the road network. Effects from vibration during construction are very site specific and any reference to other developments is not relevant.

Changes to the draft that you consider necessary:
Wording reworded to read:
"The impact of vibration during construction to nearby receptors shall be assessed and shown to be within acceptable limits."
The last sentence in Box 23 should be deleted and replaced with the same revised text for Para 3.7.12 for consistency.

SKDC Response:
The wording is considered appropriate as drafted

Recommended Changes:
n/a

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Noise and Vibration
3.7.13

CommentID: WED549

Nature of Response: Commenting

Reasons:
Mitigation measures should accord with the good practice specified in BS5228: 2009 Part
1 & 2

Changes to the draft that you consider necessary:
Add 'in accordance with the good practice specified in BS5228: 2009 Part 1 & 2' after
'mitigation measures' before the bullet pointed list.

SKDC Response:
The bullet point is intended to give examples of possible mitigation measures that might be put in place. If they are subject to British Standards then where implemented they would be required to meet these standards. As such it is not considered that the proposed change would necessarily add anything to the paragraph.

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.14

CommentID: WED51

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add a condition to decommission and remove any turbine found to generate unacceptable levels of noise and/or vibration.

SKDC Response:
See comment for WED187 (paragraph 3.7.11)

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.14

CommentID: WED117

Nature of Response: Commenting

Reasons:
Add a condition to decommission and remove any turbine found to generate unacceptable levels of noise and/or vibration.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED187 (paragraph 3.7.11)

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Noise and Vibration
3.7.14

CommentID: WED189

Nature of Response: Commenting

Reasons:
Add a condition to decommission and remove any turbine found to generate unacceptable levels of noise and/or vibration.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED187 (paragraph 3.7.11)

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Noise and Vibration
3.7.14

CommentID: WED433

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add a condition to decommission and remove any turbine found to generate unacceptable levels of noise and/or vibration.

SKDC Response:
See comment for WED187 (paragraph 3.7.11)

Recommended Changes:
n/a

Consultee
713530 Mr Andrew Jenkins

Agent

Consultation Point
Noise and Vibration
Box 23

CommentID: WED332

Nature of Response: Objecting

Reasons:
Noise is a contributor to adverse health effects of wind turbines. Findings published in the British Medical Journal1 and upholding their duty of care to residents. The research confirmed that those living within 2km of industrial wind farms are at risk of;:- Sleep disturbance Headaches Ringing or buzzing in the inner ear Ear pressure, leading to vertigo Nausea Tachycardia
Reference British Medical Journal, 8th March 2012, Hanning and Evans, Leicester University Hospital and Queens University Belfast.
Allowing developers to assess impacts of noise by reference to other developments is insufficient as this impact can often be amplified by local conditions such as topography and presence of buildings or natural features

Changes to the draft that you consider necessary:
Proper "site specific" noise tests should be carried out, Developments should be removed if acceptable limits are breached

SKDC Response:
The SPD requires specific assessments to be undertaken. Planning approvals for wind turbines are subject to conditions specifying agreed noise levels. Should these be exceeded then enforcement action can be taken.

Recommended Changes:
n/a

Consultee
713800 Mr Michael Worth

Agent
713774 Mr Robert Doughty
RDC Ltd

Consultation Point
Noise and Vibration
Box 23

CommentID: WED366

Nature of Response: Supporting

Reasons:
Support the requirement for robust assessment of noise, but would wish to see a specific requirement for all proposals to be supported by a noise assessment that includes background noise levels, not only near to the site, but also at the nearest residential properties.

Changes to the draft that you consider necessary:
Box 23 should require background noise assessments for all proposals, particularly wind turbines of 15m or higher. Reference to ETSU Guidance should note the emerging best practice guidance referred to in paragraph 3.7.7.

SKDC Response:
The text states that noise assessments will be required for all large and medium-scale developments, and that small developments may require assessment, subject to discussion with the Council. This is considered to be correct, as some small turbines may not be near any properties (or only the landowner's properties) and, therefore, a noise assessment may not be required. Noise assessments do require monitoring at the nearest properties.
The Institute of Acoustics Good Practice Guide is referred to in paragraph 3.7.7.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Noise and Vibration Box 23

CommentID: WED483

Nature of Response: Commenting

Reasons:
It is not always possible at that stage to specify the precise details. Very few planning applications include the precise details of the make and model and this is not commercially reasonable. The application should include such detail as is reasonably necessary in order to make the determination and this could quite reasonably include the hub height and the blade length within a range so it gives a clear indication of what is expected. Developers need to have flexibility within a range to make sure that they can procure the necessary turbines without at that stage, when contracts have not been placed, being left exposed securing one particular model and make.

Changes to the draft that you consider necessary:
Delete 2nd sentence.

SKDC Response:
The Council consider that this information should be provided. Where this is not possible then the worst case approach should be adopted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Noise and Vibration Box 23

CommentID: WED484

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
At the end of third paragraph add " and other available information"

SKDC Response:
Agree that this would be reasonable. To be consistent the wording should also be added to paragraph 3.7.12

Recommended Changes:
At end of last sentence of Box 23 add 'and other available information.'

Consultee
710811 Miss Nicola Bell
RWE Npower Renewables Ltd (RWE NRL)

Agent

Consultation Point
Noise and Vibration
Box 23

CommentID: WED550

Nature of Response: Objecting

Reasons:
It is not considered practical for South Kesteven to draft an amplitude modulation condition that is compliant with Circular 11/95 and the NPPF. Any such condition would not pass the appropriate legal tests for validity because (1) it is a rare occurrence and guidance from Government is that a condition is not required (2) there is no established and professionally agreed measure of amplitude modulation appropriate for control purposes (3) there is no established and agreed level of amplitude modulation that distinguishes between "acceptable" levels and levels that should, in the public interest, be conditioned against. For all these reasons successive planning Inspectors have ruled that imposition of an AM condition is not appropriate for onshore wind developments, and this approach has been supported by Secretaries of State in their decisions. The Woolley Hill decision (APP/H0520/A/11/2158702 23 March 2012) is a recent notable example, where in response to requests for a condition by the local opposition group Inspector Rose demonstrated he had comprehensively assessed both the need for and lawfulness of an OAM condition. He concluded that such a condition was not necessary and would fail the tests set out in Circular 11/95. He stated:
'202. Overall, without an agreed robust methodology for measuring excess amplitude modulation, based on convincing research, it would be unreasonable to impose a condition on such an uncertain basis.
203. In conclusion, despite the findings of the Inspector in the Den Brook case, the evidence presented to me does not provide convincing justification that an excess amplitude modulation condition would be necessary. In addition, such a condition, if imposed, would be unreasonable given the current limited knowledge and understanding of excess amplitude modulation and a lack of consensus beyond the guidance of ETSU-R-97.'
The Burnthouse Farm decision, a Secretary of State Case (6 July 2011 APP/D0515/A/10/2131194) also drew similar conclusions.
Unless South Kesteven can provide any site specific evidence to suggest a higher than remote risk of excess amplitude modulation at a particular site under consideration, a condition would be unjustified.

Changes to the draft that you consider necessary:
Remove the entire second paragraph in Box 23 which refers to the Council's intention to impose a condition on amplitude modulation.

SKDC Response:
The Council would only seek to impose such a condition if Amplitude Modulation was an issue and could be justified.

Recommended Changes:
n/a

Consultee
26136 Yana Bosseva
Renewable UK

Agent

Consultation Point
Noise and Vibration
Box 23

CommentID: WED558

Nature of Response: Objecting

Reasons:
Box 23 in this section states that developers shall specify precise details about the proposed turbines. It should be noted that these are often clear further down the process of gaining planning permission. Given the time-frames of the planning process, which in some cases can take more than 2-3 years, and taking into consideration the fast-paced development in wind turbine technology,

developers usually only specify a maximum height at the time of the planning application.

Changes to the draft that you consider necessary:

SKDC Response:
See comment to WED483

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26136 Yana Bosseva Renewable UK		Socio-economics 3.8

CommentID: WED559

Nature of Response: Commenting

Reasons:
This section is missing two key elements: wind energy's positive effects on tourism, and the contribution of the wind industry to the local and national economy.
In terms of tourism, it should be noted that there are also positive effects of windfarms on tourism. In many areas, once a wind farm has been installed it generates an increased interest in the area for visitors. The most widely-known example is the Whitelee Wind Farm where a visitor centre has been established, together with mountain biking tracks and other activities. In addition, a familiarisation event was hosted there recently where a number of British Horse Society members took their horses for a ride around the Whitelee Wind Farm, demonstrating that any concerns about horses near wind turbines are generally unfounded.
In terms of economic effects, it should be noted that the onshore wind sector in the UK has grown significantly over the last decade and in particular over the last five years. Further increases are expected in onshore wind energy deployment over the course of the decade in order to meet the UK's 2020 renewable energy commitments and longer-term energy security and low carbon goals.
A recent report commissioned by RenewableUK and DECC – 'Onshore Wind – Direct and Wider Economic Impacts'1 – looked at the economics of onshore wind. It found that 98% of project development expenditure is spent in the UK, together with 90% of operation and maintenance and 45% of construction expenditure. In terms of direct and supply chain impacts, projects that have been developed in the last year bring £737m to the UK, through O&M contracts, over their lifetime. Over the last two years the industry as a whole has expanded by a quarter, and now provides full-time equivalent direct employment for over 12,200 people .
In 2011 the onshore wind industry comprised 8,600 jobs and contributed £548 million in GVA across the UK. Of the UK total, 4,500 jobs and £314 million GVA arose at the regional/national level to individual wind farms. Of the regional/national impacts, 1,100 jobs and £84 million GVA arose at the local level for individual wind farms (i.e. at Local Authority level).
Additionally, the UK small wind industry is a vibrant success story, delivering global industrial leadership in product design, innovation and standards. Over 10 UK based manufacturers offer turbines of different designs, ranging from few hundred watts to 60kW and supply the major part of the domestic small wind market. The UK small wind turbine manufacturers are also leading in exports, selling half of their production to more than 100 countries, predominantly to North America and Europe. The sector already employs over a thousand people and if the expected deployment projections are realised by 2020, 12,000 UK based jobs will be created.

Changes to the draft that you consider necessary:

SKDC Response:
It is considered that the SPD strikes a reasonable balance on this issue. However, additional reference to tourism has been added.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Socio-economics 3.8.1

CommentID: WED380

Nature of Response: Commenting

Reasons:
The introduction to Socio-economics section indicates a wider range of issues than just those that are listed following paragraph 3.8.1. In normal planning matters the impact of development on property values is not a material planning consideration, however, the imposition of wind energy development and the proliferation of turbine proposals on a community has greater impact than just the local employment market and other matters. It fundamentally changes the local property market to the detriment of existing residents.
It should be beholden on applicants to consider the impact on the local property market to include the impact on sale values, rental sector and general saleability, using reference to other similar schemes in the country.
Should it be shown that the impact on the local community will be to the detriment to not just the value of property, but the ability to sell or rent it out post development, this clearly has a significant socio-economic impact including the possibility that financial liability could be created including rateable value.

Changes to the draft that you consider necessary:
The SPD should require reneweable energy development proposals to include an assessment of socio economic impact to include that in relation to local community property markets. Should there be a detrimental impact, this should be a basis for refusing planning permission.

SKDC Response:
Impacts on property values is not a material consideration and, therefore, this should not be included.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.2

CommentID: WED52

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 1st line add 'possible' so sentence reads '... highlights the possible positive contribution…'

SKDC Response:
As the National Planning Statement EN3 does not use the term 'possible' it would not be appropriate to make the change suggested.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.2

CommentID: WED53

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 4th line add 'temporary' so sentence reads '….and also through temporary job creation…'

SKDC Response:
Wind farms do create jobs and not necessarily just temporary jobs. People are employed to operate and maintain the windfarms and implement habitat management plan agreements.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.2

CommentID: WED118

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
in 1st sentence add 'possible' so sentence reads:
'... highlights the possible positive contribution...;

SKDC Response:
See comment for WED52

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.2

CommentID: WED119

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 2nd sentence add 'temporary' so it reads:
;....and also through temporary job creation...'

SKDC Response:
See comment for WED53

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.2

CommentID: WED190

Nature of Response: Commenting

Reasons:
in 1st sentence add 'possible' so sentence reads: "highlights the possible positive contribution"

Changes to the draft that you consider necessary:

SKDC Response:
See comment to WED52

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.2

CommentID: WED198

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 2nd sentence add 'temporary' so it reads: ".. and also through temporary job creation ..'

SKDC Response:
See comment for WED53

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
712930 Lady Sarah Sigurdsson Hardradi BHATs (Billingborough & Horbling Against Turbines)		Socio-economics 3.8.2

CommentID: WED250

Nature of Response: Commenting

Reasons:
We are pleased that you acknowledge that wind turbines create virtually no local jobs. An example of one being operated by the internet is provided by the one at March, Cambridgeshire, which your own Development Control Committee members visited some time ago and saw that it was operated remotely from Denmark. The construction jobs are largely imported from outside the area of the site and only exist because the industry is heavily subsidised. (This would be the case for any subsidised industry.) As you recognise in Paragraph 3.8.3, the detrimental effects on recreation and tourism can have a far greater and more negative impact.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Socio-economics 3.8.2

CommentID: WED320

Nature of Response: Supporting

Reasons:
I welcome and agree with the reference to wind energy installations being positive.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted.

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Socio-economics
3.8.2

CommentID: WED431

Nature of Response: Commenting

Reasons:
The 'positive contribution of wind energy installations to the local economy' is more wishful thinking than fact. Especially where the financial benefits are shared between a foreign energy company and an absentee landlord.

Changes to the draft that you consider necessary:
Modify first line - hightlights the POSSIBLE postive contribution.
Modify fourth line - through TEMPORARY job creation

SKDC Response:
See comments for WED52 and WED53

Recommended Changes:
n/a

Consultee
517670 Natural England
Natural England

Agent

Consultation Point
Socio-economics
3.8.3

CommentID: WED10

Nature of Response: Supporting

Reasons:
Welcome section and pleased to note that it covers the impact of wind energy sites on public Rights of Way and other recreational routes and cycleways.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted

Recommended Changes:

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Socio-economics
3.8.3

CommentID: WED54

Nature of Response: Commenting

Reasons:
3rd line - It's not clear what '…obstruct and restrict movement in the countryside' means.

Changes to the draft that you consider necessary:

SKDC Response:
Agree this sentence should be removed as wind turbines are highly unlikely to obstruct and restrict movement.

Recommended Changes:
Delete second sentence of paragraph 3.8.3

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Socio-economics
3.8.3

CommentID: WED120

Nature of Response: Commenting

Reasons:
In 2nd sentence it's not clear what '…obstruct and restrict movement in the countryside' means.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED54

Recommended Changes:
See change for WED54

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Socio-economics
3.8.3

CommentID: WED199

Nature of Response: Commenting

Reasons:
In 2nd sentence it's not clear what '… obstruct and restrict movement in the countryside …' means.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED54

Recommended Changes:
See change for WED54

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Socio-economics
3.8.3

CommentID: WED297

Nature of Response: Commenting

Reasons:
The Lincolnshire Wildlife Trust welcomes the recognition that the siting of wind turbines can impact on rural recreational activities. Aside from impacts on ecology, the Lincolnshire Wildlife Trust would have concerns about turbines located near to nature reserves in terms of negative effects on recreation experience. Nature reserves are places for the quiet enjoyment of nature, including walking and bird watching, and in many cases it would be inappropriate to locate medium or large scale turbines in close proximity to a nature reserve. In particular, where they would be prominent features of the landscape and visible from bird hides or visitor routes. Noise from the turbines may also impact on the ability to hear bird song for instance.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Socio-economics 3.8.3

CommentID: WED321

Nature of Response: Objecting

Reasons:
I am disappointed by these comments. Wind turbines do not necessarily affect views. I do not support the statement that wind turbines affect tourism, eg bird watching, angling and walking.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted. The extent to which any impact on the character of the landscape is considered to be either positive or negative is based on the perception and opinion of the viewer and recreational user.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.4

CommentID: WED55

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add sentence: 'Positive effects have been attributed to visitor centres co-located with some of the first large turbines in the country. However, this is very unlikely to be the case for current or future developments.'

SKDC Response:
The potential positive effects could be highlighted, in the interests of balance.

Recommended Changes:
At end of last sentence of paragraph 3.8.4 add: 'Positive effects have been attributed to visitor centres co-located with some of the first large turbines in the country. However, this is very unlikely to be the case for current or future developments.'

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.4

CommentID: WED56

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
in final sentence:add 'sites and other venues' so sentence reads '.....changing views from popular tourist sites and other venues nearby.'

SKDC Response:
It is not considered that the proposed word change will add anything to the meaning of the sentence.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.4

CommentID: WED121

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add sentence: 'Positive effects have been attributed to visitor centres co-located with some of the first large turbines in the country. However, this is very unlikely to be the case for current or future developments.'

SKDC Response:
See comment for WED55

Recommended Changes:
See change for WED55

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.4

CommentID: WED122

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In final sentence add 'sites and other venues' so it reads:
'.....changing views from popular tourist sites and other venues nearby.'

SKDC Response:
See comment for WED56

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.4

CommentID: WED200

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add sentence: 'Positive effects have been attributed to visitor centres co-located with some of the first large turbines in the country. However, this is very unlikely to be the case for current or future developments.'

SKDC Response:
See comment for WED55

Recommended Changes:
See change for WED55

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.4

CommentID: WED201

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In final sentence add 'sites and other venues' so it reads: '..changing views from popular tourist sites and other venues nearby.'

SKDC Response:
See comment for WED56

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Socio-economics 3.8.4

CommentID: WED430

Nature of Response: Commenting

Reasons:
'tourism site' implies something in a guide book. Industrial wind turbines will also impact hospitality and leisure industries, such as those hosting wedding receptions and shoots. These employ many local people directly (e.g. beaters, catering, ground-staff) and indirectly (e.g. contractors, accommodation).

Changes to the draft that you consider necessary:
Amend final sentence - .....views from popular tourist sites AND OTHER VENUES nearby.

SKDC Response:
See comment for WED56

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.6

CommentID: WED57

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add additional sentence / paragraph:
The local rural economy also benefits from a number of other leisure-related businesses that capitalize on the unspoilt and tranquil landscape; these include wedding venues, film locations, hunting and other country sports. As well as boosting the rural economy, these businesses provide considerable employment for local people (grounds maintenance, catering and waiting staff, beaters etc).

SKDC Response:
It is not considered that the proposed additional wording will add anything to the meaning of the paragraph.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.6

CommentID: WED123

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add additional sentence / paragraph:
The local rural economy also benefits from a number of other leisure-related businesses that capitalize on the unspoilt and tranquil landscape; these include wedding venues, film locations, hunting and other country sports. As well as boosting the rural economy, these businesses provide considerable employment for local people (grounds maintenance, catering and waiting staff, beaters etc).

SKDC Response:
See comment for WED57

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.6

CommentID: WED202

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add additional sentence / paragraph: The local rural economy also benefits from a number of other leisure-related businesses that capitalize on the unspoilt and tranquil landscape; these include wedding venues, film locations, hunting and other country sports. As well as boosting the rural economy, these businesses provide considerable employment for local people (grounds maintenance, catering and waiting staff, beaters etc).

SKDC Response:
See comment for WED57

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714270 Mrs W McCallin Westborough & Dry Doddington Parish Council		Socio-economics 3.8.6

CommentID: WED355

Nature of Response: Commenting

Reasons:
Para 3.8.6 The Parish Council believes that local leisure-related businesses based on the unspoilt and tranquil landscape should be included,(wedding venues, film locations, hunting and other country sports). As well as boosting the rural economy, these businesses provide significant employment for local people.

Changes to the draft that you consider necessary:
Para 3.8.6 The Parish Council believes that local leisure-related businesses based on the unspoilt and tranquil landscape should be included,(wedding venues, film locations, hunting and other country sports). As well as boosting the rural economy, these businesses provide significant employment for local people.

SKDC Response:
See comment for WED57

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Socio-economics 3.8.6

CommentID: WED429

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add additional sentence / paragraph:
The local rural economy also benefits from a number of other leisure-related businesses that capitalise on the unspoilt and tranquil landscape; these include wedding venues, film locations, hunting and other country sports. As well as boosting the rural economy, these businesses provide considerable employment for local people (grounds maintenance, catering and waiting staff, beaters etc).

SKDC Response:
See comment for WED57

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
372928 Mr Tom Gilbert-Wooldridge English Heritage		Socio-economics 3.8.7

CommentID: WED396

Nature of Response: Commenting

Reasons:
With regards to the last sentence of paragraph 3.8.7, there are a number of historic parks and gardens around the whole district, not just Grantham and Grimsthorpe. In the previous paragraph, Grimsthorpe is misspelt as Grimesthorpe.

Changes to the draft that you consider necessary:
Please see above

SKDC Response:
Text should be amended to reflect this comment.

Recommended Changes:
Correct spelling of Grimsthorpe.
Amend final sentence of paragraph 3.8.7 to read "There are a number of historic park and gardens in the District and an extensive network of accessible woodland between Grantham and Bourne."

Consultee	Agent	Consultation Point
711472 Mrs Pamela MacAllister		Socio-economics 3.8.8

CommentID: WED196

Nature of Response: Commenting

Reasons:
The assessment should be balanced with the potential loss of employment caused by the siting of a wind farm in terms of businesses that depend on the unspoilt landscape for their trade eg wedding venues, or tourism eg holiday cottages, b&bs etc.

Changes to the draft that you consider necessary:
Include requirement to assess the potential negative impact on existing employment in hospitality or tourism based businesses.

SKDC Response:
It would be difficult to undertaken the assessment. It is not possible to analyse the impact of a wind farm on tourism within an area as it relates to people's perception of the wind farm which may be positive or negative.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Socio-economics 3.8.8

CommentID: WED485

Nature of Response: Commenting

Reasons:
This is inappropriate. Whilst there will be work during the construction phase, but thereafter there is unlikely to be any continuing employment generated by the Wind development. There will be monitoring, but this is often done very periodically and remotely. A full assessment is unnecessary and unreasonable.

Changes to the draft that you consider necessary:

SKDC Response:
This paragraph relates to both the construction and operation phases of development. It is, therefore, appropriate to consider employment opportunities resulting from such development. It is not considered that the assessment should be an onerous process.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.9

CommentID: WED58

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add fox hunts and shooters to the list of recreational groups.

SKDC Response:
It is not considered appropriate, or desirable, to include a definitive list of recreational groups.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.9

CommentID: WED124

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add fox hunts and shooters to the list of recreational groups.

SKDC Response:
See comment for WED58

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.9

CommentID: WED203

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add hunters and shooters to the list of recreational groups. Also 4x4 and motorcycle off road users

SKDC Response:
See comment for WED58

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
605225 Ms Jane Bateman		Socio-economics 3.8.9

CommentID: WED322

Nature of Response: Objecting

Reasons:
I do not think that horse-riders, mountain bikers and 4x4 off-road users need to be consulted in relation to wind turbines. These groups have a detrimental affect on land use.

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted, however, this is a personal opinion and cannot justify a change to the text.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Socio-economics 3.8.9

CommentID: WED377

Nature of Response: Objecting

Reasons:
While support the need for proper consultation, the paragraph does not identify the potential for proposals to be unacceptable, suggesting instead that consultation will address the impacts.

Changes to the draft that you consider necessary:
The SPD should make it clear that consultation should be carried out to assess whether a wind energy development of any scale may have a detrimental impact on the enjoyment of the local countryside by any user who visits for recreational or leisure purposes. Any development that detracts from the "quiet" countryside amenity should be referred to as likely to attract a refusal of planning permission for this reason.

SKDC Response:
The acceptability, or otherwise, of any proposals for wind turbine development, will be determined by reference to all the issues under consideration. These include the potential impacts of the proposed development on the landscape and on the amenity of users of the countryside.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Socio-economics 3.8.9

CommentID: WED486

Nature of Response: Commenting

Reasons:
Practice shows that some recreational groups do not wish to interact – it is reasonable to give them notices of the Consultation events that will be undertaken so they can then engage in the process.

Changes to the draft that you consider necessary:
In the 1st sentence after "energy developers" introduce "should take into consideration".

SKDC Response:
No change: it is acknowledged that some groups may not respond to consultations. However, it is considered important that their views are sought.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Socio-economics 3.8.10

CommentID: WED551

Nature of Response: Objecting

Reasons:
The text provided appears to misinterpret advice provided within the PPS22 Companion guide. The two key paragraphs from the Companion guide, that should be referenced, are:
56. The British Horse Society, following internal consultations, has suggested a 200 metre exclusion zones around bridle paths to avoid wind turbines frightening horses. Whilst this could be deemed desirable, it is not a statutory requirement, and some negotiation should be undertaken if it is difficult to achieve this.
57. Similarly, there is no statutory separation between a wind turbine and a public right of way. Often, fall over distance is considered an acceptable separation, and the minimum distance is often taken to be that the turbine blades should not be permitted to oversail a public right of way.
The inclusion of an encouragement of four times tip height distance from National Trails and three times tip height from other routes, including roads, is therefore not supported.
The sentence in Para 3.8.10 'PPS22 Companion Guide recommends that the total height of a turbine (to blade tip) plus 10% is considered an acceptable separation distance from public rights of way' is a mistaken quotation. This appears to be referencing Para 51 in the Companion guide (quoted in full below for clarity) which deals with 'safety' generally and is not specific to public rights of way. The paragraphs in the companion guide that are specific to public rights of way and bridleways are Para 56 and 57 as quoted above and it should be these that are discussed in the SPD to ensure consistency with national guidance.
51. The minimum desirable distance between wind turbines and occupied buildings calculated on the basis of expected noise levels and visual impact will often be greater than that necessary to meet safety requirements. Fall over distance (i.e. the height of the turbine to the tip of the blade) plus 10% is often used as a safe separation distance.

Changes to the draft that you consider necessary:
Replace paragraph 3.8.10 with:
"'There are no statutory separation distance to public rights of way and bridleways. However, PPS22 Companion Guide provides the following advice:
 The British Horse Society, following internal consultations, has suggested a 200 metre exclusion zone around bridle paths to avoid wind turbines frightening horses. Whilst this could be deemed desirable, it is not a statutory requirement, and some negotiation should be undertaken if it is difficult to achieve this (Para 56).
 Often, fall over distance is considered an acceptable separation, and the minimum distance is often taken to be that the turbine blades should not be permitted to oversail a public right of way (Para 57).
Delete 'Wind turbines shall be located at a distance equivalent to at least the height of the turbine plus 10% from any rights of way. In the case of bridleways there should be a minimum separation distance of 200m, with the aim of achieving a distance of three times the overall height of any turbine' from Box 24.

SKDC Response:
The PPS22 Companion Guide remains extant following the publication of the National Planning Policy Framework in March 2012. It is accepted that, as drafted, the wording of paragraph 3.8.10 and Box 24 do not refelct the Companion Guide advice as clearly as it could and that a rewording to clarify this would be appropriate. However, it is also considered appropratie to draw attentiion to the later advice published by the British Horse Society

Recommended Changes:
Amend wording of paragraph 3.8.10 to read: 'There is no statutory minimum separation between a wind turbine and public right of way or bridleways. The PPS22 Companion guide recommends that the total height of the turbine (to blade tip) is considered an acceptable separation distance from public rights of way (this is called the 'falling over' measurement) with the minimum distance often being taken to be that the turbine blades do not overhang a public right of way. In the case of bridleways, the PPS22 Companion Guide refers to a 200 metre exclusion zone around bridle paths to avoid frightening horses suggested by the British Horse Society (BHS) but that some negotiation should be undertaken if this is difficult to achieve. The BHS published advice on bridleways and wind farms in 2013 (add link as footnote), which states that as a starting point when assessing a site and its potential layout a separation distance of four times the overall turbine height should be applied for National Trails and Ride UK routes, as these are likely to be used by equestrians unfamiliar with turbines, and a distance of three times overall height from all other routes, including roads, with the minimum distance of 200m advised in the PPS22 Companion Guide being seen as the minimum, where it is shown in a particular case that this would be acceptable.'
Amend last two sentences of Bpx 24 to read: 'Wind turbines shall be located at a distance equivalent to at least the height of the turbine from any rights of way. In the case of bridleways a distance of three times the overall height of any turbine should be the starting point with a minimum separation distance of 200m where this would be difficult to achieve.

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics 3.8.11

CommentID: WED59

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Include requirement to assess the potential effect on the hospitality businesses in the area. (e.g. weddings).

SKDC Response:
See comment for WED196 (paragraph 3.8.8)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics 3.8.11

CommentID: WED125

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Include requirement to assess the potential effect on the hospitality businesses in the area. (e.g. weddings).

SKDC Response:
See comment for WED196 (paragraph 3.8.8)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics 3.8.11

CommentID: WED204

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Include requirement to assess the potential effect on the hospitality businesses in the area. (e.g. weddings).

SKDC Response:
See comment for WED196 (paragraph 3.8.8)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Socio-economics 3.8.11

CommentID: WED428

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Include requirement to assess the potential effect on hospitality businesses in the area. (e.g. weddings).

SKDC Response:
See comment for WED196 (paragraph 3.8.8)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Socio-economics 3.8.11

CommentID: WED589

Nature of Response: Commenting

Reasons:
The effect on Tourism (Section 3.8.11) should include the associated hospitality and leisure industries, such as those hosting wedding receptions and shoots. These employ many local people directly (e.g. beaters, catering, ground-staff) and indirectly (e.g. contractors, accommodation).

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED196 (paragraph 3.8.8)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics Box 24

CommentID: WED60

Nature of Response:

Reasons:

Changes to the draft that you consider necessary:
In second sentence change 'likely' to 'possible' so sentence reads: 'Where recreational impacts are possible, the relevant user groups shall be consulted ...'

SKDC Response:
Agree proposed change

Recommended Changes:
Amend 2nd sentence of Box 24 to read: "Where recreational impacts are possible, the relevant user groups shall be consulted, ..."

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Socio-economics Box 24

CommentID: WED61

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In last sentence add '(including roads and other rights of way for horse riders' so sentence reads: 'In the case of bridleways (including roads and other rights of ways for horse riders), there should ...'

SKDC Response:
No change: it is not considered that the suggested wording would add anything to the meaning.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics Box 24

CommentID: WED126

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 2nd sentence add 'possible' so sentence reads:
'Where recreational impacts are possible; the relevant user groups shall be consulted…'

SKDC Response:
See comment for WED60

Recommended Changes:
See change for WED60

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Socio-economics Box 24

CommentID: WED127

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In final sentence add '(including roads and other rights of way for horse riders' so sentence reads:
'In the case of bridleways (including roads and other rights of way for horse riders), there should….'

SKDC Response:
See comment for WED61

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics Box 24

CommentID: WED205

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In 2nd sentence add 'possible' so sentence reads: 'Where recreational impacts are possible; the relevant user groups shall be consulted ..'

SKDC Response:
See comment for WED60

Recommended Changes:
See change for WED60

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Socio-economics Box 24

CommentID: WED206

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In final sentence add '(including roads and other rights of way for horse riders' so sentence reads: 'In the case of bridleways (including roads and other rights of way for horse riders), there should ..'

SKDC Response:
See comment for WED61

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Socio-economics Box 24

CommentID: WED368

Nature of Response: Supporting

Reasons:

Support the need for proposals to be accompanied by an assessment of social and economic impacts, but wish to see a review of the distances referred to in respect of separation from bridleways, as 200m is not sufficient.

Changes to the draft that you consider necessary:

Separation distance of 200m should be reviewed and a greater distance proposed that will adequately protect users of bridleways, particularly riders and their horses.

SKDC Response:

The distances referred to in Box 24 and paragraph 3.8.10 are those included in the PPS22 Companion Guide, which remains extant guidance, and also non-statutory advice issued by the British Horse Society. Given the source of these distances a review of them would not be justified.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Socio-economics Box 24

CommentID: WED427

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

Amend: 'Where recreational impacts are POSSIBLE the relevant user groups shall be consulted…'
Amend: 'In the case of bridleways (including roads and other rights of way for horse riders), there should….'

SKDC Response:

See comments for WED60 and WED61

Recommended Changes:

See change for WED60

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Socio-economics Box 24

CommentID: WED487

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

At end of 2nd sentence delete the words "and tourism" and after recreation insert "uses".

SKDC Response:

No change proposed, as drafted the wording reflects the guidance in the proceeding paragraphs.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Socio-economics Box 24

CommentID: WED488

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Delete last sentence

SKDC Response:
See comment for WED551 (paragraph 3.8.10)

Recommended Changes:
See change for WED551

Consultee	Agent	Consultation Point
714597 Louise Barrett		Shadow Flicker 3.9

CommentID: WED513

Nature of Response: Commenting

Reasons:
Do not think it is acceptable for homes near to wind turbines to be required to block out natural light through tree planting and blinds to prevent the harmful effects of flicker. In addition think that the Council should take steps to identify vulnerable residents and take steps to protect their health. Believe that there have been a number of studies carried out that suggest that the flicker effect has a very significant effect on local residents and cannot be mitigated by tree planting and blinds

Changes to the draft that you consider necessary:

SKDC Response:
The SPD quotes Government guidance which states that shadow flicker will not occur beyond ten times the rotor diameter. The SPD should refer to Government guidance as opposed to other research studies.
It should be noted, that the National Society for Epilepsy states that 1 in 131 people suffer from epilepsy during their lifetime, and about 5% of this group will have photosensitive epilepsy. Flashing or flickering at frequencies between 3–30 Hz are the most common form of photic stimuli known to cause photo-epileptic seizures: large commercial turbines have rotation speeds that result in frequencies below 2 Hz.
Any mitigation measures for shadow flicker would need to be agreed with the homeowner

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714273 Vikki Hoole reVOLT		Shadow Flicker 3.9

CommentID: WED590

Nature of Response: Commenting

Reasons:
Flicker effects (Section 3.9) are not confined to when the blades interrupt the direct path between the sun and homes (shadow flicker). The rotation of the blades and the flash/flicker from them can also affect health, especially (we understand) for autistic children and some people with epilepsy and other neurological conditions. The national guidance may mitigate the effects of shadow flicker, although blocking natural light through tree planting or the use of blinds is not acceptable. However, this guidance will not necessarily prevent the other affects listed above. A study into the effects of flicker on epilepsy7 showed that the impact can be far more wide ranging than catered for by the current guidance.
The council should identify potentially vulnerable residents and take steps to protect their health. Again, in lieu of any reliable, enforceable guidance, mandatory separation distances may be the only way to protect public health.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED513

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Shadow Flicker 3.9.4

CommentID: WED62

Nature of Response: Commenting

Reasons:
However, a study into shadow flicker and strobing effects on epilepsy by the Neurosciences Institute, Aston University showed that seizure risk does not decrease significantly until the distance from turbines exceeds 100 times the hub height.
There have also been reports of autistic people, particularly children, being affected by the rotating blades well beyond the immediate shadow zone.

Changes to the draft that you consider necessary:
In 4th line add 'less likely to' so sentence reads: '... shadow flicker is less likely to occur beyond 800m ...'

SKDC Response:
See comment for WED513 (section 3.9)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Shadow Flicker 3.9.4

CommentID: WED128

Nature of Response: Commenting

Reasons:
A study into shadow flicker and strobing effects on epilepsy by the Neurosciences Institute, Aston University showed that seizure risk does not decrease significantly until the distance from turbines exceeds 100 times the hub height.
There have also been reports of autistic people, particularly children, being affected by the rotating blades well beyond the immediate shadow zone.

Changes to the draft that you consider necessary:
In final sentence add 'less likely' so sentence reads:

'.. shadow flicker is less likely to occur beyond 800m…'

SKDC Response:
See comment for WED513 (section 3.9)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711472 Mrs Pamela MacAllister		Shadow Flicker 3.9.4

CommentID: WED197

Nature of Response: Commenting

Reasons:
4th line '--- shadow flicker will not occur beyond 800m'. This is a misleading statement as a study into shadow flicker and strobing effects on epilepsy by the Neurosciences Institute, Aston University showed that seizure risk does not decrease significantly until the distance from turbines exceeds 100 times the hub height.
There have also been reports of autistic people, particularly children, being affected by the rotating blades well beyond the immediate shadow zone.

Changes to the draft that you consider necessary:
reword 4th line --shadow flicker is less likely to occur beyond 800m

SKDC Response:
See comment for WED513 (section 3.9)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Shadow Flicker 3.9.4

CommentID: WED207

Nature of Response: Commenting

Reasons:
A study into shadow flicker and strobing effects on epilepsy by the Neurosciences Institute, Aston University showed that seizure risk does not decrease significantly until the distance from turbines exceeds 100 times the hub height. There have also been reports of autistic people, particularly children, being affected by the rotating blades well beyond the immediate shadow zone.

Changes to the draft that you consider necessary:
In final sentence add 'less likely' so sentence reads: '.. shadow flicker is less likely to occur beyond 800m..'

SKDC Response:
See comment for WED513 (section 3.9)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Shadow Flicker 3.9.4

CommentID: WED426

Nature of Response: Objecting

Reasons:
Flicker effects are not confined to when the blades interrupt the direct path between the sun and homes (shadow flicker). The rotation of the blades and the flash/flicker from them can also affect health, especially for autistic children and some people with epilepsy and other neurological conditions.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED513 (section 3.9)

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Shadow Flicker 3.9.6

CommentID: WED63

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
At end of first sentence add '(including the gardens of homes and schools).

SKDC Response:
Shadow flicker only occurs inside buildings where the flicker appears through a narrow window opening. It is therefore not appropriate to include reference to gardens.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Shadow Flicker 3.9.6

CommentID: WED129

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In first sentence add '(including the gardens of homes and schools) so it reads:
'.....occupied buildings (including the gardens of homes and schools).'

SKDC Response:
See comment for WED63

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Shadow Flicker
3.9.6

CommentID: WED208

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In first sentence add '(including the gardens of homes and schools) so it reads: '...occupied buildings (including the gardens of homes and schools).'

SKDC Response:
See comment for WED63

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Shadow Flicker
3.9.6

CommentID: WED424

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
'Occupied buildings' should include gardens.

SKDC Response:
See WED63

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Shadow Flicker
3.9.7

CommentID: WED64

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In first sentence delete 'signifcant'

SKDC Response:
Although in some cases shadow flicker may only occur for a few minutes in a year which is not a significant impact, deleting 'significant' would remove uncertainty as to whether shadow flicker should be mitigated or not.

Recommended Changes:
In first sentence of paragraph 3.9.7 amend to read: “Where shadow flicker …”

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Shadow Flicker 3.9.7

CommentID: WED65

Nature of Response: Commenting

Reasons:

2nd bullet - It is not acceptable to require residents to close blinds, or to plant trees with the intention of blocking natural light from homes.

Changes to the draft that you consider necessary:

SKDC Response:

Mitigation measures would be discussed and agreed with the residents of properties. It would be for them to discuss what is acceptable or not.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Shadow Flicker 3.9.7

CommentID: WED130

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

In first sentence delete 'significant'

SKDC Response:

See comment for WED64

Recommended Changes:

See change for WED64

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Shadow Flicker 3.9.7

CommentID: WED131

Nature of Response: Commenting

Reasons:

2nd bullet - It is not acceptable to require residents to close blinds, or to plant trees with the intention of blocking natural light from homes.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED65

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
711191 Mrs Vikki Hoole		Shadow Flicker 3.9.7

CommentID: WED141

Nature of Response: Objecting

Reasons:
How can it be reasonable to expect residents to screen their properties from flicker using planting or by closing blinds, when this will also impact on their residential amenity - daylight, sunsets, views of open skies etc?

Changes to the draft that you consider necessary:
Turbines should not be sited where flicker could affect any properties.

SKDC Response:
See comment for WED65

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Shadow Flicker 3.9.7

CommentID: WED209

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In first sentence delete 'significant'

SKDC Response:
See comment for WED64

Recommended Changes:
See change for WED64

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Shadow Flicker 3.9.7

CommentID: WED210

Nature of Response: Commenting

Reasons:
2nd bullet - It is not acceptable to require residents to close blinds, or to plant trees with the intention of blocking natural light from homes.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED65

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
693648 Mrs Vikki Hoole		Shadow Flicker 3.9.7

CommentID: WED367

Nature of Response: Objecting

Reasons:
"screening affected properties through tree/ shrub planting or the use of blinds" is not acceptable mitigation. Why should people have to close their blinds or block their views?

Changes to the draft that you consider necessary:
Remove reference to screening affected properties through tree/ shrub planting or the use of blinds as being an acceptable mitigation measure.

SKDC Response:
See comment for WED65

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Shadow Flicker 3.9.7

CommentID: WED425

Nature of Response: Objecting

Reasons:

Changes to the draft that you consider necessary:
It is not acceptable to require residents to close blinds, or to plant trees with the intention of blocking natural light from homes.

SKDC Response:
See comment for WED65

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714397 Mr Robert Thornton		Shadow Flicker 3.9.7

CommentID: WED452

Nature of Response: Objecting

Reasons:
People should not have to install blinds or grow vegetation to protect themselves from the dibilitating effect of shadow flicker. It contavenes their human rights to have to exclude sunlight from their properties. Blinds do not work when you are sitting in your garden!

Changes to the draft that you consider necessary:
Remove the line regarding vegetation and blinds. Turbines should be positioned to ensure that shadows cast by revolving blades do not fall on peoples' dwellings.

SKDC Response:
See comments for WED65 and WED63

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713530 Mr Andrew Jenkins		Shadow Flicker 3.9.8

CommentID: WED334

Nature of Response: Objecting

Reasons:
findings published in the British Medical Journal1 and upholding their duty of care to residents. The research confirmed that those living within 2km of industrial wind farms are at risk of:
• Sleep disturbance
• Headaches
• Ringing or buzzing in the inner ear
• Ear pressure, leading to vertigo
• Nausea
• Tachycardia
Reference British Medical Journal, 8th March 2012, Hanning and Evans, Leicester University Hospital and Queens University Belfast.

Changes to the draft that you consider necessary:
There should be a separation of at least 2km between medium and large scale wind turbines and any inhabited property

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Shadow Flicker 3.9.10

CommentID: WED66

Nature of Response: Commenting

Reasons:
The scrutiny of the impact on residents within 2km of a proposed site (para 3.20) should include screening for residents with neurological conditions which might include particular sensitivity to all types of wind turbine flicker. These effects (which will vary with the turbine design as well as medical factors) should be assessed on a case by case basis.

Changes to the draft that you consider necessary:

SKDC Response:
It would be inappropriate to undertake neurological screening of residents as suggested by the representation.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Shadow Flicker 3.9.10

CommentID: WED132

Nature of Response: Commenting

Reasons:

The scrutiny of the impact on residents within 2km of a proposed site (para 3.20) should include screening for residents with neurological conditions which might include particular sensitivity to all types of wind turbine flicker. These effects (which will vary with the turbine design as well as medical factors) should be assessed on a case by case basis.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED66

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Shadow Flicker 3.9.10

CommentID: WED211

Nature of Response: Commenting

Reasons:

The scrutiny of the impact on residents within 2km of a proposed site (para 3.20) should include screening for residents with neurological conditions which might include particular sensitivity to all types of wind turbine flicker. These effects (which will vary with the turbine design as well as medical factors) should be assessed on a case by case basis.

Changes to the draft that you consider necessary:

SKDC Response:

See comment for WED66

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
713530 Mr Andrew Jenkins		Shadow Flicker Box 25

CommentID: WED333

Nature of Response: Objecting

Reasons:

findings published in the British Medical Journal1 and upholding their duty of care to residents. The research confirmed that those living within 2km of industrial wind farms are at risk of:

- Sleep disturbance
- Headaches
- Ringing or buzzing in the inner ear
- Ear pressure, leading to vertigo
- Nausea

• Tachycardia
Reference British Medical Journal, 8th March 2012, Hanning and Evans, Leicester University Hospital and Queens University Belfast.

Changes to the draft that you consider necessary:
There should be a separation of at least 2km between medium and large scale wind turbines and any inhabited property

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714280 Mr Roger Kingscott		Shadow Flicker Box 25

CommentID: WED423

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
The council should identify potentially vulnerable residents and take steps to protect their health. In lieu of any reliable, enforceable guidance, mandatory separation distances may be the only way to protect public health.

SKDC Response:
See comments for WED513

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
26104 Mr M Herbert Brown & Co		Shadow Flicker Box 25

CommentID: WED489

Nature of Response: Commenting

Reasons:
This really should be reworded because the emphasis appears to be on not putting turbines within 10 rota diameters even where this may not be appropriate and is proven through technical information supplied. As indentified before, there is not always flicker within a 10 rota diameter and this should be evaluated by consultation and reports and the policy emphasis should be changed.

Changes to the draft that you consider necessary:
Suggest a rewording along the lines of:
Where large and medium scale developments are located within 10 rota diameters away from potentially affected properties the effects will be considered and appropriate mitigation measures should be put in place to reduce or eliminate the effects to an acceptable level. For small scale developments, whether this requirement would apply would be at the reasonable discretion of South Kesteven District Council.

SKDC Response:
Agree current wording is unclear. Change wording of box 25 as suggested.

Recommended Changes:
Reword box 25 to read:
Where large and medium scale developments are located within 10 rotor diameters away from potentially affected properties the possible shadow flikcer effects will be investigated and appropriate

mitigation measures shall be put in place to reduce or eliminate the effects to an acceptable level. For small scale developments, the application of this requirement will be at the reasonable discretion of South Kesteven District Council.

Consultee	Agent	Consultation Point
703308 Squadron Leader Neal Henley Civil Aviation Authority		Aviation 3.10

CommentID: WED2

Nature of Response: Commenting

Reasons:

Although East Midlands Airport is outside of South Kesteven, wind turbine developments within the district have the potential to impact upon the Air Traffic Control radar located at East Midlands airport and therefore they should be included in the list of consultees.

Changes to the draft that you consider necessary:

Amend the wording of Box 26 to read: 'Consultation shall be undertaken with the CAA, MOD, NATS, East Midlands Airport and the owners/operators of private landing areas for all proposed wind turbines 11m to blade tip or taller. Developers shall seek to address any potential impacts on aviation interests prior to a planning application being submitted.'

SKDC Response:

Agree proposed change

Recommended Changes:

Amend the wording of Box 26 to include reference East Midlands Airport

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Aviation 3.10.1

CommentID: WED67

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:

Amend end of first sentence to read: '.... additional collision and turbulence risk to low and slow flying aircraft.'

SKDC Response:

The CAA have been consulted on this SPD and have made no comment or raised any concern about turbulence risk to low flying aircraft. This issue is not therefore considered to be of significance to aviation.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Aviation 3.10.1

CommentID: WED133

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Amend end of 1st sentence to read:
'...additional collision and turbulence risk to low and slow flying aircraft'

SKDC Response:
See comment for WED67

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Aviation 3.10.1

CommentID: WED212

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Amend end of 1st sentence to read: '...additional collision and turbulence risk to low and slow flying aircraft'

SKDC Response:
See comment for WED67

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
711810 Mr Sacha Rossi NATS		Aviation 3.10.3

CommentID: WED219

Nature of Response: Commenting

Reasons:
The proforma is no longer used by NATS and all LPA consultations should be directed to NATS preferable by e-mail.

Changes to the draft that you consider necessary:
Change reference regarding use of proforma by NATS.

SKDC Response:
Agree proposed change

Recommended Changes:
Reword last two sentances of this paragraph to read:
'Consultation with the CAA, MOD and DAP shall be conducted using a standard Renewables UK (formerley BWEA) proferma (see below) which is submitted to the MOD who consults its various departments as well as the CAA. NATS should be consulted seperately preferably to its email address.'

Consultee	Agent	Consultation Point
711810 Mr Sacha Rossi NATS		Aviation 3.10.4

CommentID: WED220

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Applicants should be referred to the NATS FAQ document.

SKDC Response:
Agree proposed change

Recommended Changes:
Add to the end of the paragraph: 'Further information is available from the NATS FAQ document on its web site.'

Consultee	Agent	Consultation Point
711810 Mr Sacha Rossi NATS		Aviation 3.10.7

CommentID: WED222

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
In Sources of Further Information update reference to NATS website.

SKDC Response:
Agree proposed change

Recommended Changes:
Update NATS website address

Consultee	Agent	Consultation Point
710811 Miss Nicola Bell RWE Npower Renewables Ltd (RWE NRL)		Aviation 3.10.7

CommentID: WED552

Nature of Response: Objecting

Reasons:
Impacts on aircraft and/or radar are often mitigated through technical mitigation. The types of mitigation described in Para 3.10.7 is misleading in that it infers that mitigation can only be achieved by alterations to the turbine height, location and spacing, which is not always the case.

Changes to the draft that you consider necessary:
Add ‘or through technical mitigation’ to the end of the first sentence in Para 3.10.7.

SKDC Response:
Agree proposed change.

Recommended Changes:
Add "or through technical mitigation" to end of first sentance of 3.10.7

Consultee | **Agent** | **Consultation Point**

711810 Mr Sacha Rossi
NATS

Aviation
Box 26

CommentID: WED221

Nature of Response:

Reasons:
As per the Safeguarding Direction 2002, NATS must be consulted by LPAs on ALL wind turbine applications in the UK. Please refer to the UK map for wind turbine development attached. Applicants seeking pre-application advice should refer to NATS's guidance FAQs and the NATS website.

Changes to the draft that you consider necessary:

SKDC Response:
Update text

Recommended Changes:
Amend wording of first sentence of Box 26 to refer to NATS being consulted on all wind turbine applications.

Consultee | **Agent** | **Consultation Point**

472273 Mr John Hannam
Colsterworth and District Parish Council

Telecommunications
3.11.1

CommentID: WED68

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add bullet about interference with mobile phone and data services.

SKDC Response:
Agree proposed change.

Recommended Changes:
At end of 2nd bullet point add following:' including mobile phone and data services.'

Consultee | **Agent** | **Consultation Point**

26373 Mrs Gillian Wilson
Stubton Parish Council

Telecommunications
3.11.1

CommentID: WED134

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add bullet about interference with mobile phone and data services.

SKDC Response:
See comment for WED68

Recommended Changes:
See change for WED68

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Telecommunications
3.11.1

CommentID: WED213

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add bullet about interference with mobile phone and data services.

SKDC Response:
See comment for WED68

Recommended Changes:
See change for WED68

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Telecommunications
3.11.1

CommentID: WED422

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add bullet about interference with mobile phone and data services.

SKDC Response:
See comment fort WED68

Recommended Changes:
See change for WED68

Consultee
605225 Ms Jane Bateman

Agent

Consultation Point
Telecommunications
3.11.3

CommentID: WED325

Nature of Response: Objecting

Reasons:
Wind turbines are preferable to mobile phone masts. This para is too negative in terms of wind turbines.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted, but no change proposed

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
649840 Miss Philippa Brown Fulbeck Parish Council		Telecommunications 3.11.6

CommentID: WED605

Nature of Response: Commenting

Reasons:
SKDC already suffers from many "black spots" for mobile signals and broadband reception. It is essential SKDC ensures that this will not be made any worse before any wind turbines are erected, not after.

Changes to the draft that you consider necessary:

SKDC Response:
The need to consult with relevant operators to identify potential affects and for appropriate mitigation is already highlighted in this section. However, a change to the wording of Box 27 is proposed to emphasise this applies to all except micro proposals.

Recommended Changes:
In Box 27 amend first sentence to read: “For all wind energy schemes (except micro-generation schemes) developers must undertake consultation …..”

Consultee	Agent	Consultation Point
372057 Mr Peter Beever Rutland County Council		The Application Process 4

CommentID: WED310

Nature of Response: Objecting

Reasons:
The document does not include any reference to consultation and liaison with neighbouring local authorities when considering planning applications. This is considered to be important given the "duty to cooperate" with neighbouring authorities and the possibilities that proposals for wind turbines could affecting neighbouring areas, given their potential size and scale.

Changes to the draft that you consider necessary:
Include reference to consultation a with neighbouring local authorities when considering planning applications for wind turbines.

SKDC Response:
Agree proposed addition

Recommended Changes:
Add into the table at 4.1:
Neighbouring Local Authorities (including as appropriate depending on the location of a proposal: Rutland CC; Peterborough City Council; South Holland District Council; North Kesteven DC; Newark and Sherwood DC; Melton Borough Council; Lincolnshire County Council; Nottinghamshire County Council; Northamptonshire County Council; Cambridgeshire County Council)

Consultee	Agent	Consultation Point
703325 Mr John Halton		The Application Process 4

CommentID: WED613

Nature of Response: Commenting

Reasons:
Due to the size of wind turbines they can be viewed from a considerable distance. it may be that a wind farm developer can select an appropriate site in South Kesteven, however, its impacts could cause demonstrable harm to occupants and heritage assets in neighbouring authorities. It is therefore advisable to ensure that in addition to the scoping opinion the wind farm developer enters into

pre-application discussions with the various authorities prior to submitting an application.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED310

Recommended Changes:
See change for WED310

Consultee	Agent	Consultation Point
714270 Mrs W McCallin Westborough & Dry Doddington Parish Council		The Application Process 4.1.1

CommentID: WED356

Nature of Response: Commenting

Reasons:
Table 4.1 The Parish council feel that the National trust should be included in the consultee list.

Changes to the draft that you consider necessary:
Table 4.1 The Parish council feel that the National trust should be included in the consultee list.

SKDC Response:
Agree. It is proposed to add the National Trust to Table 4.1

Recommended Changes:
Add National Trust to table in 4.1 as a non-statutory consultee

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Consenting Mechanisms 4.2.5

CommentID: WED298

Nature of Response: Supporting

Reasons:
The Lincolnshire Wildlife Trust supports the inclusion of assessments of grid connections within the EIA.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Consenting Mechanisms 4.2.5

CommentID: WED490

Nature of Response: Commenting

Reasons:
There may be situations where it is inappropriate and not possible to determine the route of the connection to the electricity Grid and it would not be unreasonable for this to be, on occasions, treated as a separate process.

Changes to the draft that you consider necessary:

SKDC Response:
Information on the grid connection route or different options for the grid connection route should be included and an assessment should be undertaken of whether this route is likley to have a significant environmental impact. The grid connection does however form a seperate application. No change to wording.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
703325 Mr John Halton		Consenting Mechanisms 4.2.5

CommentID: WED615

Nature of Response: Commenting

Reasons:
In order to avoid a network of lengthy overhead cables it is important that wind farm developers consider sites close to the National Grid.

Changes to the draft that you consider necessary:

SKDC Response:
Developers will do this where possible anyway due to the costs involved in connecting to the grid.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
714593 Anne Casey RSPB		Environmental Impact Assessment (EIA) 4.3

CommentID: WED504

Nature of Response: Commenting

Reasons:
This section should be referred to more clearly at the start of Chapter 3 to make the link between EIA and the key items relating to siting and design in 3.2 to 3.11.

Changes to the draft that you consider necessary:

SKDC Response:
Agree, the proposed change would introduce the need for EIA earlier in the document and a change to this effect is proposed in response to another representation (WED494 - paragraph 3.1.1).

Recommended Changes:
See change for WED494

Consultee	**Agent**	**Consultation Point**
26136 Yana Bosseva Renewable UK		Environmental Impact Assessment (EIA) 4.3

CommentID: WED560

Nature of Response: Commenting

Reasons:

Under existing legislation, wind farm applicants are required to conduct an Environmental Impact Assessment (EIA). This process is designed to identify and assess the potentially significant environmental, social or economic effects likely to result from a development proposal. As a well established part of the planning process, transposed from the 1997 EU EIA Directive, the EIA process and the resulting Environmental Statement will be given detailed consideration in assessing the individual merits of a wind farm application.

This statutory assessment, conducted in parallel with detailed local consultation (including local communities, Councillors, planners and other stakeholders) at an early stage in the pre-application phase is designed to ensure that potentially significant adverse effects are mitigated for each specific application and area. During the formal assessment of a planning application, each potential planning constraint will then be assessed at a project specific level and the extent of each constraint clearly justified through the EIA process. RenewableUK supports this approach under which Local Authorities make decisions on a case-by-case basis, in line with trusted policy and guidance.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Environmental Impact Assessment (EIA) 4.3.5

CommentID: WED299

Nature of Response: Supporting

Reasons:

The Lincolnshire Wildlife Trust supports the requirement for all developments to carry out ecological surveys even when EIA is not required.

Changes to the draft that you consider necessary:

SKDC Response:

Comments noted.

Recommended Changes:

n/a

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Environmental Impact Assessment (EIA) 4.3.7

CommentID: WED69

Nature of Response: Commenting

Reasons:

The Rochdale Envelope is routinely used for the convenience of developers but is only officially recognised in relation to offshore wind turbines. Furthermore, this concession seems to conflict with the guidance in para 3.7.14 (box 23). Developers should be required to nominate a turbine model for noise assessment purposes. The applicant should have the flexibility to request a subsequent change to another turbine with better noise and/or generation performance, provided that other characteristics are no worse than those assessed. A developer wishing to exercise this flexibility should ensure that all possible characteristics of the final choice (height, blade length, noise etc) are assessed on a worse case basis.

Changes to the draft that you consider necessary:

SKDC Response:

The Rochdale Envelope has been widely used for offshore wind energy developments but also other developments throughout the UK. National Policy Statement EN 1- Energy states:

"In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case. Where some details are still to be finalised the ES should set out, to the best of the applicant's knowledge, what the maximum extent of the proposed development may be in terms of site and plant specifications, and assess, on that basis, the effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed."
The SPD does conflict in the advice. Agree that the assessment should be based on a worse case assessment.

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
26373 Mrs Gillian Wilson Stubton Parish Council		Environmental Impact Assessment (EIA) 4.3.7

CommentID: WED135

Nature of Response: Commenting

Reasons:
The Rochdale Envelope is routinely used for the convenience of developers but is only officially recognised in relation to offshore wind turbines. Furthermore, this concession seems to conflict with the guidance in para 3.108 (bold text). Developers should be required to nominate a turbine model for noise assessment purposes. The applicant should have the flexibility to request a subsequent change to another turbine with better noise and/or generation performance, provided that other characteristics are no worse than those assessed. A developer wishing to exercise this flexibility should ensure that all possible characteristics of the final choice (height, blade length, noise etc) are assessed on a worse case basis.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED69

Recommended Changes:
n/a

Consultee	**Agent**	**Consultation Point**
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Environmental Impact Assessment (EIA) 4.3.7

CommentID: WED214

Nature of Response: Commenting

Reasons:
The Rochdale Envelope is routinely used for the convenience of developers but is only officially recognised in relation to offshore wind turbines. Furthermore, this concession seems to conflict with the guidance in para 3.108 (bold text). Developers should be required to nominate a turbine model for noise assessment purposes. The applicant should have the flexibility to request a subsequent change to another turbine with better noise and/or generation performance, provided that other characteristics are no worse than those assessed. A developer wishing to exercise this flexibility should ensure that all possible characteristics of the final choice (height, blade length, noise etc) are assessed on a worse case basis.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED69

Recommended Changes:
n/a

Consultee
693648 Mrs Vikki Hoole

Agent

Consultation Point
Environmental Impact Assessment (EIA)
4.3.7

CommentID: WED369

Nature of Response: Objecting

Reasons:
Rochdale Envelope is only applicable to offshore wind turbines. There is no coast line in South Kesteven District Council.

Changes to the draft that you consider necessary:
Remove reference to Rochdale Envelope.

SKDC Response:
See comment for WED69

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Environmental Impact Assessment (EIA)
4.3.7

CommentID: WED421

Nature of Response: Objecting

Reasons:
The Rochdale Envelope is routinely used for the convenience of developers but is only officially recognised in relation to offshore wind turbines. Furthermore, this concession seems to conflict with the guidance in para 3.7.14. Developers must have a candidate turbine model in mind as they finalise their environmental, operational and financial plans, so this should be declared with any application. If a more efficient, quieter model subsequently becomes available, SKDC has the power to vary any planning consent.

Changes to the draft that you consider necessary:
Developers should be required to nominate a turbine model for noise assessment purposes. The applicant should have the flexibility to request a subsequent change to another turbine with better noise and/or generation performance, provided that other characteristics are no worse than those assessed. A developer wishing to exercise this flexibility should ensure that all possible characteristics of the final choice (height, blade length, noise etc) are assessed on a worse case basis.

SKDC Response:
Agree. Developers will undertake the noise assessment with a specific turbine, and this should be the worse case scenario - it is not appropriate to restrict developers to the use of this turbine alone, but the final turbine used should be no worse than the turbine used for the assessment.

Recommended Changes:
n/a

Consultee
714273 Vikki Hoole
reVOLT

Agent

Consultation Point
Environmental Impact Assessment (EIA)
4.3.7

CommentID: WED591

Nature of Response: Commenting

Reasons:
We do not think it is acceptable for developers to specify a 'Rochdale Envelope'. This is only intended to be used for offshore wind farms. Developers must have a candidate turbine model in mind as

they finalise their environmental, operational and financial plans, so this should be declared with any application. If a more efficient, quieter model subsequently becomes available, SKDC has the power to vary any planning consent.

Changes to the draft that you consider necessary:

SKDC Response:
See comments for WED69

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Habitats Regulations Assessment 4.5.7

CommentID: WED300

Nature of Response: Commenting

Reasons:
In addition to the European sites mentioned above, we would consider that there could be potential for impacts from wind energy developments within South Kesteven (particularly through direct mortality of qualifying bird species) on the Humber Estuary SPA and The Wash SPA. Habitats Regulations Assessment would need to be carried out for any proposed development which may impact on the interest features of an SPA (or SAC or Ramsar site), no matter how far away the development may physically be from the designated site.

Changes to the draft that you consider necessary:

SKDC Response:
Para 4.5.8 sets out the circumstances where scoping and an Appropriate Assessment would be required in accordance with the Habitats Regulation. This requirement has to be reasonable and will depend on the significance of the potential impact on the reason for the designation of the European site. No change required.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
713800 Mr Michael Worth	713774 Mr Robert Doughty RDC Ltd	Consultation 4.6.1

CommentID: WED370

Nature of Response: Supporting

Reasons:
Support the need to consult the general public, but would wish to see a requirement for proper consultation to demonstrate support from the local community prior to a planning application being submitted. At the very least an assessment of changes to a proposal to address local concerns should accompany an application where agreement on all matters could not be reached.

Changes to the draft that you consider necessary:
A box should be added to deal with local community consultation, perhaps with a requirement for all proposals of turbines of 15m or higher to include a Statement of Community Involvement to demonstrate local people have been consulted and engaged prior to a planning application being submitted.

SKDC Response:
Agree that these suggestions would be beneficial and would help the planning application process. Suggest that an additional box is inserted which recommends that planning applications for wind turbines are accompanied by a statement of community consultation which includes a table showing how proposals have been changed to address local concerns and where agreement on all matters has not been reached. This will aid the consideration of a proposal by all parties.

Recommended Changes:
Add following words into a new box:

Planning Applications for large and medium scale developments should be submitted together with a statement of community involvement setting out how the community has been consulted on a proposal and what the outcome of this consultation was. This should include reference to the comments made through consultation and how the submitted proposal has sought to address concerns, or where agreement has not been reached on matter arising from consultation. The submission of a statement of community involvement for small scale developments will be at the discretion of the Planning Authority.

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Consultation 4.6.2

CommentID: WED70

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add National Trust to Table 4.1

SKDC Response:
Agree proposed change although as not all proposals will impact on National Trust interests this should be qualified to 'where relevant'.

Recommended Changes:
Add new row to Table 4.1 to read: National Trust - Landscape, Heritage and Nature Conservation Interests (where relevant)

Consultee	Agent	Consultation Point
26373 Mrs Gillian Wilson Stubton Parish Council		Consultation 4.6.2

CommentID: WED136

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add National Trust to Table 4.1

SKDC Response:
See comment for WED70

Recommended Changes:
See change for WED70

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Consultation 4.6.2

CommentID: WED215

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
Add National Trust to Table 4.1

SKDC Response:
See comment for WED70

Recommended Changes:
See change for WED70

Consultee
475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent

Consultation Point
Consultation
4.6.2

CommentID: WED301

Nature of Response: Commenting

Reasons:
We are pleased to act as a non-statutory consultee on wind energy developments. Comments will be provided in line with our statement on provision of planning responses and our wind energy policy, both of which can be downloaded from our website here: http://www.lincstrust.org.uk/conservation/article.php?id=5

Changes to the draft that you consider necessary:

SKDC Response:
Comments noted.

Recommended Changes:
n/a

Consultee
26221 Mr Alan Hubbard
The National Trust

Agent

Consultation Point
Consultation
4.6.2

CommentID: WED344

Nature of Response: Objecting

Reasons:
It is considered that the list of non-statutory consultees should be amended to include National Trust having regard to its heritage and nature conservation interests, and in particular its significant property interests in South Kesteven at Belton House and Park, Grantham House and Woolsthorpe Manor.

Changes to the draft that you consider necessary:
Add a new row to Table 4.1:
National Trust : Landscape, Heritage and Nature Conservation Interests

SKDC Response:
See comment for WED70

Recommended Changes:
See change for WED70

Consultee
703308 Squadron Leader Neal Henley
Civil Aviation Authority

Agent

Consultation Point
Planning Conditions
4.7.4

CommentID: WED3

Nature of Response: Commenting

Reasons:
There is an international civil aviation requirement for all structures of 300 feet (91.4 metres)* or more to be charted on aeronautical charts. However, on behalf of other non-regulatory aviation stakeholders, in the interest of Aviation Safety, the CAA requests that any feature/structure 70 feet in height, or greater, above ground level is notified to the Defence Geographic Centre ICGDGC-ProdAISAFDb@mod.uk, including the location(s), height(s) (maximum blade tip height for wind turbines) and lighting status of the feature/structure, the estimated and actual dates of construction and the maximum height of any construction equipment to be used, at least 6 weeks prior to the start of construction, to allow for the appropriate notification to the relevant aviation communities.

Changes to the draft that you consider necessary:
Add another 'typical condition' along the lines of 'For developments 70 feet in height, or greater, above ground level notify the Defence Geographic Centre of the location(s), height(s) (maximum blade tip height for wind turbines) and lighting status of the structure, the estimated and actual dates of construction and the maximum height of any construction equipment to be used, at least 6 weeks prior to the start of construction, to allow for the appropriate notification to the relevant aviation communities.'

SKDC Response:
Agree reference to this should be added although as the detailed wording of conditions is not set out in this section the wording suggested should be summarised

Recommended Changes:
Add new bullet point to read: "Notification to Defence Geographic Centre (for developments 21.3metres in height, or greater, above ground level) of the location(s), height(s) and lighting status of the structure, the estimated and actual dates of construction and the maximum height of any construction equipment to be used"

Consultee	Agent	Consultation Point
711191 Mrs Vikki Hoole		Planning Conditions 4.7.4

CommentID: WED142

Nature of Response: Objecting

Reasons:
There is nothing here about minimum separation distances. I believe that SKDC has a duty of care to protect residents. There is a considerable body of peer-reviewed evidence demonstrating that, event at ETSU 97 compliant noise levels, sleep can be severely impacted for residents living close to industrial wind turbines.
Lincolnshire County Council has a wide experience of wind farms and recommends separation distances and has offered support for district councils in this respect. Nick Boles, Grantham MP and Planning Minister, has said that he recommends SKDC adopt the same stance as Lincoln County Council. Stephen Phillips MP said in parliament that 'surely minimum separation distances are appropriate'.

Changes to the draft that you consider necessary:
To include appropriate separation distances between utility scale wind farms (even if not individual turbines) and residential houses. Or at least include the option to impose such separation distances on a case by case basis.

SKDC Response:
See comment for WED143 (general section) on separation distances.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Planning Conditions 4.7.4

CommentID: WED302

Nature of Response: Commenting

Reasons:
The Lincolnshire Wildlife Trust would support the use of ecological conditions as described above. In some instances, monitoring of operational impacts on birds or bats may indicate that the

development is impacting on a sensitive population. It may therefore be necessary to be able to implement a reactive condition which would limit operation of the turbine(s) to certain times of day or year. It may also be appropriate to include conditions relating to habitat enhancement as well as species mitigation.

Changes to the draft that you consider necessary:

SKDC Response:
The list of conditions is just a sample of potential conditions that could be used. The proposal to limit use of turbines to certain times of year etc.is likely to be unacceptable to wind farm developers and seen to be overly restrictive. The implementation of a HMP could be applied as a condition or S106 agreement as appropriate.

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26277 Jenny Young Heritage Trust for Lincolnshire		Planning Conditions 4.7.4

CommentID: WED308

Nature of Response: Commenting

Reasons:
It would be more appropriate to remove the phrase 'watching brief'

Changes to the draft that you consider necessary:
An alternative phrase to use would be 'an archaeological scheme of works may be required'. This provides flexibility if during the assessment stage, remains are recorded which warrant further investigation if redesign of turbine base is not feasible.

SKDC Response:
Agree, for the reasons outlined in the representation, to the proposed change. This would necessitate separating ecology and archaeology into two bullet points

Recommended Changes:
Amend 4th bullet point to read: “watching brief – i.e. need for ecologist to be present …”
Add new bullet point to read: “an archaeological scheme of works - i.e. programme of archaeological work in accordance with a written scheme of investigation”

Consultee	Agent	Consultation Point
472273 Mr John Hannam Colsterworth and District Parish Council		Planning Obligations 4.8.2

CommentID: WED71

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet - add ‘including reduction in property value, loss of business income, damage to health or loss of amenity’.

SKDC Response:
Reduction in property value etc. is not a material planning consideration.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Planning Obligations
4.8.2

CommentID: WED137

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet - add 'including reduction in property value, loss of business income, damage to health or loss of amenity'.

SKDC Response:
See comment for WED71

Recommended Changes:
n/a

Consultee
26332 Mr Andrew Anderson
Hough on the Hill Parish Council

Agent

Consultation Point
Planning Obligations
4.8.2

CommentID: WED216

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet - add 'including reduction in property value, loss of business income, damage to health or loss of amenity.'

SKDC Response:
See comment for WED71

Recommended Changes:
n/a

Consultee
714280 Mr Roger Kingscott

Agent

Consultation Point
Planning Obligations
4.8.2

CommentID: WED419

Nature of Response: Commenting

Reasons:

Changes to the draft that you consider necessary:
2nd bullet - add 'including reduction in property value, loss of business income, damage to health or loss of amenity'.

SKDC Response:
See comment for WED71

Recommended Changes:
n/a

Consultee
649840 Miss Philippa Brown
Fulbeck Parish Council

Agent

Consultation Point
Planning Obligations
4.8.2

CommentID: WED606

Nature of Response: Commenting

Reasons:
This should include devaluation of property and lowering of house prices and/or loss of business to local residents together with any health issues that may arise.

Changes to the draft that you consider necessary:

SKDC Response:
See comment for WED71

Recommended Changes:
n/a

Consultee
472273 Mr John Hannam
Colsterworth and District Parish Council

Agent

Consultation Point
Planning Obligations
4.8.3

CommentID: WED72

Nature of Response: Commenting

Reasons:
Once consented, wind farm leases are often sold on, such that the landowner, leaseholder and operating company may be legally separate bodies. Planning agreements should make clear which of these bodies is responsible for the conditions attached to any consent, and any other liabilities arising from the construction / operation / decommissioning of the site.

Changes to the draft that you consider necessary:

SKDC Response:
Planning conditions run with the land and Section 106 obligations pass with succession of title, therefore all matters which are controlled through planning conditions and S106 agreements will be continue to be controlled (and therefore enforceable) regardless of who owns or operates a facility. No change necessary.

Recommended Changes:
n/a

Consultee
26373 Mrs Gillian Wilson
Stubton Parish Council

Agent

Consultation Point
Planning Obligations
4.8.3

CommentID: WED138

Nature of Response: Commenting

Reasons:
Once consented, wind farm leases are often sold on, such that the landowner, leaseholder and operating company may be legally separate bodies. Planning agreements should make clear which of these bodies is responsible for the conditions attached to any consent, and any other liabilities arising from the construction / operation / decommissioning of the site.

Changes to the draft that you consider necessary:

SKDC Response:
See response to WED72

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26332 Mr Andrew Anderson Hough on the Hill Parish Council		Planning Obligations 4.8.3

CommentID: WED217

Nature of Response: Commenting

Reasons:
Once consented, wind farm leases are often sold on, such that the landowner, leaseholder and operating company may be legally separate bodies. Planning agreements should make clear which of these bodies is responsible for the conditions attached to any consent, and any other liabilities arising from the construction / operation / decommissioning of the s

Changes to the draft that you consider necessary:

SKDC Response:
See response to WED72

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
475706 Miss Clare Sterling Lincolnshire Wildlife Trust		Planning Obligations 4.8.3

CommentID: WED303

Nature of Response: Supporting

Reasons:
We support the need for provision to be included for management and monitoring of habitats covered by S106 agreements.

Changes to the draft that you consider necessary:

SKDC Response:
Comment noted

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
714280 Mr Roger Kingscott		Planning Obligations 4.8.3

CommentID: WED418

Nature of Response: Commenting

Reasons:
Once consented, wind farm leases are often sold on, such that the landowner, leaseholder and operating company may be legally separate bodies.

Changes to the draft that you consider necessary:
Planning agreements should make clear which of these bodies is responsible for the conditions attached to any consent, and any other liabilities arising from the construction / operation / decommissioning of the site.

SKDC Response:
See comment for WED72

Recommended Changes:
n/a

Consultee	Agent	Consultation Point
26104 Mr M Herbert Brown & Co		Appendix 1

CommentID: WED491

Nature of Response: Commenting

Reasons:
At the first paragraph it should be page 20 not 18 as indicated. We would also question the benefit of supplying this information when clearly there is no adopted policy framework or evidence to support the separation distances. If people read this they may feel that this is indicative of what generally is expected when clearly the case is unproven. Each situation needs to be considered on its merits and Parliament has not legislated on this subject.

Changes to the draft that you consider necessary:
Suggest that 3.2.15 on page 20 is deleted as well as Appendix 1.

SKDC Response:
As the Milton Keynes separation distances referred to have been the subject of a successful recent High Court challenge it would be appropriate for the Appendix to be deleted.

Recommended Changes:
Delete Appendix 1

Consultee **Agent**

711810 Mr Sacha Rossi
NATS

CommentID: SWT1

Nature of Response: Commenting

Reasons:
NATS has no comments to make.

SKDC Response:
Noted.

Consultee **Agent**

235539 Mr Clifford Bacon
Clipsham Parish Meeting

CommentID: SWT2

Nature of Response: Supporting

Reasons:
Our view is that the definition of a small turbine should mean a turbine no higher than 30 metres to tip of blade, for exactly the reasons that have been expressed.

SKDC Response:
Comments noted.

Consultee **Agent**

749722 Mr Martin Webster

CommentID: SWT3

Nature of Response: Supporting

Reasons:
Agree, and even at 30 metres these turbines are really very large and visually unattractive.

SKDC Response:
Comments noted.

Consultee **Agent**

750248 Mr Malcolm Cooke

CommentID: SWT4

Nature of Response: Supporting

Reasons:
It is agreed that wind turbines even at 30 metres can be a substantial structure and do indeed require specific consideration

SKDC Response:
Comments noted.

Consultee **Agent**

26184 Mrs Wendy McCallin
Foston Parish Council

CommentID: SWT5

Nature of Response: Supporting

Reasons:
'Foston Parish Council agrees that the definition of the turbine classification should be altered.
For example the suggested 30 metres for the upper height limit for a small turbine is still relatively tall and equivalent to a 10 storey building and likely to be taller than many Parish Churches. A turbine of 30 metres would be considerable taller than our Parish Church of St Peter that stands at 17 metres. We would suggest 20 metres would be a more realistic height for a small turbine classification and even at that height it would tower over our Church.
We would suggest small scale up to 20 metres.
medium scale from over 20 to 50 metres and
large scale from over 50 metres
(50 metres is equivalent to a 16 storey building which is a very large structure not likely to be lost in any landscape)'

SKDC Response:

Consultee **Agent**

26373 Mrs Gillian Wilson
Stubton Parish Council

CommentID: SWT6

Nature of Response: Supporting

Reasons:
We are supportive of the proposal to designate small wind turbines as a maximum of 30 metre height to the tip of the blade.

SKDC Response:
Comments noted.

Consultee **Agent**

26329 Ms R Woolley
Braceborough & Wilsthorpe Parish Council

CommentID: SWT7

Nature of Response: Commenting

Reasons:
The Parish Council do not intend to make any futher representation with regard to this consultation.

SKDC Response:
Noted.

Consultee **Agent**
714397 Mr Robert Thornton

CommentID: SWT8

Nature of Response: Supporting

Reasons:
Because a 49m wind turbine is not 'small'.

SKDC Response:
Comments noted.

Consultee **Agent**
714270 Mrs W McCallin
Westborough & Dry Doddington Parish Council

CommentID: SWT9

Nature of Response: Supporting

Reasons:
The Parish Council agrees that the defintion of the turbine classification should be altered. We feel the size should be in proportion with our historic assets, the churches that dominate our local skylines. Most churches locally are 20-25 metres approximately. We would suggest:
small scale up to 20 metres
medium scale from 20 to 50 metres
large scale from over 50 metres

SKDC Response:
Comments noted.

Consultee **Agent**
714630 Mr David Smith

CommentID: SWT10

Nature of Response: Commenting

Reasons:
Feel that at 50m/155ft to refer to a wind turbine as small is a crying shame, even to re-categorise small down to 30m/93ft is still not "small" most of our parish churches would then be regarded has having small towers. Our churches are dominant in a landscape of homes that barely extend over 15m/46ft. Bring small down to 15m and then a small domestic turbine would be considered as such, whereas anything above that height becomes commercial and "medium".

SKDC Response:
Comments noted.

Consultee **Agent**
605225 Ms Jane Bateman

CommentID: SWT11

Nature of Response: Objecting

Reasons:

In my view more should be done to encourage wind turbines to be built and reducing the definition of small wind turbines to up to 30m will result in more scrutiny of proposals and will be detrimental.

SKDC Response:

Comments noted.

Consultee **Agent**

26352 Ms Rosemary H Woolley
Baston Parish Council

CommentID: SWT12

Nature of Response: Commenting

Reasons:

The Parish Council decided that the definition of small scale wind turbines should be reduced to up to 15 metres in height (to blade tip).

SKDC Response:

Comments noted.

Consultee **Agent**

752250 Mrs Sharon Milne
Allington Parish Council

CommentID: SWT13

Nature of Response: Supporting

Reasons:

Allington Parish Council believes that it is right, for the purposes of the SDP, to change the definition of small scale wind turbines from 50m in height to 30m (to blade tip). A turbine of 30m can still significantly dominate the landscapes and affect the environment. Parish Councillors would also like to see this change made retrospectively however it accepts that it is unlikely.

SKDC Response:

Comments noted.

Consultee **Agent**

752530 Mr Robert Eburne
Wincrop Ltd

CommentID: SWT14

Nature of Response: Objecting

Reasons:

Windcrop Ltd. has submitted a number of comments on the draft SPD in November 2012. Several of these comments raise issues which clearly demonstrates that the SPD is excessively precautionary in respect of the information and planning requirements for individual micro scale and small scale wind turbines.
Since the closure of the consultation the Government has consulted on a series of measures entitled 'Streamlining the Planning Process' (January 2013) which proposes to amend Article 29 of the Development Management Procedure Order to include new conditions on the information local planning authorities can request from applicants. The changes impose a requirement that:
- information requests should be reasonable having regard to the nature and scale of the proposed development and
- information requests should relate to matters that it is reasonable to think will be a material consideration in the determination of a planning application

Furthermore LPAs are now statutorily required to provide statements with planning decisions ot demonstrate that they have worked with the applicant in a positive and proactive way.
The NPPF at policies 193 and 153 seeks to require only information which is relevant, necessary an material to the application. SPDs shoud be used where they can help applicants to make successful

applications and should not be used to add unnecessarily to the financial burdens on development.
In totality the draft SPD is disproportionate in its approach to very small scale and mirco wind projects proposing individual turbines. The planning issues and impacts pertaining to a 15m turbine mast are minimal but the SPD makes little distinction between this proposal and a mast 2 or 3 times taller. The reduction in the definition of small scale is a move in the right direction but the definition is wrong. The Windcrop proposal is for a 15m high mast with a 5.5m diameter blade. This sits beneath the threshold for EIA and the projects involve providing renewable energy direct to rural enterprises. The reduction in the definition from 50m to 30m totally fails to capture very small scale wind turbines into the policy context in a proportionate way.
The SPD must be further revised to recognise the rural enterprise and community benefits of very small scale projects (less than 20m in height) which are currently considered in the same context as significantly larger projects. To use an analogy, a planning officer would not be expected to use the same detailed planning and validation critieria when considering a 15 storey block of flats and a bungalow. This change is in effect asking for the same criteria to apply to a 10 storey building and a single storey building. It remains a disproportionate document which deviates from the positive planning policy of the NPPF towards renewable energy and to small scale projects.

SKDC Response:
Comments noted. However, the Council considers that the document provides guidance to ensure the impacts of wind turbine development are addressed satisfactorily.

Consultee **Agent**
715711 Cllr Charmaine Morgan

CommentID: SWT15

Nature of Response: Supporting

Reasons:
Support proposal to reduce the wingspan of a small wind turbine to 30m height. I would argue that this could be even lower.

SKDC Response:
Comments noted.

Consultee **Agent**
26360 Mrs J Ingle
Welby Parish Council

CommentID: SWT16

Nature of Response: Supporting

Reasons:
Welby Parish Council are in agreement with the draft proposal.

SKDC Response:
Comments noted.

Consultee **Agent**
472273 Mr John Hannam
Colsterworth and District Parish Council

CommentID: SWT17

Nature of Response: Objecting

Reasons:
The Parish Council makes the following observatoins:
a. It is interesting to note that 2 applications have been submitted for 2 turbines which sit side by side in the field, north of Honeypot Lane next to the A1. I have been advised by Lenton Parish Meeting (who have been fighting the siting of a wind turbine) that submitting separate planning applications for individual turbines is standard practice and can hide the total number of turbines they will want

to install on the site in the long term.... once 1 is allowed it is easier to get more, and 1 or 2 turbines in an application are not subject to the rigorous Environmental Impact Assessments that a larger scale installation requires. I understand there is an application for a 3rd turbine in the pipeline but I don't know where the proposed site for that is for that.
b. The applications are for 50m high turbines. Nationally classed as small turbines and therefore not subject to the more rigorous assessments for noise, landscape and visual impact etc. However, SKDC is just doing a consultation exercise about restricting the size of the small turbine classification to 30m high. These applications should not be treated as small if they are going to set a limit of 30m for the small category and therefore should be subject to full Environmental Impact Assessments (EIAs).
c. The turbines will be visible from N Witham & Colsterworth, particularly the Bourne Rd area and most particularly from the property that is 350 ms away, just up the A1. Have SKDC consulted with them and other nearby properties?
d. Noise.... Renewables UK Good Practice Guidance says any noise level above 45db within 1.5kms can be highly intrusive. The wind turbine application noise assessment says levels will be around 100db (but I don't really understand the full report). The good guidance says main roads will cause much more noise and mask the noise of turbines. This will no doubt apply to the property 350m away.
e) Wind direction. The noise from the turbines would be more apparent to local population depending on the wind directions. We know this from the traffic noise from the A1 when the wind is coming from the north or east. SKDC need to take this into account.

SKDC Response:
Comments noted, however, it appears that they relate to a recent scoping opinion request. The respondent has been advised of this and that the Parish Council will be consulted when a planning application(s) are submitted.

Consultee
26154 Mrs N Jacobs
Bourne Town Council

Agent

CommentID: SWT18

Nature of Response: Supporting

Reasons:
The Highways & Planning Committee of Bourne Town Council unanimously resolved to support the change to the definition of small wind turbine to 30 metres in height (from 50m).

SKDC Response:
Comments noted.

Consultee
713800 Mr Michael Worth

Agent
713774 Mr Robert Doughty
RDC Ltd

CommentID: SWT19

Nature of Response: Supporting

Reasons:
Support the proposed change to the definition of a small turbine. It is agreed that small turbines can have significant impact on the local landscape; the impact can be equally significant in terms of impacts on local ecology and heritage assets. Furthermore, the height of the turbine is only one factor in determining the likely impact, as the specific location is just as likely to determine this.

SKDC Response:
Comments noted.

Consultee
517670 Natural England
Natural England

Agent

CommentID: SWT20

Nature of Response: Supporting

Reasons:
Would welcome proposed change to the definition of small wind turbines because it would result in stronger management of these structures and potentially result in less impact on the landscape.

SKDC Response:
Comments noted.

Consultee **Agent**
754157 Mr Andrew Jenkins

CommentID: SWT21

Nature of Response: Supporting

Reasons:
Support the change to reduce the height of small wind turbines from 50m to 30m as 50m height is too large for the landscape of South Kesteven and would allow developments of an unacceptable scale

SKDC Response:
Comments noted.

Consultee **Agent**
755216 Mrs Elizabeth Naeem

CommentID: SWT22

Nature of Response: Supporting

Reasons:
Support the proposal that the definition of small scale wind turbine should be reduced to up to 30m.
This does not mean though that every wind turbine application of 30m would be acceptable in any given location. Our attractive landscape is precious to local people and the marrring of it by revolving industrial like structures which confer no benefit on local inhabitants but rather impoverishes them is not appropriate. Applications for small scale wind turbines would still require careful consideration.

SKDC Response:
Comments noted.

Consultee **Agent**
26302 Mrs M.T.D Cooke
Castle Bytham Parish Council

CommentID: SWT23

Nature of Response: Supporting

Reasons:
The Parish Council has no objections to the the definition of small scale wind turbines being reduced.

SKDC Response:
Comments noted.

Consultee **Agent**
372928 Mr Tom Gilbert-Wooldridge
English Heritage

CommentID: SWT24

Nature of Response: Commenting

Reasons:

Thank you for consulting English Heritage on a proposed revision to the Wind Energy SPD. Our comments on the original draft SPD (dated 30 November 2012) remain valid and we hope changes will be made to the final SPD based on our comments. In terms of the proposed revision, we would like to make the following observations:

We note that the revision consists of redefining small wind turbines as being up to 30 metres in height rather than up to 50 metres. It would be helpful if the draft SPD could have been amended to show the proposed revision in track changes, in order for consultees to quickly see how the revision affects the document.

We have no objections to the proposed revision, which would mean that turbine proposals between 30 and 50 metres would be subject to greater information requirements and assessment as medium-sized turbines rather than small ones. Although the guidance in the landscape and historic environment sections of the draft SPD does not distinguish between different sizes of turbines, one would assume that turbines over 30 metres in height would be subject to greater scrutiny in terms of their impact on landscape and heritage assets.

However, care needs to be taken to avoid the assumption that any turbine under 30 metres is automatically less harmful; a small turbine in the wrong location could cause substantial harm to heritage assets. There is also the issue of cumulative impact; several small turbines in the same location could have considerable effects on the landscape and historic environment.

Furthermore, the design of the turbine can be an important consideration regardless of height; any turbine on a solid column will be more intrusive than one placed on a pylon or scaffold structure. The SPD will need to be future-proofed against technological advances in wind energy, which may see different designs and sizes in the future. New materials, for example, allow larger blades to sit on smaller supports, with different and potentially more harmful impacts.

We hope that the above comments are of assistance.

SKDC Response:

Comments noted.

Consultee **Agent**

260326 Mrs M Ford
Market Deeping Town Council

CommentID: SWT25

Nature of Response: Commenting

Reasons:

All wind turbines, regardless of size, should be subject to stringent planning scrutiny.

SKDC Response:

Comments noted.

Consultee **Agent**

714593 Anne Casey
RSPB

CommentID: SWT26

Nature of Response: Commenting

Reasons:

There is no clear reason as to why the Council initially chose 50m to blade tip to define "small" and there is still no clear reason as to why a change to 30m to blade tip should be defined as "small".

There are many different reasons as to why the height of a wind turbine has an impact on birds. These include hunting heights, flying heights and mating display heights. These all differ between species.

The RSPB suggests that the council should take a more precautionary approach when considering what their guidance specifies in relation to ‘small’ turbines. Based on this we would consider that the definition of ‘small’ in the context of the SPD should be up to 15m to hub height to make it consistent with Schedule 2 of the EIA Regulations for England. This then removes the need for the Council to define what may or may not need an EIA for those applications that fall between EIA regulations requirements and South Kesteven’s lower limit of the definition of "small".

However the location of any turbine, regardless of height, is a significant factor in determining the level of assessment required and the level of impact created.

We would strongly recommend that the combination of height and location, as well as regulatory requirements, are used to determine whether an EIA will be required. Height, alone, should not be used as the key factor to decide on the level of assessment appropriate for an application.
The RSPB made a number of suggested changes to the SPD that relate to small turbines in our letter dated 30 November 2012. These will still apply even with a change to the definition of "small' turbine".

SKDC Response:
Comments noted, however, the Council does not solely rely on height in determining the need for an EIA.

Consultee **Agent**

26136 Yana Bosseva
Renewable UK

CommentID: SWT27

Nature of Response: Supporting

Reasons:
RenewableUK supports the proposed change. The table below includes RenewableUK's definitions of micro, small and medium scale wind turbines.
Definition of micro, small and medium wind turbines
Power(kw) Annual energy production (kWh) Total height(m)
Micro 0-1.5 Up to 1,000 10-18
Small 1.5-50 Up to 200,000 15-35
Medium 50-500 Up to 1,800,000 25-55
The table above indicates that, for RenewableUK's purposes, small turbines are between 15 and 35m in total height. Ideally, the Council's definition should be aligned with this and should define small wind turbines as up to 35m in height (to blade tip).

SKDC Response:
Comments noted.

Consultee **Agent**

490730 Mr Alan Hubbard
The National Trust

CommentID: SWT28

Nature of Response: Supporting

Reasons:
National Trust notes the refinement proposed in relation to turbine sizes and in general terms supports what in practice would be a little more sophisticated approach than that set out in the consultation version of the SPD, with the consequent additional level of information/scrutiny that would apply.
The Trust is aware that turbines of more than 30 metres in height to blade tip can still have a range of impacts that require appropriate assessment, including in particular their visual impacts upon heritage and landscape resources. Nonetheless turbines that are less than 30 metres tall can of course still result in visual impacts that require careful assessment, in particular when prominently sited, e.g. in an exposed location, or where proposed close to designated sites. Similarly it will still always be necessary to consider cumulatively impacts that occur either as a result of multiple turbines being proposed in a single application or where an additional turbine is proposed close to existing installed/permitted/proposed turbines - including turbines less than 30 metres tall to blade tip.
So whilst National Trust does not disagree with, and indeed generally supports, the proposed approach in principle, it will always be the case that individual proposals will require individual assessment, including in determining the particular level of information required to enable adequate review of the proposed development having regard to the particular sensitivities of the site in question and its surroundings.

SKDC Response:
Comments noted.

Consultee **Agent**

703308 Squadron Leader Neal Henley
Civil Aviation Authority

CommentID: SWT29

Nature of Response: Commenting

Reasons:

The CAA do not have a specific definition for small, medium or large turbines; however, what is being proposed by South Kesteven District Council seems entirely reasonable and we would welcome any amendment that gives more attention to wind turbine planning applications.

SKDC Response:

Comments noted.

Appendix 4: Proposed Changes to Draft Wind Energy SPD

Note: The proposed changes are expressed in the form of strikethrough for ~~deletions~~ and underlining for additions of text

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
1.1.2	3	Amend first and second sentences of paragraph 1.1.2 to read: "The SPD does not form part of the Development Plan but is a material consideration in the determination of wind energy planning applications in the area. It supports the positive implementation of Development Plan Polices EN1 ….."	RWE Npower Renewables (RWE) (WED528)
1.3.2	4	In first sentence of paragraph 1.3.2 delete ~~[this section will be updated once the consultation is completed].~~ Amend 2nd bullet point to read: "formal consultation on the draft SPD ~~[to be updated once the consultation is completed – This will refer to statement of consultation – how consultees comments were taken on board etc]~~ took place between 19th October and 30th November 2012. A further consultation on amending the definition of small wind turbines was undertaken between the 5th April and 3rd May 2013. The responses to the consultations and how the draft SPD was amended before adoption to respond to the issues raised are set out in the Statement of Consultation."	SKDC
1.3.3	4	At end of paragraph 1.3.3 add: "Over time guidance documents referred to in this SPD may be revised or replaced and the most up to date version of the guidance documents should be used when they are published."	Brown & Co (WED461)
2.2.3	6	From end of 5th sentence amend paragraph 2.2.3 to read: "~~The following table outlines the typical scales of turbine and their potential output (in terms of installed capacity) and height (to the tip of the turbine blades in meters). Please note that t~~There can be considerable variations in turbine heights and outputs depending on the make and manufacture of the machine used. For the purpose of this SPD the scale of turbine set out in Table 2.1 will be used. ~~Table 2.1 shall therefore only be used as an approximate guide.~~"	BHATS (WED235); Billingborough Parish Council (WED251); Mr A Saunders (WED305); responses to consultation on definition of small wind turbine
Table 2.1	6	Amend 3rd and 4th lines of Table 2.1 to read: Small 1.5 – 50kW up to approximately ~~50~~ 30m Medium 50kW – 1MW ~~50~~ 30-100m	BHATS (WED235); Billingborough Parish Council (WED251); Mr A Saunders (WED305); responses to

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
			consultation on definition of small wind turbine
2.2.5	6	In 2nd sentence delete "~~report~~" and replace with "SPD"	SKDC
2.2.7	7	In 4th bullet point under paragraph 2.2.7 delete '~~which is generally removed after construction~~'	RWE (WED523)
2.2.8	7/8	Delete 4th and 5th sentences of paragraph 2.2.8: ~~Where planning permission is required from South Kesteven District Council for transmission lines, then a planning application for these must be submitted at the same time as the application for the wind turbines. If planning permission is not required from the District Council details should be submitted for information~~	RWE (WED524); Brown & Co (WED456)
2.3.2	8	At end of last sentence of paragraph 2.3.2 add: "… come from onshore wind contributing towards the security of the overall energy supply."	Renewable UK (WED554)
2.4.4	9	Amend second sentence of paragraph 2.4.4 to read: "The fundamental need for renewable ~~and wind energy~~ is therefore clearly…."	Colsterworth & District PC (WED15); Stubton PC (WED80); Hough on the Hill PC (WED149) Mrs P McAllister (WED191); Mr R Kingscott (WED402); Foston PC (WED566)
2.4.6	10	Before last sentence of paragraph 2.4.6 add: "These Statements are likely to be a material consideration in decision making on planning applications with a generating capacity below 50MW. Whether and to what extent the Statements are a material consideration will be judged on a case by case basis."	RWE (WED525)
2.4.9	12	Delete penultimate sentence and amend final sentence of paragraph 2.4.9 to read: ~~The LCA currently includes a broad brush assessment of the sensitivity of seven character areas to wind energy development~~ On adoption of the SPD, the Council ~~intends to~~ rescinded those sections of the LCA that referred to the...."	SKDC
2.4.10	12	"Lincolnshire County Council adopted a Wind Energy Position Statement in June 2012. ~~Position Statement on Wind Farms in May 2010 (Executive 4 May 2010, Decision reference 01722). The statement has since been updated in May 2012 on the recommendation of Lincolnshire's Environmental Scrutiny Committee which was concerned about the proliferation of wind energy developments in the County.~~ The position statement states that wind farms	SKDC

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
		will only be acceptable if they meet more stringent conditions on landscape and visual impact, residential amenity and impact on the historic and natural environment. Following local consultation, the County Council formally adopted the Position Statement as its policy towards the location of wind farm development in the county in February 2013."	
2.4.11	12	Amend first sentence of paragraph 2.4.11 to read: "~~The~~ Lincolnshire County Council ~~Position Statement does not form part of the Development Plan and therefore is not a material consideration in the determination of a planning application in South Kesteven~~ is not the local planning authority for wind turbine development and, as such, has no ability to make planning statements or policy. Instead, it provides clarification of the County's opinion and how it will respond to consultations on planning applications or the development of relevant Local Plan policies."	SKDC
New paragraph before 3.1.2	13	Add new paragraph before 3.1.2 : "Medium to large scale wind turbine proposals may be required to prepare an Environmental Impact Assessment (EIA) under the EIA regulations. An EIA will assess the potential impact of the proposal on all identified relevant matters such as landscape, biodiversity; telecommunications etc. The scope of an EIA will be established by the District Council and the applicant as part of a Scoping stage (where this is requested) before the EIA is prepared to ensure that all relevant matters are considered. Chapter 4 provides more information about the EIA process and how it applies to development proposals."	RSPB (WED494 & WED504)
3.1.3	14	Delete paragraph 3.1.3	SKDC
3.1.4	14	At end of first sentence in paragraph 3.1.4 add: ", in addition to the development plan and other material considerations."	Brown & Co (WED458); RWE (WED527)
3.2.1	14	Under paragraph 3.2.1: Amend 1st bullet point to read: "Impact on ~~the site as a result of the loss of~~ existing landscape features ...." Amend 2nd bullet to read: "impact on landscape character, both direct ~~and indirect~~ impact on the …" Add new bullet point to read: "impact of lights on rural areas at night"	Brown & Co (WED459) Brown & Co (WED460) Barkston & Syston PC (WED269)
3.2.3	15	Add "Burghley House (II*) (part of the registered park is within the District)" to bullet point list. Add the grades for Belton (I) and Grimsthorpe (I)	English Heritage (WED386)
3.2.4	15	Amend sentence of paragraph 3.2.4 to read: "… such as Burghley House and Culverthorpe Hall"	English Heritage (WED386)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
Footnote	15	Amend first sentence of footnote 1 to read: "South Kesteven DC in conjunction with the National Trust commissioned a setting study to define and describe the visual ~~setting~~ boundary of Belton House and Park"; Amend second sentence of footnote 1 to read: ""… sensitivity of the setting to various types of development, including tall structures."	English Heritage (WED386)
3.2.6	16	Delete last part of first sentence and the second sentence of paragraph 3.2.6 to read: "Any visualisations shall be undertaken in accordance with the Landscape Institute's Advice Note 01/11. ~~And Scottish Natural heritage's Visual Representation of Wind Farms Good Practice Guidance (2006). The visual representation guidance is currently under review and update guidance should be used when published~~ .This recommends the use of a 50mm lens on SLR camera (or digital alternative). However, there is emerging practice (insert footnote reference to Highland Council guidance) for single frame views of the use of 70-75mm lens on SLR camera (or digital alternatives), as this is closer to what the human eye sees and developers will be expected to follow this in preparing their submissions for proposals within South Kesteven District. It is not the intention that this should seek additional information but rather the information be presented in a particular way. "	BHATS (WED241); Billingborough PC (WED254); Carter Jonas (WED230); Mr R Kingscott (WED406); Foston PC (WED571); revolt (WED584)
Box 1	16	Amend 2nd sentence of Box 1 to read: "The required study area for the LVIA may vary depending on the size of development proposed (see ~~Scottish Natural Heritages Visual Representation of Wind Farms Good Practice Guidance~~ Landscape Institute Advice Note 01/11 (Photography and Photomontage in Landscape Visual Impact Assessment) as a guide). Amend third sentence to read: "Information on landscape and visual impacts shall also be provided for non-EIA development. ~~including v~~Visualisations~~/photomontages~~ should be based on photography with a 70/75mm lens."	Colsterworth & District PC (WED19); Stubton PC (WED84); Hough on the Hill PC (WED153); Billingborough PC (WED255); Mr A Jenkins (WED330); RWE (WED529); RWE (WED530); Foston PC (WED572)
3.2.8	16/17	In bullet point list under paragraph 3.2.8: Amend 3rd bullet point to read: ".. rather than blade tips only - this particularly relates to large scale turbines and may be a particular consideration...." Amend 5th bullet point to read: "consider siting turbines in locations in close proximity to industrial areas, infrastructure corridors ~~less remote areas~~ or on brownfield sites ~~e.g. locations in close proximity to main road corridors, business parks, and railways, as well as reclaimed, industrial and man-made landscapes~~"	Windcrop (WED383) Colsterworth & District PC (WED20 & 21); Stubton PC (WED85 &86); Hough on the Hill PC (WED154 &156); Mrs Hoole (WED363); Mr R Kingscott (WED407)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
		Amend 7th bullet point to read: "for large and medium scale wind energy ... (e.g. Grantham Scarp) or ~~skylines with important cultural or historic landmark features such a church spires and towers~~ where they would overwhelm important cultural or historic landmark features." Move 8th bullet point in paragraph 3.2.8 (which begins "ensure the size …") and add into bullet point list under paragraph 3.2.9.	Colsterworth & District PC (WED22); Stubton PC (WED85 &86); Hough on the Hill PC (WED154 &156)Mrs McAllister (WED193): Brown & Co (WED463) Mr R Kingscott (WED407)
Box 2	17	In 2nd sentence of Box 2 amend wording to read: " .... how the location ~~fits with~~ takes into account local landscape character .... "	Brown & Co (WED464)
3.2.9	17/18	At end of 5th bullet point under paragraph 3.2.9 add: "for medium and large wind turbines" Add 8th bullet point moved from bullet point list under paragraph 3.2.8 Amend 9th bullet point under Layout and Design of Ancillary Features to read: "grid connections shall be underground wherever reasonably possible." At end of 10th bullet point (under Layout and Design of Ancillary Features) add: "(see section 3.10 Aviation) Add new bullet point (under list headed Layout and Design of Ancillary Features) to read: "Where impact to ecology and/or ornithology is unavoidable, mitigation should be implemented and the habitats concerned should be reinstated and, wherever possible, enhanced post-construction."	Windcrop (WED432) Mr R Kingscott (WED407) Brown & Co (WED465) CAA (WED1) Lincolnshire Wildlife Trust (WED273)
3.2.12	19	Amend 2nd bullet point under paragraph 3.2.12 to read: "…. (but also might be increased if for example only turbine tips of large and medium scale turbines ~~only~~ are visible."	Windcrop (WED437)
3.2.13	19	Amend first sentence of paragraph 3.2.13 to read: "…. in relation to properties. ~~,But the Council propose that a~~ A distance of at least …." At end of paragraph 3.2.13 add: "The study area should be agreed with the Planning Authority at the earliest	SKDC

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Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
		opportunity."	
3.2.15	20	Amend first sentence of paragraph 3.2.15 to read: "… and Milton Keynes (footnote For current status of these see http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy.htm and http://www.milton-keynes.gov.uk/planning-policy/displayarticle.asp?ID=84312) ~~(see Appendix 1).~~ Amend second sentence to read: "… examined or ~~are potentially~~ have been the subject of legal challenge by wind farm developers."	SKDC Colsterworth & District PC (WED27); Stubton PC (WED92); Hough on the Hill PC (WED164)
Box 4	20	In 3rd line replace "50m" with "30m". At end of Box 4 add: "The study area should be agreed with the Planning Authority."	SKDC
3.2.17	20	Amend beginning of second sentence of paragraph 3.2.17 to read: "Cumulative impact assessment requires a proportionate approach, tailored to the scale of turbine and should ~~shall~~ be undertaken …."	Windcrop (WED441)
3.2.18	20/21	In 3rd bullet point under 3.2.18, replace 'surrounding' with 'dominating'.	Colsterworth & District PC (WED30); Stubton PC (WED95); Hough on the Hill PC (WED167)
Box 5	21	Amend last sentence in Box 5 to read: "... as required by the EIA Regulations~~,~~. The study area will need to be agreed with the Planning Authority but may need to be …."	Brown & Co (WED467)
3.3.1	22	Insert comma after "compounds" in third sentence of paragraph 3.3.1.	Colsterworth & District PC (WED33); Stubton PC (WED98); Hough on the Hill PC (WED170)
3.3.4	22	At end of first sentence of paragraph 3.3.4 add: "as well as Local Wildlife Sites, Local Geological Sites and other sites of high biodiversity value." Amend final part of third sentence in paragraph 3.3.4 to read: "... Wildlife and Countryside Act 1981, the ~~Conservation (Natural habitats etc) Regulations 1994~~ Conservation and Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) or the Protection of Badgers Act 1992.	Natural England (WED9); Lincolnshire Wildlife Trust (WED275) RSPB (WED497); RWE (WED533)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
3.3.6	23	At end of paragraph 3.3.6 add: : "The assessment of impacts of decommissioning will be controlled through the imposition of a planning condition on a planning permission."	Lincolnshire Wildlife Trust (WED277)
3.3.8	23	At end of first sentence of paragraph 3.3.8 add: "….Ecological Impact Assessment for large and medium scale developments. Small schemes may need an assessment if there is a reasonable possibility of ecology being affected and this should be discussed and agreed with the South Kesteven Development Management team" Amend second sentence of paragraph 3.3.8 to read: "The Lincolnshire Environmental Records Centre holds information on non-statutory sites not available elsewhere and should be contacted to provide information for assessments on the presence and siting ...."	SKDC; RSPB (WED498) Windcrop (WED446)
Box 6	23	Amend Box 6 to read: "An ecological impact assessment in accordance with the IEEM guidelines shall be undertaken for large and medium scale wind energy developments. Natural England, RSPB and the South Kesteven Development Management Team shall be consulted on the scope of the assessments required. Small wind energy proposals may also require an ecological assessment to ensure there are no sensitive features affected, the scope of which should be agreed with ~~. Natural England, RSPB and~~ the South Kesteven Development Management Team ~~shall be consulted on the scope of the assessments required~~."	SKDC; RSPB (WED498); Windcrop (WED447)
3.3.9	24	Amend first sentence of paragraph 3.3.9 to read; "... within their vicinity, which will depend on the qualifying interests of the site and the nature/scale of the development, will need to ...."	Brown & Co (WED468)
3.3.10	24	Amend first sentence of paragraph 3.3.10 to read: "... will not have ~~an~~ a material adverse effect on ...". Amend second sentence to read: "... on SSSIs are avoided, minimised or mitigated against." At end of paragraph 3.3.10 add: "For local sites wind energy schemes will need to demonstrate that they will not have a material adverse effect on a Local Wildlife Site, Site of Nature Conservation Importance or other county level designation. Strict measures should be taken to ensure that harmful effects on local sites are avoided, minimised or mitigated against."	Brown & Co (WED469) Brown & Co (WED469) Lincolnshire Wildlife Trust (WED280)
3.3.12	24	At end of second sentence add: "… Action Plan and those identified as of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006."	Lincolnshire Wildlife Trust (WED282)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
3.3.13	24	In first sentence of paragraph 3.3.13 delete 'or moorlands' At end of paragraph 3.3.13 add: "Wind farm developments in close proximity to ancient woodland where, particularly in the construction phase, there may be significant adverse effects particularly along the edge of the ancient woodland may also be unacceptable."	Colsterworth & District PC (WED35); Stubton PC (WED100); Hough on the Hill PC (WED172) Woodland Trust (WED347)
Box 7	24	Amend first sentence in Box 7 to read: "... alone or cumulatively, on ~~biodiversity sites~~, statutory and non-statutorily designated nature conservation sites, habitats and species and identify measures to avoid, minimise or mitigate harm ... " Amend last sentence in Box 7 to read: "Where a scheme, alone and in combination with other plans and projects, could have an impact on an internationally designated sites, developers must ~~carry out an assessment of the likely significant effect of the scheme~~ provide the local authority with enough information on the likely significant effects of the scheme to enable the local authority to complete an assessment in accordance with the Habitats Regulations"	Lincolnshire Wildlife Trust (WED283); Brown & Co (WED470) RSPB (WED501); RWE (WED534)
3.3.15	25	At start of seventh sentence of paragraph 3.3.15 add: "Where appropriate, consultation shall be ... " At end of paragraph 3.3.15 add: "The cumulative impacts on birds must also be assessed in relation to other proposed, approved or operational wind energy schemes and other developments."	Brown & Co (WED471) SKDC
Box 8	25	At end of final sentence in Box 8 add: " ... and the British Wind Energy Association After last sentence in Box 8 add: "The cumulative impacts on birds must also be assessed in relation to other proposed, approved or operational wind energy schemes and other developments."	RWE (WED535) RSPB (WED502); RWE (WED536)
3.3.19	26	Amend first sentence of paragraph 3.3.19 to read: "All bats ~~are protected species~~ and their places of shelter are protected under UK and European legislation. A bat survey ... "	Lincolnshire Wildlife Trust (WED288)
3.3.20	26	Amend last sentence of paragraph 3.3.20 to: "… impacts on bats ~~(and birds)~~ must also .."	RWE (WED536)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
Box 9	26	Amend last sentence in Box 9 to read: "... wind energy schemes and other developments." Amend third sentence in Box 9 to read: "… impacts on bats ~~(and birds)~~ must also .."	Lincolnshire Wildlife Trust (WED290) RWE (WED536)
3.3.22	26/27	In bullet point list under paragraph 3.3.22: Amend 1st bullet point to read: "wind energy developments shall be located on less sensitive habitats and ~~shall not be directly adjacent to sites~~ impacts on sites which are designated for .... and water bodies should be minimised." Amend 2nd bullet point to read: "… from linear features, except in the case of small turbines, in accordance with …." Amend 6th bullet point to read: "impacts on birds ~~and bats~~ shall …". Add new bullet point to read: "the restoration and enhancement of surrounding habitats should be carefully considered so that sensitive species are not attracted into close proximity with turbines which may place them at risk of collision or barotrauma. Translocation of species should only be carried out as a last resort when no other options to avoid or mitigate harm are available."	 Lincolnshire Wildlife Trust (WED291) Windcrop (WED453); RWE (WED557) Lincolnshire Wildlife Trust (WED291) Lincolnshire Wildlife Trust (WED291)
3.3 Section D.	27	In 5th bullet point add reference to TIN069. Add new bullet point to read: "Bat Conservation Trust guidance 'Bat Surveys – Good Practice Guidelines 2nd Edition: Surveying for onshore wind farms'."	Lincolnshire Wildlife Trust (WED292) Lincolnshire Wildlife Trust (WED292); RWE (WED539)
3.4		Amend references to 'historic assets' to read 'heritage assets' throughout.	English Heritage (WED387)
3.4.3	29	In 2nd sub bullet point replace 'dominance' with 'prominence'.	English Heritage (WED388)
3.4.4	29	At beginning of last sentence of paragraph 3.4.4 add: "In the Fen area there is much evidence of Iron Age ….."	Billingborough PC (WED258); Spring Wells Heritage Group

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
			(WED335)
3.4.5	29	Amend last sentence of paragraph 3.4.5 to read: "… designed views that ~~may be~~ are particularly sensitive…" At end of paragraph of paragraph 3.4.5 add: "(see the Belton House and Park Setting Study)".	Colsterworth & District PC (WED38); Stubton PC (WED104); Hough on the Hill PC (WED176) Colsterworth & District PC (WED39); Stubton PC (WED105); Hough on the Hill PC (WED177); Mr R Kingscott (WED412)
3.4.7	30	In paragraph 3.4.7 update figures to read: ~~77~~ 110 Grade I, ~~196~~ 195 Grade II* and ~~1696~~ 1843 Grade II listed buildings. 2 Grade I, ~~2~~ 3 Grade II* and 5 Grade II Registered Parks and Gardens	English Heritage (WED388)
3.4.9	30	Add National Trust to bullet point list	Mrs McAllister (WED195)
3.4.13	31	Add heading before paragraph 3.4.13 to read: 'Non-physical impacts'. In second sentence of paragraph 3.4.13 replace "~~historic environment~~" with "archaeological"	English Heritage (WED390)
Box 12	31	In last sentence in Box 12 replace "~~of works~~" with "for an assessment"	Brown & Co (WED473)
3.4.15	32	Amend last sentence of paragraph 3.4.15 to read: "~~For~~ Large and medium scale wind energy developments (as defined in table 2.1) may require an assessment within 10km radius ~~an outer study area of 10km radius shall be examined~~ for significant assets ... "	Billingborough PC (WED260)
Box 13	32	Amend Box 13 to read: "The Council will expect heritage assets with theoretical visibility to or from the proposed development within 5km to be assessed for potential impacts, this to be applied flexibly in line with the proposed scale and likely visibility of the scheme, and within 10km radius for large and medium scale wind energy developments for significant heritage assets with particular sensitivity to visual impacts."	Windcrop (WED454); RWE (WED541)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
Box 14	33	At end of sentence in Box 14 add 'historic' before 'landscapes'	English Heritage (WED392)
3.4.21	33	In bullet point list under paragraph 3.4.21: Amend 6th bullet point to read: "avoid unacceptable harm to designed and other significant views from and towards parks,..." In 6th bullet point replace 'necessary' with 'intrinsic' In 1st, 3rd, 4th and 5th bullet points change term 'avoid' to 'avoid unacceptable harm to' Add new bullet point to read: "consider the potential for indirect impacts on the setting of heritage assets including noise and shadow flicker"	 English Heritage (WED393 &395) Colsterworth & District PC (WED41); Stubton PC (WED107); Hough on the Hill PC (WED179) English Heritage (WED393) English Heritage (WED384)
3.4.24	35	In bullet point list under paragraph 3.4.24: Amend 1st bullet point to read: "... tracks respect, and where possible follow, the grain ..." Amend 2nd bullet point to read: "... tracks to avoid or minimise physical impacts ..."	 Brown & Co (WED477) Brown & Co (WED478)
3.4.25	35	Amend first sentence of paragraph 3.4.25 to read: "... consented, ~~or~~ the subject of a valid planning application or formally notified at scoping stage (within and outside South Kesteven)..."	Colsterworth & District PC (WED42); Stubton PC (WED108); Mr R Kingscott (WED414)
Box 18	36	In Box 18 delete: "~~However, it is unlikely that significant cumulative effects will be generated beyond 5-10km'~~	Colsterworth & District PC (WED44); Stubton PC (WED110); Hough on the Hill PC (WED182)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
3.5.3	37	Amend end of first sentence of paragraph 3.5.3 to read: " ... flood risk will be increased elsewhere and only consider development appropriate in areas at risk of flooding~~and to apply the Sequential Test when identifying sites for development~~." Amend last sentence of paragraph 3.5.3 to read: "... Flood Zones 1, 2 or 3~~: however the Environment Agency shall be consulted in relation to all wind energy developments.~~ The Environment Agency should be consulted in relation to all large and medium scale wind energy developments. For small scale proposals they would be consulted where certain criteria are met (insert footnote)." Add footnote to read: "EA does not need to be consulted on applications for small numbers (less than 10 turbines) of small scale wind turbines (defined by EA as up to 20 metres in height to hub) unless: The turbine would be within 20m of a watercourse or flood defence within the EA's jurisdiction; the site could be contaminated and overlies an aquifer/ is located within 50m of a surface watercourse; land raising greater than 100 square metres is proposed; the development is classed as Essential Infrastructure (see Table 2 of the Technical Guidance to the NPPF); there are specific environmental concerns with the development proposal"	RWE (WED543) Environment Agency (WED515) Environment Agency (WED515)
3.5.6	37	Amend heading before paragraph 3.5.6 to read: "Impacts on watercourses and groundwater" After paragraph 3.5.6 add new paragraph to read: "The potential risk posed to controlled waters from piling should be considered, particularly where the wind turbine(s) is located on brownfield land or is located over a vulnerable aquifer."	Environment Agency (WED522)
3.5.7	38	Delete first sentence of paragraph 3.5.7: "~~Consultation with the Environment Agency shall be undertaken to determine if a Flood Risk Assessment (FRA) is required.~~" After second sentence of paragraph 3.5.7 amend to read: "~~Where this is not possible, it may be necessary to raise land to accommodate the substation, and the Environment Agency shall be consulted on these works.~~ Where this is not possible, applicants should consider the flood resilience of the development and in particular ensure that all sensitive electrical equipment is installed above the predicted flood levels. This will ensure the development remains operational during flood events. If this is to be done by land raising greater than 100 sqm, an assessment of impacts on third parties from any displacement of flood water or interruption of flood flow routes will be	Environment Agency (WED517, 519)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
		required. The Environment Agency shall be consulted on this assessment."	
3.5.8	38	Amend second sentence of paragraph 3.5.8 to read: "... appropriate mitigation measures, which may include minimising impermeable areas or ensuring access roads are constructed using permeable materials where possible, in consultation ..."	Environment Agency (WED520)
3.5.9	39	Amend first sentence of paragraph 3.5.9 to read: " … completed in consultation with South Kesteven District Council (Environmental Health) and the Environment Agency."	SKDC
Box 19	39	Amend first sentence of Box 19 to read: "Large and medium ~~scale~~ wind energy developments …."	SKDC
3.6.1	39	At end of first sentence of paragraph 3.6.1 add: ".... although these may largely be temporary and not permanent." Add new bullet point to read: 'temporary effects on pedestrian and highway safety' Include definition of 'abnormal loads' in glossary	Mrs J Bateman (WED318) Fulbeck PC (WED603)
3.6.12	42	In bullet point list under paragraph 3.6.12: Amend 4th bullet point to read: "Minimise ~~avoid~~ impacts on key ...." Combine and amend 6th and 7th sub bullet points to read: " Avoid siting turbines where motorists need to pay particular attention to driving such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists. The associated road network should be reviewed with particular attention being paid to the complexity of junctions, traffic flows and the possible presence of short headways between vehicles. Information on existing 'accident black-spots' can be obtained from the police service.'	Brown & Co (WED480) Colsterworth & District PC (WED45); Stubton PC (WED111); Hough on the Hill PC (WED183); Mr R Kingscott (WED415); revolt (WED586); Mr Miley (WED596)
Box 22	43	At the end of Box 22 add " … unless otherwise agreed with the appropriate authorities"	Brown & Co (WED481)
3.7.4	44	Revise layout of bullet points below paragraph 3.7.4 Amend last sentence of first bullet point to read: '~~One P~~potential ~~noise~~ imapcts associated with aerodynamic noise	SKDC

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
		include ~~is amplitude modulation~~ In first sentence of bullet point amend to read: '~~Another noise impact is wind sheer~~ Wind shear ….'	
3.7.6	45	At end of paragraph 3.7.6 add: "…, although many people consider that ETSU does not take account of the adverse health effects of low frequency noise."	Colsterworth & District PC (WED47); Stubton PC (WED113); Hough on the Hill PC (WED185); Mr Jenkins (WED332)
3.7.7	45	Amend paragraph 3.7.7 to read: "The Institute of Acoustics ~~has launched a consultation on~~ published a "Good Practice ~~Guidance~~ Guide to the application of ETSU-R-97 for wind turbine noise assessment" in May 2013. ~~following a request from the Department of Energy and Climate Change (DECC) to take forward the recommendation of the Government commissioned Hayes McKenzie report on 'Analysis of How Noise Impacts are considered in the Determination of Wind Farm Planning Applications'. The intention is to produce a final version of the Good Practice Guide for publication early in 2013, which will~~ The Guide supplements ~~the~~ ETSU-R-97 ~~document~~ providing guidance on the technical issues relating to ETSU-R-97 noise assessment procedures ~~where used for wind turbine noise assessments~~."	SKDC
3.7.12	46	At end of sentence add "… and other available information."	SKDC
Box 23	47	Amend last sentence of final paragraph to read: "… comparable developments and other available information."	Brown & Co (WED484)
3.7 Section C	48	Replace last bullet point with: "Institute of Acoustics (2013) 'Good Practice Guide to the application of ETSU-R-97 for wind turbine noise assessment'	SKDC
Section 3.8	48	Change title of Socio Economic Section to Socio Economic and Other Impacts	Sport England (WED229)
3.8.3	48	Delete second sentence and amend third sentence of paragraph 3.8.3: "~~As wind energy installations tend to be located in rural area, there is potential, to obstruct and restrict movement in the countryside.~~ They can ~~also~~ affect views …."	Colsterworth & District PC (WED54); Stubton PC (WED120); Hough on the Hill PC (WED199);
3.8.4	49	At end of last sentence of paragraph 3.8.4 add: "Positive effects have been attributed to visitor centres co-located with some of the first large turbines in the country. However, this is very unlikely to be the case for current or future developments".	Colsterworth & District PC (WED55); Stubton PC (WED121); Hough on the Hill PC (WED200);

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
3.8.7	49	Amend final sentence of paragraph 3.8.7 to read: "There is a number of historic park and gardens in the District ~~located around Grantham and Grimsthorpe~~, and an extensive network …."	English Heritage (WED396)
3.8.10	50	Amend paragraph 3.8.10 to read: "There is no statutory minimum separation between a wind turbine and public right of way or bridleways. The PPS22 Companion guide recommends that the total height of the turbine (to blade tip) ~~plus 10%~~ is considered an acceptable separation distance from public rights of way (~~T~~this is called the 'falling over' measurement) with the minimum distance often being taken to be that the turbine blades do not overhang a public right of way. In the case of bridleways, the PPS22 Companion Guide refers to a 200 metre exclusion zone around bridle paths to avoid frightening horses suggested by the British Horse Society (BHS) but that some negotiation should be undertaken if this is difficult to achieve. ~~guidance published by t~~The ~~British Horse Society (BHS)~~ published advice on bridleways and wind farms in 2013 (add link as footnote), which states that as a starting point when assessing a site and its potential layout a separation distance of four times the overall turbine height should be applied for National Trails and Ride UK routes, as these are likely to be used by equestrians unfamiliar with turbines, and a distance of three times overall height from all other routes, including roads, with a the minimum distance of 200m advised in the PPS22 Companion Guide being seen as the minimum, where it is shown in a particular case that this would be acceptable. ~~In addition, PPS22 Companion Guide recommends that turbines shall be a located at a distance that ensures that turbine blades do not overhang a public right of way or bridleway.~~	RWE (WED551)
New paragraph to follow 3.8.13	50	Add new sub heading and paragraph after 3.8.13 as follows: Sports Facilities "Wind Turbines located on playing fields or located near to playing fields and other sports facilities can have an impact on the ability to play sport at that site. Where relevant this should be assessed using the guidance (to be) published by Sport England on the impact of wind turbines on sports facilities."	Sport England (WED229)
Box 24	50	Amend second sentence in Box 24 to read: "Where recreational impacts are ~~likely~~ possible, the relevant user groups shall be consulted, ..." Amend last two sentences of Box 24 to read: "Wind turbines shall be located at a distance equivalent to at least the height of the turbine ~~plus 10%~~ from any rights of way. In the case of bridleways ~~there should be a minimum separation distance of 200m, with the aim of achieving~~ a distance of three times the overall height of any turbine should be the starting point with a minimum separation distance of 200m where this would be difficult to achieve.	Colsterworth & District PC (WED60); Stubton PC (WED126) RWE (WED551)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
3.9.7	52	In first sentence of paragraph 3.9.7 amend to read: "Where ~~significant~~ shadow flicker …"	Colsterworth & District PC (WED64); Stubton PC (WED130); Hough on the Hill PC (WED209)
Box 25	53	Amend Box 25 to read: "~~For~~ Where large and medium scale developments ~~wind turbines shall be~~ are located ~~at least~~ within ten rotor diameters away from potentially affected properties, the possible shadow flicker effects will be investigated and~~. Where this is not possible,~~ appropriate mitigation measures shall be put in place to reduce or eliminate the effects of shadow flicker to an acceptable level. For small scale developments ~~whether this~~ the application of this requirement ~~will apply~~ will be at the reasonable discretion of South Kesteven District Council."	Brown & Co (WED489)
3.10.3	53	Reword last two sentences of paragraph 3.10.3 to read: "Consultation with ~~these bodies~~ the CAA, MOD and DAP shall be conducted using a standard Renewables UK (formerly BWEA) proforma (see below)~~.~~ which ~~This~~ is submitted to the MOD who consults its various departments as well as the CAA ~~and NATS~~. NATS should be consulted separately preferably to its email address.	NATS (WED219)
3.10.4	54	At end of paragraph of paragraph 3.10.4 add: "Further information is available from the NATS FAQ document on its web site."	NATS (WED220)
3.10.7	54	At end of first sentence of paragraph 3.10.7 add "or through technical mitigation"	RWE (WED552)
New paragraph to follow 3.10.7	54	Add new paragraph (after paragraph 3.10.7) to read: "Any structure of 150 metres or more must be lit in accordance with the Air Navigation Order and should be appropriately marked. If an aviation stakeholder (including the MOD) made a request for the lighting of a structure below 150 meters in height it is likely that the Civil Aviation Authority would support such a request, particularly if the request falls under Section 47 of the Aviation Act. It is the responsibility of the aviation stakeholder requesting aviation warning lighting to define the technical specification of such lighting. Where possible infra-red lighting should be used to minimise visual impacts at night. Although infra-red lighting may satisfy MOD requirements it is unlikely to satisfy civil aviation requirements."	CAA (WED1)
Box 26	54	Amend first sentence in Box 26 to read: 'Consultation shall be undertaken with NATS for all wind turbine applications, and with the CAA, MOD, ~~NATS,~~ East Midlands Airport and the owners/operators of private landing areas for all proposed wind turbines 11m to blade tip or taller. .."	CAA (WED2); NATS (WED221)

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
3.10 Section D	54	Update website address for NATS	NATS (WED221)
3.11.1	55	Amend 2nd bullet point to read: "Interference with point-to-point transmission links operated by telecommunications service providers in the area, including mobile phone and data services."	Colsterworth & District PC (WED68); Stubton PC (WED134); Hough on the Hill PC (WED213); Mr R Kingscott (WED422);
3.11.5	56	Amend paragraph 3.11.5 to read: "~~Small wind energy proposals~~ It is understood that turbines under 15 metres in height and those that do not have metal blades are unlikely to cause significant effects on television signals. ~~Renewables UK advises that any turbine under 15m in height, and those which do not have metal blades, will have no effect on either television reception."~~	SKDC
Box 27	56	In Box 27 amend first sentence to read: "For all wind energy schemes (except micro-generation schemes) ~~D~~developers must undertake consultation ….."	SKDC
New box after paragraph 4.6.2	62	Add new box to read: "Planning applications for large and medium scale developments should be submitted together with a statement of community involvement setting out how the community has been consulted on a proposal and what the outcome of this consultation was. This should include reference to the comments made through consultation and how the submitted proposal has sought to address concerns, or where agreement has not been reached on matters arising from consultation. The submission of a statement of community involvement for small scale developments will be at the discretion of the Planning Authority. "	Mr M Worth (WED370)
Table 4.1	62	Add to table 4.1: National Trust - Landscape, Heritage and Nature Conservation Interests (where relevant) Neighbouring Local Authorities (including as appropriate depending on the location of a proposal: Rutland CC; Peterborough City Council; South Holland District Council; North Kesteven DC; Newark and Sherwood DC; Melton Borough Council; Lincolnshire County Council; Nottinghamshire County Council; Northamptonshire County Council; Cambridgeshire County Council)	National Trust (WED344) Rutland County Council (WED310)
4.7.4	64	In bullet point list under paragraph 4.7.4: Amend 4th bullet point to read: "watching brief – i.e. need for ~~archaeologist and/or~~ ecologist to be present …"	SKDC

[1] Number in bracket refers to draft Wind Energy SPD representation number

Section/ Paragraph/ box of SPD	Page No (in draft SPD)	Proposed Change	Change in Response to[1]
		Add new bullet point to read: "an archaeological scheme of works - i.e. programme of archaeological work in accordance with a written scheme of investigation" Amend 10th bullet point to read: "... medium scale turbines (requiring that the turbines, and foundations, are removed ...." Add new bullet point to read: "Notification to Defence Geographic Centre (for developments 21.3 metres in height, or greater, above ground level) of the location(s), height(s) and lighting status of the structure, the estimated and actual dates of construction and the maximum height of any construction equipment to be used"	Heritage Trust for Lincolnshire (WED308) D Mathieson (WED609) CAA (WED3)
Appendix 1	66	Delete appendix	SKDC
New Appendices		Include new appendices listing Glossary of Terms and Acronyms used in SPD	Colsterworth & District PC (WED12); Stubton PC (WED77); Hough on the Hill PC (WED145); Fulbeck PC (WED607)

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