

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 further 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 definition 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 as 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:

Wincrop 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 to 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 and material to the application. SPDs should 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 micro 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 criteria 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 observations:

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

Draft Wind Energy SPD: Proposed change to Definition of Small Wind Turbine

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

Agent

26154 Mrs N Jacobs
Bourne Town Council

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

Agent

713800 Mr Michael Worth

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

Agent

517670 Natural England
Natural England

CommentID: SWT20

Nature of Response: Supporting

21/05/2013

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 marring 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

260326 Mrs M Ford
Market Deeping Town Council

Agent

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

714593 Anne Casey
RSPB

Agent

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.
