

SNH guidance: Assessing the cumulative effect of onshore wind energy developments, version 3

February 2010

Introduction

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Institute's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

The LI welcomes the opportunity to comment on the above document. As you may be aware, the Institute has produced its own Position Statement on climate change, sent with this response, which you may wish to include in your bibliography. A very clear statement is made in the Introduction by the LI President Neil Williamson and Jon Lovell, Chair of Policy Committee on the "the critical and central role that the landscape architecture profession has to play in the delivery of climate change policy objectives", reinforced in section 3.5 which states: "The Landscape Institute is fully committed to the maximisation of renewable energy capacity as an essential aspect of climate change mitigation whilst ensuring the robust protection and enhancement of landscape character and condition".

Detailed response

The LI is supportive of the attempt to bring consistency of approach to the assessment of cumulative effects of windfarm developments across Scotland and also considers it will provide helpful guidance for use elsewhere in the UK, although the LI recognises that SNH's remit does not extend beyond Scotland. This approach is similar to that taken by the LI to SNH's comprehensive guidance on the visualization of windfarms. It may be of value in this process to establish if a measure of consistency might be achieved with the guidance emerging from DCLG: the LI is aware that SNH was represented at the consultation meeting held in 2009. The guidance should also be consistent with the final version of SNH's recent guidance on the Siting and Design of Windfarms.

The LI has no substantive criticisms of the document, and sees it as well-balanced and thoughtful. Some detailed points about the internal consistency of the document are set out below. They mainly comprise the degree to which it is appropriate to consider projects in detail when they are still at the scoping stage, and the issue of sensitivity of receptors to development.

The guidance pays due regard to PAN 45 and SPP6 which, with respect to other wind farm development, considers schemes 'in the vicinity' and which are existing, under construction, consented and subject to formal application. It is only exceptionally that consideration should be given to schemes which have been

subject to a scoping request and, even then, it may only be appropriate for those which are substantially nearing the end of the EIA process when details are reasonably certain.

The LI considers that the guidance should stress that assessment of sensitivity is not part of the baseline but the outcome judgement. Instead of addressing sensitivity in advance of the assessment, the document would be more useful if it suggested that the practitioner identified landscape elements, patterns, characteristics and attributes, including experiential aspects, which may be potentially sensitive and valued. It is only by testing the scheme against these factors that the assessor will be able to determine whether or not they would be sensitive to the proposed scheme.

The LI welcomes the opportunity to submit its views as part of the consultation on this guidance, and hopes that SNH will find this input helpful. The comments and responses below are founded upon the LI's belief and principle that all landscapes matter. LI members are fully cognizant that landscape professionals have responsibilities to the character and quality of the environment; that we should seek to manage change in the landscape for the benefit of both this and future generations, and we should seek to enhance the diversity of the natural environment, to enrich the human environment and to improve both in a sustainable manner. We are pleased to be able to contribute to what will be important guidance for landscape and other professionals.

Comments

Our comments and suggestions on the text (referring to the document's paragraph numbering):

Part 1

9. *Cumulative effects can arise from a mixture of different types of development, for example a wind farm taken in combination with industrial development.*

It should be explained what the potential effects could be.

10. *Cumulative impact is sometimes loosely described as 'positive' or 'negative', but this use is discouraged as there is room for ambiguity.*

This statement could be confusing to the reader. Could further clarification be given?

16. The differences between "landscape capacity" and "landscape sensitivity" should be clarified and not confused. Suggest the sentence is reworded as:

"Landscape capacity studies may assist by identifying the ability of areas of differing landscape character to accommodate certain types or scales of development".

17. *The area included within a strategic cumulative assessment need not be constrained by legislative boundaries.*

Suggest "need not" is replaced with "should not".

29. *The scope of cumulative assessment may differ depending on the nature of the affected resource, i.e. landscape fabric, landscape character or quality or visual amenity. If the major issue is landscape or visual impact within a particular locale, then it may suffice to include all windfarms (existing and proposed) which will be visible from that locale. If the issue is one of overall impact on landscape character across an area, it may be appropriate to consider all schemes within or affecting the landscape of the area.*

This is important because it emphasises and underpins the need for the experienced landscape professional.

Part 2

2. *Whilst wind turbines may provide a focus of interest in some landscapes, in others they may be in conflict with key characteristics or valued attributes of the landscape, such as remoteness or wildness.*

Suggest “remoteness, wildness or tranquillity”.

7. This is a large and complex topic, which could be debated at length. It should be noted here that public consultation is a key part of the planning process.

13. *Any constructed or consented windfarm*

This is baseline data

Any windfarm proposal which has been subject to an EIA scoping request

This appears to contradict earlier text on schemes which should be taken into account (existing, under construction, consented and subject to a formal application for development consent). It must surely be the case that, only exceptionally, would a scheme which is subject to a scoping request be taken into account and far less a scheme which has been made the subject of a public announcement or a community meeting. Paras 18 and 19 refer to existing, consented and those which are the subject of a valid application.

17. *The assessment should clearly describe the baseline conditions and should identify existing windfarms and the extent to which these have altered landscape character and affected sensitivity*

Para 18. *The assessment should also identify the sensitivity of the landscape and visual amenity resource and the predicted magnitude of cumulative change arising from each of the relevant scenarios, for example: sensitivity issues*

Regarding sensitivity, surely at most all that can be done is to flag up *potential* sensitivities, given that a judgement concerning sensitivity is an outcome resulting from the testing of proposals against elements, combinations and patterns which may be sensitive. But this cannot be known or confirmed until after the assessment has taken place. Landscape sensitivity is not part of the landscape baseline (GLVIA).

20. *The number of other windfarm projects which would be visible in the landscape in each of the different scenarios (existing, consented or applications stage)*

This is the correct ‘shopping list’ for cumulative inclusions.

22. *Cumulative ZTVs should clearly show those areas from where one or more windfarms are likely to be seen. Each windfarm and its ZTV should be shown in a different colour ... In the case of a ZTV showing three windfarms it will be possible to illustrate the overlapping areas using separate colours e.g. red, blue and yellow to represent each development (with corresponding overlaps of orange, green, purple etc.)*

Other suitable means of demarcations e.g. hatching can also be used, with separate ‘directions’ of hatching instead of colours.

39. *These effects should be objectively assessed in accordance with standard landscape character assessment guidelines (LUC for SNH and CA, 2002, GLVIA 2002).*

Suggested this be changed to: ‘These effects should be assessed as objectively as possible whilst recognising that professional opinion also involves a measure of subjectivity.’ Also note that “Landscape Character Guidance for England and Scotland” (2002) provides guidance on Landscape Character Assessment, not guidance on assessment of effects.

43. *An analysis of potential landscape and visual sensitivities based on the magnitude of change, pattern and scales of development, and how the landscape is experienced*

It is not possible to be so absolute about sensitivity until the assessment has been carried out. For example, a host landscape may have potential sensitivities which would be impacted upon by a crude scheme but which might be avoided by a carefully conceived and designed scheme. In this instance, the landscape’s attributes would be sensitive to the first scheme, but not to the second. We cannot know what the sensitivity would be in advance of carrying out the assessment – hence the GLVIA’s guidance on this matter.

The Landscape Institute would like to thank SNH again for the opportunity to contribute to this consultation. For any queries relating to this response please contact:

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