



CPRW Position statement “Single and small groups of wind turbines”

April 2014

The purpose of this Position Statement is to guide CPRW Branches in the approach they adopt when considering the acceptability of proposals for single or small groups of wind turbines in their respective areas.

1. A rapidly changing context

1.1 Many areas outside the TAN 8 Strategic Search Areas (SSAs) are facing an onslaught of planning applications by those seeking consent to construct Single wind turbines, typically 30-70m (100-250 ft) in total height.

1.2 The pattern of these turbines tends to be random and unpredictable, with consultation regarding them piecemeal and unstructured. Similarly the evaluation of their impacts on the landscape and decisions about their acceptability is at best inconsistent across Authorities. This combination of circumstances means that single turbines or clusters of them are having an increasing impact on many Welsh landscapes and resulting in the *de facto* emergence of dispersed wind farms.

1.3 Every single turbine approved tends to encourage others, but only a handful of individuals benefit, while the wider community bears the cost. A sensible and precautionary principle towards the proliferation of single turbines must therefore be adopted to limit their impact on the landscape, especially as they make such an ineffectual contribution to national renewable energy targets.

1.4 In certain areas because of their sporadic nature, they are increasingly affecting the setting of areas designated because of their natural beauty, namely our National Parks and AONBs. Most affected areas also have well distributed rural populations who are increasingly exposed to unacceptable noise, potentially health risks and the overbearing visual impacts of these developments.

1.5 The potentially adverse costs to the community of this landscape change and the possible risks to local economies which are heavily dependent on tourism are likewise not being properly taken into account in the existing decision making processes.

1.6 Despite having to determine a growing number of these types of application the policies of most current Local Authority Development Plans do not adequately address the consequences of Single turbine applications or small groups of them. As a result, the capacity of landscapes to accommodate them and the individual and cumulative impacts of them on that landscapes are being dealt with in an ad hoc way often with individual proposals being considered in isolation and on a “*first come first*

served” basis rather than as part of an overall Authority wide strategy for renewable energy.

1.7 These circumstances are further compounded because most single turbine proposals are farm related, with many being of a scale and a rated power output far in excess of the realistic energy requirements of the farm enterprise on which they are located. Consequently the size of turbines and their landscape implications are disproportionately greater than would be the case if such proposals simply reflected the realistic needs of the farm enterprise. Whilst, CPRW is in general supportive of farm diversification, oversized single turbines or groups of them which exceed the requirements of the farm enterprise should, from a planning point of view, not be regarded as legitimate and justified farm diversification but industrial development in the open countryside.



CPRW’s overarching policy position on single turbines

Given the lack of an up to date Guidance framework and detailed local planning criteria to determine the acceptability of single turbines or clusters of them

CPRW will

Only support single turbines or clusters of them, where it can be demonstrated that their scale, nature and location are compatible with the landscape in which they are located. Those which are not will be opposed.

Subject to the above principle, the scale of any turbine or cluster of them proposed as “farm diversification” initiative should be aligned with the energy needs of the applicant or their farm enterprise. Those whose output exceed this threshold should be assessed in the same way as any other industrial development in the open countryside.

CPRW's detailed position on Single or Clusters of wind turbines



Landscape implications

CPRW believes that the relationship between the capacity of a landscape to accommodate a wind turbine and the scale of its potential impact on the character of the landscape in which a turbine is located is critical. The acceptability of any single turbine or cluster of them, therefore depends on the impact of the proposal upon

- **the aesthetic character** of the landscape in terms of its scale, visual enclosure, complexity, order, pattern, movement, form and line.
- **the scenic dimensions or qualities** of the landscape such as skyline, focal points, landmarks, backdrops and views.
- **existing scale indicators**, features and structures, (e.g. the vertical size of existing buildings, farm silos or trees
- **on any buildings and settlements** within prescribed Separation distances.
- **the special qualities** of any designated Protected landscape or designated nature conservation or heritage sites and their setting.
- **the appeal of tourist areas or recreational features** which contribute to the economic prosperity of the area.
- **prominent landmarks, or features** of local amenity value to communities or important open or green spaces which surround settlements.
- **the location of any clusters** of turbine which span different landscape types.
- **the magnitude of the impacts** arising from the proposal.

CPRW position

CPRW will object to any proposals for single or clusters turbines which create an unacceptably detrimental impact on the landscape character of an area or the amenity of valued features or attributes within it.



Standards for separation distances between turbines

CPRW believes that in open rural areas where turbines are potentially inter visible, the minimum separation distances for single turbines should be

No less than 1km for turbines between 25-50m in height

No less than 1.5km for turbines between 50-100m in height

No less than 2km for turbines between 100-150m in height

No less than 3km for turbines more than 150m in height

CPRW position

CPRW will object to proposals for wind turbines where inadequate separation distances mean that individual or clusters of turbines detrimentally impact upon or dominate a landscape.



Separation from residential and other properties

CPRW believes that in rural areas and subject to local topography, where turbines are visible from individual residential dwellings, work places or community facilities, a minimum separation distances from these to the turbines should be

- **No less than 700 metres or a distance equivalent to at least 10 times the turbine's rotor blade diameter (whichever is the greater)**
- **No less than 2km from the edge of towns and villages, except where it is located on an existing brown field site.**
- **No less than 2 kms from the boundary of a National Parks, AONB's World Heritage sites, Conservation Areas or Registered Historic landscapes, to ensure they do not detrimentally affect the character and special qualities of these areas**

CPRW position

CPRW will object to any proposals for wind turbines where inadequate separation distances mean that individual or clusters of turbines have an unacceptable and detrimental impact on surrounding residential properties and settlements or landscape designated because of their special qualities or acknowledged importance.



Turbine heights

CPRW believes that the height of turbines must be accompanied by detailed information which justifies why a turbine of the height proposed is required at the proposed site. Any proposals should be sympathetic to the characteristics and sensitivity of the landscape in which it is located. Its height should not create unacceptable individual, cumulative or sequential visual impacts on

- The special qualities of National Park or AONB, World Heritage site, Conservation Area or Landscape of Registered Historic importance.
- Open farmed landscapes when proposed as part of an agricultural diversification initiative.

CPRW position

CPRW will not support any proposals for turbines which are oversized in terms of the energy requirements of the applicant or their enterprise, out of scale with their surroundings, dominate more complex smaller scale landscapes or have an unacceptable impact on the scale of surrounding buildings and settlements.



Accessibility and transport

The means by which turbine components are transported to their proposal site and their implications on public access has consequences in terms of:

- The frequency of vehicle movements to and from the site during the construction phase.
- The change to a landscape as a result of improvements to or the widening of any existing access routes to the development site.
- The ability of individuals to be able to continue to walk, ride or undertake informal recreation on the site or in its immediate surroundings, especially routes which National Trails or designated because of their local importance

CPRW position

CPRW will oppose proposals for single turbines or small clusters of them where the transportation, infrastructure or construction implications of them results in the loss of public amenity or the unacceptable or detrimental impacts to the landscape in which they located.



Cumulative impacts

Growing concern exists regarding the cumulative effects that increasing numbers of small turbines are having on the landscapes of rural Wales in respect of:

- The different forms and scales of turbines in the same landscape.
- The visual confusion and poor coordination of images when different sized turbines are seen in combination with each other.
- The extent that the distinction between different landscape character types in the locality is compromised and its integrity lost.
- The extent that the profile of a skyline, the visibility of narrow views or important focal points or the amenity of nearby properties or settlements is compromised.

CPRW position

CPRW will object to any proposals for single or small groups of wind turbines where their cumulative impacts in the landscape result in

- **An increase in visual clutter**
- **Create visual confusion and poor coordination of images**
- **Distort the scale of the proposal's surroundings,**
- **Compromise the integrity of individual landscape character types or the distinction between different ones**
- **Dominate important views or have significant impacts on the scale of surrounding buildings and settlements.**
- **Compromise the special qualities of National Park, AONBs, Conservation Areas or Registered Historic landscapes or their respective settings.**

CPRW will also oppose any proposal where the information or assessment of its cumulative impacts are inadequate or do not conform to best practice requirements.



Community Renewable Energy projects

Whilst landscape considerations will be CPRW's primary consideration in determining the acceptability of small clusters of turbines, some will inevitably be promoted to serve a local community need. "**Community driven energy project**"¹ may be more acceptable if the direct and tangible local benefits of the scheme can be genuinely demonstrated.

¹ A Community driven energy project is a proposal which is driven by the local community for the benefit of the local community.

CPRW position

Within reason, CPRW will look more favourably on “Community driven energy projects” where the scheme is

- **100% owned and operated by a local community organisation and its revenue finances community initiatives, or is re-invested in social, community or public assets**
- **A joint venture where a local community organisation is a major shareholder;**
- **A fully constituted community cooperative regulated by the Financial Services Authority.**

Any proposal by an individual landowner or a small group of private local individuals investing for personal financial gain will not be considered as a Community driven energy project



Consultation Procedures

Opportunities for interested parties to know about let alone comment on the acceptability of turbine proposals are often arbitrary and notification procedures vary considerably from Authority to Authority across Wales.

CPRW believes that

- all applications for single turbines or small groups of them, must include a Community Engagement Statement, describing how the applicant has carried out and established the views of neighbours /local community
- How these have been taken into account in the formulation of their development proposal.
- The outcomes of the local consultations undertaken, should be made publically available.

CPRW position

CPRW will oppose any proposals for single turbines or clusters of them where

- **Inadequate consultation has been undertaken by developers to explain the implications of their proposals**
- **Insufficient opportunity has been provided for individuals or interested parties to comment on them for a minimum period of 28 days prior to the determination of the application.**



Publicly available Information

Prior to the determination of any applications any member of the public should have access free of charge to

- The outcome of an Initial Screening by the relevant Planning Authority, indicating their detailed commentary on the need for an Environmental Impact Assessment (EIA) in support of the planning application, especially those located within 2kms of a National Parks or Area of Outstanding Natural Beauty.
- For areas outside designated Protected landscapes or where a formal EIA is not deemed necessary, an appropriate Landscape and Visual Impact Assessment in support of the application based on the following Zones of Theoretical Visibility (ZTV)
 - 15km ZTV for turbines over 15m but less than 50m total height to blade tip.
 - 30km ZTV for turbines over 50m total height to blade tip
- Realistic photomontages from all key vantage points, the number depending on the size of the turbine(s) and the range of important views affected.

CPRW position

CPRW will object to single turbine applications unless all the relevant screening and landscape evaluation information is publicly available prior to its determination, on the grounds that without this the impacts of the development cannot be properly understood nor its acceptability capable of being properly judged.

Appendix 1

Planning policy Guidance for Single wind turbines

Because of the dearth of policy guidance to determine the acceptability of single turbines or small clusters of them, CPRW calls on every Local Planning Authority as a matter of urgency to produce or update any Supplementary Planning Guidance relating to Onshore Wind Energy to include specific advice detailing the approach and assessment criteria which it will use when evaluating the acceptability of proposals for Single or small groups of wind turbines in their area²

Any such Supplementary Planning guidance should include all of the following

- **An up to date and comprehensive Landscape Character and Sensitivity Assessment of their area identifying the capacity and sensitivity of different landscapes to all forms of wind energy development, including single or small groups of turbines.**

This categorisation should identify

Areas of High landscape Sensitivity which would be significantly and detrimentally affected by any form of wind turbine and should therefore be protected.

Areas of Moderate to High landscape Sensitivity which would be adversely affected but where some limited opportunity to accommodate renewable energy developments may exist in certain locations without changing the landscape character of that area.

Areas of Moderate Sensitivity where certain characteristics of the landscape are vulnerable and may be adversely affected and where special care is needed in locating any turbines.

Areas of Limited or Low Sensitivity where the landscape are either robust and would not be adversely affected by renewable energy developments. These landscapes are likely to accommodate development without a significant change to their character.

- **A clear statement detailing what information and assessments all developers must provide before their proposal is evaluated.**

² SNH has produced guidance for the assessment of small scale wind energy projects which do not require formal Environmental Impact Assessment, <http://www.snh.gov.uk/docs/C206956.pdf>

- **A requirement that all proposals are accompanied by an independent landscape evaluation and impact assessment, the content and nature of which is proportionate to the scale of the proposal**
- **A prioritised list of criteria and standards which to be used to determine the acceptability of any proposal for a Single or cluster of wind turbines.**
- **A commitment to determine all onshore wind proposals through their adopted Committee procedures rather than by means of existing schemes of delegation.**
- **The Authority's standards for the minimum Separation Distances between single turbines or groups of them.**
- **The Authority's standards for the minimum Separation Distances between single turbines or groups of them and residential properties, other than that of the applicant.**
- **Details of the sizes and height limits of turbines which would be acceptable in the different landscape character areas defined by the Authority**