

Policy 42

Id No Respondent

166 Banks Development Division

Policy 42

Appropriateness of the Suggested Spatial Pattern of Windfarm Sites

The Banks Group consider the use of the comprehensive sieve mapping exercise which has formed the basis of the spatial strategy for on shore wind set down in diagram "Environment 1" of the draft RSS is sound and provides a useful means of identifying broad areas where significant constraints on wind development do not apply. The Banks Group support the terms of policy 42 of the draft RSS which seeks to establish a positive policy framework for wind development in the areas of least constraint. Given the comprehensive sieve mapping exercise undertaken which has led to the areas identified in the policy 42 being identified, the cross reference in the final sentence of policy 42 to all proposals for onshore wind development also being considered against the criteria of policy 41 would appear unnecessary and potentially counter productive. It is clear the list of criteria contained in policy 41 includes several factors which have already been factored into the sieve mapping exercise e.g. green belt, impact on National Park etc. The Banks Group would recommend that policy 41 is amended to take account of the work undertaken at the strategic level to identify areas of least constraint.

408 BHMCG

We are opposing policy 42 onshore wind for the following reasons.

After 7 years of research on behalf of the group it is apparent on shore wind on the scale envisaged is not acceptable particularly when having checked whether these turbines are doing what was promised and I FIND THEY ARE NOT.

Expected to work on a load factor of about 30% Anything less will mean more turbines to reach targets.
INFORMATION FROM THR ROC REGISTER HAS PROVED THIS.

Maximising potential output and minimising cumulative impact. CAN ONLY BE ATTEMPTED REALLY OFFSHORE
It is now obvious from the reactions locally that quality of life of those affected will be damaged .if policy 42 is accepted
It seems economics are overriding protection of the environment and peoples quality of life. The latest guidance is that in LDF's/SCI's we will be taking onshore wind energy development forward regardless
THAT IS UNDEMOCRATIC .

The area between the Stang and the A66 in Teesdale was removed from the Regional Renewable Energy Strategy Indicative Map after much opposition to its inclusion for wind energy development. Especially after the successful but long, hard and costly fight to protect the area 7 years ago and which went to High Court ,the inclusion in PPS22 Companion Guide we find insensitive. We hope therefore it will remain excluded when the RSS is finalised

I have responded to every consultation for the past seven years on behalf of the group.
Many are too busy earning a living or have no computer so I continue to represent them

A member of CPRE Regional group I have seen the submission sent and it covers many topics. With respect I realise it will be the official representation for the region. As a member of the sub region (Durham Branch Secretary /Acting Chair) I must point out that only we really know the area, something I hope other sub regions will have done

There are other ways more efficient and less costly to the public, of saving polluting emissions.
I have on behalf of Durham Branch submitted a well researched and peer viewed document which we hope is constructive to this consultation.
BHMCG supports that document completely

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428	Campaign To Protect Rural England	<p>Neither the policy nor the supporting text adequately reflect the nature of the Strategic Wind Resource Areas as developed in the regional Renewable Energy Strategy. One of the significant criteria for identifying them was the visual sensitivity of the local landscape to wind turbines. The location of the 'W's on the map is only intended to give a rough indication of the area. The SWRA represented by the W is only that part of the area indicated which has landscape of low visual sensitivity. This must be made clear in the policy or supporting text. Confusion is already arising eg with the assumption that the high sensitivity landscape (identified in the regional Renewable Energy Strategy) at Great Bavington and the 'Wannies' is part of the adjacent Knowesgate SWRA.</p> <p>The identification of large, medium and small-scale windfarms as appropriate to a given SWRA is meaningless without limits on the total number of windfarms as well. Two medium sized windfarms visible from a single point are equivalent in terms of impact to a large one.</p> <p>Although it may be regarded as closing the stable door after the horse has bolted, 'development briefs' or similar should (or should have been) developed for the SWRAs to maximise electricity output for minimum impact. Para 3.139 (p115) hints at this concept in relation to grid connections but does not develop it fully.</p> <p>Add: "... be identified within Local Development Frameworks. Development briefs or similar for these areas will assist in maximising their potential output and minimising cumulative impact. Other areas will be..."</p>
362	Campaign to Protect Rural England	<p>I oppose the siting of a wind farm at Kiln Pit Hill for following reasons</p> <ol style="list-style-type: none"> 1. Area of high landscape value to locals and visitors 2. It is centred around main A68 route and is gateway to Northumberland and Scotland 3. Attractive rural environment attracts "in-migrating" and returning residents. It is not sparsely populated as other areas of least constraint are. 4. Building activity is severely restricted as area categorized as "commuter pressure". 5. Turbines will be seen from all over counties of Durham and Northumberland and adjacent Pennines area of outstanding natural beauty. 6. Area has grade 1 and grade2 listed buildings and objective 11 of RSS is to protect and enhance cultural heritage and diversity. 7. Policy 42 conflict with spirit of policies 9,10,16,33,34,35 &41 of the RSS 8. There has been no direct consultation with local community 9. Connection to National Grid is complicated and will further damage the countryside 10. There is abundant wildlife and the geo-diversity of the area is important. Amenity and recreational value will be reduced and so the quality of life of residents as well as being detrimental to businesses.
349	Defence Estates	<p>Onshore Wind Development</p> <p>Policy 42 identifies broad areas of least constraint for wind energy developments. Paragraph 3.141 states that proposals for onshore wind development should be assessed against the criteria contained within Policy 41. Paragraph 3.142 recognises that the Policy as it relates to Kielder Forest will be kept under review as work with MOD progresses.</p> <p>It should be noted that under an arrangement with the Wind Industry, the Ministry of Defence is consulted at pre-planning stage on prospective wind developments.</p> <p>Defence Estates recognise the areas identified as having potential for medium or small scale wind development. Many of the areas listed have already been subject to a number of proposed windfarms and where possible the MOD has not expressed concerns or has been able to agree mitigating solutions. Any further additional wind farms in the vicinity of these will need to be very carefully assessed to avoid creating major impacts on radar.</p>

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MoD will continue to explore options with stakeholders in order to find a way forward for wind projects to coexist with defence facilities (particularly Brizlee Wood, Spadeadam and RAF Leeming) in these areas.

DE object to Policy 42 as it does not provide sufficient clarity with which to promote onshore wind development in the identified broad areas of least constraint. DE consider that Policy 42 should specify that whilst the broad areas identified are recognised as areas of least constraint for wind energy development all proposals for onshore wind development will still need to be assessed against the criteria within Policy 41.

DE consider that the above changes and those suggested for Policies 40 and 41 would provide sufficient clarity and strategic policy advice to assess proposals for renewable energy development.

202 Durham County Council

Policy 42 refers to “broad areas of least constraint” but Map ENV1 shows “medium resource areas”. “Medium resource area” is a vague and not particularly useful concept. Using the term medium to describe the resource area is also confusing when the text only explains the term medium in respect of the scale of development. Suggest that the map should show broad areas of least constraint and the text should explain that these areas have been assessed as suitable for small to medium scale development.

The East Durham Plateau has now been included on ENV 1 as a ‘medium resource area’ but is not referred to as a broad area of least constraint in the text. The text and the map should be consistent with each other. Suggest that Policy 42 should include the East Durham Plateau in its list of broad areas of least constraint.

102 Durham Tees Valley Airport

An area of up to 30km around Durham Tees Valley Airport is subject to wind farm safeguarding. It is essential that within this area the potential impact of any wind turbines on airport radar systems is fully taken into account. DTVA objects to the absence of a reference to this in Policy 42 and requests that a note is added to make clear that consultation with the Airport will be required on any wind turbine proposals within 30km of DTVA. It is important that wind farm operators are aware of the potential constraints given that the Tees Plain is an identified area for medium scale development in Policy 42.

200 Environment Agency

3.142

Overcoming environmental constraints is mentioned here but not in Policy 42 – we think it should be mentioned in the policy as well.

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The need to overcome environmental constraints in onshore wind development should be mentioned.

329 Friends of the Earth South Tyneside

South Tyneside Friends of the Earth strongly supports onshore wind development within South Tyneside.

We believe the areas listed should be the absolute minimum considered. However we feel that the capacity for contribution from micro wind generation should be recognised with an additional point c):

- “require the inclusion of renewable energy micro generation on all new developments and redevelopments.”

We would like to see this support for wind energy strengthened with the addition of the following sentence to the bottom of policy 42:

‘There will be a presumption in favour of renewable energy schemes unless it can be demonstrated that they are inconsistent with sustainable development.’

4 Friends of the Earth Tyne Bridge

Tyne Bridge FoE supports this policy and believes that the NE is in an ideal position to become a national and international leader in renewable energy generation. In order to present a coherent “message” and meet the 10% renewables by 2010 target and 20% by 2020 targets the wording should be changed in the opening paragraph to:

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195	Grainger Trust	<p>“Strategies, plans and programmes should provide a positive policy framework to encourage onshore wind development within the following broad areas of least constraint for wind energy developments:”</p> <p>This policy is supported with particular reference to the need for a positive policy framework for onshore wind development and the need for LDF’s to define the locations of least constraint for such developments</p>
164	Hallam Land Management Ltd	<p>This policy is generally supported but it should not lead to the exclusion of other areas not named which could provide onshore wind development and which should be considered on their own merits but in the context of a supportive policy to assist the meeting of the stated National and Regional minimum targets.</p>
147	Hartlepool Borough Council	<p>It is unclear what the implications of Policy 42 actually are for Hartlepool in terms of the references to “broad areas of least constraint for wind energy developments” and further clarification would be welcomed within the context of both major onshore wind development and smaller urban wind farms</p>
160	Highways Agency	<p>To provide a positive policy framework to facilitate on shore wind development within the following broad areas of least constraint for wind energy developments: Keilder Forest has the potential to become a Strategic Renewables Resource Area, including large scale wind energy development; and the following areas have potential for medium scale development: south and west Berwick upon Tweed, North/south Charlton, Knowesgate, Harwood Forest, Northern Coalfield south of Druridge Bay, Kiln Pit Hill, North and South Durham Upland Coalfield, Tees Plain and Teeside/Tees Estuary.</p>
340	Kirkwhelpington Parish Council	<p>Knowesgate, within the parish of Kirkwhelpington has been designated as an area having potential for a medium scale wind energy development. In paragraph 3.141 a medium scale wind energy development is defined by the number of turbines ie: 20-25. Conflict arises when examining the 'Technical Background Paper No. 7 - 'Energy'. On page 33 this defines the size of a wind farm development by the height of the turbines. A medium sized development being of turbines 110m in overall height. Would the ultimate definition of a 'medium sized' development include both number and size of turbines? There is no doubt that wind farm development will be a continuous issue so Kirkwhelpington Parish Council would like to be sure that in the final draft of the RSS there can be no ambiguity concerning the definition 'medium sized' development.</p>
506	Member of Public	<p>I oppose the siting of a wind farm at Kiln Pit Hill for following reasons</p> <ol style="list-style-type: none"> 1. Area of high landscape value to locals and visitors 2. It is centred around main A68 route and is gateway to Northumberland and Scotland 3. Attractive rural environment attracts "in-migrating" and returning residents. It is not sparsely populated as other areas of least constraint are. 4. Building activity is severely restricted as area categorized as "commuter pressure". 5. Turbines will be seen from all over counties of Durham and Northumberland and adjacent Pennines area of outstanding natural beauty. 6. Area has grade 1 and grade2 listed buildings and objective 11 of RSS is to protect and enhance cultural heritage and diversity. 7. Policy 42 conflict with spirit of policies 9,10,16,33,34,35 &41 of the RSS 8. There has been no direct consultation with local community 9. Connection to National Grid is complicated and will further damage the countryside 10. There is abundant wildlife and the geo-diversity of the area is important. Amenity and recreational value will be reduced and so the quality of life of residents as well as being detrimental to businesses.
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470	Member of Public	<p>The environmental and economic case for onshore wind energy development is overwhelming. There is an urgent need to act on climate change by promoting sustainable energy generation. Any local objections to specific developments must be balanced against the overwhelming advantages of sustainable energy.</p>
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308 Member of Public

- Oppose: the inclusion of Kiln Pit Hill, described as a broad area, with the least constraints for the siting of a medium sized wind farm, and request the deletion of the area within the draft RSS for North East for following reasons:
- (1) This is an area of high landscape value and highly valued by the local community, visitors and tourists alike.
 - (2) It is centred around the main A68 route and is the getaway to Northumberland and Scotland.
 - (3) The area is an attractive rural environment in which to live and attracts 'in- migrating and returning' residents. It is not sparsely populated as other identified areas of least constraint are.
 - (4) It is categorised as an area of 'commuter pressure' which means that building activity is severely restricted.

Id No Respondent

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- (5) The 25 by 100 meter high turbines will be clearly seen from all over the counties of Durham and Northumberland and from the adjacent North Pennines Area of Outstanding Natural Beauty.
- (6) The area contains at least one Grade 1 listed building and several Grade 2 listed buildings, which are enjoyed by many people. Objective 11 of the RSS is to protect and enhance the regions culture heritage and diversity.
- (7) Policy 42 conflicts with the spirit and criteria of policies 9, 10, 16, 33, 35, and 41, contained also in the draft RSS.
- (8) There was no direct consultation and communication with the local community about the identification and inclusion of the area, known as Kiln Pitt Hill in the draft RSS. Many of the people in the area learnt about its inclusion from the press.
- (9) Connection to the National Grid, from the area known as Kiln Pitt Hill in the draft RSS is complicated and will further damage the countryside.
- (10) The area is fortunate to have an abundance of wildlife and the geo-diversity of the area is important. The amenity and recreational value of the area in terms of riding and cycling road networks will be reduced, thus limiting amenity access and will affect the quality of life to residents and have detriment to local businesses.

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As residents of Great Bavington, Northumberland we, along with many others in the area, are suffering the fallout of the loose definition of "Knowesgate" and "medium sized windfarms" in the RSS.

We currently have AMEC, Banks and Wind Prospect proposing a total of over 100 Large scale turbines in an area south and west of Knowesgate covering a huge area down to Great Bavington and west to Thockrington and Green Rigg. Development on this scale is clearly contrary to Policy 41 criteria a, b, c, d, e, h, i & j.

It needs to be made clear to developers that the term "a medium sized windfarm" means 20- 25 turbine total for the area and not 20 -25 per proposal. If it was the intention to set a 20 -25 turbine target per proposal then you would also need to set a limit for the number of proposals!

A conversation with the Banks Project Manager at their exhibition on 28th September suggest that this developer is still working to the description of Knowesgate contained in an early draft of the Regional Renewable Energy Strategy as "the area between the A68 and the A696 in the broad area of Knowesgate" . We remind you that subsequent versions of this document, the Northumberland Structure Plan and the draft RSS only refer to "the broad area of Knowesgate". The former description is clearly encouraging developers to adopt an overly broad definition of this area of least constraint to suit their commercial interests.

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Oppose: the inclusion of Kiln Pit Hill, described as a broad area, with the least constraints for the siting of a medium sized wind farm, and request the deletion of the area within the draft RSS for North East for following reasons:

- (1) This is an area of high landscape value and highly valued by the local community, visitors and tourists alike.
- (2) It is centred around the main A68 route and is the getaway to Northumberland and Scotland.
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 - (9) Connection to the National Grid, from the area known as Kiln Pitt Hill in the draft RSS is complicated and will further damage the countryside.
 - (10) The area is fortunate to have an abundance of wildlife and the geo-diversity of the area is important. The amenity and recreational value of the area in terms of riding and cycling road networks will be reduced, thus limiting amenity access and will affect the quality of life to residents and have detriment to local businesses.

297 Member of Public

- Oppose inclusion of Kiln Pit Hill for siting if wind farm for following reasons:
- 1. This is an area of high landscape value to local community and tourists.
 - 2. It is centred around main A68 route and is gateway to Northumberland and Scotland
 - 3. Is an attractive rural environment in which to live and attracts inward migrating and returning residents. It is not sparsely populated as other areas of least constraint are.
 - 4. It is categorized as an area of "commuter pressure" which means building activity is severely restricted.
 - 5. The turbines will be seen from all over Durham Area of Outstanding Natural Beauty.
 - 6. Area contains at least one grade 1 listed and several Grade 2 listed buildings. Objective 11 of the RSS is to protect and enhance the region's cultural heritage and diversity.
 - 7. Policy 42 conflicts with spirit of Policies 9,10,16,33,34,35,& 41
 - 8. No consultation or communication with local community about inclusion of area.
 - 9. Connection to National Grid is complicated and will damage countryside
 - 10. Area has abundance of wildlife and is geo -diverse. The amenity and recreational value of area in terms of riding and cycling road networks will be reduced, thus limiting amenity access and will affect quality of life of residents and be detrimental to businesses.
- Please remove Kiln Pit Hill from RSS

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296	Member of Public	<p>Oppose inclusion of Kiln Pit Hill for siting if wind farm for following reasons:</p> <ol style="list-style-type: none"> 1. This is an area of high landscape value to local community and tourists. 2. It is centred around main A68 route and is gateway to Northumberland and Scotland 3. Is an attractive rural environment in which to live and attracts inward migrating and returning residents. It is not sparsely populated as other areas of least constraint are. 4. It is categorized as an area of "commuter pressure" which means building activity is severely restricted. 5. The turbines will be seen from all over Durham Area of Outstanding Natural Beauty. 6. Area contains at least one grade 1 listed and several Grade 2 listed buildings. Objective 11 of the RSS is to protect and enhance the region's cultural heritage and diversity. 7. Policy 42 conflicts with spirit of Policies 9,10,16,33,34,35,& 41 8. No consultation or communication with local community about inclusion of area. 9. Connection to National Grid is complicated and will damage countryside 10. Area has abundance of wildlife and is geo -diverse. The amenity and recreational value of area in terms of riding and cycling road networks will be reduced, thus limiting amenity access and will affect quality of life of residents and be detrimental to businesses. <p>Please remove Kiln Pit Hill from RSS</p>
295	Member of Public	<p>Oppose inclusion of Kiln Pit Hill for siting of wind farm for following reasons:</p> <ol style="list-style-type: none"> 1. This is an area of high landscape value to local community and tourists. 2. It is centred around main A68 route and is gateway to Northumberland and Scotland 3. Is an attractive rural environment in which to live and attracts inward migrating and returning residents. It is not sparsely populated as other areas of least constraint are. 4. It is categorized as an area of "commuter pressure" which means building activity is severely restricted. 5. The turbines will be seen from all over Durham Area of Outstanding Natural Beauty. 6. Area contains at least one grade 1 listed and several Grade 2 listed buildings. Objective 11 of the RSS is to protect and enhance the region's cultural heritage and diversity. 7. Policy 42 conflicts with spirit of Policies 9,10,16,33,34,35,& 41 8. No consultation or communication with local community about inclusion of area. 9. Connection to National Grid is complicated and will damage countryside 10. Area has abundance of wildlife and is geo -diverse. The amenity and recreational value of area in terms of riding and cycling road networks will be reduced, thus limiting amenity access and will affect quality of life of residents and be detrimental to businesses. <p>Please remove Kiln Pit Hill from RSS</p>
309	Member of Public	<p>Oppose: the inclusion of Kiln Pit Hill, described as a broad area, with the least constraints for the siting of a medium sized wind farm, and request the deletion of the area within the draft RSS for North East for following reasons:</p> <ol style="list-style-type: none"> (1) This is an area of high landscape value and highly valued by the local community, visitors and tourists alike. (2) It is centred around the main A68 route and is the getaway to Northumberland and Scotland. (3) The area is an attractive rural environment in which to live and attracts 'in- migrating and returning' residents. It is not sparsely populated as other identified areas of least constraint are. (4) It is categorised as an area of 'commuter pressure' which means that building activity is severely restricted. (5) The 25 by 100 meter high turbines will be clearly seen from all over the counties of Durham and Northumberland and from the adjacent North Penines Area of Outstanding Natural Beauty. (6) The area contains at least one Grade 1 listed building and several Grade 2 listed buildings, which are enjoyed by many people. Objective 11 of the RSS is to protect and enhance the regions culture heritage and diversity.

Id No Respondent

Policy 42

- (7) Policy 42 conflicts with the spirit and criteria of policies 9, 10, 16, 33, 35, and 41, contained also in the draft RSS.
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- (9) Connection to the National Grid, from the area known as Kiln Pitt Hill in the draft RSS is complicated and will further damage the countryside.
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- 3. Attractive rural environment attracts "in-migrating" and returning residents. It is not sparsely populated as other areas of least constraint are.

- 4. Building activity is severely restricted as area categorized as "commuter pressure".
- 5. Turbines will be seen from all over counties of Durham and Northumberland and adjacent Pennines area of outstanding natural beauty.
- 6. Area has grade 1 and grade2 listed buildings and objective 11 of RSS is to protect and enhance cultural heritage and diversity.
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I am commenting on paragraphs 3.138 – 3.142, supporting documents and their links to Policy 42. As they are interlinked, I felt it appropriate to make all comment under the heading of Policy 42.

I welcome para 3.138. It provides an excellent basis for assessment of particular Landscapes and their potential for wind farm proposals. It is important that this document is given due weight: the assessments of wind farm potential provided here is much more important than in documents such as the Energy Grid Capacity Study which really deals with constraints rather than potentials.

3.141 There is a major problem with the definition in the final sentence. It introduces confusion and part of the definition is not supported by the other documents. There will clearly be major changes in technology but this does not change the number of turbines. Technology is primarily driving an increase in scale, size and capacity, not number.
This definition is carried over from the Technical Background Paper No.7 (Energy). It discussed, under “Summary of the Landscape Study” (p32) paras 7 & 8, the criteria for judgments made on sensitivity of landscapes to windfarm typologies.
This summary gives two alternative definitions of windfarm typologies; one based on turbine size and scale, the other on number of turbines. It is clear on reference to the Landscape Study that this summary is incorrect. Section 2.2.6, “Typology of Windfarm Development”, defines in para 3 the “...three main typologies. These were turbines of overall maximum height to blade tip of 80m, 110m, and 140m. We..refer to these as small, medium and large types for convenience. ... In the assessments which follow, reference is made for convenience to small, medium and large commercial developments to signify sensitivity across the range 80m-140m overall height”
The definition of “Windfarm Typology” in Paper No.7 should be amended to exclude option (b) “the size or number of turbines”
Unfortunately this error has been compounded in 3.141, where the “scale” has been defined purely in terms of number. The height definition has now been excluded. The number definition, in fact, derives from the Grid Capacity Study which should not take precedence over the Landscape Study for determination of potential. The use of the number definition has the effect of unnecessarily restricting development numbers.

This error was carried over to the Northumberland Structure plan where it was noted in the EiP:

5.32 GO-NE considered that the reference to medium-scale development in relation to WRAs appeared to exclude larger schemes than 25 turbines. “Medium scale” follows the RRES, which is the best information currently available on likely capacity. Should further information become available, we consider the Regional Spatial Strategy will be the place to address that.

The final sentence of 3.141 should be amended to read:

“Medium scale wind energy development is defined as turbines with a typology of up to 110m maximum tip height, with small scale up to 80m height”

The reference to changes in technology would be inappropriate in this place as these will in no way effect the impact upon Landscape.

Policy 42

In view of the above “medium” should be changed so (b) will read:

“the following areas have potential for medium-small scale development”.

This will accurately reflect the Landscape Appraisal yet will not constrain development numbers.

Knowesgate provides an excellent example of the difficulties arising from the existing definition error and of the designation or areas by place name. It is identified as an area “of least constraint” in the Landscape Appraisal as it is on Landscape Type “Upland Fringe Farming”

Id No Respondent

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(UFF). It is an extensive area that covers from Harwood, through Knowesgate almost to Corbridge. At the Knowesgate location the UFF area is actually a narrow, 2-3km wide, tongue of land between areas of high landscape sensitivity. The Landscape Appraisal further constrains the area by indicating that the development scale where UFF abuts the Rolling Lowland Farming LCT (the eastern edge) should be "small". In effect this severely limits the potential for development. The small physical area limits the turbine numbers.

I would suggest the potential for development should not be circles on a map (Env 1) and a list of place names (Policy 42) but should actually show the UFF (and similar) regions graphically, as defined in the GIS study.

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3. Attractive rural environment attracts "in-migrating" and returning residents. It is not sparsely populated as other areas of least constraint are.
4. Building activity is severely restricted as area categorized as "commuter pressure".
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6. Area has grade 1 and grade2 listed buildings and objective 11 of RSS is to protect and enhance cultural heritage and diversity.
7. Policy 42 conflict with spirit of policies 9,10,16,33,34,35 &41 of the RSS
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630 Member of Public

Oppose swamping area with wind farm development when other technologies being developed and less intrusive, I.e wave and tidal power.

Already low generators in existence. Do not want hundreds of tall generators to be visible across and beyond the region.

Policy 42 conflicts with several other objectives and policies in the document:

3.86 - Bullet points 4 - Wind farms will cause significant environmental harm
6 - Wind farms will affect the natural beauty.

Policy 2g - wind farms will destroy the quality of..

Policy 9 - Wind farms will not enhance the environment.

Policy 33 - Wind farms within sight of the areas mentioned at bullets a & b will be contrary to those policies

Id No	Respondent	Policy 42
		Under policy 41 on-shore wind farms should be rejected particularly by bullet points a, c, d, f, I & j.
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434 Moorsyde Action Group

Our comments are very specific to the wording in Annex A of Technical Paper number 7, dealing with energy and in particular the wording relating to the area to the South and West of Berwick. Our concern is to ensure consistent and accurate wording in relation to the descriptions that accompany the Regional Renewable Energy Strategy indicative diagram and also wording that accurately reflects the capacity of the identified areas.

At present a wide range of inconsistent terminology is used in the consultation draft. The description in relation to the area to the south and west of Berwick is particularly vague and is unfortunately already being seized upon by Developers in an attempt to justify their individual proposals. At the same time they are unwilling to acknowledge the problems of capacity or accumulation in the area, or indeed to even acknowledge the proposals of other developers.

Descriptions of capacity in Annex A of Technical Paper 7 seem not to follow a consistent terminology, as demonstrated in the following descriptions of the Northumberland proposed wind resource areas

S&W Berwick - One or more small / medium scale wind farms, clustered and / or separate from one another.

North / South Charlton - Small / medium scale.

Knowesgate - Medium scale wind farm development.

Harwood Forest - Small or medium scale wind farm development

Northern Coalfields - Small or medium scale wind farms

Kiln Hill Pit - Small or medium scale

The descriptions of the Durham area again seem to follow a very different format, both from Northumberland and from each other.

Within these current descriptions it is possible to infer that the Berwick area has a capacity for a number of medium scale wind farms, whereas the North / South Charlton area has a capacity for a single small or medium scale wind farm and the Knowesgate area has capacity for a single medium scale development. This in no way reflects the very different characteristics of the areas described. The Berwick area is a relatively small and populated lowland arable plateau, which also contains a significant number of tourist businesses. Whereas the Knowesgate area in particular consists of large expanses of open and unpopulated moorland and the Charltons area, to the west of the A1 also contains significant expanses of upland moors with very sparse population.

The description of the Berwick area also seems to ignore the clear constraints, originally highlighted in the landscape evaluation study undertaken by the University of Newcastle in 2003, and further detailed in the North East Renewable Energy Strategy published in March 2005. This sets out how turbines should not be sited so as to impinge on principle views of the Cheviots.

Id No Respondent

Policy 42

The Newcastle University study also details how the area to the south and west of Berwick has a medium sensitivity to wind development, although this is frequently misrepresented as a low to medium sensitivity.

It should be noted that both the Northumberland County Structure Plan, as recently amended, and the North East Renewable Energy Strategy March 2005, both suggest medium scale development as being appropriate to the area to the south and west of Berwick. This suggests that the sum total of the capacity of the area would be a medium scale development either resulting from a single wind farm or accumulation of two or more smaller clusters.

The area to the south and west of Berwick undoubtedly has some, albeit limited, capacity for wind farm development. This might be through a medium scale wind farm, but given the population patterns and the other constraints of the area is far more likely to be achieved through dispersed clusters. It quite clearly, however, cannot accommodate a number of medium scale developments. An accurate reflection of the area in strategic guidance is far more likely to enable the area to make a contribution. Ambiguous or inaccurate draft guidance has already seen the Borough placed under siege by numbers of developers who are independently trying to maximise the number of turbines that they can shoe-horn into individual sites.

Such a lack of clearly defined limits to the capacity that the area can accept is encouraging successive proposals that will place an impossible burden on the local planning system that must already be under strain. The prospect of successive applications for large arrays of turbines is already blighting local communities and business development in the affected area. All of these effects are damaging to the successful adoption and development of renewables and to the economic development of the Borough.

173 Morpeth & District Civic Society

Policy 42 Onshore Wind Development page 116

We are uneasy about the prospect of the countryside and the urban fringe being despoiled by wind farms. The economics of wind power are highly questionable –as also is their true worth and value to the nations electricity supply. Wind power has become a quick and ready way of achieving renewable energy targets, in the absence of any truly suitable technology. At a local level , we do not support the proposals for large scale wind farms in Kielder Forrest (close to the National Park) and the medium scale developments proposed in the “ Northern Coalfield south of Druridge Bay “. Has this reference to the ‘Northern Coalfield’ been used to create the false impression that the landscape in this area is of little value and therefore suitable for wind farms ? There is no coalfield – and the landscape should not be despoiled . There is the heritage coast here – the wind farms would be visible across the flat landscape. As a general point , it is accepted that solitary small local wind generators – in suitable locations - can be acceptable .

449 National Trust North East

The Trust support this policy, although we have concerns about the cumulative impact of some proposals, and the potential impact that some proposals may have on the Northumberland National Park.

We would therefore request that the policy be re-worded to read:

“...should provide a positive policy framework to facilitate onshore wind development within the following broad areas of least constraint for wind energy developments, subject to the provisions contained within Policy 41:”

Some of the areas identified are a little too specific for the RSS – i.e. the identification of Harwood Forest, which is a small area of land, much of which is owned by the National Trust, which is also directly adjacent to the Northumberland National Park (which is the reason for asking for the inclusion of the extra wording suggested). The RSS is not supposed to be site specific, and the Trust feels that the RSS is identifying a

Id No Respondent

Policy 42

particular site for development, and this is contrary to advice contained in PPS11.

222 Northumberland County Council

The County Council supports the policy framework for onshore wind developments as being consistent with the adopted Northumberland Joint Structure Plan policy but expresses concern regarding the cumulative impacts of proposed developments in identified areas of least constraint for such developments

452 Shotley Low Quarter Parish Council

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151 Sunderland ARC

Onshore Wind Developments is supported

254 UK Coal Mining Ltd

Generally Supportive of the areas identified for large and medium scale onshore wind development, as identified in criteria A and B.

Para 3.141 – We note the definition of medium scale wind energy development is defined as 20-25 turbines. It is suggested that some flexibility should be incorporated to enable open 'medium' scale development with, slightly higher number of turbines than identified