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## Representations

To enable the representations received by the Panel Secretariat on the Regional Spatial Strategy Submission Draft to be viewed, a set of summaries have been prepared and are organised, with policies of the document.

Whilst every effort has been made to achieve a consistent approach to summarising the representations some referred to sections of the document which did not contain policies and others were out of match to individual policies.

Therefore, in these cases, a summary of the response is located under 'Overall General Comments' of the particular section of the Submission Draft.

During this process overall time constraints have inevitably prevented the checking of the spelling and layout errors.

Names of individuals (i.e. members of public) have been omitted in the set of summaries in line with Data Protection Act regulations.

Please contact the Panel Office if you would like further information on the summaries of the representations.

**To view the list of all organisations who gave responses [click here](#).**

Overall General Comments	Policy 14	Policy 30	Policy 4
General Comments - Section 1	Policy 15	Policy 31	Policy 4
General Comments - Section 2	Policy 16	Policy 32	Policy 4
Policy 1	Policy 17	General Comments - Section 3c	General Section
Policy 2	Policy 18	Policy 33	Policy 4
Policy 3	Policy 19	Policy 34	Policy 5
Policy 4	Policy 20	Policy 35	Policy 5
Policy 5	Policy 21	Policy 36	Policy 5

Policy 6	Policy 22	Policy 37	Policy 5
Policy 7	Policy 23	Policy 38	Policy 5
Policy 8	General Comments - Section 3b	Policy 39	Policy 5
Policy 9	Policy 24	Policy 40	Policy 5
Policy 10	Policy 25	Policy 41	Policy 5
Policy 11	Policy 26	Policy 42	Impleme
General Comments - Section 3a	Policy 27	Policy 43	
Policy 12	Policy 28	Policy 44	
Policy 13	Policy 29	Policy 45	

development should include an explicit recognition of the proximity of this area to the Northumberland National Park and the need for any proposals to be assessed in terms of their compatibility with National Park purposes.

Paragraph 3.129 states that the target of 20% of electricity to be generated by renewable sources by 2020 would be possible if strategic scale wind development took place within Kielder Forest. Paragraph 3.132 states that it is proposed to undertake a further assessment of the strategic wind development potential within Kielder Forest, which will include further discussions with the Ministry of Defence and National Park Authority. Policy 40 sets sub-regional targets for 2010 and an aspirational target for 2020 that will need to be re-assessed following the results of this work and the review of the Regional Renewable Energy Strategy.

Defence Estates note the designation of the Kielder Forest area as suitable for Strategic Wind Development. This is an area where wind turbines could affect air defence radar at Brizlee Wood and air traffic control radar at RAF Spadeadam. Part of the Kielder Forest area falls within the low flying zone for RAF Spadeadam Electronic Weapons Training Range wind turbines could interfere with low level entry and exit from the range. The MOD has previously demonstrated the value and uniqueness of Spadeadam at a Public Inquiry when an application for a wind farm was turned down.

Research in the last year or so has concluded that wind turbines of current design that are in line of sight (radar line of sight) significantly affect both air defence and air traffic control radar. Some measures have been identified which may, once tested and if proved effective, be applied to air defence radar in the longer term. MOD will continue to explore options with stakeholders in order to find a way forward for wind projects to coexist with defence facilities in the area.

DE object to the 2010 targets and aspirational 2020 targets within Policy 40 as the work to assess the strategic scale wind development potential within Kielder Forest has not been completed.

Duddo Parish Council is totally opposed to the RSS policy on Regional Renewable Energy in which an area south west of Berwick is identified as having potential for medium scale development and further states that this is an area of least constraint for major wind energy developments. Duddo Parish Council has canvassed all the households of the Parish and following consideration of their views wishes to object to the strongest possible terms to this policy. Our parish is totally unsuited to development of wind turbine farms of the proposed size, the turbines will dominate that landscape and be visible for more than 30km in all directions. Tourism is one of our major industries and many of our other rural businesses play a supporting role and benefit greatly both in job provision and financially from catering for visitors. Potential developments of this nature will ruin our landscape and peaceful rural area, which is the reason so many visitors enjoy North Northumberland. Residents have for years put up with the disadvantages of living in a rural area like our parish, with its fewer and more expensive services, for the benefits of living in a cleaner and beautiful environment. Now we may lose these benefits if our countryside is despoiled by turbines, pylons, wires, roads and substations. Also the Regional Spatial Strategy plans as proposed effectively curtail new housing and business development in our rural parishes. It is our residents wish to sustain and regenerate our parishes and all we are offered is an industrial landscape of wind turbines. We are aware of and have been consulted on the application by 'Your Energy' for a turbine wind farm at Moorsyde in our parish. Now we may have to contend with a further development by 'Npower' at Toft Hill in our parish. These with other potential similar development in our neighbouring parishes will be disastrous for our parish and its residents the cumulating effect will be totally dominant. For the above reasons Duddo Parish Council object strongly to the parts of the North East Regional Spatial Strategy on Renewable Energy.

Policy 40 - support the policy that plans should facilitate the generation of at least 10% of the region's consumption of electricity from renewable resources by 2010. The identified target for County Durham of achieving a minimum of 82MW by 2010 is challenging but early

**Id No    Respondent**

428    Campaign To Protect Rural England

**Policy 42**

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.

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.

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.

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..."

362    Campaign to Protect Rural England

I oppose the siting of a wind farm at Kilm Pit Hill for following reasons

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.
- Onshore Wind Development

349    Defence Estates

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.

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.

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.

**Id No Respondent****Policy 42**

MoD will continue to explore options with stakeholders in order to find a way forward for wind projects to coexist with defence facilities (particularly Brizlec 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.

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.

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.

3.142

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

Policy 42

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

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.'

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:

202 Durham County Council

102 Durham Tees Valley Airport

200 Environment Agency

329 Friends of the Earth South Tyneside

4 Friends of the Earth Tyne Bridge