

## **Assessing the Environmental Capacity for On-Shore Wind Energy Development Consultation on Proposed Approach to Natural England Guidance**

### **Response by the Cotswolds Conservation Board.**

1. The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes<sup>1</sup>:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

2. The Board is very concerned that the guidance, although stated to be for Natural England staff, will be used by a wider audience to support or object to proposals for wind farm development. Natural England is the Government's adviser for landscape and biodiversity and therefore this guidance will have considerable weight. In this regard it is very important that wording is clear and unambiguous and that there is a solid basis for statements being made.
3. The Board remains concerned that the mapping approach, particularly of landscape capacity, will suggest that there are areas which at a regional scale are acceptable, whilst more detailed study would indicate otherwise. As an example of the problems mapping will cause, the setting of designated areas are currently not mapped, and therefore do not appear as a constraint on the national map, (Map2) whereas they are referred to under scenic quality.
4. The wording of the "Explanation of Criterion" for scenic quality is ambiguous. "Land of high scenic quality occurs within designated landscapes (World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts) but also elsewhere." would read more accurately as "The nationally designated National Parks and Areas of Outstanding Natural Beauty are of high scenic quality. World Heritage Sites and Heritage Coasts may include land of high scenic quality, which may also occur elsewhere."
5. The Board is not convinced that the General Principles set out in Annex 2 are helpful. They are very generalised and hedged with a number of caveats. It is not clear how these have been derived from the Criteria based approach set out in the main guidance.
6. It is really not appropriate for such guidance to include statements beginning "as a rule of thumb". Where do these "rules" come from? Is there any consensus on the distances etc., set out in the "rules"?

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<sup>1</sup> Section 87, Countryside and Rights of Way Act 2000.

- 7 It would be helpful at some point in the document to indicate that those areas with low capacity for onshore wind energy development can still make a significant contribution to reductions in carbon emissions by the implementation of energy conservation measures and other renewable energy technologies.

**Responding to the consultation**

Please respond to the consultation via the dedicated email address:

<http://www.naturalengland.org.uk/ourwork/policy/consultations/default.aspx>