



Campaign to Protect  
Rural England

NORFOLK  
05 July 2010

Mr Geoff Hall, Executive Director  
Development Services  
Borough Council of King's Lynn & West Norfolk  
King's Court, Chapel Street  
King's Lynn  
Norfolk PE30 1EX

Dear Mr Hall

**Application No. 10/00883/FM – Wind Energy Development at land between Bagthorpe, Barmer and Syderstone known as Chiplow**

CPRE believes that man-made climate change is a major threat to the countryside and the wider environment. However, we also believe that onshore wind power proposals should be approached on a case by case basis and each assessed for potential impacts on the landscape and its cumulative impact, an impact which effects both landscape and visual amenity. It is noted in **PPS22: Renewable Energy**, that of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects.

Having carefully studied the application documents and visited the site and the surrounding countryside, we write to strongly **object** to this proposal on the following grounds:

- Negative effects on the landscape character
- Negative visual effects on the landscape
- Negative cumulative landscape and visual effects

The application is for 5, 2MW wind turbines with a tip height of 100 metres, and a permanent 50 metre anemometry mast, all to be set on 04.70 hectares of arable farmland.

We wonder why there is now a need for a permanent mast, whereas the original application for a mast only, permitted on appeal, was for 24 months, when the Inspector considered that bird deflectors were necessary and monitoring of bird mortality should be carried out for the period over which the mast was in place. **Fig 4.7** shows no guy lines or deflectors on the mast.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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### Landscape and Visual Effects

The Non-Technical Summary describes the site as ‘lying within lowland farmland in a gently undulating predominantly agricultural landscape of arable land with associated hedgerows and woodland blocks. There are scattered farmsteads and villages within the area surrounding the site including Bagthorpe, Barmer and Syderstone’. Yet the site itself is described as containing no distinct landscape or visual elements, a weak sense of place, no extensive views and a sense of relative isolation.

However, the site and the surrounding area lies within a landscape designated as an Area of Important Landscape Quality ‘Confined’ and saved **Policy 4/6** of the **Local Plan** (1998) states: *In an Area of Important Landscape Quality shown on the Proposals Map development which damages the distinctive character or appearance of the landscape will not be permitted.*

The **Companion Guide to PPS22: Renewable Energy** (para 3.31) defines landscape character as ‘a distinct and recognisable pattern of elements that occur consistently in a particular type of landscape’. Both **PPS1 Supplement: Planning and Climate Change** (para 4.16) and **PPS7: Sustainable Development in Rural Areas** (para 24) under the heading Local landscape designations ‘recognise and accept that there are areas of landscape outside nationally designated areas that are particularly highly valued locally ... and that tools such as landscape character assessments should provide sufficient protection for these areas’ ...

The **Landscape Character Assessment** (2007) shows the application site straddling two landscape types: Type I Rolling Open Farmland and Type J Plateau Farmland.

Key landscape characteristics of Rolling Open Farmland are:

- an overriding sense of openness, wide open skies
- landscape feels very still
- prominent skyline often uninterrupted and smooth
- strong sense of remoteness and tranquillity

Landscape planning guidelines seek to

- conserve the generally undeveloped rural character of the area and related strong sense of tranquillity
- ensure the sensitive location of development involving tall structures including wind turbines
- conserve the landscape setting of Bircham Newton [village] and Bagthorpe

Key landscape characteristics of Plateau Farmland are:

- most elevated landscape type: 40m – 90m AOD\*
- strikingly flat terrain, long distance panoramic views, strong sense of exposure
- skyline prominent, often uninterrupted and smooth giving way to wide open skies
- landscape feels mostly still having a remote, almost vacant character in places

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\*The contours of the application site are between 55m – 70m. Varying heights over undulating ground has potential to confuse the simplicity of the skyline. (LUC Report 2003)

Landscape planning guidelines seek to

- conserve the scarce settlement pattern characteristics of the area
- conserve the landscape setting of existing villages
- conserve the largely undisturbed and tranquil nature of the area

It is noted that one of the key forces for change is wind turbine development.

**Policy ENV2: Landscape Conservation, East of England Plan**, states that ‘Planning authorities and other agencies should recognise and aim to protect and enhance the diversity and local distinctiveness of the countryside character areas identified’, and **PPS7** emphasises the continuing need to protect the countryside for the sake of its intrinsic character and beauty.

Though the applicant believes there will be no significant landscape effects beyond 10km of the site, they acknowledge that the 100 metre turbines will be the largest and most prominent landscape elements providing a contrast with other existing built and land-cover elements in terms of scale, form, function and colour. They go on to state that the presence and movement of 5 turbines will generate a high magnitude of landscape change within the application site and its immediate environs

**Norfolk Coast Partnership** in their letter of the 16<sup>th</sup> June 2010 responding to the application, writes that as the development site is approximately 7km beyond the southern boundary of the AONB, “the potential effects on the landscape quality of the North Norfolk Coast is on the views from the AONB and the views from the Norfolk Coast Path and Peddars Way National Trails. Many visitors do look landwards to the views of marsh and farmland, particularly from the Norfolk Coast Path”.

**Policy ENV2** states that the Norfolk Coast and North Norfolk Heritage Coast will be afforded the highest level of protection and, within the AONBs, priority over other considerations will be given to considering the natural beauty, wildlife and cultural heritage of each area.

The applicant may consider that there would be no significant landscape effects beyond the 10km radius of the site, yet there will certainly be significant visual effects within the detailed study area, and within and beyond the 30km radius. 78.2% of the total area of the AONB is within the defined study area. (para 7.3.45 Vol.1 Main Text). Figures of the Zones of Theoretical Visibility (ZTVs) show that it is theoretically possible to see wind farms 30km in any direction. **Fig. 7.5** shows those residential properties that will be most affected within a 3km radius from the site centre and the many wire frames taken from various view points show that all the 5 turbines are visible, even above tree tops, both at hub height and blade tip, of these 100 metre high turbines. We do not accept the applicant’s statement that though residential properties are of high sensitivity, they would not experience significant effects on their visual amenity.

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In paragraph 3.35 of the **Companion Guide to PPS22**, in discussing **landscape sensitivity**, the Guide states that ‘*a distinction can be made between the “overall landscape sensitivity” and “landscape sensitivity to a particular kind of change”. The “overall landscape sensitivity” may be described as a combination: the visual sensitivity of the landscape resource, the extent to which it is seen by people, and the scope to mitigate the visual impact*’.

As described earlier, the Plateau Farmland landscape has very little scope to mitigate the visual impact - as clearly illustrated in the photomontages. Although there are blocks of woodland, there are no buildings, just hedgerows and a ‘*strikingly flat terrain, long distance panoramic views and a strong sense of exposure*’.

We believe the key landscape characteristics of both the Rolling Open and Plateau Farmland types, as well as the landscapes viewed beyond their boundaries, are landscapes that are both *sensitive to a particular kind of change* and have an *overall landscape sensitivity* – areas that have already been described in the Norfolk Coast Partnership letter.

We would question how a statement can be made in the **Non-Technical Summary** that the 5 turbines are unlikely to affect key characteristics as described in the Landscape Character Assessments of the Rolling Open and Plateau Farmland landscape types, i.e.

open views    tranquillity    isolation    woodlands

when the **Land Use Consultants’ Report on Wind Turbine Development** (2003), used to determine the viability of the area for wind turbine development, also describes the two landscape types as having an overriding sense of openness, wide open skies, remoteness and tranquillity?

Whilst the **LUC Report** finds that both these landscape types are suited to single and small scale turbine development, it is also pointed out that ‘in a perceptually remote landscape, a small scale turbine development (2-12 turbines) may increase the sense of human influence and adversely affect the remote and tranquil character of the landscape’.

How do we define tranquillity? Tranquillity is the quality of calm experienced in places with mainly natural features and activities, free from disturbance from manmade ones. **CPRE** believes that tranquillity is a significant environmental issue and we launched a national map of tranquillity in October 2006, when surveys were carried out to explore further what most people enjoyed and appreciated about the countryside, and assessing what factors add or subtract from their sense of tranquillity. Wind turbines were included in the survey as a negative impact. The map for Norfolk, revised in 2007, (attached) shows the Rolling Open and Plateau Farmland landscapes as being most tranquil.

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There is no doubt that the proposed development will change the character of available views and will also have a permanent, direct and negative impact not only on the landscape but a long term and significant adverse effect on the visual amenity of those people living, working and visiting the area.

The diversity and local distinctiveness of the Borough's landscapes are considered to be a major environmental asset, making a significant contribution to the quality of life for West Norfolk's communities (LCA 2007) - and to the important tourism economy.

### **Cumulative Landscape and Visual Effects**

**PPS22 Companion Guide, paragraph 5.22** describes cumulative landscape effects as *'the effects of a proposed development on the landscape fabric, character and quality and so concerns the degree to which renewable energy development becomes a significant or defining characteristic of the landscape'*.

**Paragraph 5.22** goes on to say that cumulative visual effects *concern the degree to which renewable energy development becomes a feature in particular views (or sequences of views), and the effect this has upon the people experiencing those views'*.

**Figure 7.47** is a map of the proposed Chiplow site in relation to other on-shore wind farms within the 60km Cumulative Assessment Study Area showing operational, consented, submitted, at appeal or pending public inquiry. The closest operational shown are those at Swaffham and North Pickenham within the 30km study area, but the majority shown are to the south west in Cambridgeshire and Fenland, all within the 60km radius and do most certainly create both cumulative landscape and visual effects in that area. The applicant states that there is minimal potential for cumulative landscape effects and no potential for a 'windfarm landscape' in relation to the proposed Chiplow site.

However, there are 2 submitted applications within the 30km/60km radius of Chiplow at Dickleburgh and Tivetshall St Mary, (South Norfolk), and 2 that have been to appeal and likely to be re-submitted or in scoping at Shipdham (Breckland) and Guestwick (Broadland), that should be included in Eon's Figure 7.47 map.

This would illustrate and confirm the opinion expressed in **para 5.21, PPS22 Companion Guide**, that *'Several areas in England are experiencing much interest from renewable energy developers and cumulative effects have become a factor in the determination of applications'*.

We do understand that planning authorities must determine a single application on its merits and not take into account those in preliminary discussions. However, **Scottish Natural Heritage Guidance\*** (p.5, para. 19) states that *'pre-application proposals could be regarded as a material consideration, especially where the proposals are already in the public domain as a result of developer publicity or a formal request for scoping opinion, and where they are well articulated in terms of location and scale'*.

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\*Scottish Natural Heritage Guidance: Cumulative Effect of Windfarms, Version 2 revised 13.04.05

As you know, here in West Norfolk, within the 10km detailed study area of the Chiplow application (Fig. 7.47) two Scoping Opinions have been sought. One for 7, 126m turbines at **Fring/Docking** by West Coast Energy (March 2009), and the other by RES Ltd (February 2009) for 6, 100m turbines (originally 30, 127m turbines) at **Jack's Lane**, between North Creake, Syderstone and Stanhoe – both proposals clearly articulated in terms of location and scale.

More positively articulated in terms of location and scale are RES Ltd's plans for Jack's Lane Wind Farm – a distance of less than 3km as the crow flies from the Chiplow site. The applicants held public exhibitions in North Creake and Stanhoe in late March this year at which were shown detailed plans of their proposals, including wire frame images, photomontages and ZTVs taken from various viewpoints as well as technical information. A Community Liaison Group has been set up by RES Ltd consisting of neighbouring Parish Councils to which a Planning Officer of the Borough is invited, and there is even an active project website.

**Paragraph 5.23 PPS22 Companion Guide** makes a very clear point when stating that *'Cumulative effects may arise where two or more of the same type of renewable energy development are visible from the same point, or are visible shortly after each other along the same journey. Hence, it should not be assumed that, just because no other sites are visible from the proposed development site, the proposal will not create any cumulative effects'*.

Therefore, we believe RES Ltd's scheme, which has been 'subject to a scoping request and is substantially nearing the end of the EIA process when details are reasonably certain'\* (clearly demonstrated at the public exhibitions), and using SNH Guidance on cumulative effects of windfarms - a widely accepted reference for landscape and visual assessment of wind farm applications throughout the UK as acknowledged by the applicant - we would suggest that the pre-application proposals and Scoping Opinion sought by RES Ltd should be regarded as a material consideration and should be included within a cumulative assessment when determining this application.

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\*Landscape Institute Report on SNH guidance: Assessing the cumulative effect of onshore wind energy developments, version 3, p2, Feb. 2010

**Summary**

The applicant states that their proposals for a wind farm at Chiplow for 5, 100m wind turbines will have no significant effects on the landscape character types and the areas of national designations beyond a 10km radius, but they acknowledge that 'the presence and movement of 5 turbines will generate a high magnitude of landscape change within the application site and its immediate environs'.

CPRE Norfolk's **reasons for objecting** to the application are as follows:

- The site and environs are in a designated Area of Important Landscape Quality 'Confined' – a material consideration.
- The important nationally designated areas of the North Norfolk Heritage Coast and the AONB are on the edge of the 10km radius and the turbines will be visible to the south in the views across the landscape of marsh and farmland and beyond into the 30km radius in all directions – including several Cultural Heritage sites and Conservation Areas.
- The proposals will be in conflict with the key characteristics and valued attributes of the landscape as clearly set out in the Landscape Character Assessment – landscape character such as remoteness, sense of openness and tranquillity. Attributes also described in the LUC Report.
- There will be significant visual effects on residents within the 10km radius of the site as well as negative effects from flicker and noise.
- There is little scope to mitigate the visual impact.

We would emphasise again that RES Ltd's Scoping Opinion for a wind farm in North Creake should be a material consideration when determining Eon's application for Chiplow. As already stated, we believe RES Ltd's proposals are 'reasonably certain' given the amount of information in the public domain.

We should be grateful if you would inform Members of the Development Control Board of our reasons for strongly **objecting** to this application.

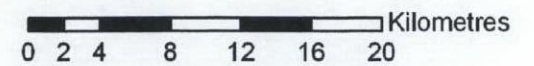
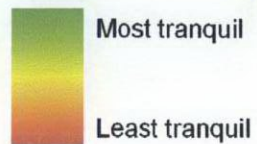
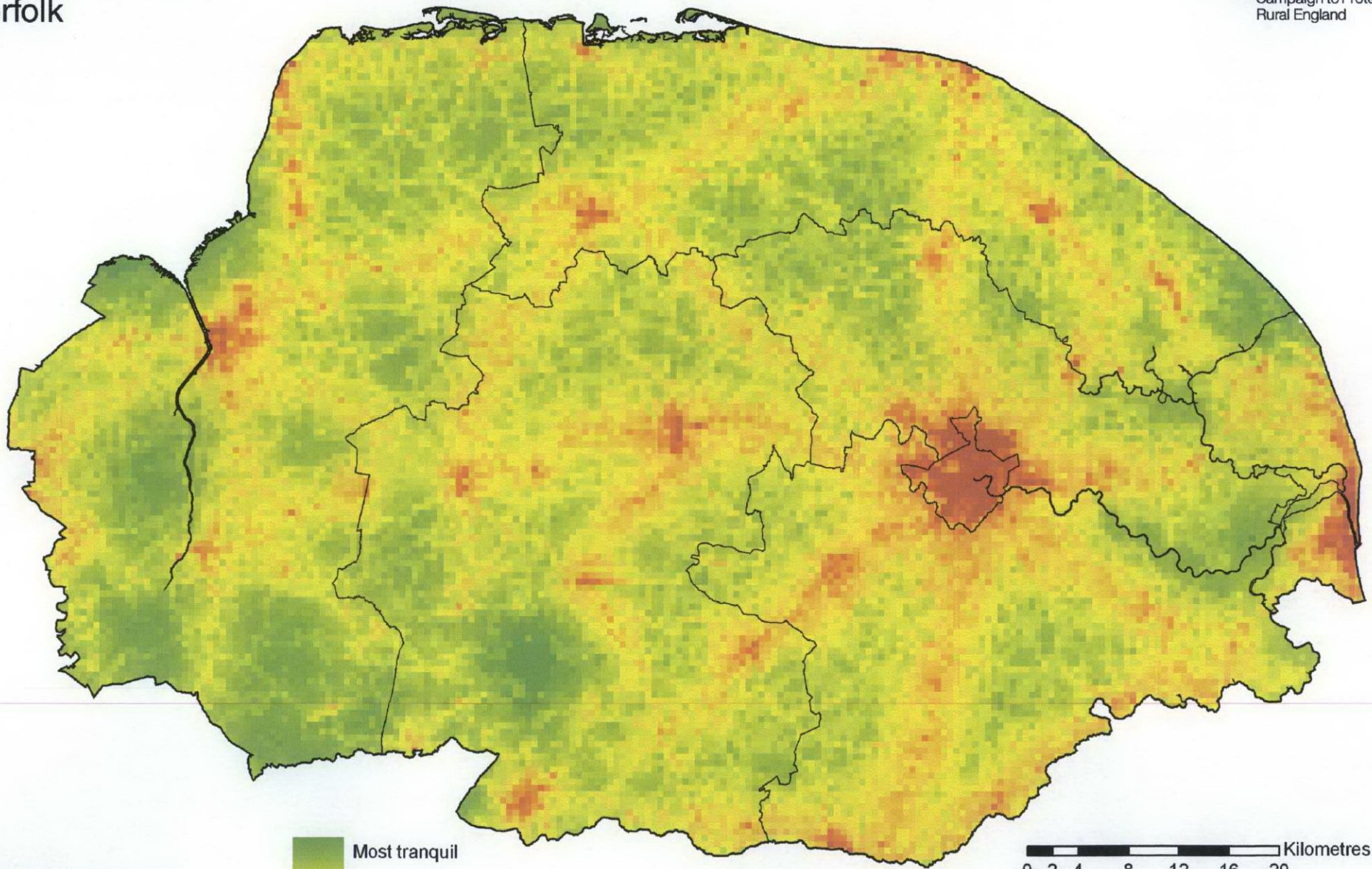
Yours sincerely



Rosemary Bryan  
Caseworker  
CPRE West Norfolk

Attached: CPRE Tranquillity Map (2007)

# Tranquillity map: Norfolk



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