

Mr S J Oxenham, Head of Planning and Building Control  
Fao Mr I Thompson/Mr P Took  
North Norfolk District Council  
Holt Road  
Cromer  
Norfolk, NR27 9EN.

29<sup>th</sup> November 2009

Dear Mr Oxenham,

**Erection of Two 130m Wind Turbines with Associated Hardstandings, Access Tracks and Substation Compound. Grove Farm, Ingham.**

CPRE Norfolk objects to this application. The two wind turbines at a tip height of 130m are a third again higher than the spire of Norwich Cathedral, which reaches 96m (315ft), only marginally smaller to Salisbury, the highest in the country. They proposed site is in a 'low plain' landscape area, and the turbines would be visible in reasonable weather over much of a 15km radius or more.

The area includes the whole of The Broads, the coastline from Trimingham to Winterton-on-Sea, and inland as far as Aylsham, Rackheath and South Walsham. As such this application should be judged not just on the impact in the immediate vicinity, but over a very much wider area.

Further as regards the cumulative effect of wind farms, it should be noted that Wind Power Renewables Ltd has other proposed applications in the planning process; at Stalham (3x1.8MW), Catfield (1x1.8MW) and Witton (1x1.8MW) (see appendix 1).

CPRE objects to the application with respect to the LDF Core Strategy Policies:

- SS 4 Environment
- SS 5 Economy
- EN 1 Norfolk Coast AONB and The Broads
- EN 2 Protection and Enhancement of Landscape Settlement Character
- EN 7 Renewable Energy.

We also make reference to national and other policies which relate to landscape issues, and the cumulative effect. First though we refer to the LDF policies, quoting relevant parts of text (in italics) and then making a brief comment.

## Policy SS 4 Environment

*'All development proposals will contribute to the delivery of sustainable development, ensure protection and enhancement of natural and built environmental assets... Renewable energy proposals will be supported where impacts on amenity, wildlife and landscapes, are acceptable'.*

The turbines would be severely detrimental on landscape grounds. The scale and impact of the turbines are alien; whether the blades are turning or not. They will be seen for miles around in many views; and there is no scope to mitigate their impact. They may also present some hazard to over-wintering geese populations travelling in an east-west line, and perhaps some raptors, such the marsh harrier.

The contribution to adapting to climate change is miniscule, and greatly out-weighted by the adverse landscape impact. Small scale biomass projects would offer a more appropriate form of renewable energy, and offer a more efficient process (0.85) compared with on-shore wind energy at 0.3 of net capacity. Also the output is predictable, and the national grid is not faced with the problem of trying to deal with variable demand and variable input. Biofuels, and in particular sugar beet for bioethanol, is another alternative with the agricultural advantage of helping to maintain a crop rotation system. These can both be integrated with normal farming practices, and do not or need not incur landscape dis-benefits.

## Policy SS 5 Economy

*'Proposals should demonstrate that they will not have a significant detrimental effect on the environment , and cycling ,walking and heritage tourism will be encouraged by promoting and enhancing long distance walking and cycling routes and heritage trail's'.*

Paragraph 2.7.19. *'Tourism makes a vital contribution to the economy of North Norfolk. Figures from the East of England Tourism Board show that in 2003 total direct tourism spend in North Norfolk was over £357 million and supported over 7,000 full time equivalent jobs..... However, the main tourism appeal in North Norfolk is based on the environmental assets and it is important to protect these'.*

This application, and others that might follow from Windpower Renewables Ltd, despoil the landscapes which visitors come to enjoy, especially the sense of place and tranquillity, which are displaced by ubiquity and the 'twitch' of revolving turbine blades. There are alternative options for farm diversification, as pointed out at paragraph 2.7.9, albeit not such 'easy' sources of income.

## Policy EN 1 Norfolk Coast Area of Outstanding Beauty and The Broads

*'The impact of individual proposals, and their cumulative effect, on the Norfolk Coast AONB, The Broads and their settings, will be carefully assessed. Development will not be permitted where it:*

- *is inappropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area;*
- *does not detract from the special qualities of the Norfolk Coast ANOB or The Broads;*

The turbines by virtue of their height, motion and large-scale industrial appearance, are an alien presence in the landscape. Because of their prominence and dominance in looking out from the ANOB or the Broads, the turbines enforce their impact as an unwelcome and unacceptable presence in the setting of these nationally designated areas. As such, they do not comply with the above policy requirements.

#### Policy EN 2 Protection and Enhancement of Landscape and Settlement Character

*‘Proposals for development should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and the features identified in relevant settlement character studies.*

*Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:*

- *the special qualities and distinctiveness of the area (including the historical, biodiversity and cultural character)*
- *gaps between settlements and their landscape setting*
- *distinctive settlement character*
- *the pattern of distinctive landscape features, such as water courses, woodland, trees and field boundaries, and their function such as ecological corridors for dispersal of wildlife*
- *visually sensitive skylines, hillsides, seascapes, valley sides and geological features*
- *nocturnal character.*

Wind turbines by their size, scale, design, materials and movement of their blades are alien in a landscape where they are widely visible. This also makes them disruptive where for centuries past churches have been the highest feature in the landscape. This is a cultural matter as well as one for the historic built environment.

A development such as that proposed erodes local distinctiveness, landscape features, open and visually sensitive skylines, and nocturnal character (the height requires for aircraft safety that the top is illuminated at night).

The adopted District Landscape Character Assessment (June 2009) shows that the application is situated within an extensive Low Plains Landscape Character Type, the North Walsham Plain, which is described at paragraph 6.0.1 as having included the key characteristics:

- *A landscape with an open character with long, uninterrupted views*
- *The topography of the whole is either flat or gently undulating, which falls away towards river valleys and areas of marshland*
- *The skyline is very prominent for the most part in this character area, due to the large expanse of open, uninterrupted landscape*
- *Prominent features in the landscape, which can often be seen on the horizon, include church towers and more unusual structures such as the Trimmingham dome (in neighbouring Type), along with modern agricultural buildings*
- *Views are generally uninterrupted and aside from the structures detailed above, large expanses of this character area are relatively empty/vacant.*

The Landscape Area in which the proposed site sits, within the wider Landscape Character Type of Low Plain, is LP2-Stalham (map page 63 and paragraph 6.2). A specific point made for LP2 is that the arable field size is generally large and the boundaries are marked by banks (due to past large scale removal of hedges, and non-replacement), giving the impression of an even larger and more open landscape. Also for LP2 it is stated that the landscape could have extensive restoration; and while the sensitivity of the landscape area is generally described as moderate, the capacity to accept new development is greatly reduced by its open nature and the starkness of existing development as a result.

There is also a need to consider the impact of the cumulative impact of the proposed wind farm with others that are already operational or in the planning process. The CPRE Norfolk Map (August 2009) and the explanatory note illustrates the adverse cumulative impacts in north east Norfolk (and elsewhere in the county); see the enclosure at appendix 1.

The PPS22 companion guide (December 2004) makes clear in paragraphs 5.21 to 5.24 that an assessment of the cumulative effects of wind turbines should be made; this is in addition to the site specific consideration. This has not been properly addressed. Further very useful information and guidance is provided by Scottish National Heritage (April 2005) and a Fenland District report (June 2009); see appendix 2.

#### Policy EN 7 Renewable Energy

*'Proposals for renewable energy technology, associated infrastructure and integration of renewables technology on existing or proposed structures will be permitted where individually, or cumulatively, there are no significant effects on:*

- *the surrounding landscape, townscape and historical features/areas;*
- *residential amenity (noise, fumes, odour, shadow flicker, traffic, broadcast interference; and*
- *specific highway safety, designated nature conservation or biodiversity considerations.*

*'Large scale renewable energy proposals should deliver economic, social, environmental or community benefits that are directly related to the proposed development and are of reasonable scale and kind to the local area.*

As stated above, there would be a significant adverse impact on landscape, including parts of the AONB, the undeveloped coast and the Broads.

There may be issues of residential amenity, in particular noise, with some eight properties it appears within 500m-1km of one turbine or the other; and in addition the closest houses in Stalham are 656m from turbine 2 and 1044m from turbine 1. We note that Norwich Airport does not appear in the list of consultees. With the closure of RAF Coltishall the airport is taking over the sole responsibility for air traffic control for safety purposes that Coltishall previously covered.

The developer has offered a fund of £10,000 to pay for conservation measures, including hedge restoration and planting for an area within 5-7km of the site (at a cost of £5/m this would represent 2km of restored hedging). While there is a need for such

measures in an area which has been over-zealously industrially farmed in the past, the normal process for seeking to carry out remedial measures is for the farmer to engage directly with Defra on Stewardship Schemes, rather through an applicant seeking a planning permission on their land. This proposal is not directly related to the application, other than it offers some opportunity to 'lose' the view of the turbines behind hedges in the vicinity of the site.

The offer of a community fund of over £150,000 over a period of 25 years is open-ended in use. It is in fact a bribe, condoned by the Government, and brings the planning system into disrepute (CPRE statement enclosed as appendix 3).

Yours sincerely,

Ian Shepherd  
Policy Co-ordinator