

7 January 2009

Mr Gareth Leigh
Consents Manager
Department of Energy and Climate Change
Energy Development Unit, Bay 2123
1 Victoria Street
London SW1H 0ET

DECC Ref: 01.08.10.06/369C

Dear Mr Leigh

**ELECTRICITY ACT 1989 – SECTION 36
APPLICATION FOR A 57MW TURBINE GENERATING STATION AT
LAND NEAR TO MARSHLAND ST JAMES, NORFOLK**

1. 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. So, having studied the application documents and visited the site, our response will focus in particular on the landscape issues, with some emphasis on the tranquillity and cumulative impacts.

Landscape and Visual Effects

2. This application for 19, 3MW turbines, each 142m above ground, covering an area of 1,036 hectares, is proposed to be erected in The Fens – Open Inland Marshes, Type E landscape - a landscape described in the **Landscape Character Assessment** (March 2007) as having

- *‘a strong sense of place,*
- *strong sense of tranquillity,*
- *wide open skies,*
- *strong sense of openness and remoteness,*
- *strong landscape pattern and historic integrity and small-scale settlement density’.*

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3. In the **Companion Guide to PPS22, paragraph 3.31**, landscape character is defined as ‘a distinct and recognisable pattern of elements that occur consistently in a particular type of landscape’.

4. Part of the northern area of the application site is an Area of Important Landscape Quality ‘Open’ – a ‘saved’ designation still valid in the King’s Lynn & West Norfolk **Local Plan**, as is **Policy 4/6** which states:

In the 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

5. **Policy 4/7** also seeks ‘to protect and where appropriate, enhance features of value to the landscape like the Marshland Drove – a route used historically for cattle and sheep transfer between winter and summer pastures.

6. If we look at the Landscape Planning Guidelines of this Type E landscape as set down in the **Landscape Character Assessment**, we see that guidelines recognise and underline the importance and sensitivity of this Fens - Open Inland Marshes landscape. They

- Seek to conserve the generally undeveloped rural character of the area and related strong sense of remoteness and tranquillity;
- Seek to conserve wide open views across the area;
- Seek to limit development in prominent skyline locations both within the character area and within adjacent character areas;
- Seek to conserve and enhance a recognisable sense of place within the area;
- Where appropriate, consider sensitive farm diversification, in keeping with local settlement pattern and character;
- Seek to ensure the sensitive location of development involving tall structures (such as telecommunications masts and wind turbines, for example) in relation to prominent skyline locations both within the character area and within adjacent character areas;
- Consider the visual impact of new development (particularly tall vertical developments) on the open character of the area.

7. The last two Planning Guidelines above are included in four of the ten Type E landscapes, and include adjacent character areas.

8. **PPS7: Sustainable Development in Rural Areas (para 24)** under the heading **Local landscape designations**, states, ‘*The Government recognises and accepts 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*’; and here we have an area of landscape that is certainly highly valued locally - and beyond.

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9. **PPS: Planning and Climate Change**, the Companion Guide to PPS1, (**para 4.16**) also acknowledges that landscape character assessments should provide sufficient protection to highly valued landscapes outside nationally designated areas.

10. **Policy ENV2: Landscape Conservation, East of England Plan (RSS)**, also needs to be considered. ‘Planning authorities and other agencies should recognise and aim to protect and enhance the diversity and local distinctiveness of the countryside character areas identified’. The Fens are shown in Figure 6 as one of the Countryside Character Areas. In paragraph **8.10** it says ‘National policy for sustainable development in rural areas in **PPS7** emphasises the continuing need to protect the countryside for the sake of its intrinsic character and beauty.

11. The **Land Use Consultants’ Report on Wind Turbine Development (2003)**, produced for Breckland District Council and King’s Lynn & West Norfolk Borough Council, which has been used by the applicant to determine the viability of the area for wind turbine development, lists some of the key characteristics of this area of Open Inland Marshes of The Fens as:

- A large scale landscape, extensive views, wide open skies, evoking a strong sense of openness, exposure and isolation.
- Isolated farmsteads – landscape largely devoid of landmarks or strong focal points.
- A simple but strong skyline, uninterrupted and smooth with expansive horizons giving way to huge skies.
- Landscape, for the most part, feels empty and peaceful.

12. As can be seen, the LUC Report and the Landscape Character Assessment have both used the same language to describe this particular landscape. The many photomontages accompanying the application so clearly illustrate and reinforce the characteristics of the Open Inland Marshes. The views into the adjoining Fens landscape – the Settled Inland Marshes – are clear and appear to be a continuous landscape type.

13. However, the LUC Report, after an evaluation of the sensitivity to wind turbine development in this landscape, has concluded that there is in fact a high capacity to accommodate all scales of turbine development. We would contest this conclusion, as there is no flow in the logic from LUC’s own evaluation of the landscape – a landscape where ‘*wind speeds are relatively modest*’.

14. **LUC’s Key Characteristics of the Landscape, Open Inland Marshes - medium scale group (13 – 24) - include:**

- **Skyline** – stated as having low sensitivity, yet also ‘*issues related to cumulative development and the maintenance of a simple, skyline is key to local character*’.

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- **Views and Connections with Adjacent Landscapes** – moderate sensitivity, yet *'this size of turbine group is more likely to be conspicuous especially from those areas immediately abutting this landscape type'*.
- **Remoteness and Tranquillity** – low sensitivity, yet *'a medium scale turbine group is likely to have localised impact upon peaceful character. However, the overall sense of remoteness and tranquillity in the landscape will be challenged by cumulative development'*.

15. LUC concludes Section 5 (page 69) of their report with a statement that though the land cover pattern appears to be suitable for all scales of turbine development, too many turbine groups would adversely affect the wide open skyline and the peaceful character of the landscape and that these characteristics should be conserved. The report goes on to say that, *'As different scales/sizes of turbines can appear confusing, a single and small scale group should not occur together in any one view'*.

16. But then if we look at the Site Layout map (Figure 1.2) of the Environmental Statement, it will be seen that the turbines are sited on a north/south line with five separate small groups stretched along approximately 7.5 km of a flat, agricultural landscape consisting of 5, 2, 1 and 6 turbines each and one group in a long line of 5 turbines. The cumulative effect of this layout will *'appear confusing'*, and certainly detract from the open skyline and the peaceful character of this landscape – *'characteristics that should be conserved'*.

17. The applicant acknowledges that the scale of these 19 wind turbines will dominate the landscape and be prominent elements in the Fens Open Inland Marshes landscape thus creating **a significant impact**. It is also acknowledged that *'Any sense of calm and isolation within this character area may be reduced.'* It is even suggested that the Landscape Character Assessment will need to be modified to create a new landscape type: **Fens Open Inland Marshes – With Turbines**.

18. CPRE continues to refine the concept of **tranquillity** and seeks improvements in the ways it might be better defined and measured. In October 2006 we launched a new national map of tranquillity and surveys were carried out to explore further what people most enjoyed and appreciated about the countryside, and assessing what factors add or subtract from their sense of tranquillity. The map for Norfolk (attached) shows the Marshland Fenland area to be tranquil. Any lighting that may be required on these very tall turbines will cause light pollution (a material consideration) in a dark skies area of Norfolk.

Landscape and the assessment of individual applications: PPS22 and Guide:

19. We return to national guidance to further support our view that the landscape issue on its own is sufficient reason to reject this application; although there are additional reasons, which also bear against.

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20. **PPS22** notes that the landscape and visual effects of particular renewable energy developments will vary on a case by case basis, according to the type of development, its location and the landscape setting; and notes that of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects.

21. The **Companion Guide to PPS22** points out that Landscape Character Assessment methodology deals primarily with the identification of character, rather than with landscape quality or value, but that these are also relevant to informing decision making; see Landscape Character (para 3.30).

22. The Landscape and Visual Effects section (pages 59-63 of the Companion Guide), describes the common approaches to landscape and visual assessment on a case by case basis. Paragraph **5.19** lists the factors to consider in analysing the landscape and visual effect of individual applications. These include Landscape Sensitivity (see page 37 of the Companion Guide).

23. Paragraph **3.35** makes the point that ‘*Sensitivity relates to the character of a landscape and how vulnerable this is to change. It is assessed by considering the physical and perceptual characteristics of a given landscape character type/area in relation to particular forms of development*’.

24. In paragraph **3.35**, 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.*

25. Table 1.1: Towns and Villages in the Vicinity of Marshland Wind Farm (ES Main Text, p.6), lists 22 settlements and their distance from the nearest turbine, radiating north, south, east and west from the site. Hubs and blades and, in many cases the whole structure, will be visible from each of these settlements. The applicant acknowledges that ‘**Significant** effects on local residents and recreational walkers have been identified in the immediate surrounding villages’. (Non-Technical Summary, p15). The proximity of the turbines to these settlements, and the public rights of way, will result in a high degree of sensitivity to visual change locally.

26. The scale and impact of the proposed 19 turbines at Marshland St James are alien to the site and the low-lying Fenland landscape; the blades whether turning or not, even the hubs, will be visible for many miles in every direction; and there is no scope to mitigate their impact. We conclude that the site, and the deeply rural character of the wider area, is not acceptable for the wind turbine development proposed.

27. Finally, on the “particular kind of change” in a landscape, paragraph **3.35** of the **Companion Guide** makes the point that any landscape character area may be more sensitive to change resulting from one renewable technology than another, and adds

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that in assessing the potential for renewable energy generation, strategic planners should consider the widest possible range of alternative technologies. We are supportive of this statement.

Cumulative Landscape and Visual Effects

29. **Figure 8.9 and Table 1.2 of the ES** show known wind farms within 35km of the development site: 12 operational, 1 consented and 4 in planning, and it is stated in **8.10.1 of the ES** that *‘Within the 35km area, all twelve operational and the one consented wind farms situated within the study area will be intervisible with Marshland’*. The Syderstone (Chiplow Cluster) of 5 turbines to the north east of the site, in planning, is omitted from this list. The 2 turbines at Shipdam to the east, in planning, outside the 35km but well within the 60km radius are also omitted.

30. It is stated in **paragraph 1.8** that there are 31 wind farms to consider within 60km of the proposed Marshland Wind Farm (as at September 2008) either operational, consented or in planning. (See **Figures 8.9 and 8.10**).

31. **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’. Cumulative effects of wind energy development can relate to a wider range of social and economic, as well as environmental effects.

32. **Paragraph 5.23** 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’.

33. Photomontages, computer-generated wireframe views and detailed diagrams showing the potential zones of influence (ZVI) of the proposed scheme accompany the application. Just one example: from Ely Cathedral all 19 Marshland wind turbines will be visible in the view at a distance of 25km to 32km as well as a number of existing wind farms within 30km. (ES p.189).

34. As noted in paragraphs 29 and 30 above, there are certainly more than two or more wind farm developments either operational, consented and in planning within 35km and 60km of the proposed development. This illustrates clearly the negative cumulative landscape and visual effects of the proposal in this Fenland landscape as described in **paragraph 5.23** above.

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35. Just to add to the above numbers, a formal request for a Scoping Opinion was submitted in December for a large-scale wind farm well within the 35km radius of Marshland. **Scottish Natural Heritage** in their Guidance on Cumulative Effect of WindFarms, (paragraph 19) advises that where a formal scoping opinion has been provided and thus the principle of a proposal is within the public domain, then it can become a material consideration and used in assessing cumulative landscape and visual effects.

36. We would agree with the sentiment expressed in paragraph 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*'.

37. We would also agree with **Fenland District Council's** statement (LDF Consultation, 10 Nov.08 to 15 Jan.09), regarding cumulative landscape impacts: '*There is a danger that excessive development of wind turbines in any landscape would at some point result in such material change as to unbalance and overpower the existing key characteristics of the landscape*'. We have already learned, in paragraph 17 above, that the developer suggests the need to modify the Landscape Character Assessment to create a new landscape type: **Fens - Open Inland Marshes – WITH TURBINES.**

Ecology

38. With the close proximity of the proposed turbines to the Ouse Washes and the Welney Wildlife & Wetlands Trust reserve, over-wintering populations of Bewick and Whooper swans, could be adversely affected, especially when they meet the broken line of turbines stretching across 7km of farmland.

Cultural Heritage

39. The applicant states that the setting of churches in the area has been considered and it was found that the churches are '*predominantly medieval in date and there is no evidence they were constructed with reference to particular views*'. The applicant understands that churches in the villages in the study area may suffer from effects relating to the relative scale of nearby turbines but consider there will be no significant effects upon their setting. (**ES, 12.5.2**).

40. Here, in this Fenland area, to quote Simon Jenkins, '*we find the finest concentration of late-medieval craftsmanship in England. Here, there are at least a dozen otherwise anonymous and workaday villages with simply enormous churches, many of them replete with wonders in stone and wood. Biggest and grandest churches are at Walpole St Peter and Terrington St Clement. St Peter is one of the most stunning architectural documents of the late medieval period. There are four Wiggenhalls, and All Saints' Church, Walsoken, is one of the finest churches in East Anglia*'. Pevsner mentions very few buildings west of the Ouse – except the great churches, some of which are among England's finest. These churches are a very important part of our cultural heritage. /cont'd ...

Mr Gareth Leigh, BERR

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41. In conclusion, having studied the application documents and taken note of National, Regional and Local policies, we would say again that the scale and impact of these 19 turbines are alien to the site and the landscape; the blades whether turning or not will be seen for miles in every direction - let alone the impact on the village of Tilney Fen End, the nearest turbine is only 0.9km away; and there is no scope to mitigate their impact. The site, and the deeply rural character of the wider area, is not acceptable for the wind turbine development proposed.

42. We are fast approaching the point where it may not be possible to stand and look round in any open place in Norfolk, or go for a cycle ride or a walk on a long distance footpath, without seeing one or more wind farms. This will make a very fundamental and most unwelcome change in the Norfolk countryside.

Yours sincerely

Rosemary Bryan
Caseworker
CPRE West Norfolk

Enclosed:

Tranquillity Map: Norfolk (CPRE revised 2007)

Copy to:

Mrs Hannah Wood-Handy, Principal Planner
Borough Council of King's Lynn & West Norfolk