

26 April 2010

Mr Phillip Isbell
Lead Planning Professional
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

For the attention of Bronwen Curtis

Dear Mr Isbell,

**Planning application reference: 0724/10 - Former Airfield, Eye
Erection of 2 No. 130 metre high wind turbines and associated
infrastructure**

1. I am writing on behalf of the Suffolk Preservation Society ('the society') in response to the above planning application for the erection of 2 No. wind turbines of 130 metres in height, together with the relevant associated infrastructure. These comments have been formulated after careful consideration and analysis of the submitted application together with supporting documents.

Renewable Energy and Energy Conservation: The Society's position

2. There is an absence of regional and local strategic guidance on renewable energy generation and decisions are taken on an ad-hoc basis. In addition there are few, if any, indications of a coordinated approach between energy demand, energy generation and energy conservation and the whole issue of sustainability. The Society has a policy to ensure that all development in the county is sustainable and compatible with its special character. The Society supports the incorporation of measures to both reduce energy consumption and to conserve energy. It is considered that to conserve energy is likely to have a lesser impact upon the character and appearance of the county than the provision of stand alone renewable energy generation.

3. To that end, the Society believes that new or additional renewable energy generation proposals should be located to minimise impact upon

the environment. The Society considers that proposals that are within or are adjacent to Areas of Outstanding Natural Beauty (AONB) Special Landscape Areas (SLA), The Suffolk Coast and Heaths Project Area, Dedham Vale and Stour Valley Project Area, and Suffolk River Valleys Environmentally Sensitive Areas or other similar important designations will not be considered acceptable.

4. In the Society's opinion, proposals in, on or adjacent to Listed Buildings, Conservation Areas, Historic Parks and Gardens and in Scheduled and non-scheduled Ancient Monuments will not be considered acceptable where the setting would be harmed or the character compromised. This includes proposals which border on or impact upon views from and to conservation areas and historic parks and gardens. In our opinion this approach is in conformity with the statutory protection afforded to these heritage assets. Proposals involving wind turbines exceeding 95 metres in height and within 2 kilometres of residential properties (in excess of 10 houses); will not normally be considered acceptable on amenity grounds. In conclusion, the Society will object to proposals which are not considered environmentally sustainable on energy grounds or would have a significantly harmful impact on residential amenity, landscape character or designated heritage assets.

The Planning Policy framework

Relevant National Policy

5. Government Policy, having regard to the nature and location of the proposal, is set out at Planning Policy Statements PPS1 Delivering Sustainable Development, PPS7 Sustainable development in rural areas and PPS22 Renewable energy, along with its companion guide.

PPS1 reiterates the Governments four aims for sustainable development which include the protection of the environment (para.4). The PPS states at para.5 that "*Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:*

- *making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;*
- *contributing to sustainable economic development;*

- *protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities:*
- *ensuring high quality development through good and inclusive design and the efficient use of resources and,*
- *ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.”*

6. Paragraph 17 reiterates that *“The Government is committed to protecting and enhancing the quality of the natural and historic environment in both rural and urban areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole.”* Paragraph 18 states that Planning has a positive role and should *“seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through positive policies on issues such as design, conservation...”*

Paragraph 36 states that a key objective should be to ensure that developments respond to their local context and create or reinforce local distinctiveness.

7. PPS7 “Sustainable Development in Rural Areas” reiterates several key principles which should under-pin land-use planning, relevant extracts being:

Para.1(i) Decisions on development proposals should be based on sustainable development principles, ensuring an integrated approach to the consideration of:...effective protection and enhancement of the environment...”

and

Para.1(vi) All development in rural areas should be well designed and inclusive, in keeping and scale with its location and sensitive to the character of the countryside and local distinctiveness”

In relation to specific policy advice on the countryside the PPS states:

Para.15 “Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced.”

8. PPS 22 “Renewable Energy “sets out key principles including:

Para.1(iii) “At the local level, planning authorities should set out the criteria that will be applied in assessing applications for planning permission for renewable energy projects.”

And

Para. 11 “In sites with national recognised designations (...Areas of Outstanding Natural Beauty...Conservation Areas, Listed Buildings,...Registered Parks and Gardens) planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which areas have been designated are clearly outweighed by the environmental, social and economic benefits.”

9. In relation to landscape and visual effects of renewable energy developments PPS 22: Renewable Energy states:

Para. 19 “The landscape and visual effects of particular renewable energy developments will vary on a case by case a according to the type of development, its location and the landscape setting of the proposed development...Proposed developments should be assessed using objective descriptive material and analysis wherever possible even though the final decision on the visual and landscape effects will be, to some extent, one made by professional judgement”

and

Para.20 “Of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects. However, in assessing planning applications, local authorities should recognise that the impact of turbines on the landscape will vary according to size and number of turbines and the type of landscape involved...”

10. Planning for Renewable Energy a Companion Guide emphasises the role of planning at a regional level to determine key decisions including targets and broad areas. In particular, that “*broad areas should be identified at the regional or sub regional level where development of particular types of renewable energy may be considered appropriate*”. The guide confirms that “*Renewable Energy policy should cascade from spatial strategy level to local level and that “appropriate tools may include*

...geographic information systems (GUIS), landscape character assessment and landscape sensitivity studies” At paragraph 3.10 the guide advises that *“for some technologies detailed regionally specific work may be required. For on-shore wind, a constraints geographic information system (GIS) may be needed and a landscape sensitivity study....”*

11. The guide emphasises the strategic role of the RSS in the development of a policy framework against which detailed criteria should be elaborated upon in Local Development documents. At paragraph 3.16 it states that *“Policies in regional spatial strategies should be sufficiently detailed to provide a clear framework for the development of renewable energy in the region...”* 3.17 *“Criteria based policies may relate to particular types of locality, or technology or scale of development...”*

12. The East of England Plan (2008) fails to provide the requisite criteria-based policy framework at the regional level for the assessment of proposals for renewable energy. Furthermore, at the present time the Mid Suffolk LDF is insufficiently advance to provide the requisite *“criteria based policies that focus on key local issues, within the framework set out by national planning policy and the Regional Spatial Strategy”* as identified as a key issue in planning for renewable at the local level (para. 4.6 of the Companion Guide and reiterated at para. 4.7) Paragraph 4.11 of the Guide states that such policies should list the issues to be taken into consideration set against the specific elements of landscape character and their sensitivity to change together with specific references to the impacts on the amenities of the area.

13. The proposed turbines measure 130metres in height with a rotor blade span of 103metres. These are the largest turbines currently in production, and will therefore have the greatest possible impact upon the landscape and the heritage assets contained within it.

14. Having regard to the principles set out above from PPS22 and its companion guide, this proposal will compromise the objectives of designation of the SLA, the setting of hundreds of listed buildings, the conservation areas of Eye, Hoxne, Hoxne Cross Street, Mellis, Thrandeston and Scole whose character and appearance will fail to be preserved or enhanced, together with the setting of 4 Scheduled Ancient Monuments. The conclusion must be that this proposal does not meet the key principles in PPS22. It is, therefore, contrary to national policy which

specifically sets out guidance for such developments and should be refused.

15. PPS 5 Planning for the Historic Environment states at para.7 “The Governments overarching aim is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.”

16. Policy HE7 provides principles to guide the determination of applications for development affecting heritage assets or their setting. At HE7.1.vi it states “Where appropriate and when the need to understand the need to understand the significance of the heritage asset demands it, expert advice (from in-house experts, experts available through agreement with other authorities, or consultants and complemented as appropriate by advice from other heritage amenity societies).”

17. Policy HE9.1 states “They should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance including scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings and grade I and II* Registered Parks and Gardens, World Heritage Sites should be wholly exceptional.”

18. Policy HE10 provides guidance for development affecting the setting of designated heritage assets. It states “When considering applications for development that affect the setting of a heritage asset, local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution or better reveal the significance of the asset. When considering applications that do not do this, local planning authorities should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater the benefits will be needed to justify approval.”

Regional policy

19. The East of England Local Plan 2008 sets out the regional planning guidance. Policy ENV6 states:

“In their plans, policies, programmes and proposals local planning authorities and other agencies should identify, protect, conserve and where appropriate, enhance the historic environment of the region and landscapes including historic parks and gardens and those features and sites (and their settings) especially significant in the East of England:

ii) an exceptional network of historic market towns

iii) a cohesive hierarchy of smaller settlements ranging from nucleated villages, often marked by architecturally significant medieval parish churches, through to a pattern of dispersed isolated farms.

vi) conservation areas and listed buildings, including domestic, industrial and religious buildings and their settings and significant designated landscapes.

vii) the rural landscapes of the region which are highly distinctive and of ancient origin and

viii) the wide variety of archaeological monuments, sites and buried deposits which include many scheduled ancient monuments and other nationally important archaeological assets.

The proposal is clearly not in accordance with policy ENV6 of the East of England Regional Plan and should therefore, be refused.

Relevant Saved Local Plan Policies and Local Development Framework Core Policies

20. Mid Suffolk Local Plan (1998) Saved Policies HB1, HB8, HB13, HB14, CL2, CL3, CL24, E12, H16, GP1, RT12 and policies CS2 and CS5 LDF core policies are considered to be of direct relevance to the assessment of the application. In the Societies opinion, for the reasons set out in our representations, the proposals are not in conformity with the objectives of these policies in so far as the turbines would significantly:

- harm the landscape qualities for many kilometres around the site;
- would significantly adversely impact upon local residential amenity;

- would materially harm the setting of many listed buildings and conservation areas.

The application – Quantifying the impact

21. Wind farms, by their nature and scale, have an impact far beyond the immediate application area and this is acknowledged by the applicants in their Environmental Statement (ES) accompanying the planning application which states:

22. Para. 6.7.12 of the ES states that “By its nature, the proposed turbines would result in significant visual effects which it would not be feasible to mitigate by adjusting the siting or providing screening.” Whilst the application is not subject to any specific landscape designation, it immediately adjoins a Special Landscape Area (Mellis) and will therefore impact upon it. It is important therefore, that the policies of PPS7 and other planning policies are applied not only to the immediate application site, but also to the area of impact.

23. The limited zone of influence examined within the ES clearly illustrates the weight of historic assets that are within very close proximity of the application site. The area of search for cultural heritage assets does not reflect English Heritage guidance which (8.2.1) which recommended consideration of all assets in a 5km radius and grade I and II* up to 10km of the site. The application has sought to seriously under represent the likely impact upon cultural heritage by only considering 5km for grade I and II* listed buildings. This not only ignores guidance provided by English Heritage as part of the scoping exercise but also relevant English Heritage guidance (2005). The area immediately surrounding the application site is distinctive by virtue of the concentration of heritage assets. It includes 9 grade I listed buildings and 33 grade II* listed buildings within 5km of the site, and 165 grade II listed buildings within 5km of the site, together with 8 conservation areas and 4 Scheduled Ancient Monuments. This concentration of heritage will be harmed by the scale and prominence of this development within the elevated, exposed and highly visible site.

24. With regard to the national policy set out above within PPS1 and PPS7 this proposal cannot be considered to be in keeping with its location. Neither can it be said to be sensitive to the character of the countryside and local distinctiveness; by reason of its monumental scale and industrial character. This proposal will not, as required, protect or enhance the

character of the countryside. It fails all the requirements and tests of PPS7 and is, accordingly, contrary to national policy for rural areas and the countryside and should therefore be refused for the following reasons;

- would materially harm the setting of many listed buildings including those at the highest grades of national importance;
- potentially harm unidentified archaeological remains that could be of national significance in the absence of a field evaluation;

And finally:

- would harm the setting of adjacent conservation areas including Eye, Thrandeston, Mellis, Hoxne, Hoxne Cross Street and Scole

Technical Suitability of the Site: The Wind resource

25. The potential wind resource at this site is unknown. The degree of wind shear present at the site (increase in speed of wind related to elevation above ground) relates to the surrounding environment and surrounding obstacles. As para.32 of the Companion Guide (PPS22) confirms the assessment of suitability requires historic meteorological data and information from site anemometers that normally are required on site for 12 months to determine site suitability. The mast should be as tall as the hub of the turbine. The Guide states “*often when the mast is erected it is not known either if the site is suitable for wind farming or which turbine type would be most suitable*”. The Developer has failed to provide this basic technological assessment of the suitability of the site and the application is therefore fundamentally flawed.

Impact on Historic Environment: Archaeology, Listed Buildings and Conservation Areas

26. The Companion Guide (PPS22) confirms the sensitivity of listed buildings and conservation areas to wind turbines. Para. 48 states:

“Special care will be needed if proposed sites for wind turbines should happen to be near listed buildings or conservation areas. PPG15 gives advice about the conservation aspects of planning control”.

27. English Heritage guidance “Wind Energy and the Historic Environment” (2005) identifies direct and in-direct impacts upon the historic environment. The direct impacts include the large foundation slabs

and associated trenching for cable ducts which have “*the potential to damage any underlying archaeological remains*”. In this case the applicant’s submission asserts that there will be no significant impact upon the archaeological resource. However, the resource below this part of the site is unknown and the recent application for turbines on the adjacent site identified a significant archaeological resource. The current submission is unable to quantify the surviving resource, which may be significant having regard to the archaeology thought to exist in close proximity to the site.

28. In light of national policy set out in PPS5, in the absence of a field evaluation there is insufficient information concerning the nature and importance of the archaeological resource to allow an informed decision to be made and consequently planning permission should be refused on archaeological grounds alone.

29. The English Heritage guidance identifies indirect impact upon the heritage:

“Wind energy developments may impair the setting of historic sites and can compromise the visual amenity of the wider landscape, detracting from historic character, sense of place, tranquillity and remoteness. In certain conditions, indirect impacts can also include noise and shadow flicker from turbines...Turbines towers are now typically in excess of 60m in height and may have a zone of visual influence more than 10km in radius.”

30. In terms of the influence on listed buildings the applicants have restricted their search area in the case of the highest grades (I or II*) to only 5km and in the case of grade II buildings to only 1.5km. We find this narrowly defined search area unacceptable in so far as it presents a wholly misleading picture of the magnitude of the impact upon buildings within the statutory list. The discrimination between the search areas applied to the various categories is inconsistent with the statutory protection afforded by the 1990 Act. In our opinion, and based upon Government policy set out at PPS5 above, the setting of a listed building should not be narrowly defined and the impact upon all listed buildings where there would be intervisibility should be assessed. To set an arbitrary limit of 1.5km on the setting of grade II listed buildings lacks any logical basis, statutory justification and directly conflicts with English Heritage guidance.

31. The Society suggests that in order to assess the visual impact upon each listed building, a case by case study is required to discharge the statutory duty at S.66(1) of the 1990 Act. We consider the report grossly

negligent in respect of its assessment of impact. Even with the applicants own meagre catchment, the impact on the highest grades of listed building is wholly unacceptable with no. 7 grade I churches, no. 3 grade I secular buildings and 33 grade II* dwellings within a 5km radius. Accepting that the unique character of each building will determine the exact nature of the impact, the impact upon the five medieval churches is particularly alarming given that these were intended to be the most significant built form in the landscape and designed to have a dominant presence on the skyline. The magnitude of the adverse impact upon the immediate setting of Yaxley parish church alone illustrates the unacceptable harm associated with the proposed development. Even within the 1.5km zone a very significant number of grade II buildings are identified, if the search is increased to 5km this number increases exponentially. The report is consistently dismissive of the impact upon the setting of listed buildings (cf 8.7.14 – 16). In our own expert opinion this is clearly unfounded in fact or statute.

32. In terms of visual dominance, EH guidance (2005) highlights this as a key factor to be borne in mind when assessing the acceptability of development within the setting of historic sites:

“Visual dominance: wind turbines are far greater in vertical scale than most historic features. Where an historic feature (such as a hilltop monument or fortification, a church spire, or a plantation belonging to a designed landscape) is the most visually dominant feature in the surrounding landscape, adjacent construction of turbines may be inappropriate.”

33. The submission states at para.8.8.5 that “four listed buildings are in relative close proximity to the site,” resulting in a moderately significant impact upon their settings.

34. Similarly, in the opinion of the Society, the impact of the development on the setting of adjacent conservation areas (8.7.20-8.7.26) is in some cases very significant, depending upon the intervisibility of the turbines to the conservation area in question. The submission casts its net only locally to cover a 5km radius and we believe that this fails to acknowledge the statutory position, Government nor English Heritage guidance. The submission identifies 8 conservation areas within the 5km radius but sadly trivialising the impact of the development based upon the presence of intervening trees and minimal distance. The report is dismissive of the

impact upon conservation areas, especially in the case of Thrandeston and Mellis where views out of the area will be significantly harmed, together with the wider setting of Eye historic town.

35. In our opinion this conclusion is not supported by even a superficial assessment of the intervisibility of the development and its contrast in scale and character with that of the conservation areas identified. In particular, the impact upon the skyline in views in to and out of the areas would be profoundly harmed having regard to the subdued topographic setting and the resultant visual dominance of turbines of this scale. The ZTVI clearly shows that the turbines will be clearly visible within 15km of the site. The visual analysis is too heavily reliant on the screening effects of intervening trees. Given the decision nature of these trees, for much of the year there will be direct intervisibility and indeed even during summer months the scale of the turbines is incapable of effective screening by modestly scaled native trees.

36. In our opinion the turbines would have a significantly harmful impact on the character, and setting of the conservation areas identified and this impact would be proportionate to their intervisibility extending many km beyond the subjective 5km radius selected by the applicant. Usefully, in the recent Suffolk County Council Core Waste Strategy documents, the ZVI of a flue on the same site, but only 90m in height and lacking the rotor blades found on a turbine, is mapped by landscape consultants. This independent landscape assessment conservatively demonstrates the potential ZVI of an installation at Eye. It should be noted that due to the topography this exceeds 15km in radius and this confirmed by the EH 2005 guidance that notes “turbine towers are now typically in excess of 60m in height and may have a zone of visual influence more than 10km in radius.”

37. The cumulative impact of the current proposals and those recently previously submitted on Greenfield land to the south-east will serve to magnify the harmful effects of the proposed turbines. This is acknowledged at para.8.6-8.10. The submission is fundamentally flawed in so far as its assessment focuses solely upon the principal views of the buildings as opposed to a consideration of setting in its widest sense including views from the asset to encompass the whole visual envelope. In terms of the cumulative impact upon conservation areas, even the submission acknowledges at 8.8.11-12 that the impact on Eye, Mellis and Thrandeston Conservation Areas is raised from low to Medium. This

assessment is also flawed in so far as its analysis is based on the “original” setting of these areas which are identified as already being substantially altered (para8.8.14). This is not the relevant test which should consider the impact upon the existing setting of each area and how this would be affected. In the case of Thrandeston and Mellis Conservation Areas we believe the impact would be very significantly harmful to the essential defining characteristics of these areas.

Landscape impact

38. The report identifies a proportionate effect upon landscape character in relation to site proximity. At 6.11.9 the report acknowledges.. “significant effects on landscape character may occur within the limited local area at distances up to 3km where views of the turbines would be experienced.” In our opinion 3km would not normally be held to be a localised area in relation to detrimental impact associated with development. We cannot find any other circumstance where a development in the private interest could be held acceptable in circumstances where the applicants admit that it would impact adversely over a very large area contrary to established national and local planning policy. Para. 6.6.10 identifies a series of Special Landscape Areas (SLA’s) that will be potentially adversely affected by the introduction of turbines. Para. 6.8.4 acknowledges that the turbines will potentially be visible throughout the 15km radius of the study area and the extensive list of settlements detrimentally affected is set out at 6.8.6. No. 8 of the 13 views analysed (para.6.9) demonstrates a significant adverse affect, in particular upon those areas within a 5km radius. In terms of the SLA’s, para. 6.11.39 acknowledges that within the Thornham Parva SLA (which includes Thornham Park, Thornham Magna and Mellis Green) there is “potential for localised significant effects.” Within the Waveney River Valley/Dove River Valley SLA “Localised effects within 3km of the turbine is likely to occur.” In the assessment of landscape effects para.6.11.6 acknowledges that the ancient plateau claylands would experience direct effects, although there would be indirect effects on other parts of the ancient plateau claylands landscape character type.”

39. The viewpoint analysis indicates that a number of key and sensitive viewpoints will be adversely affected including: the view southwest from Thrandeston (substantial to moderate change with a significant effect upon amenity), the view north-east from Mellis Green (a significant to substantial/moderate change identified with the impact on visual amenity considered to be a major/moderate significant effect), similarly the view

north-east from the A140, Thornham Parva and north-west from the B1077 from Eye where substantial impact is acknowledged with a commensurate impact upon visual amenity being identified. The sensitivity of the views from Thrandeston and Mellis SLA should be afforded further weight given that these areas are also subject to conservation area designation with a statutory duty for development to preserve or enhance (S.66(1) 1990 Act).

40. We find the absence of any community fund to in some way compensate the local community and mitigate, in a limited way, the considerable landscape impact, entirely unsatisfactory. Even in the adjacent site the applicants proposed, albeit derisory, £10,000 to mitigation plus community contributions. In the case of a series of similar applications at Ringsfield, Waveney District, an annual contribution of £10,000 was proposed. In our opinion, it is the surrounding communities and their treasured landscape that will bear the true cost of the development.

Residential Amenity

41. The extensive visibility of the proposed turbines on a lengthy list of attractive historic, rural settlements is set out a para. 6.12.3. In terms of settlements within 5km of the site “it is considered that these closest residents have the potential to experience significant effects where the turbines are visible in views from the dwellings.” At 6.11.9 the report acknowledges “the scale of the turbines would contrast markedly with the scale of the dwellings and settlements.” At paras.6.12.6 to 6.12.11a series of settlements where significant adverse affects on residential amenity are set out. In our opinion there is no justification to permit such a damaging proposal with far reaching implications for amenity and landscape quality.

42. The application site is immediately surrounded by residential properties: To the east, in Eye parish, to the north in Brome, to the west Yaxley village and Thrandeston and Braiseworth to the south. All of these parishes will be very significantly affected by visual intrusion and increased background noise levels. This will be most significant at night when background noise levels are at their most sensitive and resident’s quiet enjoyment of their homes at its most precious. Whilst at peak periods the A140 creates a localised noise corridor with enhanced background levels, the settlements adjacent to the A140 remain tranquil and retain a remote rural character. This will be fundamentally harmed by the increase

in background noise levels due to aerodynamic modulation. In particular, the applicants calculations are all dependent on an accurate projection of predicted turbine noise levels from the Nordex N100 turbine model. No assessment of background noise levels has been carried out outside the noise corridor associated with the A140, an area approximating to the 30dB threshold and beyond. In this very rural area the background noise levels are extremely low and hence the increase in noise may be more significant, especially having regard to the effect of cumulative impact.

43. In our opinion the night-time hours are of equal or greater sensitivity to the busy daytime period when residents are engaged in daily activities. At night it reasonable expectation for quiet enjoyment of rural homes and the ability to sleep with open windows without alien noise intrusion. Whilst the applicants admit that shadow flicker is a potential threat and that a highly detailed study is required to measure the location and size of all windows with potential to suffer from this problem (presumably because of the proximity of so many dwellings to the site). The suggestion that software will close down the turbines when appropriate, highlights the fundamental conflict between the proposed development and the residential amenity of neighbouring dwellings. At para.10.4.1 the applicant admits that of 22 receptors examined only 6 will not receive any shadow flicker. Whilst at 10.5.3 only 4 receptors are identified as receiving no shadow flicker.

Illumination

44. The report acknowledges the need to attach a warning beacon to the nacelle and that this will be infra-red lighting fitted to the nacelle (para 11.3.11). However, if conventional lighting of between 10-25 candella were used the visual impact would extend to approximately 4 miles distant.

Biodiversity

45. The Society defers to the opinion of Natural England, The Suffolk Wildlife Trust together with the County Ecologist. However, we note in the case of the sister application on Eye airfield, a potentially significant impact upon protected species of birds and bats was identified. In particular species protected by the Wildlife and Countryside Act 1981 including the Song Thrush and Fieldfare (Red List Suffolk County Council List of Conservation Concern) and Bullfinch (Amber List Suffolk County Council List of Conservation Concern). The current application fails to acknowledge any such impact and revealed only 2 species of bat (in

contrast to the 8 species of bat including Natterers bat, which is identified on the adjoining site and is subject to international protection. We find it difficult to accept that within such a small area such a huge discrepancy in the diversity of wildlife could realistically exist. In consequence it appears likely that an under-estimate of the impact of diversity must be inherent to this submission.

46. Planning for Renewable Energy a Companion Guide (2004) acknowledges that cumulative effect is a legitimate concern (para.5.22-5.24) where multiple renewable energy developments become a feature in views or sequences of views as part of a journey. A methodology is suggested for the assessment of cumulative impact. In this case the submission acknowledges that many of the visual impacts identified upon local communities will be accentuated if the two proposed turbines were read in conjunction with those proposed upon the neighbouring site (6.13 and elsewhere).

47. The reports indicate that the harmful effects would extend to those using the roads and footpath network. At 12.12.39 the report acknowledges “the turbines would form a landmark for road users and blade movement would be prominent”. It is acknowledged that “the magnitude of change experienced by users of the A140 over a short 1.8km to 2km distance...would be substantial.” Furthermore, even in the case of rail users it is noted that “there is potential for rail users to experience significant effects between Mellis and Thrandeston.” Yet, the submission downplays the impact on landscape quality/character and residential amenity in the conservation areas. In terms of footpath users at 6.12.49 the report acknowledges significant effects on visual amenity” and at 6.12.50 “significant effects would be experienced.” Similarly, in the case of the regional Cycle Route 30, at 6.12.54 “potential significant effect” is identified.

Conclusions

48. The Suffolk Preservation Society believes that there is an overwhelming weight of sound planning reasons based on statute, national, regional and local policy to reject these ill-conceived proposals. In accordance with the provisions of S.38(6) of the Planning and Compensation Act 2004 this harmful proposal should be refused in conformity with these established policies. As para. 11 of PPS22 states “*in sites with nationally recognised designations (...scheduled monuments,*

conservation areas, listed buildings etc) planning permission for renewable energy projects should only be granted where it can be demonstrated, that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits". As we have demonstrated this is clearly not the case in this instance and the LPA should therefore refuse planning permission.

49. We believe this outcome would accord with the aspirations of the local community surrounding the site as expressed by their respective parish councils, as their democratic representatives. The Society wishes to confirm that its full support and expertise will be forthcoming to the local planning authority in the event of a subsequent appeal against any refusal.

Yours sincerely



Simon Cairns
MRTPI IHBC
Director

cc Eye Town Council, Brome & Oakley PC, Yaxley PC, Mellis PC, Thrandeston PC, Diss Town Council, Thornham PC, Hoxne PC Head of Planning South Norfolk District Council, Strategic Director Planning SCC, Dan Poulter Conservative Candidate Central Suffolk, Timothy Passmore Leader MSDC; timothy.passmore@midsuffolk.gov.uk; Michael Munt & John Ette – EH East Region charles.flatman@midsuffolk.gov.uk; stuart.gemmill@btinternet.com; david.laurie@midsuffolk.gov.uk; charles.michell@suffolk.gov.uk; guy.mcgregor@suffolk.gov.uk;