

30 March 2010

Mr Phillip Ridley
Head of Planning
Waveney District Council
Town Hall
Lowestoft
Suffolk
NR32 1HS

For the attention of Richard Amor

Dear Mr Ridley,

Planning application reference: DC/10/0088
Erection of 3 No. 125 metre high wind turbines and associated infrastructure – Granary Farm, Church Road, Ringsfield

1. I am writing on behalf of the Suffolk Preservation Society ('the society') in response to the above planning application for the erection of 3 No. wind turbines of 125 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. The Society believes that the cumulative impact of this development and associated multiple applications by the same applicant in the immediate environs have the potential to result in an exceptional adverse environmental impact.

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.”*

Para. 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...”*

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

6. 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.”

PPS7 confirms at para. 21 that areas subject to national designations are afforded the highest status, in terms of landscape protection, and that they should be given great weight in development control decisions. The PPS advises that major development should not take place in these designated areas, except in exceptional circumstances (para.22).

PPS7 reaffirms at para. 1(iv) the longstanding presumption against development in the open countryside and confirms that the countryside should be protected for its intrinsic character and beauty.

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.”

7. 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 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...”

9. Planning for Renewable Energy a Companion Guide (2004) 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 (GIS), 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....”*

Landscape and visual impact are identified as key issues for development control (para.5.4) the guide advises that these should be addressed at the scheme specific level together with cumulative impact. The guide 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.

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...*”

10. 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 Waveney District LDF is insufficiently advanced 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.

Regional policy

11. The east of England Local Plan 2008 sets out the regional spatial strategy. 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.

12. Relevant Saved Local Plan Policies and Local Development Framework Core Policies

Waveney Local Plan (1996) Saved Policies ENV1, ENV2, ENV20, ENV23 and policies CS02, CS14, CS16 and CS17 of the Adopted LDF core strategy (Jan 2009) are considered to be of direct relevance to the assessment of the application. In the Society's 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 including those at the highest grades of national importance;

And finally:

- would harm the setting of adjacent conservation areas in Bungay & Beccles

The application

13. The proposal comprises three turbines set in an extremely tranquil rural area to the immediate north of Ringsfield village and 2km south-west of the historic market town of Beccles. The turbines would occupy an elevated greenfield site with dwellings in very close proximity to the south (Ringsfield and Ringsfield Corner) east (Beccles) and north (Barsham) . The application forms part of a series of related applications by the same applicant submitted in the immediate area of Ringsfield (Devonshire Farm, Ringsfield and Laurel Farm, Shipmeadow). The issue of cumulative impact between these proposed turbines and those existing or consented (Ness Point Lowestoft, Kessingland and Upper Holton, Halesworth) is a significant and legitimate concern.

Technical Suitability of the Site: The Wind resource

14. 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.

The application instead refers to the generic DTI wind speed data and 12 months of data collected at Kessingland. This data is not only derived from a different site but moreover from a mast 60 m in height. This data is not robust and should not provide any reassurance regarding site suitability in conformity with para. 22 of the Companion Guide.

The impact of development

15. The proposed turbines measure 125 metres in height with a rotor blade span of 90 metres. These are some of the largest turbines currently in production, and will therefore have the greatest possible impact upon the surrounding communities, landscape and the heritage assets contained within it.

16. Having regard to the principles set out above from PPS22 and its Companion Guide, as we will demonstrate this proposal will compromise the objectives of designation of the Broads National Park, Coastal AONB, SLA, the setting of hundreds of listed buildings, the conservation areas of Beccles whose character and appearance will fail to be preserved or enhanced. 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.

Landscape impact

17. The applicant has identified a Zone of Theoretical Visual Influence (ZTVI) for the proposed development and this demonstrates the very significant area potentially affected by the development. In particular, this

identifies a very high potential visual impact between 0-1.5 km, potentially high magnitude of impact between 1.5- 6 km, high to medium magnitude between 6 -15 km and potentially medium impact between 15-25 km. In particular, it demonstrates that each development would fall within the zone of very high visual impact created by the nearest neighbouring scheme. Moreover, this also serves to demonstrate the potentially antagonistic cumulative impact whereby the zones of visual interference of the existing and permitted schemes would fall within the high to medium ZTVI.

18. 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 ZTVI that extends 25 km from the application site. Despite this, the applicants study area for the assessment of impact has been restricted to a 15km study area. In our opinion, this will inevitably under represent the actual environmental impact.

19. There are two national landscape designations within the immediate area surrounding the site: the Broads National Park and Suffolk Coast and Heath AONB. Broadly these designations seek to ensure that the landscape qualities of these areas are conserved and where possible enhanced by development. The southern part of the Broads National Park is only one km from the site. The development would accordingly conflict with the aims of this designation (NERC Act 2006) and the Broads Management Plan (2004). The Suffolk Coast and Heath AONB lies only 4km distant to the east and SE of the site. In our view, the development would serve to harm the setting of this area contrary to s.85(1) of the CROW Act 2000.

20. In addition to these national designations, the development would impinge upon the Suffolk Heritage Coast (some 5.5 km distant) whose objectives set out at para.1.17 of PPG20 are to protect, conserve and enhance natural beauty. Similarly, some 11.5 km to the south lies a Special Landscape Area (Waveney District & Suffolk Coastal Local Plan) and 6 km to the west, the River Valleys policy area (South Norfolk LP) all of which are intended to protect and enhance local landscape character.

It is not a sustainable to contend that because the site fall outside these protected landscapes they will be unaffected by the proposals. Natural England in their recent non-statutory guidance 'Making Space for Renewable Energy' (2010) conclude (page 24) "*Natural England therefore considers that, as with sites within protected landscapes, the bar is also higher in the areas outside them which form their setting.*"

21. In relation to these designations the submissions conclude that the development would not bring about significant change or impact. We believe that there are significant contradictions in the reports conclusions.

The report acknowledges “B.68 The site is located within the Ancient Plateau Claylands and Rolling Valley Claylands LCT’s. The character of both these LCT’s would be significantly affected within the vicinity (2.5 km) of the proposal...” Similarly at para. B69 it continues “Within the Waveney Valley LCT significant affects would be limited to an area approximately 2-4km north of the nearest turbine and within the Thuriton Tributary...South Norfolk, marginally significant affects would be limited to an area approximately 3.5-4km north of the nearest turbine.” Similarly at B.74 views within the AONB 4-5km from the turbines would experience marginally significant change in the character of the LCT and AONB. Whilst the report acknowledges at 9.55 “The ZTV in vol.4 illustrates that the three proposed turbines would potentially be visible from much of the study area...(25km) “screening effects of local topographic and landscape features would greatly fragment and reduce the extent of most of these zones of potential visibility” Nevertheless the report concludes at 9.199 that “The three proposed wind turbines will become a defining characteristic of the landscape on the site and the local area within 3.5-4km of the nearest turbine. This area is not within any national landscape designation and the proposed wind turbines will not compromise the purpose of any local landscape designations. However an extremely small part of the Broads AONB does fall within 4km of the nearest turbine, where a limited significant, knock-on effect would occur.”

22. The submitted landscape analysis does not apparently acknowledge the importance of the National Park designation but does accept that this area will be significantly affected. At 9.205 the report does finally concede that there is no consensus regarding the threshold at which change can be considered to be significant, resulting in an unacceptable impact upon visual amenity. The society believes that there are few developments that can have an equal or greater landscape impact than that presently proposed due to the scale of the development.

23. The report fails to address the fundamental question of cumulative impact in terms of the nine turbines for which consent is sought around Ringsfield read in conjunction with the existing/consented turbines at Kessingland and Upper Holton. The application site area forms an important strategic gap. The Companion Guide to PPS22 identifies the importance of cumulative landscape impact at para.5.22-5.24 and the resulting sequential effect along a route resulting in a disproportionately dominant presence on the skyline. It is precisely this effect that the society believes would result from this development read in conjunction with other proposed and

consented turbines becoming “a defining characteristic of the landscape (para.9.199).”

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.

Impact on Historic Environment: Listed Buildings and Conservation Areas

25. The ES considered only a very limited zone of influence within only 2km of the site despite the fact that elsewhere the report clearly acknowledges a very significant impact within 4.5km of the site. This approach clearly underestimates the weight of historic assets directly affected by the development. Nevertheless, 148 listed buildings are identified within 2km, 12 of which are identified as having direct intervisibility with the turbines. Many of these are of the highest grades. Roos Hall (grade I) is 1.1km and Ashmans Hall (grade II*) is 1km distant whilst The White House (grade II) is within 0.4km. The Holy Trinity Church, Barsham and The Old Rectory (both grade I) are also within 1.5km. The landmark church of St. Michael’s, Beccles (grade I) is only 1.6km distant. The Manor House, The White House and The Old Rectory, Ringsfield, are a mere 0.5km from the nearest proposed turbine. The report concludes at 10.159 that “*A significant effect on the setting of five to seven listed buildings might occur, possibly rising to 7 in winter when the level of screening provided by vegetation could be partly reduced ...*”

26. In the opinion of the society, this harmful effect is contrary to S.66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and allied national, regional and local policies.

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”.

English Heritage guidance “Wind Energy and the Historic Environment” (2005) identifies direct and in-direct impacts upon the historic environment.

“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.”

27. Planning Policy Guidance (PPG) 15, Planning and the Historic Environment sets out government guidance in relation to the heritage. In PPG15 at para.1.6 the government urges local authorities to maintain and strengthen their commitment to stewardship of the historic environment...”.At para 2.1 the guidance confirms that *‘the protection of the historic environment, whether individual listed buildings, conservation areas...or the wider historic landscape...will need to be taken fully into account both in the formulation of authorities’, planning policies and in development control.*” The note reiterates the statutory protection afforded to listed buildings and their setting (para. 2.16) and in terms of setting, the note confirms at para. 2.17 that *“the setting of a building may be limited to obviously ancillary land, but may often include land some distance from it...a proposed high or bulky building may also affect the setting of a listed building some distance away, or alter views of a historic skyline.”*

With regard to conservation areas the note reiterates the statutory protection afforded to conservation areas together with their setting or views into or out of the area (para. 4.14).

28. In terms of the influence on listed buildings the applicants have restricted their search area in the case of all grades to only 2km. 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. In our opinion, and based upon Government guidance set out at PPG15 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 2km on the setting of listed buildings lacks any neither logical basis nor statutory justification.

Accepting that the unique character of each building will determine the exact nature of the impact, the impact upon the 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 Barsham

and Ringsfield parish churches alone illustrates the unacceptable harm associated with the proposed development. Even within the 2km zone a significant impact upon 12 of the 52 buildings is identified, if the search is increased to 10km this number would increase exponentially. We cannot surmise on what basis the applicant believes that 2km is a reasonable catchment upon which to assess the impact on listed buildings. In our own expert opinion this is clearly unfounded in fact or statute.

29. 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.”

30. Similarly, in the opinion of the Society, the impact of the development on the setting of adjacent conservation areas warrants detailed consideration. In the case of Beccles (1.8km east) and Bungay, we believe that the impact upon the setting could be very significant. The submission casts its net only locally to cover a 2km radius thereby omitting to consider this important issue. We believe that this fails to acknowledge the statutory position, neither Government nor English Heritage guidance.

In our opinion this approach 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 the areas would be profoundly harmed having regard to the subdued topographic setting and the resultant visual dominance of turbines of this scale. At para. 9.166 the report concedes *“potential effects on visual amenity would be limited to with approximately 4.5km of the site”*. By that token, these conservation areas would be potentially affected by the proposed development and this aspect must be quantified by objective assessment.

31. 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 2km radius selected by the applicant. The zone of theoretical visual interference graphically illustrates the potential for a medium to high

visual impact extends beyond 15km and this approach is reinforced 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.*”

Even the applicants admit that “*B.61 The addition of a renewable energy development into a landscape that is not currently characterised by wind turbines will usually have an appreciable effect on the character of at least a localised area within that landscape*”

Proximity to neighbouring houses

32. The application site is immediately surrounded by residential properties: To the north in Shipmeadow, to the east at High Common and Barsham. Whilst slightly further removed are the villages of Ringsfield Iketshall St Andrew and more significantly Bungay and Beccles. All of these parishes and their settlements will be very significantly affected by visual intrusion and increased background noise levels.

The submission acknowledges that the visual amenity of residents at some distance from the site will be affected. Paragraph B.79 acknowledges that a potentially significant impact would result for those residents within 4.5 km of the site with an unobstructed view. We believe that the extremely close proximity of the development to properties in Ringsfield village, High Common, Shipmeadow, Barsham and south-west Beccles would result in an unacceptable impact on their amenity by virtue of the scale and proximity of the turbines and the open character of the local landscape.

33. Similarly, the submission identifies very significant increases in background noise level when the turbines are operational. These predicted increases in background noise levels will be most significant at night, when background noise levels are at their lowest. During this period resident’s quiet enjoyment of their homes is at its most precious. Whilst at peak periods the Bungay Road (B1062) creates a localised noise corridor, with enhanced background levels, the settlements adjacent to the site remain extremely tranquil and retain a remote rural character. This will be fundamentally harmed by the increase in background noise levels due to aerodynamic modulation. The submission acknowledges at 12.46 that during the night time period all three turbines would exceed ETSU noise thresholds at some properties. Whilst ETSU quiet day thresholds are also exceeded at some properties (B.166-7). This material adverse impact is wholly unacceptable for private commercial gain. Furthermore, the potential for noise nuisance could be significantly greater than stated having regard to the

potential cumulative impact were all, or some, of the applications submitted in Ringsfield to be permitted.

34. 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 is a reasonable expectation for residents to retain the 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, this can only be quantified by a highly detailed study to measure the location and size of all windows with potential to suffer from this problem due to the exceptionally close 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.

The developer seeks in some way to mitigate this significant loss of residential amenity by the offer of a paltry community fund of £18,000 per annum. We believe this is an affront to the integrity of the surrounding communities and wholly inadequate to offset the loss of amenity and harm to the character of their rural environment. We believe that the applicants are aware of this harm and in relation to BS4142:1997 we believe that during operation the turbines will potentially exceed ETSU-R-97 criterion and the relevant BS standard. These standards are intended to protect amenity and should not be so readily cast aside for private commercial gain.

Illumination

35. The inevitable warning beacon attached to the nacelle of each turbine (25 candella – B.211) would be seen in the night sky up to a distance of 4 miles from the site. We believe that this impact should not be underestimated as an urbanising element in the existing unblemished night sky of the Waveney Valley and Broads. The cumulative impact of such developments should also be considered.

Biodiversity

36. The submission identifies this as a significant environmental impact. Para. B.146 identifies a “*diverse farmland bird assemblage, bats, great crested newts, brown hares, harvest mice and reptiles*”

The Society defers to the opinion of Natural England, RSPB, The Suffolk Wildlife Trust together with the County Ecologist. However, we note the

potentially significant impact upon protected species of birds and bats (para.B148 and B.149). In particular, species protected by the Wildlife and Countryside Act 1981. The operational impacts are of particular concern:

“B.149 ...impacts are likely on bats, breeding farmland birds of medium and lower nature conservation value and foraging Marsh harrier, barn owl and Kestrel. Impacts on wintering birds and birds utilising the site on passage have not been determined.”

The impact on bat species such as the Noctule is considered to be moderate adverse(B.150)

The report fails to identify roosts, flight paths and feeding grounds within and adjacent to the site to allow the impact of the turbines on these protected species to be appropriately assessed. We believe that the report fails to give adequate weight to the impact of the proposals upon biodiversity in accordance with the provisions of the NERC Act 2006. A more extensive survey over a period of twelve months is essential to allow the impact of the development on over wintering and migrant birds to be quantified. Furthermore, the suggested post-installation monitoring of mortality surveys cannot facilitate mitigation (cf. para. B151).

Conclusions

37. 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. The adverse impacts identified will be cumulative should any of the related cluster of turbine applications be permitted. Whilst each application must be considered on its merits, cumulative impact is an established consideration. 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.

39. 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 lpa in the event of a subsequent appeal against any refusal.

Yours sincerely

Simon Cairns
MRTPI IHBC
Director

CC: Beccles Town Council, Bungay Town Council, Ringsfield PC, Barsham PC, Shipmeadow PC, Geldeston PC,

Head of Planning South Norfolk District Council, Strategic Director Planning SCC, Planning Portfolio Holder Waveney District, Members of Waveney Planning Committee, Waveney Chair SPS, Broads National Park, Suffolk Coastal & Heath AONB Board, Local Member Suffolk County Council, MP