

27 May 2011

Mr Philip Isbell  
Principal Development Management Officer  
Planning Services  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Suffolk IP6 8DL

For the attention of Ms Marianna Broomfield, Planning Officer

Dear Mr Isbell

**RE: PROPOSED WIND TURBINE – LAND REAR OF OLD HALL COTTAGE,  
MAIN ROAD, HEMINGSTONE – Ref: 0676/11**

1. I am writing on behalf of the Suffolk Preservation Society ('the Society') in response to the above planning application for a wind turbines at Old Hall Cottage. The Society has principally two areas of concern.

#### **Impact upon background noise and tranquility**

2. Firstly, the Society believes that the application does not provide adequate reassurance regarding the impact of the proposed turbine upon the tranquillity of residents adjoining the site. Government guidance on noise and wind turbines (ETSU-R-97) is now some 13 years old and may not be appropriate in all instances, particularly in rural environments where the background noise levels are very low, especially at night time.

3. Notwithstanding the 35dB(A) limit, due to the very low night time background noise levels, the operation of the turbine may still be audible at residential properties which may consequently suffer a loss of amenity including Old Hall Cottage and Old Hall Farm. This is unacceptable in the opinion of the Society and further evidence is required to provide the requisite reassurance that the operation of the turbine would not lead to an unacceptable loss of amenity or adversely affect the tranquillity of this remote rural area. Policy CL24 of the Adopted Mid Suffolk Local Plan states that "wind turbines will not be permitted where their operation would result in a loss of amenity for nearby residential properties and users of rights of way." We believe that this issue requires further scrutiny.

## Impact upon the setting of nationally important listed buildings

4. Secondly, the Society has concerns regarding the impact of the turbines on the setting of listed buildings in the vicinity. The protection and enhancement of the historic environment is a strategic objective (SO4) of the LDF Core Strategy. This is reflected in core policy CS5 that seeks to *'protect, conserve and where possible enhance the natural and built historic environment'*. In turn building upon policy HB1 of the Adopted Local Plan that confirms that *"particular attention will be given to protecting the setting of listed buildings"* In particular, the impact upon the setting of the grade II listed Old Hall Cottage will be considerable. Whilst the impact upon the setting of the grade II\* listed Old Hall Farm is inadequately quantified in the supporting Heritage Statement and Design and Access Statement.

5. However, perhaps of greatest concern is that the impact upon the setting of the grade I listed Church of St Gregory. This building is set in an elevated location and there are no intervening structures to obscure long views between the church and proposed turbine. Furthermore, the church has a relatively squat tower that has for centuries served as the principal focal point in the immediate landscape. The introduction of a significantly scaled structure would change this historic setting in a fundamental and detrimental manner. In our opinion inadequate information has been submitted by the applicants to enable an informed decision to be made in accordance with national Policy set out at PPS5.

6. PPS5: Planning for the historic environment sets out the relevant national policy pertinent to the consideration of applications that affect heritage assets, directly and indirectly. In this case, the Society considers that insufficient analysis has been provided to allow the council to make an informed decision. In particular, HE6.1 states "Local planning authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance." HE6.2 continues "This information together with an assessment of the impact of the proposal should be set out in the application."

6. Policy HE10 provides guiding principles (derived from Conservation Principles: Policy and Guidance. EH. 2008) for the consideration of applications for development affecting the setting of a designated heritage asset. HE10.1 states: "When considering applications 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 to or better reveal the significance of the asset." Local planning authorities are encouraged to seek the enhancement of the setting of assets, in accordance with the established statutory duty. HE10.2 states:

“Lpa’s should identify opportunities for changes in the setting to enhance or better reveal the significance of a heritage asset. Taking such opportunities should be seen as a public benefit and part of the process of place-shaping”

7. The Society notes that English Heritage shares our concerns in this regard (see letter dated 16 May 2011). In particular, regarding the intervisibility of the turbine and the grade I Church of St Gregory and the significant presence of a tall structure when read in context with the comparatively squat church tower. This issue requires a detailed assessment and none is currently provided in the application.

### **Conclusion**

8. The Society believes that the current application is deficient in its assessment of the potential impact of the development upon residential amenity and the setting of neighbouring listed buildings. We believe these are significant issues that must be fully explored before an informed decision can be made regarding the acceptability of the scheme. Consequently, the Society requests that the applicants are required to submit further expert assessment of these issues for public scrutiny before any decision can or should be taken.

Yours sincerely



Simon Cairns  
MRTPI IHBC  
**Director**

CC: Hemingstone Parish Council, Claire Campbell - English Heritage, Mid Suffolk SPS District