

23 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 Sian Bunbury, Planning Officer

Dear Mr Isbell

**RE: PROPOSED WIND TURBINES – CHURCH FARM, CHURCH LANE,
HEMINGSTONE – Ref: 1013/11**

1. I am writing on behalf of the Suffolk Preservation Society ('the Society') in response to the above planning application for two wind turbines at Church Farm. 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; including those properties on Church Lane and Rectory Road, especially Rosery and The Beeches. 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. 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 grade I listed Church of St Gregory that is very close to the application site is unquantified. 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.

5. 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 share our concerns in this regard (see letter dated 17 May 2011). In particular, regarding the intervisibility of the turbines and the grade I Church of St Gregory and the significant presence of relatively tall structures when read in context with the comparatively squat church tower. This issue requires significantly greater assessment than is provided in the current 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