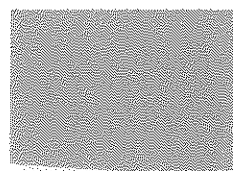


**Objection to planning application S/1018/06/F
13 Wind Turbines at Wadlow Farm
Wadlow, near West Wratting
Cambridgeshire**

Planning policy, landscape and visual critique

**Prepared by The Landscape Partnership
Made on behalf of the Stop Wadlow Wind Farm Campaign**



The Landscape Partnership is registered with the Landscape Institute, the Royal Town Planning Institute, and is a member of the Institute of Environmental Management and Assessment

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1 Introduction

- 1.1 This technical report has been prepared by The Landscape Partnership in support of the Stop the Wadlow Wind Farm Campaign's objection to planning application S/1018/06/F for 13 horizontal axis wind turbines and associated development at Wadlow Farm, near West Wrattling, Cambridgeshire, submitted by RES Developments Ltd to South Cambridgeshire District Council.
- 1.2 An Environmental Statement was submitted with the application including chapters considering renewable energy and local policy (Chapter 2), Site Selection (Chapter 3) and Landscape and Visual Impact (Chapter 5). This technical report provides a critique of these chapters and also considers the refusal of planning application S/1663/04/F for the development of 16 wind turbines and associated infrastructure south west of Huntingdon Road.

2 Landscape and visual impact

Introduction

- 2.1 This critique of the LDA (RES) Environmental Assessment has been carried out by Christopher Stratton, who is a director of The Landscape Partnership and has 33 years professional experience of landscape planning and design within East Anglia. **Between 1996 and 1998 he undertook the Landscape Character Assessment on behalf of the then Countryside Commission (currently Countryside Agency) for the eastern region, which included the area of the site LCA87, which covers the site in question, the character was deemed to be East Anglian Chalk** (See Appendix A). He also has experience of assessing the impact of wind farms, both working for proposers and for local community groups, within the UK and Ireland.

Review of the Applicant's Landscape and Visual Impact Assessment

General

- 2.2 LDA Design is a well respected practice of Chartered Landscape Architects which has experience and a good track record of assessing landscape and visual impact. The methodology broadly falls within the guidelines established by the Institute of Environmental Assessment and Landscape Institute (2002). Our main concern is that the significance of the proposed visual change is not clearly presented and that the assessment tends to underplay the adverse significance of the visual and landscape change, which would result from this proposed wind farm development.

Mitigation

- 2.3 At para. 5.1.9 of the Environmental Statement the assessors state that opportunities for significant mitigation measures are inevitably limited due largely to the nature of the proposed development. They state: *"The siting of the proposed wind farm in an area of flat, open farmland and the scale of the development means that there are no real meaningful onsite opportunities for incorporating mitigation measures for the main element of the proposed scheme. However, within the evident constraints of the proposed development, mitigation measures have been considered and, whenever possible, incorporated into the evolving scheme in order to best assess the potential effects."*
- 2.4 We do not accept that the site and the surrounding area is "flat", rather a complex series of slopes with a broadly north westerly aspect (see Appendix D) where the chalk comes down to meet the alluvial clay soil broadly to the north west of the A11 trunk road. The only mitigation proposed is a *"new section of hedge to the south west of the site"* referred to in para.5.8.2. Therefore it has to be concluded, both by LDA Design and ourselves more directly, that the visual effects of the construction of 13 wind turbines at Wadlow cannot be effectively mitigated.

Landscape and visual sensitivity

- 2.5 At paras. 5.1.15 and 5.1.16 the significance of landscape and visual effects is discussed and we agree that it should be determined by assessing the magnitude of the visual change to the landscape or visual resource against the sensitivity of the landscape or visual receptor. We also accept that sensitivity addresses the inherent strength of character of a landscape and its ability to accommodate change without significant adverse effects on its character. **However, we do not**

accept that the significance of the changes arising from the proposed wind farm has been clearly addressed nor that the whole issue of the ability of the landscape character to accommodate the proposed change has been understood.

It is our view that this proposal will have a significant adverse effect on a wide tract of countryside and settlements, in contrast with the conclusion drawn by LDA Design.

Consideration of other options within the Environmental Statement

- 2.6** Having carefully assessed the Environmental Statement we could find no assessment of consideration of alternative locations other than the oblique references found in Sections 3.3. The stated decision not to identify either the initial seven identified sites or the final three "high scoring sites" due to "commercial sensitivity" removes both the ability of any independent reader to form a value judgment, least of all the decision-maker. Given that the main purpose of environmental impact assessment is to enable decisions to be taken in the full knowledge of their environmental consequences this omission is a very serious one in the particular circumstances. Furthermore, no consideration is given within the Environmental Statement as to alternative designs or configuration of the turbines and associated structures that would contribute to any minimisation of the impact. The number of turbines, their size and location are all taken as given. **We regard these omissions as serious flaws in the Environmental Impact Assessment process, and, contrary to requirements of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and Annex III of EU Directive 85/387/EEC (as amended by 97/11/EC) on the assessment of effects of certain public and private projects on the environment. It has to be concluded that apart from presumably satisfactory wind speeds Wadlow Farm is an opportunist site negotiated with a landowner who wants to diversify his agricultural income.**

The Historic Environment

- 2.7** At para. 5.2.9 Structure Plan policy P7/6-Historic Built Environment is addressed. It is stated by the applicants that as part of their assessment conservation areas were reviewed within the entire study area. This review is undertaken at paras.5.2.21 – 22. The Landscape Partnership's research concludes that there are 25 conservation areas within 10km of the margins of the site. We do not consider that sufficient regard has been paid to the setting of these conservation areas. At para. 5.2.22 it is stated: *"Most of these conservation areas are located within the centre of settlements and have generally restricted visibility towards the site."* We do not accept that most of the conservation areas are located within the centre of the identified settlements. Those at Balsham, Fulbourn (eastern margin), Great and Little Wilbraham and West Wratting incorporate conservation areas that meet the settlement boundary. A site visit made by Christopher Stratton on 11th July 2006 noted that although existing planting within property curtilages (gardens) will provide some screening, at Great Wilbraham, Fulbourn and West Wratting there will be a significant adverse visual impact on the approaches and perimeter of the conservation areas in contrast with LDA's conclusion.
- 2.8** The southern margin of the site partially abuts the Fleam Dyke which is a very important ancient earth work which should be safeguarded. It forms part of the Harcamlow Way strategic recreation path, this gives it added value and means that its setting should also be safeguarded. These routes are designated as Scheduled Ancient Monuments and are included within a SSSI. The designations have not been given appropriate consideration by LDA Design within the Environmental Statement.
- 2.9** **Again, there has been a significant failure within the Environmental Assessment process to address the issues of setting as well as impact on the historic environment.**

Landscape Character

- 2.10** At para.5.3.3 of the Environmental Statement the Countryside Agency's Landscape Character Area 87 "East Anglian Chalk" is addressed. Although this paragraph describes the landscape character area it does not quote one of the most pertinent parts of The Countryside Agency's assessment, which was undertaken, as mentioned earlier, by The Landscape Partnership. A copy is attached as Appendix A to this report. At page 84 (under the heading "Shaping the Future") it advises: *"The area would benefit from a discouragement of both large-scale development on hilltops (emphasis*

underlined) *and the widespread use of red brick ...*". This first issue was debated very carefully by the stakeholders when the assessment was carried out in 1997/8 and was endorsed because of the need to safeguard the distinctiveness of this area which it was felt would be compromised by allowing large-scale development. The development of 13 wind turbines at Wadlow on a prominent ridge line when viewed from Cambridge and the west would clearly run counter to this principle, as tacitly acknowledged by LDA Design where, at para.5.3.24 (Landscape Sensitivity), it is stated: *"The sensitivity of the site is considered Medium to High."*

- 2.11 Attention is also drawn to para.10.14 of the Local Plan (quoted at para.5.3.9) that *"the 'Landscape Character Areas' approach is concerned to preserve and enhance the local distinctiveness and quality of the whole landscape"*. It was because of this, when defining landscape character area 87: East Anglian Chalk, we stated that the area would benefit from a discouragement of large-scale development on hilltops. **For this reason alone it is difficult to see how this application could be approved if proper credence is given to the principles of landscape characterisation.**

Surrounding Area

- 2.12 At para.5.3.18 it is stated: *"The site is surrounded by a network of local roads"*. No mention is made of the A11 trunk road which passes about 1km to the west of the site (see Appendix D). It is often acknowledged that this stretch of road between Four Went Ways (the A1307 junction and six mile bottom) forms one of the gateways to East Anglia; for it is where this principal highway leaves the home counties of Essex and Hertfordshire and enters the Newmarket chalklands and Brecks. We also do not accept that *"the landscape surrounding Cambridge is predominantly flat with a considerable amount of vegetation restricting distant views from most locations."* This does not take account of the Gog and Magog Hills adjacent to the A1307 road, Lime Pit Hill and White Hill to the south of Fulbourn. These areas offer extensive open views to the site and would experience significant adverse impact should the Wadlow proposal be approved (see Appendix D).

Landscape Value

- 2.13 At 5.3.23 it is stated that the site itself is considered to have a medium landscape value locally. LDA Design state that *"it is not recognised by any Special Landscape Area designation and is consequently of slightly lower value than that of the more distant landscape surroundings to the east"*. As government guidance no longer supports local landscape designations therefore, the fact that it is not designated by the South Cambridgeshire Local Plan, does not mean that it is not important landscape. PPS7 advises that landscapes outside of national designation that are of high local importance should be protected via criteria based policies in LDDs and landscape character assessments (para.24), particularly as one of the key principles is to promote more sustainable patterns of development by protecting *"the countryside for the sake of its intrinsic character and beauty, the diversity of its landscape, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all."* (para. 1(iv)). Given this site's prominence and therefore its impact over a substantial area due to its topography and location 8km to the east of Cambridge we consider that this landscape does have a sub-regional and possibly regional significance. It is also rare within East Anglia to find prominent higher land of high quality. This quality is dependent upon its striking topography and surface mantle of woodlands and substantial hedgerows which add definition and emphasise the landform.

Landscape Sensitivity

- 2.14 At para.5.3.24 it is stated: *"The sensitivity of the site itself is considered Medium to High. . . However, the relatively limited number of local receptors slightly reduces the site's overall sensitivity to change"*. We do not agree – it is what it is and the absence of fixed local receptors in part is what gives the area its attractiveness and character. However, it should not be overlooked that, in fact, many thousands of motorists a day use the A11 and will have clear views of the site. Three key recreation paths cross the area within close vicinity of the site, the Fleam Dyke, Harcamlow Way (which partially abuts the site on its southern margin) and the Icknield Way which interestingly all intersect within the vicinity of the site. These recreational routes have been given additional policy impetus within the Cambridgeshire Green Infrastructure Strategy (Cambridgeshire Horizons, 2006), which is an overarching document for the preparation of Local Development

Frameworks and was produced by The Landscape Partnership in March 2006 (ref. Appendix B). Although the applicants do not give proper recognition to these recreation routes they do accept at para.5.4.11 (Visual Receptors) that *"those whose principal preoccupation is with the enjoyment of the outdoor environment and open countryside will be more sensitive to visual changes."* There follows a rather peculiar statement: *"However, with the exception of return visitors to the area visitors may not necessarily be as sensitive to changes as they will have no previous image of the area."* If followed, this would be a very dangerous precedent and conflicts with the ethos that all areas of the countryside should be protected for their own sake. At para.5.4.20 it is merely stated: *"There are a number of public footpaths and bridle ways located within the study area. It is therefore expected that recreational visitors to the area may obtain incidental views of the site from a variety of viewpoints."* This is one of the more serious understatements in the Environmental Statement and seriously plays down the impact on these key strategic recreational routes.

The ZVI Visual Impact

- 2.15 The ZVI is described at paras.5.4.6 – 5.4.8 of the Environmental Statement. We appreciate the difficulties with ZVI and note that at para.5.4.8 LDA state: *"the development would, in theory, be visible from over half of the study area, with distant theoretical visibility being highest towards the north and west"*. Whilst we acknowledge this qualification it does emphasise the prominence of the site due to its height and location, particularly, in our view, to the southwest, west and northwest. Throughout the Environmental Statement there is an assumption that the visual impact will largely be confined to open countryside and not settlements. We do not consider that this will be the case and it is very dangerous to exclude eastern margins of Fulbourn, Great Wilbraham, West Wrattling and the southwest margins of Newmarket and eastern edge of Cambridge. We consider that there will be views from these locations but that they have not been properly considered.

The significance of the adverse impact

- 2.16 Landscape Character Area 87 is a material consideration and consequently South Cambridgeshire District Council must satisfy itself that there are no significant adverse impacts associated with this proposal that would impair the distinctiveness of the landscape character area.
- 2.17 In the Summary and Conclusion at para.5.9.1 it is stated: *"Due to topography and intervening vegetation the potential visibility of the wind farm in the landscape is relatively limited with the most significant visibility within a 10 km radius and generally limited intervisibility with the more wooded landscapes in the east"*.
- 2.18 This statement does not proffer a judgement; it just refers to *"significant visibility"*. **We regard it as a significant visual change that would impair the distinctiveness of the landscape character of a wide tract of countryside. Due to the prominence of the site on the chalk ridge the visibility and adverse impact of the wind farm in the landscape will be substantial. We have indicated this on Figure 05 which is based on field assessment carried out in June 2006.**
- 2.19 We do not accept the statement at para.5.9.2: *"Substantial landscape and visual effects are limited to a vicinity of approx 3km from the site and Moderate effects are generally limited to within a 10 km radius"*. **As Figure 05 shows Substantial effects would be experienced over a much wider area roughly equivalent to a 10km radius of the site.** We suspect that the significant adverse visual impact to the east of the site would extend further than we have indicated. We have not carried out a more extensive assessment from this direction because of the presence of intervening woodland making the area more complex to assess than the lowland areas to the north west and west where the presence of the ridge across to Fulbourn and the Wilbrahams, can be clearly seen.

LDA's Conclusions

- 2.20 The first bullet point within para. 5.9.2 is misleading. It states: *"The change between open panoramic views across a number of elements within the wider landscape, which generally reduces the significance and focus of the development site, to a very intimate, often partially wooded,*

landscape sweep, limited long distance views towards the site." This statement ignores the prominent ridge location of the site, particularly when viewed from the west and north west.

- 2.21 We also disagree with the second bullet point: *"The predominant use of the area as a working landscape and various associated infrastructure detractors (main transport routes, telegraph poles, electricity pylons in an essentially rural area) reduces the sensitivity of the landscape"*. This landscape currently absorbs the national grid lines and the A11 but any further intrusion with the addition of 13 no. 120m high turbines could not be accommodated without detracting from the distinctiveness or central character of the chalk ridge. The A11 and national grid power lines for the most part run below the ridge whereas the wind turbines will appear as skyline features dominating the ridge at this point.
- 2.22 The third bullet point is also inaccurate and underplays the situation: *"Relatively limited existing recreational access and limited population reduces the number of receptors and their exposure to change"*. This statement has no regard to the significance of the strategic recreation routes (the Fleam Dyke, Icknield Way and Harcamlow Way). It also ignores the area's proximity to Cambridge. The Green Infrastructure Study for the Cambridge Sub Region highlighted the shortage of open space around Cambridge, which is rapidly expanding in population. In addition, Haverhill, Linton and Newmarket are all substantial settlements lying within 10 km of the site. Therefore there is a large population who could be expected to utilise this countryside for recreational access in addition to local residents and users of the A11. It must be remembered that the grain of the rural road network lies north/west – south/east and many residents will work in Cambridge or Newmarket and could thus be expected to drive past the site.
- 2.23 At para. 5.9.4 it is stated: *"Whilst the presence of the wind farm would bring about a significant change in the landscape this would not be detrimental change in terms of the quality of the landscape for most locations."* It is also stated at para.5.9.5 that *"tree planting as mitigation would be ineffective, and bearing in mind the character of the site, inappropriate."* These statements show that even LDA consider that there would be a significant change, although not accurately defined, they conclude that it would not be detrimental: *"Indeed, some people might view it as a positive change, adding interest to an otherwise rather homogenous working landscape"*. It is presumptuous to suggest that this landscape is homogenous and needs the "positive" change of 13 no. 120m high wind turbines to make it more interesting. Having carried out the Landscape Character Assessment for East Anglia in 1997 we regard this character area as one of the most prominent landscape tracts within the region. It is recognised as a key entry point to counties of Norfolk and Suffolk and an important defining context as a "rim to the bowl" which holds the city of Cambridge and its surroundings from Royston in the west to Newmarket in the north east
- 2.24 **We consider the Environmental Statement to be seriously flawed because it makes the assumption that people will like to see wind turbines without considering the capacity of the landscape to accommodate them without detriment to its local distinctiveness. It has underplayed the significance of the visual change and has not considered the capacity of the area to accommodate 13 wind turbines. They are taken as a given number and size. Furthermore, this site is assumed to be the correct place for them regardless of landscape quality, prominence and setting.**
- 2.25 **It is a statutory requirement that Environmental Impact Assessments consider alternative sites. We suggest that this application cannot be properly considered in light of government guidance until it has been compared with other potential sites. We understand that Cambridge airport (Marshalls) are aware of 30 other proposals which might affect them and would therefore urge South Cambridgeshire District Council to carry out a landscape capacity study similar to that undertaken by Kings Lynn and West Norfolk and Breckland District Councils. This process is good practice in identifying sites with potential for wind farms rather than being focused on one-off proposals which are identified on an opportunist basis, such as Wadlow.**

3 Planning policy context

Conservation areas and listed buildings

3.1 The development will have a negative impact on the listed buildings and conservation areas within the Area of Significantly Adverse Visual Change identified within the Environmental Statement and modified by The Landscape Partnership (see Figure 1). The conservation areas and the listed buildings that will be affected are described below.

Balsham

3.2 There is a distance of 1km between the southerly tip of the application site and the nearest point of Balsham conservation area. The parish of Balsham features 33 Grade II listed buildings, 28 of which are within the conservation area. Figure 1 illustrates the open views of the application site from the northern and western boundaries of the conservation area.



(Figure 1: The impact on Balsham conservation area)

West Wratting

3.3 At its south eastern boundary the application site is within 2km of the West Wratting conservation area. The conservation area includes 4 Grade II* listed buildings and 14 Grade II listed buildings. The Church of St. Andrew is a Grade II* listed building within the conservation area, which has the view of the application site displayed in Figure 2.



(Figure 2: The impact on West Wratting conservation area)

Fulbourn

3.4 The most southerly point of the Fulbourn conservation area is within 4.5km of the north westerly point of the application site. The Fulbourn conservation area hosts 2 Grade II* and 28 Grade II listed buildings. 6 further Grade II listed buildings fall outside of the Fulbourn conservation area (See Figure 3).



(Figure 3: The impact on Fulbourn conservation area)

Great Wilbraham

- 3.5 The Great Wilbraham conservation area is 3km from the north westerly point of the application site. The Great Wilbraham conservation area hosts 3 Grade II* and 26 Grade II listed buildings, 7 Grade II listed buildings fall outside of the conservation area. The application site can be viewed from the south eastern boundary of the Great Wilbraham conservation area (See Figure 4).



(Figure 4: The impact on Great Wilbraham conservation area)

- 3.6 There is no published guidance on the assessment of the indirect effects of wind turbines on designated features of cultural heritage interest in England and this is recognised within the Environmental Statement. The Environmental Statement considers Scottish National Heritage's acknowledgement that wind turbines will be the dominant visual feature up to 2km from any site and would potentially have a significant impact on the setting of features within 5km.
- 3.7 Consideration of the argument put forward by Scottish National Heritage acknowledges that the application site would have a significant effect on the setting of the Church of the Holy Trinity at Balsham and the listed buildings and conservation areas referred to above due to their proximity. According to Scottish National Heritage the proposed wind turbines would be the dominant visual feature of the locality of the Fleam Dyke Scheduled Ancient Monument.
- 3.8 Sections 5.6.8 and 5.6.16 of the Environmental Statement argue that the majority of the affected listed buildings and conservation areas have inward facing characters. The churches in the area make up a significant proportion of the Grade I and II* listed buildings. Historically, churches were built as the dominant structure in the local landscape and were not inward facing. The impact of the proposed development on views from all areas within the curtilage of listed buildings should be assessed. At West Wratting and Balsham the conservation areas tend to be linear and are not inward facing. The statement that the majority of the affected listed buildings and conservation areas are inward facing is a generalisation and further consideration of the impact of the wind turbines on these important historical elements is required.

National policy

- 3.9 Relevant Government guidance is identified within Section 2 of the Environmental Statement with cross references to relevant chapters and to the Planning Statement. However, upon closer analysis, these only amount to token references to Planning Policy Statement PPS1 (Delivering Sustainable Development) (ODPM, 2005), Planning Policy Statement PPS7 (Sustainable Development in Rural Areas) (ODPM, 2004), Planning Policy Statement PPS9 (Biodiversity and Geological Conservation) (ODPM, 2005) (but with no reference to the accompanying ODPM Circular 6/2005), Planning Policy Guidance Note PPG15 (Planning and the Historic Environment) (DoE, 1997) and Planning Policy Guidance Note PPG16 (Archaeology and Planning) (DoE, 1990). We contend that the heritage, ecological and landscape considerations reflected within central government planning policy are materially relevant due to the likely impact of the proposed wind turbines on these considerations.
- 3.10 PPS1 provides a framework for all other planning policy. The document aims to facilitate and promote sustainable and inclusive patterns of development. The Government's commitment to

protecting and enhancing the natural and historic environment is emphasised as a key objective to achieve sustainable development within Planning Policy Statement 1.

- 3.11 PPS 7 details central government's intention to protect all areas of countryside for its intrinsic character and beauty, landscape heritage and wildlife, in addition to natural resource value. PPS 7 makes specific reference to renewable energy development at para. 16(iv) and (v), stating that when determining planning applications local planning authorities should *"provide for the sensitive exploitation of renewable energy resources in accordance with the policies set out in PPS22; and conserve specific features and sites of landscape, wildlife and historic or architectural value, in accordance with statutory designations"*.
- 3.12 PPS9, paras. 15 and 16 draw particular attention to species protection and to local authorities needing to take measures to protect the habitats of these species from further decline including refusing planning permission unless the needs for and benefits of the development clearly outweigh the harm. Circular 5/2005, para. 99 also emphasises the need for adequate surveys before planning permission is granted. This aspect is addressed separately by our clients.
- 3.13 We also draw particular attention to the advice at PPG15, para.3.5 to a listed building's setting and its contribution to the local scene (which may be very important where it forms an element to the landscape), and, at para. 4.14 to the desirability of preserving or enhancing the character or appearance of a conservation area in respect of development proposals which are outside the conservation area but which would affect its setting, or views into or out of the area. PPG16, para. 8 also emphasises that in striking the right balance with the many demands of modern society, there should be a presumption in favour of the physical preservation of nationally important archaeological remains, whether scheduled or not.
- 3.14 The thrust of central government policy within PPS7, PPS9, PPG15 and PPG16 is that planning permission should only be granted where it can be demonstrated that the development will not compromise the objectives of heritage, landscape and nature conservation designations, unless adverse effects are outweighed by environmental, social and economic benefits. Insufficient attention is drawn to this all important balancing exercise within the Environmental Statement, and, to the various considerations that need to be addressed.
- 3.15 Application S/1018/06/F will have an adverse impact on:
- Landscape Character Area 87 – East Anglian Chalklands
 - Fleam Dyke Scheduled Ancient Monument
 - The Balsham, West Wrattling, Fulbourn and Great Wilbraham conservation areas
 - Grade II* and Grade II listed buildings within 5km of the application site (see Figure 1)
- 3.16 Planning Policy Statement 22: Renewable Energy is not considered adequately within the Environmental Statement. Environmental, social and economic impacts are a key focus of the document and this is not reflected within the analyses provided.
- 3.17 Paragraphs 19 and 20 of Planning Policy Statement 22 consider the impact of renewable energy technologies on the landscape. Paragraph 19 states 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** of the proposed development"*.
- 3.18 Paragraph 20 goes on to state: *"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 the size and number of turbines and the type of landscape involved**"*.
- 3.19 The proposed wind turbines at Wadlow would have a significantly adverse impact on the local landscape due to their height, location and constant movement (see section 2.15).
- 3.20 The Companion Guide to Planning Policy Statement 22 is not referred to within the Environmental Statement. The Guide provides detailed practical advice to local authorities when determining planning applications for the utilisation of renewable resources, stating that the contribution towards the regional target cannot in itself be a reason for refusal or permission, key impacts and

proposed mitigation must also be accounted for and should be approached no differently from other types of planning application. The environmental, social and economic benefits specific to the proposal (as opposed to, for example, broader environmental benefits that could be applicable to any renewable energy project) should also be outlined. Here, both in the Planning Statement and the Environmental Statement insufficient regard has been paid to this aspect. Indeed, other than the generation of electricity, no other benefit has really been identified. Furthermore, the question how that generated electricity can be utilised on a regular and/or consistent basis is left unanswered.

Landscape Character Assessment

- 3.21 Local Designations are replaced with a propensity to Landscape Character Assessment within Planning Policy Statement 7. The document states that any proposed development that would significantly disrupt landscape quality and character should not be permitted and that this should be assessed through the identification of landscape characteristics and the examination of the significance of visual change.
- 3.22 The proposed wind farm at Wadlow is located within Landscape Character Area 87: East Anglian Chalk, which is one of the most prominent landscapes within the eastern region (See Appendix A and Section 2.9). The character of the area is largely defined by its geology and topography which comprises a chalk ridge, extending from the Chilterns to the south west, through north east Hertfordshire, via Royston and across to Newmarket.
- 3.23 The ridge is significant when viewed from the low lying and relatively flat Fen Clay Plateau to the northwest, which includes Cambridge and the surrounding villages. The views of the East Anglian Chalk Landscape Character Area from a number of these villages, including Fulbourn and Great Wilbraham, will be adversely affected by the proposed development. LDA Design acknowledges that the area is sensitive to change because it is relatively open, however, they do not deem the impact to be significant due to the level of topographical variation (Environmental Statement paragraph 5.3.24).
- 3.24 Development on hilltops is likely to have a significantly adverse impact on the Landscape Character Area and this is emphasised within the Joint Character Document, prepared by The Landscape Partnership as consultants for the Countryside Agency and English Nature and supported by the stakeholders and consultees. The document states that *'This area would benefit from a discouragement of large-scale development on hilltops'* (Countryside Agency, 1999).

Strategic policy context

The Draft East of England Plan, Regional Spatial Strategy for the East of England, 2005

- 3.25 The Regional Spatial Strategy is referred to within Appeal Decision APP/K2610/A/05/1180685, which dismisses Enertrag (UK) Ltd's appeal against the decision of Broadland District Council to refuse the construction of a wind farm on farmland adjacent to Skitfield Road, Guestwick, Norwich. Inspector David Lavender included the following statement at paragraph 50 of his Decision Letter:

"The balance between on shore wind energy generation across the region and local protection of the rural environment will not become firmly established in policy terms until RSS14 in its final version is published in early 2007, the further work on targets and apportionment proposed by EERA has been carried out...That is, I acknowledge, likely to be some way off. However, as matters currently stand, it cannot be said that the proposal is either plan-led (as intended by PPG22)...In these circumstances it would be wrong to regard EERA's currently recommended targets for inclusion in draft RSS14 as a reason for attaching greater weight to the exploitation of wind energy from this particular site than to other aspects of the environment which, in the public interest, ought to be protected".

As such the detrimental impact on the landscape and the historic environment cannot be justified through reference to renewable energy targets.

- 3.26 Policy ENV2 of the Regional Spatial Strategy considers landscape character, placing a requirement on Local Planning Authorities to protect and enhance the diversity and local distinctiveness of landscape character throughout the East of England. The policy dictates that all development

should respect and enhance landscape character or provide appropriate mitigation where damage to local landscape character is unavoidable. The proposed development at Wadlow does not respect or enhance the landscape character, and the planting mitigation measures proposed within the Environmental Statement are not considered appropriate to mitigate the negative impact on the landscape.

- 3.27 The Regional Spatial Strategy considers the historic environment within policy ENV5. The policy requires Local Planning Authorities to protect, conserve and, where appropriate, enhance the historic environment, including historic buildings and landscapes. The negative impact on listed buildings, conservation areas and the historic landscape detailed above reveal the contravention of the proposed wind turbine development with policy ENV5.

Cambridgeshire & Peterborough Structure Plan (2003)

- 3.28 The Fleam Dyke is the oldest of four defensive dykes in the vicinity of the development. The Anglo Saxons built the dyke between the 5th and 7th Centuries AD. The Fleam Dyke is designated as a Scheduled Ancient Monument due to its historic value and is also within a Site of Special Scientific Interest, designated for its nature conservation value. These are not accounted for within the Environmental Statement. Policy P1/2 of the Structure Plan refers to environmental restrictions on development, stating that no new development would be permitted that would adversely affect nationally important nature conservation areas, such as Sites of Special Scientific Interest, and historic features, such as Scheduled Ancient Monuments. The policy considers that development should be restricted where this would lead to the damage or loss of these important sites and features. Should the proposed development at Wadlow be permitted it would have a damaging effect on the landscape setting and lead to the loss of the visual amenity of the historic landscape.
- 3.29 Policy P7/4 relates to landscape and is not sufficiently considered within the Environmental Statement. The policy requires that development, including large structures, must relate sensitively to the local environment, contributing to the sense of place, identity and diversity of the distinct Landscape Character Areas. The Environmental Statement considers that the proposed large scale development complies with Policy P7/4 through the provision of appropriate mitigation. Conversely, the proposals are incompatible with policy 7/4. The development would not contribute to the sense of place, identity and diversity of the East Anglian Chalk Landscape Character Area as the mitigation proposed is not adequate.
- 3.30 Policy P7/7 of the Structure Plan relates specifically to renewable energy generation, requiring that applicants for renewable energy projects demonstrate that there is not an unacceptable impact on residential amenity or the local environment. Table 5.3 of the Environmental Statement attempts to address residential amenity and the local environment. The Environmental Statement acknowledges that the Environmental Impact Assessment does not demonstrate that there will not be an unacceptable impact on residential amenity or the local environment, as the impact on the East Anglian Chalk Landscape Character Area would be substantial within 3km of the proposed development.

Local policy context

South Cambridgeshire District Local Plan (2004)

- 3.31 Policy EN1 of the plan considers Landscape Character Areas, relating to those prepared by the Countryside Agency, which are defined on the Proposals Map. Policy EN1 states that the District Council will seek to ensure that the local character and distinctiveness of Landscape Character Areas is respected, retained and enhanced through planning decisions. The document states that development which would have an adverse impact on the character and local distinctiveness of Landscape Character Areas would not be permitted. The development of the Wadlow Wind Farm will have a significantly adverse impact on the character and distinctiveness of the East Anglian Chalklands Landscape Character Area (See sections 2.9 and 3.19).
- 3.32 The impact of development on historic landscapes is quantified within policy EN4 of the Local Plan. The policy states that planning permission will not be granted for development which would adversely effect or lead to the loss of important areas and features of the historic landscape, whether or not they are statutorily designated. The impact on the nearby Scheduled Ancient

Monument, which is a statutory designation, has not been given sufficient consideration within the Environmental Statement and this disregards policy EN4.

- 3.33 The development will have a negative impact on the setting of the conservation areas detailed in the above section and those of some of the more prominent and sensitively located listed buildings, in contravention with policy EN30, which states that development proposals will be expected to preserve or enhance the special character and appearance of conservation areas and their settings. The application will have the greatest impact on the northern edge of Balsham conservation area (See section 3.1).

South Cambridgeshire Local Development Framework, January 2006

- 3.34 The South Cambridgeshire Local Development Framework is currently being prepared to supersede the 2004 Local Plan. Policy NE/2 of the Core Strategy relates to renewable energy, requiring developers to make provision for the removal of facilities and the reinstatement of the site. Section 2 of the Environmental Statement makes no provision for the decommissioning of the site and makes no reference to any other sections that refer to the decommissioning and full reinstatement of the site as required by policy NE/2. The supporting text to Policy NE/2 (in paragraph 8.6) directs the District Council to refuse planning permission for proposals to generate renewable energy where there is a clear adverse impact on the environment or amenity of the area. Paragraph 8.8 places importance on the need to protect the historic and natural landscape from large wind farms, as the proposed grouping of 13 turbines is deemed to be.
- 3.35 As the proposed wind turbines would have a significantly adverse impact on the character and distinctiveness of the East Anglian Chalklands Landscape Character Area they are not compliant with policy NE/4 of the Core Strategy. The policy requires that development respects, retains and enhances the local character and distinctiveness of the Landscape Character Areas.
- 3.36 The development would have a negative impact on a number of conservation areas, as detailed above. Consequently, it is not compliant with policy CH5 of the Core Strategy, which affords protection to conservation areas. The Local Development Framework is currently being prepared in accordance with the Cambridge Sub Regional Green Infrastructure Strategy (Cambridgeshire Horizons, 2005). The document highlights the Fleam Dyke and the Harcamlow Way as New Green Corridor 26 for Cambridge, reiterating their importance.

4 Refusal of application for 16 wind turbines and associated development south west of Huntingdon road

(Ref. Appendix C)

- 4.1 We have studied the South Cambridgeshire District Council's development and conservation control committee report dated 6th April 2005 for application 6/1663/04/F for a proposed wind farm comprising 16 wind turbines with height of 60m adjacent to the A14 between Huntingdon and Cambridge. We have visited this site and studied the reasons for refusal. As photographs 398 and 400 in Appendix D show this site lies immediately adjacent to the A14, comprises very open large-scale countryside with less topographical variation than Wadlow, which makes it much less prominent. It is not constrained by any strategic recreational routes as far as we can ascertain but was refused because
- 1) *"the scheme, by virtue of the size, scale and extent of the wind turbines, would dominate and adversely affect the landscape character of the area, particularly the open and gently undulating rural character of the area.*
 - 2) *the scheme, by virtue of the size, scale and extent of the wind turbines, would adversely affect the historic landscape pattern by introducing intrusive and standardised industrial forms which will visually connect Boxworth and Connington, in particular, and by virtue of its dominating the impact upon the setting of and views from conservation areas ..."*
- 4.2 We consider that both these reasons for refusal, although understandable at Boxworth and Connington, are even more pertinent to Wadlow. The site at Wadlow is of higher quality comprising far more prominent topography which can be seen extensively from the west and north west and south. It also has a very attractive surface cover of woodlands and hedges and is traversed by important strategic footpaths which are also historical trackways and earthworks.
- 4.3 Therefore, we suggest that South Cambridgeshire District Council, although considering each site on its merits, must have regard to its refusal at Boxworth and Connington and similarly refuse this scheme which affects higher quality, more prominent landscape and will result in a significant adverse impact over a substantial area.

5 Concluding comments

- 5.1 An opportunistic approach to wind turbine development would have a significantly adverse impact on the distinctive landscape and environmental features within the South Cambridgeshire District. A landscape and environmental capacity study is required to determine the most appropriate locations for wind turbine development in the District. The Environmental Statement for the proposed development of 13 wind turbines at Wadlow does not sufficiently address the significance of the changes arising from the proposed wind farm. These changes would have an adverse impact on wide tracts of countryside, settlements, historic and landscape features. The proposed development at Wadlow is comparable with the proposed wind turbines at Boxworth and Connington. These wind turbines were inappropriate and consequently they were refused. We do not consider that the electricity generated by the proposed wind turbines at Wadlow would warrant the adverse impact.
- 5.2 In overall conclusion, we commend one of the concluding remarks of the Guestwick Appeal Inspector who, in addressing similar issues, stated at paragraph 51 of his Decision Letter:
- "All of these factors add weight to my overall conclusion on the balance of issues, that the proposal before me does not provide for the sensitive exploitation of renewable energy [emphasis added] in accordance with PPS22 and would fail to conserve specific features and sites of landscape, historic and architectural value in accordance with statutory designations".*
- 5.3 We recommend that there should also be a refusal of the Wadlow proposal.