

Wadlow Wind Farm:

Stop Wadlow Wind Farm Campaign

Comments on the LDA Design Response to The
Landscape Partnership's Technical Report dated July
2006
Planning Application S/1018/06/F

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1 Introduction

1.1 We have studied the LDA Response, sent under cover of RES's letter dated 14th November 2006, to our critique of the RES Planning Application and Environmental Assessment which was submitted by the Stop the Wadlow Wind Farm Campaign in August 2006.

1.2 In respect of the LDA Response, we offer the following comments by way of a comprehensive reply:

Mitigation (LDA paragraph 2)

1.3 LDA acknowledge that wind turbines by their very nature "*are likely to be visible from areas of the surrounding countryside. That does not mean, however, that integral mitigation measures cannot be included within a scheme such that the scale, arrangement and appearance of a development can be made more appropriate to its proposed location*". This conflicts with their comments within Volume 2 of the Environmental Impact Statement (Section 5: Landscape and Visual Impact Assessment para. 5.1.9) "*opportunities for significant mitigation measures are inevitably limited due largely to the nature of the proposed development*".

1.4 The mismatch of statements relating to mitigation and the absence of any effective mitigation proposals leads us to assume that the applicants are confused and perhaps consider that the Wadlow Scheme cannot be effectively mitigated. This concurs with our view having conducted a thorough analysis of the application.

Landscape and Visual Sensitivity (LDA paragraph 3)

1.5 The reason behind the difference of opinion is simple, LDA Design have not gone far enough in their assessment. Not only have they not adequately presented the significance of visual change, they have not fully addressed whether that change would be beneficial or adverse. This is a fundamental problem with their Landscape and Visual Impact Assessment. To inspire confidence environmental impact assessment must be more impartial, this one has been procured by the applicant and fights shy of negative comment, therefore should be viewed with caution.

- 1.6 The Landscape Partnership usually start with a philosophical presumption in favour of wind turbines as they are capable of being visually interesting and attractive structures with a positive role in providing renewable energy. But it does not end there; they must be assessed objectively in relation to their effects upon the landscape character of the area in which they are proposed. If they can be accommodated without detriment to the character of the local countryside, then the visual change would be regarded as neutral, or possibly positive if they would enhance the area. If, however, by their size, number, scale and location they would adversely affect the character of that countryside then they would be deemed to have a negative impact. The positive or negative impacts could range from slight to substantial according to the degree of visual change encountered. This would depend on the size, number and location of the turbines, their proximity to sensitive view points, the topography and prominence and presence of intervening screening, (vegetation or buildings etc.).
- 1.7 In our opinion the LDA assessment has underplayed the adverse visual impact – this is hardly surprising for they are acting for the applicant. Any Environmental Statement which could not paint a positive picture would not have been submitted in support of the application.
- 1.8 We respect LDAs experience and have stated that we agreed with the methodology adopted, but only so far as it went. It did not fully address the fundamental visual issues, i.e. the negative or positive effects on the landscape character of the areas which would be affected by the proposal.

Considerations of other options within the ES (LDA paragraph 4)

- 1.9 This issue is addressed in the main body of RES's letter dated 14th November 2006 at page 5 ("Consideration of Alternatives"). RES continues to overlook the point that as a matter of law, alternatives must be considered under Directive 85/337/EEC (as amended) and the subsequent Town and Country Planning (Environmental Impact Assessment) Regulations 1999. Specifically, Schedule 4, para.2 of the EIA Regulations 1999 makes it a mandatory requirement for the Environmental Statement to include an "outline of the main alternatives studied by the applicant ...".

1.10 The RES ES provides no detailed visual or environmental evidence relating to the other six sites which were apparently considered (ref. Non Tech Summary p.7). Neither is there evidence of a "landscape led" approach to the design, which would have influenced the number, size and location of the turbines so that a more effective integration into the landscape should have been achieved. We would have expected such an approach to have been a part of the environmental assessment/design process.

The Historic Environment (LDA paragraph 5)

1.11 LDA state:

"The majority of conservation areas have not been designated for their countryside views; in fact few conservation areas have significant open countryside views as a key feature".

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be paid in the exercise of any planning function to the desirability of preserving or enhancing the character or appearance of a conservation area. Planning Policy Guidance Note 15 (PPG15) considers that the desirability of preserving or enhancing the area should also be a material consideration in the planning authority's handling of development proposals which are outside the conservation area but would affect its setting, or views into or out of the area.

Whether conservation areas have been designated for their countryside views and whether these views are a key feature is immaterial. The proposed wind turbines would affect the setting of some conservation areas and the views out of others. Special attention should be paid to the impact in accordance with the PLBCA Act 1990 and PPG15.

Landscape Character (LDA paragraph 6)

1.12 LDA now acknowledge that the landscape character assessment (Landscape Character Area 87 East Anglian Chalk) stated that "the area would benefit from a discouragement of large scale development on hill tops". They then seek to demean this statement by implying that "the widespread use of red brick suggests that the objective was targeted at large scale housing development". It obviously applies to all large scale development on hilltops. If 13 x 120m high turbines set across more than 3sq.km on one of the most prominent parts of landscape character

area 87 is not large scale development, it is difficult to know what is! The visual prominence of the proposed wind turbines would be substantially greater than a housing development which would on average be 7.5 to 10m high. Our concern is that the visual effects have not been properly assessed. Had they been LDA would probably have had to come to a similar conclusion to ourselves.

Surrounding area (LDA paragraph 7)

- 1.13 LDA state that "*however, the majority of land in and around Cambridge is below 20m AOD.*" We contend this makes the Wadlow site at 70m AOD on average even more prominent, particularly when viewed from the low lying areas on the eastern margin of the City. We do not agree that we have exaggerated the perceived adverse effects of the proposal at all, in fact we stated that we may have underestimated them when viewed from the east. We acknowledged that the wind turbines would not be equally prominent from all aspects, i.e. they would be more prominent when seen from the north west – west – south west. Conversely, there are potential views which cannot be taken account of due to the interaction of landform and vegetation. We maintain our assertion that the turbines would be visible and result in a significant adverse visual change from the areas shown on our Figure 04 which is re-submitted with this response.

Landscape value (LDA paragraph 8)

- 1.14 We do suggest that the site is of sub-regional or regional value due to its topography and location on the edge of Cambridge and know of no other areas of similar quality within 10 to 15 kilometres of Cambridge. The Barrington and Royston chalk landforms do not have the subtle interaction between landform and vegetation cover to the degree exhibited at Wadlow. We note that LDA now state that "*closer to Cambridge the landscape quality may reduce*". The fact that "*existing infrastructure and number of receptors increases considerably*" is not the point, the Wadlow site lies within a relatively high quality landscape within the Cambridge sub-region.
- 1.15 LDA state that "*There are other areas of landscape of higher quality and less capacity to accept large scale turbine development*". This statement must be substantiated by the appropriate assessment of alternative sites. RES state, in their letter of 14th November 2006, that '*there is no*

planning requirement to consider alternatives for renewable energy projects. Renewable energy projects have to be developed subject to proper Environmental Impact Assessment'. As already mentioned above, this statement is inconsistent with the requirement to consider the assessment of alternatives under Directive 85/337/EEC (as amended) as well as Schedule 4 of the subsequent Town and Country Planning (Environmental Impact Assessment) Regulations 1999.

- 1.16 We still maintain that *it is also rare in East Anglia to find prominent higher land of higher quality.* We agree that the Cromer ridge line is an example (it also lies within the AONB) but is one of very few and the only example that we, and possibly LDA can cite.

Landscape sensitivity (LDA paragraph 9)

- 1.17 We note, *"The LVA does not suggest that there are no sensitive receptors but it does indicate that in comparison to alternative sites there are comparatively few"*. This is the first time mention is made of alternative sites, they are not defined in the LVA and as we have said previously, we would have expected alternative sites as well as the do-nothing option to have been properly covered or assessed in any environmental statement. We do not accept that the landform would help reduce visibility from the west, from Cambridge or from the A11 where in fact it would make the proposed turbines even more prominent. Even from the east where the landform is flatter we still contend that the turbines would have a significantly adverse impact albeit over a reduced area (ref. TLP Figure 04).
- 1.18 RES in their letter to South Cambridgeshire District Council (dated 14th November 2006) criticised The Landscape Partnership for stating that the Hamcarlow Way was a Scheduled Ancient Monument. Where this long distance path uses the Fleam Dyke (which is a Scheduled Ancient Monument) it becomes not only a strategic recreation route but also one of great cultural/historic sensitivity. Furthermore this conjunction takes place adjacent to the Wadlow site where the adverse impact from the proposed turbines would be greatest.
- 1.19 There are two aspects to sensitivity; visual sensitivity and landscape sensitivity. Visual sensitivity depends upon the sensitivity of the receptor. Houses, public footpaths, recreation areas are more sensitive than trunk roads or employment areas. We contend that this area of countryside is going

to become an even more important recreation source with the increased populations envisaged throughout the Stansted, M11 corridor, Cambridge sub-region etc. Statistics show that people are making more use of long distance walks, cycle routes etc. and we expect this to be very much the case in the vicinity of the Wadlow site. Having just produced the Cambridge Green Infrastructure Strategy (Cambridge Horizons 2006) the Wadlow locality is shown to have an important role due to its visual attraction, presence of existing long distance routes and proximity to Cambridge (ref. Appendix B of our August submission). LDA were not able to take account of this Strategy because it was in the course of preparation at the time and has only recently been adopted. We do not accept that our "*argument presumes that for visual receptors to see turbines is a negative experience*". As we have said earlier in this response, we start in favour of wind turbines but still maintain the degree and significance of change they bring about is dependent upon the sensitivity of the viewpoint and, the number, size and location of turbines. We hold to our opinion that 13 turbines at 120m high located on this prominent site could not be mitigated (as now apparently accepted by LDA), would therefore be too dominant and so have an adverse impact on the landscape character of the area. This would result in a deterioration of visual and landscape quality as perceived by walkers, riders, cyclists, motorists on the A11, as well as residents, both living within and adjacent to settlements!

The significance of visual impact (LDA paragraph 11)

- 1.20 While LDA acknowledge that "*the proposed development will result in some substantial and some adverse impacts upon both the landscape and visual environment which is in all probability, only to be expected. That this is hardly surprising given the scale of the turbines and would hold true for almost any area of the country that they may be introduced into. The question is whether on balance the impacts are acceptable or not and we would reason that overall, this site is not in an appropriate location for the scale and size of wind energy development proposed*". They do not clearly show where the substantial and adverse impacts on the landscape and visual environment would occur. This is why in commenting on the LDA appraisal we have sought to do so (ref. our Figure 04). We disagree with the statement above because wind turbines can be acceptable in

larger landscapes, e.g. the Fens, offshore or in extensive areas of mountain and heathland, i.e. in landscapes large enough to “hold” or contain them without detriment to landscape character.

1.21 The test, has to be whether the proposal would result in a change to the landscape character of the area and the significance of that change. If the change is neutral or positive then there is no problem, but if it is adverse and significant over a wide area the proposal should not be allowed to proceed.

1.22 The Landscape Partnership’s brief was to comment on the LDA landscape and visual assessment. It was appraised by a director of the company who has over 30 years experience of carrying out landscape assessment within the eastern region. He also undertook the landscape character area assessment of the region for the national joint character map of between 1996/98 which defined landscape character area 87 The East Anglian Chalk. The Landscape Partnership’s appraisal was based on the LDA assessment but went further. It has to fall on the applicants to produce a convincing assessment based on sound survey which follows agreed guidelines to first assess the degree and significance of visual/landscape change objectively and then no doubt lead on to justify or support their proposal. The LDA survey and assessment is flawed because it steers clear of judgements about positive or negative impact upon the landscape character area and does not properly address the significance of change.

Planning policy context (LDA paragraph 12)

1.23 RES state that *“The key issue in assessing the application is to determine whether the development accords with the development plan when read as a whole”.*

The determination of the application in accordance with local policy unless material considerations indicate otherwise is a statutory requirement under Section 38(6) of the Planning and Compulsory Purchase Act 2004. We agree that the development plan should be considered as a whole, and, that policies for the built and natural environment should be considered with equal weighting to policies in support of renewable energy development. PPS1, PPS7, PPG15 and the East of England Plan Regional Spatial Strategy are material considerations that must have weight in the determination of the application as well as PPS22.

The Boxworth and Conington Appeal Decision dated the 8th December 2006

1.24 We have just received and studied the Inspector's decision in respect of the Application (copy attached). It is interesting to note that the Inspector was not convinced of the applicant's case when they stated that *"It is almost inevitable that wind energy schemes will be out of scale with their surroundings"* (ref. para.96), the Inspector goes on to state *"A large area of flat land or an area of featureless moorland or a heavily industrialised or commercialised area will all be characterised by large landscapes or townscapes. I recognise that some such areas are valued for their quality wilderness quality but in my opinion they are more readily able to accommodate large structures. Even in these locations, however, I would expect a detailed and careful assessment to be made of the maximum size and number of turbines which the landscape is capable of carrying. It follows that a site which may be capable in terms of landscape and visual impact of being able to reasonably accommodate a limited number of smaller turbines would nevertheless be overwhelmed by a larger number of the same turbines or a smaller number of larger turbines."* (ref. para.96). At para.99 the Inspector stated *"I fear the implantation of the proposed development would be incompatible with these qualities and insensitive to the character of the area."* The Inspector has correctly taken account of the visual impact and its influence on the landscape character of the surrounding countryside.

1.25 We contend that the Wadlow site and surrounding countryside has a higher visual quality and lies within a landscape character area of the East Anglian Chalk ridge *"which should be safeguarded from inappropriate development on hilltops"*, therefore it should be refused in accordance with government guidance as borne out by the Inspector's recent decision at Boxworth and Conington.

2 Conclusions

2.1 Nothing in the LDA response to our Technical Report leads us to change our observations in respect to this application. It only increases our concern that the Environmental Statement and, in particular, the Landscape and Visual Assessment on which we are particularly qualified to comment is flawed and falls short of what should be expected.

2.2 We are encouraged that Andrew Pykett, the Inspector conducting the Boxworth and Conington appeal, appears to have adopted a similar approach in dismissing that appeal on a site that we consider to be a less visually sensitive and lower quality landscape than would be influenced by the Wadlow proposal. Accordingly we urge the South Cambridgeshire District Council to refuse this application.