



Campaign to Protect
Rural England

DEVON

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23 November 2011

Mr Simon Trafford
Planning Services
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
Devon
EX16 6PP

Dear Mr Trafford

**Planning Application No. 11/01705/FULL
Erection of a 50kW wind turbine mounted on a 25 metre tower, and associated
infrastructure. Land at NGR 272456 114145. Mounticombe Farm, Chawleigh,
Devon.**

I have been asked to comment on the above application on behalf of CPRE Devon.

Having studied the submitted documentation CPRE **objects** to this application and recommends that planning permission be refused.

Landscape and Visual Impact issues.

Whilst CPRE is generally supportive of renewable energy we do have concerns over the impact of renewable energy proposals on the landscape. The Government acknowledges in PPS22 that *“of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects.”*

In this case the proposed turbine would be sited on high ground, would be as high as a 10 storey building, have rotating blades which would draw the eye, and would be a highly intrusive alien feature in what is at present a totally unspoilt landscape, unmarred by man-made structures.

At 5.2.1 the Supporting Statement says that *“The local environment has an existing element of verticality with several power cables and telephone lines.”* We assume that the applicant is trying to say that these features would reduce the impact of the turbine. This is clearly ridiculous as the average telegraph pole or power line pole is no more than 6 metres tall, less than one fifth of the height of the proposed turbine, and in any case these structures are stationary objects which do not draw the eye in the same way as the rotating blades of a wind turbine.

At 5.2.8 the Supporting Statement states that “The Draft Mid Devon Landscape Character Assessment describes the proposed site as falling within two landscape

character types; LCT 1F Farmed lowland moorland and Culm Grassland and LCT 3H; Secluded valleys. This is incorrect; the site lies wholly in LCT 1F.

Furthermore at 5.2.8 the Supporting Statement provides extracts from the description of LCT 1F within the Character Assessment, but conveniently neglects to include on of the Future Forces for Change which is *“Increased demand for wind turbines may have a dominant/negative impact on landscape”* and *“Increased pressure for the development of commercial wind turbines on elevated plateaux.”*

Accordingly the Landscape Character Assessment is clear that this proposal is inappropriate in LCT 1F. Furthermore, as we shall show later, this proposal is for a commercial turbine.

Under Past Forces for Change the Landscape Character Assessment states *“Masts are highly visible and add visual discordancy.”* This turbine would be highly visible and a discordant feature.”

The Strategic Guidelines for LCT 1F at page 80 of the Landscape Character Assessment include *“Protect tranquillity of views by locating development away from either plateau edges, ridgelines or prominent slopes where it will interrupt the character of undeveloped skylines.”* The proposed turbine would be contrary to these strategic guidelines.

Under Special Qualities the Landscape Character Assessment states *“Isolated houses and farmsteads have led to high levels of tranquillity and remoteness with panoramic views and unbroken skylines.”* The proposed turbine would be a skyline development when viewed from many viewpoints and would undermine the special qualities of the LCT.

From the proposed site there are wide vistas extending into much of Mid Devon and also into North Devon. The turbine would be an intrusive feature when viewed from many viewpoints in these areas. Its rotating blades would draw the eye and make the turbine even more intrusive than a stationary structure of the same size.

Furthermore, the turbine would dominate the outlook from a number of nearby properties. Although it is recognised that the planning system does not exist to protect views from private dwellings, it is not in the public interest for a turbine such as this to cause dwellings to be regarded as unattractive places in which to live, as would be the case here. No assessment of the visual impact on neighbouring dwellings has been carried out by the applicant.

At 5.3.5 it is stated that *“The small scale proposal would not unduly change the surrounding landscape character and due to the surrounding high and thick hedges viewpoints of the turbine are screened.”* It is difficult to see how the introduction of a structure as high as a 10 storey building cannot change the character of this landscape, and how hedges could possibly screen it from views.

At 5.3.8 it is concluded that *“Overall it has been determined due to aspects of the landscape surrounding Mounticombe Farm, the presence of a single wind turbine will be easily absorbed into the landscape with minimal harm to the character and nature of the area. It is not believed that the single wind turbine would dominate the appearance of the area to the extent that it would seriously harm the appreciation of the landscape from either individual dwellings of the local settlements.”*

No evidence is given for these conclusions. The landscape and visual impact assessment is totally inadequate. A proper landscape and visual impact assessment should be provided which complies with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment.

This assessment should include photomontages which comply with best practice guidance including Scottish Natural Heritage Visual Representation of Windfarms – Good Practice Guidance, Highland Council Visualisation Standards for Wind Energy Development, and the Landscape Institute Advice Note 01/11. The photographs contained within the Supporting Statement are totally inadequate for landscape and visual impact assessment.

Ecology issues.

No breeding bird or wintering bird surveys have been carried out, and no bat surveys have been carried out.

This is unacceptable and the Council should insist that the applicant carries out these surveys and that they should be in line with best practice guidance.

Noise issues

The effects of turbine noise on nearby properties remains unknown as the noise assessment contained within the supporting documentation is totally inadequate.

At 5.7 the Supporting Statement confirms that wind turbine developments should meet noise standards set out in ETSU-R-97, and goes on to say *that “An analysis of potential noise emissions from the wind turbine at the proposed site at a wind speed of 10m/s has been conducted, which predicts the noise effect using the methodology defined by ISO9613 using the sound power levels provided by the manufacturer (92.8dB_{LA90}).”*

It continues by purporting to show that the noise levels at four nearby dwellings will be less than 35dB_{LA90}, and that accordingly that the turbine noise levels would meet the ETSU-R-97 criteria.

There are a number of input parameters for ISO9613, but the applicant has not stated which he has used. Therefore the noise levels that he has predicted cannot be relied on. For example A_{gr} – Ground Effect which is the result of sound reflected by the ground interfering with the sound propagating directly from source to receiver. This is often known simply as “G”. For mixed ground $G=0.5$ and for hard ground $G=0$. If $G=0.5$ has been used in the assessment then in some conditions the turbine noise could be 2dB higher than predicted. As the applicant has not stated the actual turbine noise at the dwellings, only that they would be less than 35dB then there can be no certainty that the ESTU-R-97 criteria can be met.

Furthermore this turbine exhibits tonal noise at wind speeds of 8m/s and above¹ which according to ETSU-R-97 requires that a penalty be added to the predicted turbine noise levels.

The proposed turbine also has a downwind configuration whereby the blades pass downwind of the tower. This configuration has been largely abandoned with other

¹ http://www2.eaststaffsbc.gov.uk/MVM.DMS/Planning%20Application/620000/620684/P-2011-00612_Noise%20Impact%20Assessment.pdf

types of turbine as the turbulence as the blades pass the tower is now recognised as causing a pronounced “thump” at blade passing frequency, in this case of about twice per second.

A proper noise impact assessment should be carried out by an independent acoustician with appropriate experience and qualifications. The noise assessment contained within the Supporting Statement is totally inadequate and makes assertions for which no evidence is provided.

Development Plan issues.

Planning Policy Statement 22 sets out the Government’s renewable energy policy. Key Principle (i) states that *“Renewable energy developments should be capable of being accommodated throughout England in locations where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily.”* We say that at this location the environmental impacts of this turbine cannot be addressed satisfactorily.

Planning Policy Statement 4: Planning for Sustainable Economic Growth, Policy EC6.1 states that *“Local planning authorities should ensure that the countryside is protected for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all.”*

The applicant quotes sections of Planning Policy 7 which relate to farm diversification but ignores Key Principle (i) which states that the Government’s objectives for rural areas that are relevant to this Planning Policy Statement are: *“.....good quality, sustainable development that respects and, where possible, enhances local distinctiveness and the intrinsic qualities of the countryside; and continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources.”* The proposal clearly fails this test.

At 2.3.1 of the Supporting Statement the applicant states that *“The Devon Structure Plan 2001-2016 (DSP) identified much of North Devon as an ‘Area of Search for Wind based Energy Production.’* The applicant appears to have forgotten that this site is in Mid Devon and is in any case not within that area of search. Furthermore, the applicant has conveniently misinterpreted the title of the area of search; the actual title of the area of search is **“Area of Search for Strategic Wind Based Energy Production.”** (Emphasis supplied). A single 50kW turbine cannot by any stretch of the imagination be classed as “strategic”.

The Devon Structure Plan objectives include *“protecting environmental assets including the landscape and ensuring that development proposals are well designed and sympathetic to Devon’s distinctive character.”* This proposal is clearly not well designed and sympathetic to Devon’s distinctive character. As such it is contrary to the objectives of the Structure Plan.

The Structure Plan objectives also include *“meeting the needs of the community.”* Whatever the benefits of this development may be in terms of contribution to renewable energy targets, and electricity generation to benefit the applicant, the planning application sets out no clear benefits for the local community.

Policy ST1: Sustainable Development seeks to ensure sustainable development objectives are achieved by use of renewable resources, but is also very clear that

sustainable development should be achieved by *“protecting environmental assets – including landscape, the natural, built and historic environment - and ensuring that development proposals are well designed and sympathetic to Devon’s distinctive character.”* Again this proposal fails this test.

Policy CO1: Landscape Character and Local Distinctiveness sets out that the distinctive qualities and features of Devon’s Landscape Character Zones, illustrated in Map 5, should be sustained and enhanced. This proposal does not sustain or enhance the distinctive qualities and features of Devon’s Landscape Character zones.

Policy CO12 of the Devon Structure Plan is very clear that renewable energy developments should be provided for, subject to the consideration of their impact upon the qualities and special features of the landscape and upon the conditions of those living or working nearby. As we stated earlier, the applicant has not carried out a proper assessment of the impacts on the landscape and nearby residents, therefore this application is contrary to Policy CO12.

Paragraphs 4.1 and 4.2 of the Structure Plan add detail to support Structure Plan Policy CO12: Renewable Energy Development. The text points out that *“The strategy of the Structure Plan sets a framework for maintaining environmental assets alongside necessary development to achieve social and economic wellbeing”* and development will be promoted where it ***“sits in harmony with the environment, or enhances it”***. (Our emphasis) This proposal does not sit in harmony with the environment or in any way enhances it.

Structure Plan Policy ST5: Development Priority 2001 – 2016 states clearly that *“In the open countryside, development should be strictly controlled.”*

Mid Devon Core Strategy Policy COR 5: Climate Change states that *“development of renewable energy capacity will be supported in locations with an acceptable local impact, including visual, on nearby residents . . .”* This proposal clearly does not have an acceptable impact on nearby residents.

Mid Devon Core Strategy Policy CO18: Countryside sets out that *“development outside the settlements defined by COR13 - COR17 will be strictly controlled, enhancing the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy.”* Again this proposal does not enhance the character or appearance of the countryside.

Mid Devon Local Plan Policy ENV2: Sustainable Energy remains part of the development plan for the time being and states that *“Proposals for wind turbine development will be permitted provided that; the suitability of the site for potential wind energy generation outweighs the impact upon the landscape, taking into account the designation of AONB where appropriate.”* As we have already shown, the impacts on the landscape would be severe and it is our view that the limited benefits in terms of energy generation do not outweigh these impacts.

Benefits

The Supporting Statement says at 1.1.10 that *“The purpose of the wind turbine is to generate a renewable, sustainable and efficient electrical supply to provide the needs of the applicant’s farming enterprises, thereby reducing their reliance on importing expensive electricity.”* However at 3.1.9 it is made very clear that an application has been made to Western Power Distribution for a connection to the local grid

infrastructure. Thus the energy produced will be fed into the grid and will not be for the use of the applicant's farming enterprises.

This is clearly an application for a commercial wind turbine; the benefit that will be gained for the applicant will be purely financial in the form of Feed In Tariff payments. There will be no wider benefits to the community.

Conclusions

This proposal would have a severe detrimental impact on the landscape and on the quality of life of the local residents. The noise impacts remain unknown.

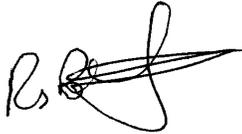
The applicant has failed to properly assess the landscape and visual impacts that the proposal would have, neither has he properly assessed the impacts on nearby residents from the noise of the turbine.

The proposal is contrary to a whole raft of Government, County and District planning policies.

It is our view that the limited benefits of this proposal do not outweigh these issues.

We therefore call on the Council to refuse planning permission for this application.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Bob Barfoot', with a long horizontal stroke extending to the right.

Bob Barfoot

Chairman, CPRE North Devon