

# Stour and Orwell Society

A society dedicated to preserving and enhancing the environment of the Stour and Orwell AONB and the associated Special Project Area

## Sent via email only

15<sup>th</sup> December 2014

Dear Member of Babergh District Council Planning Committee

## Pannington Hall Wind Turbine

We apologise for the lateness of this letter, but have only had a few days to digest the Report to Committee on this application. We have liaised with the JLG/SIT on this matter and are aware of their recent communication, but feel it is important to add a few additional points, as a local amenity society with 250 Members who know very well - and care deeply for - the area in which this massive turbine is proposed.

First, the Stour and Orwell Society wishes to congratulate the Planning Department of Babergh DC for recommending refusal of this application. It hopes and trusts that Members will follow this recommendation, but would like Members to consider strengthening the Reasons for Refusal.

In particular, SOS asks that consideration be given to the following 4 points:

1. The turbine project cannot function without a connection to the National Grid. A requirement of the EIA Regulations 2011 (Schedule 4, Part 1, para.4) is that an ES must consider the “indirect” and “secondary” effects resulting from “the existence of the development”. This requirement applies whether or not such effects (where they comprise further consequential development) would ultimately be consented under other legislation. They are part and parcel of the project, but not assessed in the ES for this application (see Report to Committee para.244). It is indicated simply that there would be a 2.3 km connection to the National Grid, presumably at Tattinstone. This means either further unsightly overhead lines through the Dodnash SLA or digging up several kilometres of roads, fringed by ancient hedgerows, including a section of the busy A137. This is a potentially significant adverse – but unavoidable - impact of the development which the public have not had the opportunity to consider and the Council has not had the opportunity to assess and weigh due to the inadequacy of the ES.

**This could be expressly referenced in proposed Reason for Refusal No.2.**

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2. Landscape and visual impacts are well summarised in the Report. They will be dramatic and hugely adverse to the Council's Dodnash Special Landscape Area, the value of which has recently been robustly upheld by an independent Planning Inspector in dismissing the solar farm appeal at Valley Farm, Tattingstone. However, you will see in the Report to Committee that Officers are heavily reliant upon the observations of the SCC Landscape Officer, Mr Watson, who measures the level of impacts by reference only to paragraph 98 of the NPPF. He makes no reference at all to the Government's Planning Practice Guidance ("PPG") (which was issued just before his consultation response in May 2014) and we infer that he did not have it in mind when framing his conclusions - as there are clear references in the PPG to local landscape and visual impacts being sound reasons for refusal of renewables development. **The PPG (ID 5-005) encourages the Council to have full regard to "the potential impacts on the local environment", which are "not overridden" by the need for renewables. The Council can thus express its reason for refusal robustly in relation to the landscape and visual impacts of the development.**
  
3. Cultural heritage impacts are again discussed extensively in the Report to Committee and, in part, form the basis for Reason for Refusal 3. However, there is plainly incomplete consideration of the impacts upon heritage assets and the Report - and English Heritage - refer to deficiencies in the submitted ES. One of these is the absence of an image in the ES showing the turbine in juxta-position with nearby Grade II Listed Bluegates Farm. This deficiency has been remedied by the JLG/SIT images prepared by The Landscape Partnership, a highly reputable local consultancy (employed by the Council to resist the Solar Farm Appeal). This image (see JLG/SIT images) shows the dramatic adverse impact on Bluegates Farm from the drive onto Belstead Street, from the original "Blue Gate". This is plainly a significant adverse impact on any assessment. The Council has a statutory duty to have special regard to the desirability of preserving the setting of listed buildings. Here, the impact cannot sensibly be regarded as less than substantial. Indeed, even the Council's Officers conclude the impacts to be "significant" (Report, para.290).

**The Council should emphasise the adverse impacts on cultural heritage if it refuses permission for the turbine.**

4. Lastly, on the question of balance, we note that the Tattingstone Solar Farm was found by the inspector to be unacceptable in the light of its "localised" environmental impacts. These were considered by the Inspector to be sufficient to outweigh the 10MW predicted to be generated. At Pannington Hall, it seems to SOS that the "very wide ranging" adverse impacts of a 130m tall turbine would be more than sufficient to outweigh the much smaller predicted generation of 2.5MW (one quarter of the generation proposed at Tattingstone).

**This should reassure the Council that it is striking the balance correctly.**

SOS wishes the Committee well in its consideration of this highly controversial application and hopes, for the sake of South Suffolk, that it endorses the recommendation of its Officers – strengthened, where possible, by reference to the matters raised by the JLG/SIT and above.

**Yours etc**

**For the Committee of the Stour and Orwell Society**