



Campaign to Protect  
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## **The Hertfordshire Society**

Director of Neighbourhood Services (Development Control)  
East Herts Council  
Wallfields  
Pegs Lane  
Hertford  
Herts. SG13 8EQ

Dear Sir/Madam,

### **Application No. 3/08/0889**

### **Three wind turbines of up to 119m in height, permanent meteorological mast, substation, access tracks and ancillary infrastructure Land east of Walkern Road and north and west of High Elms Lane, Benington**

1. After careful consideration of all the factors involved in this application, both for and against the proposal, CPRE – The Hertfordshire Society concludes that it should be refused, for the reasons given below.

#### **Green Belt**

2. Two of the proposed wind turbines are located in the designated Green Belt, and the third is just outside the Green Belt, in the designated Rural Area Beyond the Green Belt. This part of the Metropolitan Green Belt is a relatively narrow wedge whose main functions are to restrict the outward expansion of Stevenage and to prevent the coalescence of Stevenage with any of the nearby villages and hamlets. In accordance with PPG2 *Green Belts* and the adopted East Herts Local Plan (April 2007) Policy GBC1, the wind turbines and associated development are inappropriate in the Green Belt. It is therefore necessary to demonstrate very special circumstances that clearly outweigh the harm to the Green Belt caused by the proposed development.

3. Planning Policy Statement 22 (PPS22) *Renewable Energy* paragraph 13 recognises that elements of many renewable energy projects will comprise inappropriate development, which may impact on the openness of the Green Belt, so that careful consideration will need to be given to the visual impact of projects and developers will need to demonstrate very special circumstances. PPS22 states that such circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. We deal with the visual impact of this project in paragraphs 9 - 27, and with the question of very special circumstances in paragraph 37 below.

4. The applicants acknowledge that two of the three turbines are located in the Green Belt, and seek to justify this on the basis that placing the turbines in the Green Belt is necessary to maximise the distance between the turbines and local settlements and to maximise the potential of the topography to increase wind speed. This statement betrays the inherent weakness underlying this application. The whole project is circumscribed by the relatively limited extent of RH Bott & Son's landholding, which extends south and west of Benington, more or less as far as the River Beane. About two thirds of this area is in the Green Belt, which means that the applicants' wish to develop a renewable energy scheme on their land would almost certainly result in significant erosion of this part of the Green Belt.

#### **Need and Location issues**

5. The applicants claim, in their Environmental Statement Volume 2 Written Statement, that global, national, regional and local policies concerned with renewable energy all support their proposal. We

do not disagree with the premise that climate change is a major global issue and that urgent action, including the development of renewable energy in all its various forms, is necessary to combat climate change. However, we question the conclusion that this justifies the construction of three 119 metre high wind turbines in this particular location.

6. The recently published Regional Spatial Strategy, the East of England Plan, Policy ENG2 sets a target of 10% of the Region's energy to come from renewable sources (excluding offshore wind) by 2010 and 17% by 2020. It states that the development of new facilities for renewable power generation should be supported, subject to meeting European and international obligations to protect wildlife. However, renewable energy in this context includes photovoltaic, solar, geo-thermal, energy crops and biomass, and energy from waste, in addition to wind energy. The Plan states that issues of location and scale will require careful consideration, and that fuller regional guidance on renewable energy will be developed as part of the review of the RSS, including sub-regional targets based on an assessment of potential, together with locational criteria. Until this review is carried forward, therefore, there is nothing in the East of England Plan to justify a wind farm at Benington. On the contrary, there are policies in the Plan, concerned with landscape conservation, biodiversity, agricultural land and soils, etc which militate against the location of a wind farm in this area.

7. At the sub-regional (county) level, the applicants set great store by the Hertfordshire Renewable Energy Study (Entec UK Ltd) 2005, claiming that the application site is within the general area identified by Entec as having the greatest potential for wind farm development in Hertfordshire (paragraph 3.36 of the ES Vol 2 Written Statement). In actual fact, perusal of Figure 5.1 in the Entec report shows that the application site lies outside the area of north east Hertfordshire considered to be potentially attractive for wind farm development. While it may be true that the Benington project would meet 60% of the minimum 10MW and 9% of the maximum 65MW capacity for Hertfordshire indicated in the Entec study, there is no suggestion in the report that Benington would be a suitable location to provide such capacity.

8. At the local level, Policy SD3 of the East Herts Local Plan Second Review April 2007 states that *"Proposals for wind power schemes have significant potential for energy generation but can also create problems of visual intrusion and loss of amenity. While such schemes will enjoy support in principle, they will need to be carefully located and employ all reasonable mitigating measures."* This underlines the fact that the key issue in this application is location.

### **Landscape and Visual Impact**

9. The Horner + Maclellan Landscape Architect's report to Hertfordshire County Council dated 21<sup>st</sup> November 2006, on the deficiencies of the information submitted in support of the proposed Weston Hills Windfarm, states the requirements to be included in a full Landscape and Visual Impact Assessment (LVIA) which should be produced to support such proposals. The LVIA should follow good practice as set out in the 'Guidelines for Landscape and Visual Impact Assessment' produced by the Landscape Institute and the Institute of Environmental Management and Assessment, 2<sup>nd</sup> Edition, 2002 (referred to below as The Guidelines) and in 'Visual Analysis of Windfarms Good Practice Guidelines', Consultation Draft, Scottish Natural Heritage, 2005 (referred to below as Good Practice Guidance).

10. We understand that the Horner + Maclellan report has been circulated to Hertfordshire local authorities and would expect its recommendations to be followed. However, not all of the recommendations have been followed in this case.

11. For example, Good Practice Guidance recommends a 35 km radius study area for the LVIA, although this radius could be increased or decreased subject to agreement with the determining authority. Only a 15 km radius area has been studied in this case. Figures 9.3 and 9.4 of the

applicants' Environmental Statement, showing the Zone of Theoretical Visibility (ZTV) for the blade tips and hub height respectively, show that from much of the area within the 15 km radius analysed all the turbines are theoretically visible. We suggest that a wider radius would demonstrate the theoretical visibility of all three turbines over a much larger area than that shown in these two figures.

12. In our opinion, the viewpoint analysis described in paragraph 9.55 of the Environmental Statement (ES Vol 2) is deficient in a number of respects and does not follow the Horner + MacLennan recommendations as set out paragraphs 3d and 3e of their report.

13. The twelve representative viewpoints used by the applicants appear to be extremely selective and do not conform with paragraph 6.29 of The Guidelines, which states that representative viewpoints should include public footpaths and take into account for example the height of riders on horseback. In particular, we are concerned that the nearest viewpoint is 1.7 km away from the proposed turbines. We cannot understand why closer viewpoints have not been selected and appropriate visualisations produced for these.

14. For example, the immediate area around the proposal site is close to public roads from which there are close views of the site, unimpeded along long stretches by roadside hedges. This is particularly so in the case of High Elms Lane. There are also some clear views of the site from the road between Benington and Aston to the north, at approximately 1.5 km distance. Further, there are close views from other public rights of way nearby, including the Cotton Lane BOAT/RUPP which passes between the three turbine sites and within 200 metres of each of them. Close-up photomontages giving a much better impression of the impact of the proposed turbines on the landscape would have been possible from any of these routes. For example, from grid reference 301218 where a public bridleway crosses High Elms Lane, all three turbine sites are visible and well within 1 km.

15. In figure 9.14 of the ES, the viewpoint is 8.5 km from the proposed turbine site and the photomontage as expected shows the turbines looking relatively small from this distance. However, in the foreground (probably only a few hundred metres from the camera) an existing pylon dominates the view. This gives a very misleading image that the turbines would be less dominant in the landscape than the pylon. Were the turbines to be represented in a visualisation at the same viewing distance as the pylon in figure 9.14, they would clearly appear very differently.

16. The conclusion from the viewpoint analysis is that the turbines will have a major to moderate impact on some receptors (ie, people able to see the site) in villages such as Benington, Aston and Watton-at-Stone, while further away the impacts are less. These conclusions are based on what are, in our view, a very limited number of viewpoints selected for analysis, and the real impact is likely to be much higher. In our opinion, this analysis also belittles the impact of the proposals on receptors (eg walkers, cyclists etc) using public rights of way close to the site.

17. The Landscape and Visual Assessment analyses the impact of the proposals on local landscape character. The site lies within two local Landscape Character Areas (LCAs) - the Middle Beane Valley and the Benington-Sacombe Ridge - and parts or all of the proposed turbines would be visible from these and other nearby LCAs.

18. East Hertfordshire District Council has adopted as a Supplementary Planning Document the Landscape Character Assessment for the District, intending it to be used as a framework for assessing planning applications.

19. The Middle Beane Valley evaluation, under *Visual and Sensory Perception*, states that “*The overwhelming impressions here are of remoteness, tranquillity and continuity, a sense that nothing*

*has changed much over the centuries. Within the area there are quite extensive views, as there is little woodland and the topography is quite simple.*”. Under *Visual Impact*, it is stated that “*This area is quite widely visible due to its sloping landform and elevated position. It offers extensive views across the Beane valley.*” Assessed as readily accessible from Stevenage and Hertford, and with an extensive footpath system, the area has been described as offering “*constant glimpses of enchanting scenery*”. The *Strategy and Guidelines for Managing Change* in this area are to “*Conserve and Strengthen*”.

20. The Benington-Sacombe Ridge is stated as having “*extensive views out over the surrounding countryside and within it*” and its *Strategy and Guidelines for Managing Change* are to “*Conserve and Restore*”.

21. The analysis of the impact of the proposals on these two LCAs is that there will be a significant effect on both areas. In the Middle Beane Valley, the turbines would become prominent features of some views. In the Benington-Sacombe Ridge, where visible the turbines would become prominent features of some views and a key characteristic of the landscape type.

22. In our view, these conclusions conflict with the *Strategies and Guidelines for Managing Change* in both LCAs. In addition, the analysis concludes that there will be significant impacts on the landscape character of other nearby LCAs up to 5 km away from the proposal site.

23. The Horner + Maclellan report paragraph 3e recommends sequential landscape and visual assessments to be carried out along the key routes within the study area. Although some assessment of the impact of the proposals has been made from the key routes (from paragraph 9.260 of ES Vol 2), there are no illustrations to support the conclusions reached and no mapping to demonstrate whether the assessment was sequential and made separately for travel in both directions, as recommended.

24. The LVIA concludes in paragraph 9.343 of ES Vol 2, that in landscape and visual terms the proposal would be acceptable in this location, as the proposal would have an “*obvious and directly functional relationship with the nature of the local landscape*”. In our opinion, this is not the case: as the assessment itself concludes, the turbines would have a significant impact on local residents and on users of local rights of way. They would also change the appearance of the landscape contrary to policies for the conservation of Landscape Character Areas. We do not agree with the statement in paragraph 9.342 that “*the visual effects will be limited and the turbines will not be overbearing in any of these views*”. Had the viewpoint analysis been extended to locations much closer to the proposed turbine site, the overbearing impact of the turbines on the landscape, on the views out and on the experience of the locality by rights of way users would have been apparent.

25. Horner + Maclellan also recommend in paragraph 3h that details of turbine layout and design exploration should be included in the LVIA, showing for example from particular viewpoints the relative impacts of using turbines of smaller vertical height and in different layouts. This has not been done.

26. We conclude that the visualisations presented by the applicants are not fully representative of the visual impact the three wind turbines will have on the very attractive landscape of the Beane Valley and Benington-Sacombe Ridge, and that, had viewpoints closer to the application site been selected, there would be demonstrable evidence of the very significant visual damage the turbines will inflict on the area. We expect to be submitting further evidence on this point shortly.

27. PPS22 paragraph 19 states that: “*Proposed developments should be assessed using objective descriptive material and analysis wherever possible*”. It also states: “*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. Some of these effects may be minimised through appropriate siting, design and landscaping schemes, depending on the size and type of development proposed.”* While we acknowledge that the applicants have done their best to minimise the impact of the proposed turbines on the local landscape, we do not believe that it is possible to successfully ameliorate the detrimental impact of development of the type and scale proposed in this particular location.

### **Tranquillity**

28. There is also the issue of the tranquillity of the area which we believe should be taken into account. CPRE has produced maps of tranquillity for the whole of England, scoring the level of tranquillity for every 500 square metre area of land (for details see the CPRE website [www.cpre.org.uk/campaigns/landscape/tranquillity](http://www.cpre.org.uk/campaigns/landscape/tranquillity)). The measure of tranquillity assesses visual as well as aural perceptions of an area, and the tranquillity score for any area reflects the balance of positive and negative factors. Where an area is rated as most tranquil (the highest level of tranquillity), those aspects which are associated with quiet enjoyment are not overwhelmed by negative or detractor influences such as man-made intrusions, either visible or audible. The area in which the proposed Benington wind farm is located has been assessed as ranging from ‘tranquil’ to ‘most tranquil’.

29. Wind turbines may be associated with ‘clean’ energy production and therefore perceived as a positive factor. They nevertheless introduce a man-made element out of scale with most landscapes, being considerably larger than other man-made structures likely to be experienced. Their periodically constant motion also brings an unnatural element to bear. In our view, the proposed wind farm and associated development will have a major impact on the tranquillity of the area between Benington, Aston and Watton-at-Stone and will reduce its level of tranquillity markedly. As the CPRE maps show, tranquillity is a scarce resource which we can ill afford to lose.

### **Construction Period**

30. We are concerned about the effects of the Construction Phase of these proposals as detailed in Chapter 7 of ES Vol 2, especially on the village of Watton-at-Stone and its immediate surroundings which lie on the proposed route to the site for construction traffic. The heaviest single turbine component is expected to weigh over 66 tonnes, some components will measure 4 metres wide, and the turbine blades measuring nearly 39 metres long will be transported in one piece.

31. There will be a need to alter the layout of some public roads to accommodate the abnormal loads required to transport the turbine components and the construction machinery to the site. Probable road widening will require damage to verges and some trees may have to be felled. Damage to road surfaces is also likely. New and altered field entrances will change the appearance of the immediate landscape and in addition a length of hedgerow will have to be removed, as detailed in paragraph 7.51.

32. Table 7.1 lists projected vehicle movements during the construction phase. However, we are concerned that these figures substantially understate the actual number of vehicle movements which will be required. For example, in paragraph 7.37 it is stated that the crane required to hoist the turbines into their final vertical position once assembled on site will have to be transported to the site in 22 separate loads. However, this represents 88 vehicle movements through the village of Watton-at-Stone, not the 22 stated.

33. In our view, paragraph 7.59 understates the impact of the abnormal loads on local traffic: it will clearly have a significant impact and be likely to cause severe disruption to regular road users.

34. When assessing the reduction in carbon emissions by the production of electricity from the three proposed wind turbines compared with carbon emissions from electricity production from other means which produce more carbon, it is not clear whether the carbon outputs from these considerable vehicle movements required during the construction phase have been included in the equation. For example, where are the components of the turbines to be sourced from? Where does the crane come from, as it is clearly a specialist item of equipment? An assessment of the carbon footprint of the proposals should also take into account the need to reinstate the road surface, verges, street furniture etc as required.

#### **Other issues**

35. The applicants claim that the impact of the proposed development is temporary if conditions are imposed limiting the life of the project, which is expected to have a lifespan of about 25 years. We do not accept that 25 years is a 'temporary' period: it is a significant part of anybody's lifetime, and during that period the degradation of the area caused by the wind farm development could be used as an excuse for further undesirable development in the area. In the event of the planning authority being minded to grant permission for this proposed development, we consider that very stringent conditions requiring the de-commissioning and removal of the installation and all ancillary features, and the complete restoration of the area, should be imposed.

36. The applicants put forward a number of marginal 'benefits' in support of the application – that they will pay £10,000 per annum to each of Benington, Aston and Watton-at-Stone parishes; that they will provide a small car park that will benefit users of local footpaths and provide a viewing area for the wind farm; and that educational visits for local schools to experience the wind farm at close quarters will be arranged. We do not accept that the community benefits offered should be regarded as a material consideration in the planning process; they are little more than a bribe. Nor do we believe that educational and visitor facilities should be used to try to justify a development of this nature and scale.

#### **Conclusion**

37. We consider that the visual impact and loss of tranquillity resulting from the proposed development would have a severely detrimental effect on this area of high landscape value. While we have not sought to question the efficiency and viability of the proposed wind turbines, we take the view that it has not been demonstrated that it is necessary to locate them in this particular area in order to achieve the wider environmental benefits claimed for them. Moreover, we consider that the 'carbon equation' has not been fully balanced in this case by taking into account the full costs of production, installation, operation and removal and restoration. Accordingly, we do not believe that the very special circumstances necessary to justify locating this inappropriate development in the Green Belt exist.

38. For these reasons, we consider that this application should be refused.