

Planning Service Manager  
Kerrier District Council  
Dolcoath Avenue  
Camborne  
Cornwall  
TR14 8SX  
FAO James Evans

PA07/02103/FM

30 January 2008

Dear Sir/Madam

**ERECTION OF 6 WIND TURBINES ETC AT GOONHILLY DOWNS WIND FARM, BONYTHON MANOR FOR CORNWALL LIGHT & POWER CO LTD**

Thank you for your consultation dated 15 January.

In the assessment of such developments Natural England is considering:

- the impact of the infrastructure on the existing features of the natural environment;
- the changes to the existing features of the natural environment that will occur as a result of locked-in climate change;
- the potential for the infrastructure to contribute to improving the resilience of the natural environment to further climate change; and
- the contribution of the infrastructure to reducing greenhouse gas pollution

Our comments on this proposed development are as follows:

1. Potential impact of the infrastructure on the existing features of the natural environment.

We note the findings of the EIA and the conclusion that there will not be a significant impact on the existing habitats and species which use the area but that there are further wintering bird surveys awaited. At this stage, however, we confirm that we agree with this conclusion and advise that the applicant's proposed Environmental Plan for the mitigation and on-site habitat enhancement measures and post-construction monitoring of species should be produced and adopted as a condition of any planning permission.

With regard to the impact on the landscape we note that the assessment of the impact of the new turbines is for a High local impact dropping to Medium at around a distance of 4 to 5 km; that significant effects would arise as the development is within the nationally valued Cornwall AONB but that the very great majority of the Cornwall AONB would not be affected. The assessment also concludes that, although strongly influenced by the wind farm, the wider landscape would not be transformed by it. We consider that the recognised impacts on the landscape are tempered by the applicant's proposal to reduce the current *ad infinitum* lifetime of the existing wind farm down to a 25 year

period. In our view this is an important factor in terms of the reversibility of the development's impact and therefore its overall sustainability.

2. The contribution of the infrastructure to reducing greenhouse gas pollution.

We recognise that the re-powered wind farm will generate significantly more electricity than the current development and that this will further contribute to the national renewable energy target and so reduce greenhouse gas emissions.

In conclusion, we do not object to the development and will be happy to comment further on the proposed Environmental Plan should planning permission be granted.

Yours faithfully

Jeremy Clitherow

Planning Service Manager  
Kerrier District Council  
Dolcoath Avenue  
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TR14 8SX

25 February 2008

FAO James Evans

Dear James

**PA07/02103/FM - ERECTION OF 6 WIND TURBINES ETC AT GOONHILLY DOWNS WIND FARM, BONYTHON MANOR FOR CORNWALL LIGHT & POWER CO LTD**

Thank you for your consultation on the above planning application; set out below are the views of the Cornwall AONB Unit, representing the Cornwall AONB Partnership. The Unit has considered the proposals in the context of national, regional and county planning guidance on both development of renewable energy and the conservation of the natural beauty of the AONB and has concluded that the proposals will have a negative impact on both the landscape character and visual scenic qualities of the AONB which is inconsistent with the purposes of AONB designation. The main concerns are that the proposals:

- are contrary to established national policy guidance on development within AONBs as set out in both PPS7 Sustainable Development in Rural Areas and PPS22 Renewable Energy
- are contrary to regional and county planning policies with regard to the AONB and renewable energy generation
- fail to identify a range of environmental, economic and social benefits sufficient to outweigh the adverse impact of the development upon the landscape of the AONB

and

- that the Environmental Impact Statement accompanying the application fails to demonstrate that the development will conserve or enhance the landscape of the AONB. In our view the proposed development will have an adverse impact upon this particular section of the AONB, extending to other sections of the AONB such as West Penwith.

More details to support these comments are attached as Appendix1.

Yours sincerely

Paul Walton  
Cornwall AONB Partnership Manager

## Appendix 1

### National Policy

The key national policies are ***Planning Policy Statement 7: Sustainable Development in Rural Areas*** and ***Planning Policy Statement 22: Renewable Energy***.

#### **i) Planning Policy Statement 7: Sustainable Development in Rural Areas**

PPS 7 sets out the importance of AONBs and the considerations necessary in determining applications that may have an adverse effect on the natural beauty of the designated area;

“Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas.” (Para 21)

“Major developments should not take place in these designated areas, except in exceptional circumstances. This policy includes major development proposals that raise issues of national significance. Because of the serious impact that major developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination.” Para 22

#### **ii) Planning Policy Statement 22: Renewable Energy 2004**

PPS 22 addresses the issue of renewable energy developments in AONB's:

*“planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits”* (para 11).

### **Regional and county policies**

The national policy positions on protected landscapes and renewable energy are supported by the draft South West Regional Spatial Strategy.

#### **i) ENV3 Protected Landscapes**

“In Dartmoor and Exmoor National Parks and the 14 Areas of Outstanding Natural Beauty in the region, the conservation and enhancement of their natural beauty, wildlife and cultural heritage will be given priority over other considerations in the determination of development proposals.”

## ii) RE4 Meeting the Targets Through Development of New Resources

*“When considering individual applications for development of renewable energy facilities, Local Planning Authorities will take into account the wider environmental, community and economic benefits of proposals, whatever their scale, and should be mindful that schemes should not have a cumulative negative impact and that proposals in protected areas should be of an appropriate scale and not compromise the objectives of designation.”*

## iii) Cornwall Structure Plan Policy 7

Policy 7, has specific reference to the AONB with regard to land based wind energy:

*“Schemes for electricity generation should be through development that increases local benefits, particularly diversification of the rural economy, and minimises any adverse effects on the natural or built environment.*

*In respect of land based wind energy, the scale and location of development should respect landscape character and distinctiveness and reflect, in particular, county wide priorities to avoid adverse effects on the Area of Outstanding Natural Beauty”*

## Environmental, economic and social benefits

PPS22 and the SW RSS highlight the need to take account of local environmental, economic and social benefits that may be provided through developments that may adversely impact upon the AONB. Some guidance on what should be considered in these situations is provided by the Companion Guide to PPS22 which sets out a range of possible benefits that might be considered in relation to any development. From the information that accompanies the Goonhilly application there appears to be just two benefits of the scheme; reducing carbon emissions and limited local job opportunities during the installation and maintenance of the turbines.

PPS7 indicates in Para 22 that “Major development proposals should be demonstrated to be in the public interest before being allowed to proceed. Consideration of such applications should therefore include an assessment of:

- (i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- (ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- (iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.” (Para 22)

The wind farm proposal represents a major development and, with its ability to contribute to national targets for renewable energy, is of national significance. Full consideration should therefore be given to the points i) –iii) above. The proposal documents do not include an assessment of the impact of the development upon the local economy. The effect on the landscape is

addressed by the Environmental Impact Statement and our comments on this are set out below.

### **Comments on the Environmental Impact Statement**

When assessing the landscape and visual impact of any development within the Area of Outstanding Natural Beauty, it is essential to relate the assessment to the statutory purposes of an AONB i.e. to conserve or enhance natural beauty. The EIS should make an assessment as to whether the development will achieve either conservation or enhancement of the landscape.

There is a need to assess the impact of the proposed repowering on the inherent landscape of the Lizard Peninsula and the existing wind farm should not be used to offset to severity of the impacts that may be caused by the current proposal

#### **i) Impact on Landscape Character**

Government policy within PPS7 promotes the use of Landscape Character Assessments to achieve sustainable development within rural areas. The EIS identifies the Countryside Character Volume 8: South West (1999), the Cornwall Landscape Assessment (1994) and A Cornish Landscape: An Assessment of the Cornwall Areas of Outstanding Natural Beauty (1997) as evidence bases. From Countryside Character Volume 8, the EIS wrongly sets out the key characteristics of the Cornish Killa's, Area 152. The site of the wind farm is firmly within Area 157 – The Lizard, and it is these characteristics which should be used.

Although the Lizard is an open landscape, the Landscape Assessments consistently state that the landscape is gently undulating with small, irregular fields. This results not in a large scale landscape, as the EIS suggests, but in a medium scale landscape where views across the plateau are relatively limited from on the ground. This is significant, as the EIS suggests that the Lizard Peninsula is a large scale landscape capable of accommodating a large scale wind farm. The reality is that the landscape is not large scale and has a no capacity to absorb a development of this size. Although views across the plateau are limited, views of the turbines would be extensive and would dominate the skyline

Two of the character evidence bases contain a categorical statements regarding wind farm development in this area

- “Any further development of wind farms would cause visual clutter in this important area of AONB” The Cornwall Landscape Assessment (1994) and
- “Any substantial development such as further wind farms or new communications masts would have a major impact upon the open landscape of the plateau.” Countryside Character Volume 8: South West (1999).

Given these very clear statements contained within the evidence bases we question the conclusion reached by the EIS that the repowering would not significantly affect landscape character.

**ii) The presence of a wind farm leading to a wind farm landscape or wind farm sub type.**

Much of the assessment on impacts on landscape character is based on the assumption by the assessors that a wind farm in a landscape is such a dominating feature, that this will lead to a change in landscape character, to a 'wind farm landscape' or 'wind farm sub type'.

This assumption is not supported by current accepted guidance on Landscape Character Assessment or Landscape and Visual Impact Assessment. The presence of a wind farm on a single site, even one which dominates the landscape, is usually taken to be a feature within a wider landscape, a landscape made up of a combination of its inherent attributes such as agricultural land use, topography, biodiversity, settlement pattern, field pattern etc.

Features within the landscape such as a wind farm are usually assessed in terms of the contribution they make to the condition quality of that inherent landscape i.e. does that feature enhance the landscape or does it detract from it. Normally the presence of tall, man made structures such as electricity pylons, communications masts or wind turbines within a rural landscape such as the Lizard are seen as detractors from the quality of that landscape.

The argument that the presence of a wind farm on a single site would have a characterising effect, leading to a wind farm landscape is fundamentally flawed because it uses the fact that a detractor is already present within the landscape to justify the amplification of the detractor on the grounds that the character will not be altered (as it already has wind farm character).

**iii) Visibility**

The EIA assesses visibility using Zones of Visual Influence, wire frame and photomontage visualisations. It is clear from the assessment that the existing wind farm already has a significant visual impact on the landscape. It is also clear that the proposed repowering will result in an increased visual impact over and above the existing, with a significant increase in the zone of visual influence and increased visibility for the viewpoint receptors. The most striking element of the repowering brought out from the visibility assessment is the sheer scale of the proposed turbines which dwarf both the existing wind farm and the satellite dishes of the BT Station. It is clear that this proposal will introduce structures on a scale never before seen in Cornwall. In terms of the Area of Outstanding Natural Beauty, the development will be able to be viewed extensively from not only from within the South Coast Western Section of the Cornwall AONB (the Lizard Peninsula), but it will also be very visible from the West Penwith Section of the Cornwall AONB, as the Photomontage from Mousehole clearly shows.

Cumulative impacts of the repowering with other wind farm sites in Cornwall was undertaken by the EIS. However it is our view that the cumulative impact of the repowering with the satellite dishes and other structures associated with the BT Goonhilly Earth Station needs to be considered.

This visual change in the landscape will be experienced not only by residents of the Lizard Peninsula and wider, but by visitors, and users of the sea for work and recreation. Of particular concern is the impact upon the views experienced by the many thousand of users of the South West Coast Path each year.

#### **iv) Landscape quality and value**

The EIS is fair in its statement about the condition of the area currently used for wind turbines. The site itself is sandwiched between the unenclosed upland rough ground of Goonhilly Downs to the east and south and the medieval farmland to the north and west. The site consists of recently (18thC) enclosed farmland and is mainly improved pasture on former downland. The site does contain some landscape detractors such as fencing and plantation woodland, but the most substantial detractor of landscape quality is the existing wind farm itself.

However, when considering landscape impact, an assessment needs to consider the quality of the wider landscape, not just the site itself. The landscape of the Lizard Peninsula is of the highest quality, an ancient landscape of unenclosed upland rough ground, medieval farmland and coastal rough ground. It has a very strong character which stems from its underlying igneous geology and interaction with humans from the medieval period to the present day. The value attached to this high quality landscape is reflected in its designation as part of the Cornwall Area of Outstanding Natural Beauty.

#### **v) Conclusions**

The presence of the existing wind farm does not result in a change in landscape character to a 'wind farm sub type'

The wind farm repowering will have a significant impact upon the landscape character of the Lizard Peninsula.

The larger turbines resulting from the repowering will have a very high visual impact, much greater than that of the existing wind farm.

The larger turbine will also result in a visual impact on the West Penwith Section of the Cornwall AONB.

The repowering will have a negative impact on both the landscape character and visual scenic qualities of the Cornwall AONB that is inconsistent with the purposes of an Area of Outstanding Natural Beauty.