

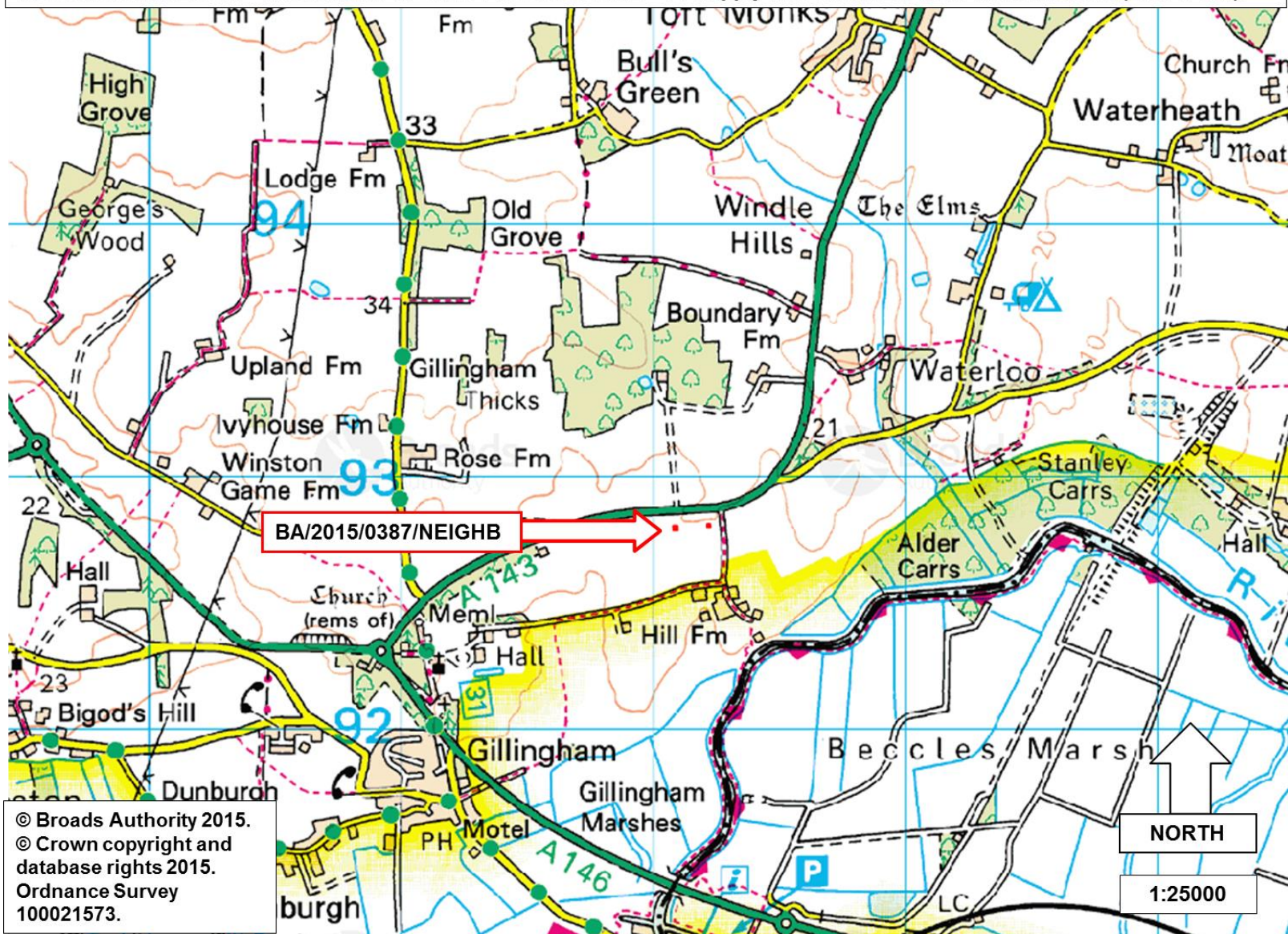
**Reference**

BA/2015/0387/NEIGHB

**Location**

Land North of Hill Farm, Yarmouth Road, Gillingham

BA/2015/0387/NEIGHB - Amendment to BA/2014/0418/NEIGHB - To supply and install 2 x 60kw wind turbines (20m tower).



**Application referred to Broads Authority for Consultation – to be determined  
by South Norfolk Council**

<b>Parish</b>	Gillingham
<b>Reference</b>	BA/2015/0387/NEIGHB <b>Target date</b> 15 January 2016
<b>Location</b>	Land North of Hill Farm, Yarmouth Road, Gillingham
<b>Proposal</b>	To supply and install 2 x 60kw wind turbines
<b>Applicant</b>	Mr Robin Bramley
<b>Recommendation</b>	Forward consultation response to South Norfolk Council objecting to the proposal

**1 Description of Site and Proposals**

- 1.1 South Norfolk Council has received a planning application for the erection of two wind turbines on land at Gillingham. The turbines would be 60kw turbines, each with a height of 22m to the hub and 34m to the blade tip. The scheme includes the associated cable connection and the planting of a small copse at the south western corner of the field in which the proposed turbines would be located. The intention is for the wind turbines to remain on site for 25 years, after which they would be decommissioned and removed from the site. The ground fixing would be removed and reinstated to agriculture, as part of the remainder of the field.
- 1.2 Access for construction would be based on the existing driveway to Hill Farm and the field opening in the western boundary of the application site.
- 1.3 The field in which the wind turbines would be located lies on the south side of the Yarmouth Road and on the north side of the River Waveney in Gillingham. The wind turbines themselves would be 150m to the north of the Broads Authority Executive Area, although the southern boundary of the subject field and the southern length of the eastern site boundary actually adjoin the Broads Authority's Executive Boundary. The wind turbines would be 1.5km to the northeast of Gillingham and 2km to the north of Beccles. The overall site comprises a mix of arable farmland, a field under grass, hedges and blocks of establishing woodland.
- 1.4 The northern boundary of the site is delineated by the hedge and tree belt associated with the Yarmouth Road (A143), which extends eastwards to the junction with the Beccles Road at the north-eastern tip of the site. A hedge and associated woodlands extend southwards from this junction and define the eastern boundary of the site. The southern boundary follows the ground

and buildings at Hill Farm, continuing westwards to a small block of woodland in the southwestern corner. These trees, and a hedge that extends from them towards the A143, defines the western boundary of the site. The framework of vegetation around the field would be retained, the woodlands on the northern and eastern boundaries of the site would be unaffected and the trees around the farmstead at Hill Farm would remain intact.

- 1.5 The site is in the vicinity of the Grade II\* listed Gillingham Hall and the wider setting of a number of other designated heritage assets including the Gillingham Conservation Area. The Grade II listed Brick Barn and Grade II listed Hill Farm house are located immediately adjacent to the southern boundary of the site and are situated within the Broads Authority's Executive Area.

## **2 Site History**

None

## **3 Policies**

- 3.1 The following Policies have been assessed for consistency with the National Planning Policy Framework ([NPPF](#)) and have been found to be consistent and can therefore be afforded full weight in the consideration and determination of this application.

Adopted Core Strategy (2007)

[Core Strategy Adopted September 2007 pdf](#)

CS 1 – Landscape Protection and Enhancement  
CS5 – Historic and Cultural Environments

Adopted Development Management Policies DPD (2011)

[DEVELOPMENTPLANDOCUMENT](#)

DP1 - Natural Environment  
DP2 – Landscape and Trees  
DP8 – Renewable Energy

- 3.2 The following Policies have been assessed for consistency with the NPPF and have found to lack full consistency with the NPPF and therefore those aspects of the NPPF may need to be given some weight in the consideration and determination of this application.

Adopted Development Management Policies DPD (2011)

DP5 – Historic Environment

## **4 Assessment**

- 4.1 This application will ultimately be determined by South Norfolk Council and in determining this application South Norfolk Council is seeking the views of the

Broads Authority on the proposal. The issues that are pertinent to the Broads Authority and which our comments should be centred around are the impact on the landscape of the Broads, the impact on the historic environment and the impact on ecology.

- 4.2 The application is supported by a detailed Landscape and Visual impact Assessment (LVIA) which has been thoroughly reviewed by the Authority's Landscape Officer. The Landscape Officer's full assessment is included as Appendix 1 to this report. The LVIA accepts that the Broads landscape is a very highly sensitive landscape receptor. This definition is considered to aptly describe the limited scope of the Broads landscape in general to accommodate wind turbine development of the size and number being proposed. This is supported by the findings of the Broads Authority's 2012 own Landscape Sensitivity Study which concluded that Local Character Area 3 Waveney Valley- Barsham, Gillingham and Beccles Marshes has a high sensitivity to more than one turbine with a tip height over 20m.
- 4.3 The impact on the landscape of the Broads falls into two distinct categories – the effect on the landscape character and the effect on views. To assess the degree of impact on the landscape character of the Broads it is necessary to assess the magnitude of the effect. This assessment looks at the size or scale of change, the geographical influence and the duration and reversibility of the proposed development. The LVIA has set out assessment criteria for each of these categories.
- 4.4 The applicant's assessment states that there would be a low magnitude of effects on the landscape character as a result of the size or scale of change of the proposed development. However it is the Broads Authority's view that the size or scale of this change would be high as it would result in a major change to the key characteristics of this area. The development would be out of scale to the existing character, the development would dominate the skyline which is relatively uninterrupted by manmade features, and the turbines would interrupt the cohesion of the existing landscape character and impact on the tranquillity of this pastoral landscape.
- 4.5 The applicant's assessment of the geographical influence of the development concludes that the effects of the development would be low being limited to a localised area and a small proportion of the overall feature or landscape character area. However it is the Broads Authority's opinion that the effects would be medium as the effects of the proposed development as a result of the height and positioning and the rotation of the blades would extend to over a third of Local Character Area 3.
- 4.6 In terms of the duration and reversibility of the scheme and its associated impact on the landscape character of the area the applicant's assessment states that there would be a low magnitude of effects as it is considered to be a medium term development (10-30 yrs) and is fully reversible. However it is the Broads Authority's view that this assessment of magnitude should be high to very high. The current Guidelines for Visual and Landscape Impact Assessment indicate that 25 years can be considered a long time in duration.

It is the Broads Authority's view that the proposed duration should outweigh the fact that ultimately the turbines could be removed.

- 4.7 In summary it is agreed between the applicant and the Broads Authority that the sensitivity of the landscape receptor of the Broads Area is very high. However the Broads Authority does not agree with the applicant's overall assessment that the magnitude of change resulting from this development would be low. The Broads Authority considers that overall the magnitude of effects is high. It is the Broads Authority's conclusion that the significance of the overall effects on the landscape, which is determined by considering the sensitivity of the site against the magnitude of effects, would range between Major and Major-Moderate adverse.
- 4.8 The LVIA process also considers the potential effect on views. Ten viewpoints, four of which lie within the Broads Authority's Executive Area, have been selected in agreement with South Norfolk Council and the Broads Authority. An assessment has been made from each of these viewpoints. Full views of the proposal would be available from the River Waveney, a number of Public Rights of Way which include the Angles way long distance footpath utilising the riverbank and Beccles marsh trail.
- 4.9 Having fully considered each of the assessments made by the applicant on the visual sensitivity of the development from each of the identified viewpoints the Broads Authority considers that the significance of the visual effects of the development have been much underestimated. Much of the area local to the development, land and water, is used for the quiet enjoyment of the countryside. The Broads is a landscape which has been nationally designated for its landscape value increasing its sensitivity in both landscape and visual terms to developments of this nature. The construction of two turbines would introduce two dominant features into this tranquil pastoral landscape. These structures would also be given added prominence as they would interrupt the current uncluttered treed skylines that exist on the northern valley side. Furthermore the views assessed are only a representative selection and it is therefore important to recognise that views of the development would be available from many other vantage points due to the extensive network of footpaths and the fully navigable River Waveney.
- 4.10 The application site is situated in the vicinity of a number of listed buildings and other designated heritage assets. The two heritage assets most directly affected by the application are within the Broads Authority's Executive Area being the Grade II listed Hill Farm house and Grade II listed Brick Barn, both sited immediately south of the turbine site. The landscape setting of these two heritage assets set on the valley side would be impacted on significantly. The Historic England Assessment of the proposal (attached as Appendix 2 to this Report) is thorough and provides a co-ordinated assessment of assets regarding the historic environment of the area in the vicinity of this site. Whilst the Assessment does not refer directly to Hill Farm house in the opening paragraphs it does refer to the impact of the development on this asset later throughout the Assessment. The conclusion reached by Historic England is that the erection of two wind turbines in the locality of Gillingham Hall, Brick

Barn and Hill Farm house and the Conservation Area would result in harm to the significance of the heritage assets through inappropriate development in their setting. Historic England also concludes that the development would be harmful to designated heritage assets in terms of paragraphs 132 and 134 of the NPPF and does not satisfy paragraph 137. The information submitted with the application also fails to satisfy the requirements of paragraph 128 of the NPPF. The Broads Authority fully endorses Historic England's Assessment of this proposal and agrees and reinforces the conclusions reached.

- 4.11 In terms of possible impact on the ecology of the area it is the Broads Authority's view that the development has the potential to adversely impact bats and birds and that this impact has not been adequately addressed in the application. The proposed location of the turbine towers appear to be approximately 60m from the closest tree belt. This is the minimal recommended distance of the turbine blade tip from a habitat feature that may be used by bats for foraging and commuting. Therefore there may be potential impacts to bats given the blade is 34m in length. Furthermore the turbines are located 500m northwest of Stanley and Alder Carrs SSSI, part of the Broadland SPA, a notable protection area for species such as marsh harrier. Marsh harriers hunt over arable areas outside of reedbed and fen habitats and may therefore be at risk from bird strike. Farmland birds such as barn owls may also be at risk.

## **5 Conclusion**

- 5.1 It is concluded that the proposed development would have a significant adverse impact on the landscape of the Broads and that this impact has been underestimated in the LVIA submitted in support of the application.
- 5.2 The proposed development would also have an unacceptable impact on the historic environment of the area in the vicinity of the site. It would particularly have a negative impact on the listed buildings closest to the site as the development is considered to be inappropriate for the setting of these listed buildings.
- 5.3 There is the potential for the proposal to adversely impact on bats and birds in the area and this impact has not been adequately addressed in the application.

## **6 Recommendation**

- 6.1 It is recommended that a formal objection to the scheme is submitted to South Norfolk Council and that this report and the Appendices are submitted to South Norfolk Council as the Broads Authority's formal consultation response on the planning application.



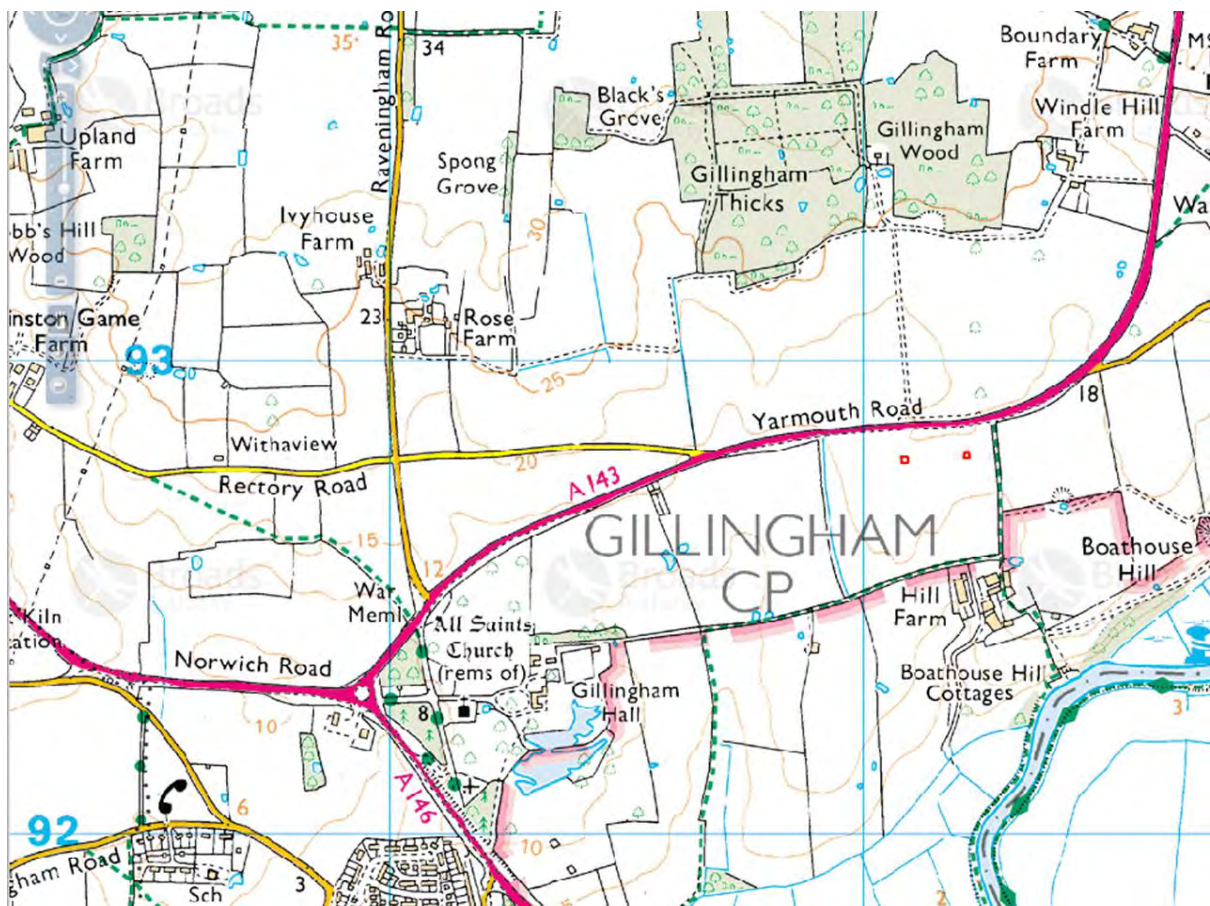
Background papers: Application File BA/2015/0387/NEIGHB

Author: Alison Macnab  
Date of Report: 11 December 2015

Appendices: APPENDIX A - Location Plan  
APPENDIX 1 – Broads Authority's Assessment of the LVIA  
APPENDIX 2 – Historic England's Consultation Response

## APPENDIX A

**BA/2015/0387/NEIGHB - Amendment to BA/2014/0418/NEIGHB - To supply and install 2 x 60kw wind turbines (20m tower)**



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Ordnance Survey 100021573.



BA/2015/0387/Neigh Land North of Hill farm, Yarmouth Road, Gillingham, Beccles

My comments on the landscape and visual impact assessment and their conclusions as produced by the Landscape Partnership on behalf of the applicant.

1. The assessment is for two turbines at a height of 22m to hub and 34m to blade tip. I believe that there are some discrepancies in the overall height to hub and blade tip between various documents that support the planning application.
2. Generally their assessment process is in line with the current industry guidelines as set out in - Guidelines for Landscape and Visual Impact Assessment, 3rd edition produced by the landscape Institute.
3. Their assessment process has neglected to include an assessment of effects on the publically accessible waterways.
4. Although the methodology for the assessment is set out in appendix 1 the reasoning and arguments relating to the actual assessment are not particularly clearly set out in their LVIA. I have however, attempted to summarise the main points of their assessment and have added my response.
5. **Effects on landscape character:** Below I have set out the main aspects of the assessment and a summary of my response to their assessment and conclusions.
  - a) The applicant's LVIA process for working out a landscape's sensitivity, susceptibility, magnitude of effects on the key characteristics and ultimately significance of the effect is set out in Appendix 1 pages 60-65.
  - b) The **values of landscape receptor** criteria range across 4 bands as set out in appendix 1 table 1. These are: low; medium, high and very high **Areas of Very high sensitivity are identified as including areas with national designations such as national parks.**
  - c) Their description setting out a landscape's susceptibility to change is set out in Appendix 1 table 2 Landscape **susceptibility to change**. The definition of very high sensitivity is "*a very limited ability of the landscape to accommodate development of the type proposed. Features particularly susceptible to change from development*".

This definition aptly describes the limited scope of the Broads landscape in general to accommodate wind turbine development of the size and number being proposed. This is supported by the findings of the Broads Authority's 2012 own landscape sensitivity study which has concluded that local character area 3 (LCA3 Waveney Valley – Barsham. Gillingham, Beccles marshes has a high sensitivity to more than one turbines over 20 metres in height (to tip height). **Please note** that the sensitivity ratings of the BA landscape sensitivity study ranged across low- medium - high and should not be confused with the 4 band range outlined at b)

Appendix 1 Table 3 sets out the overall landscape sensitivity matrix which is a combination of the value of the landscape receptor at b) and a landscapes susceptibility c) to change. Given the above weightings I am pleased to see that their assessment of landscape sensitivity for LCA 3 as "very high".

#### **Assessment of the magnitude of effects**

- d) The next step in their process is to assess the 3 aspects of magnitude of the effect which they state are "combined on professional judgement, with greater weight given to scale /size of change, into one of the following categories: High, Medium , Low or Negligible or no change where there is no effect"
- e) Appendix 1 Tables 4-6 sets out the definitions relating to these 3 aspects:  
**Landscape : Size or Scale of Change/ Geographical influence / duration and reversibility.** The categories are set out below:

- f) **Landscape :Size or Scale of Change** - Assessment definitions  
**Very High** - *The proposals constitute a very major change to the feature or key characteristics and attributes of the landscape type or area, resulting in total loss or permanent alteration to existing landscape features and forming a dominant new feature in the landscape.*

**High** *The proposals constitute a major change to the feature or key characteristics and attributes of the landscape type or area, resulting in major loss or permanent alteration to existing landscape features and forming a prominent new feature in the landscape.*

**Medium** *The proposals constitute a noticeable change to the feature or key characteristics and attributes of the landscape type or area, resulting in a conspicuous loss or alteration to existing landscape features and forming a new feature in the landscape.*

**Low** *The proposals constitute a minor change to the feature or key characteristics and attributes of the landscape type or area, resulting in limited loss or alteration to existing landscape features and forming a minor new feature in the landscape.*

**Negligible** *The proposals constitute little discernible change to the feature or key characteristics and attributes of the landscape type or area, resulting in no loss or permanent alteration to existing landscape features and forming a barely discernible new feature in the landscape.*

#### Applicant's assessment

The **applicant's assessment** states that they consider there would be a **low magnitude of effects on the landscape character as a result of the size, scale of change of the proposed development.** i.e. the proposals constitute a minor change to the feature or key characteristic and attributes of the landscape type or area, resulting in limited loss or alteration to existing landscape features and forming a minor new feature in the landscape.

#### Response

Using the assessment definitions I would consider that key landscape characteristics would be undoubtedly be affected through the proposed wind turbines which will form dominant, moving features in the landscape in an elevated position. I consider that the size or scale of this change would be **high** as it would result in a major change to the key characteristics of: scale (the development would be out of scale to the existing character); the skyline (the development would dominate the skyline which is relatively uninterrupted by manmade features an aspect which is acknowledged in the assessment ) and the perceptual qualities (the turbines will interrupt the cohesion of the existing landscape character and impact on the tranquillity of this pastoral landscape).

g) **Landscape: Geographical Influence** – Assessment definitions

**Very High Effects** experienced over an extensive area of the feature or a district level landscape character area, where this is likely to have an evident effect at the national level of landscape character.

**High Effects** experienced where changes would occur over large parts of a feature of landscape character area.

**Medium** A moderate extent of a feature or landscape character area is affected.

**Low** Effects limited to a localised area and small proportion of the overall feature or landscape character area.

**Very Low** Effects limited to a very restricted extent, sufficient that there is little discernible influence on the feature or character of the landscape character area.

Applicant's assessment

The **applicant's assessment** states that there would be a **low magnitude** of effects on the area i.e. Effects limited to a localised area and small proportion of the overall feature or landscape character area.

Response

Using LP's definitions I would consider that **medium** would be the acceptable definition. I would accept that the nature of the topography and the presence of intervening vegetation has the potential to reduce the extent of the landscape character are to be affected however I would consider that the effects of the proposed development as a result of the height and positioning and the rotation of the blades would extent to over a third of local character area 3. The applicant has not produced any assessment of Zone of Theoretical Visibility (ZTV) has been produced to support their findings. This exercise is a computer generated piece of information based on a topographical model that calculates the theoretical extents a development could influence/be viewed.

h) **Landscape: Duration and Reversibility**

LP's criteria for assessing the duration and reversibility are as follows:

**Very High** -Long term development (over 30 years) and very difficult to reverse.

**High** -Medium term development (10 to 30 years) and very difficult to reverse or long term development (over 30 years) and partially reversible.

**Medium**- Medium term development (10 to 30 years) and partially reversible or short term development (1 to 10 years) and very difficult to reverse or long term development (over 30 years) and fully reversible.

**Low** - Medium term development (10 to 30 years) and fully reversible or short term development (1 to 10 years) and partially reversible.

**Very Low** -Short term development (1 to 10 years) and fully reversible.

Applicant's assessment

The **applicant's assessment** states that there would be a **low magnitude** of effects as it is considered medium term development ( 10 -30 years) and fully reversible.

Response

I do not think that these criteria fully reflect the "spirit" of the current Guidelines for Visual and Landscape Impact Assessment (GVLIA). Which although state that the criteria can be modified to suite the assessment process, indicate that 25 years can be considered a long time in duration.

I would therefor consider that the assessment of magnitude should be **very high to high** the proposed duration should outweigh the fact that ultimately they could be removed.



i) **Conclusions of the assessment on the effects on landscape**

The ultimate significance of effects is based on considering the overall sensitivity of the landscape and the magnitude of effects. It is an industry standard approach to set the findings within the following matrix.

**Table 7: Significance of Effect on Landscape**

Criteria		Sensitivity			
		Very High	High	Medium	Low
Magnitude	High	Major	Major	Major-Moderate	Moderate
	Medium	Major-Moderate	Major-Moderate	Moderate	Minor
	Low	Moderate	Moderate	Minor	Negligible
	Negligible	Minor	Minor	Negligible	Negligible

Applicants overall assessment on the significance of the landscape effects

*"8.14 Although the proposed turbines are not located in the character area, the Broads Landscape Sensitivity Study assesses overall sensitivity of LCA 3 as moderate – high. While the area contains a number of scenic and special qualities, the overall sensitivity is reduced by the A146 road corridor. Sensitivity to turbines in the 20-50 metre high range is assessed as high, as their structures would be out of scale with the landscape; and the sensitivity of both the character area and the landscape beyond, to more than a single turbine is similarly high. As noted above, the sensitivity of the views to the Broads from South Norfolk Landscape Character Area C2, is high, as relative prominence of the valley sides and ridges in these adjacent areas means that turbines would appear more dominant in relation to the Broads.*

*8.15 Although the sense of enclosure to the valley landscape would remain unchanged; the proposed turbines in the landscape north of the valley crest would form new features in the otherwise uninterrupted and undeveloped skyline above the prominent valley sides and ridges, particularly given the clear intervisibility with LCA C2: Thurlton Tributary Farmland with Parkland.*

*8.16 Balancing all the above factors, it is considered that there would be a change in landscape quality of Low magnitude (and thus Moderate adverse significance) throughout the lifetime of the scheme, given the impact of the proposed turbines on the key characteristics of these areas. The magnitude of the effect would be likely to be higher closer to the site, and lesser when the overall character area is taken into account. Such effects are not considered to be significant. The nature of the development is such that it is fully reversible upon the decommissioning of the turbines."*

and

*"11.12 The Broads Landscape Sensitivity Study concludes that sensitivity to turbines above 20 metres high is high, and the sensitivity of both the character area and the landscape beyond to more than a single turbine is similarly high. Although the sense of enclosure to the valley landscape would remain unchanged; the proposed turbines in the landscape north of the valley crest would form new features in the otherwise uninterrupted and undeveloped skyline above the prominent valley sides and ridges.*

*11.13 Balancing the above, the change in landscape quality would be of Low magnitude, with no significant influence on the character of the river valley landscape. The nature of the development is such that it is fully reversible upon the decommissioning of the turbine"*

#### Response

I would make the following comments on this conclusion.

- The sensitivity of the landscape receptor the Broads National Park is **very high**.
- Their assessment has concluded that there would be a low magnitude of change when assessed against the three criteria described at f) g) and h).
- I consider that they have underestimated the magnitude of effects for each of these categories. I would consider that overall that the magnitude of effects is **high**.
- Therefore based on my professional judgement and a good knowledge of the area I would consider that significance of the overall effects on the landscape, which is determined by considering the sensitivity of the site against the magnitude of effects, would range between be **Major and Major-Moderate adverse**.

### **7. Effect on views**

#### General points

- a) The LVIA process also considers the potential effects on views. A normal part of the process for this assessment is to select a series of viewpoints to represent views from different areas and experienced by different user groups.
- b) 10 viewpoints were selected in agreement with the planning authorities, 4 of these lying within the Broads Authority executive area. An assessment has been completed for each of these viewpoints and photo montages have been produced for additional information.
- c) Please note in my opinion there has to be a **significant health warning attached to the outputs of any assessment relating to the effects on views** especially in relation to the over reliance on the images generated through the use of photomontage techniques the results of which I consider can mislead the reader. My view is that the photographic outputs cannot hope to fully reflect the effect on views for the user of that landscape, as the photograph techniques used do not capture it in a format that accurately represents what the user actually sees. There are recognised standards for the production of photomontages but their effectiveness relies heavily on the correct printing of the documents and the user viewing them in the correct manner. It is imperative therefore that those determining the application use photomontages in conjunction with a site visit and do not place total reliance on the imagery produced. This is the only way to fully appreciate the effects on views as a result of a proposed development.
- d) In addition the selected viewpoints can only provide information about a very small proportion of the area that will be affected by the development proposals. Full views of the proposal will be available from the river Waveney; a number of public rights of way which include the Angles way long distance footpath utilising the river bank and Beccles marsh trail. The latter being a series of circular routes around Beccles marsh

#### Viewpoint analysis



- e) The methodology of the assessment is set out in pages 65 – 68 of LVIA appendix 1
- f) I would concur with is their assessment of the visual sensitivity that in 3 of the 4 viewpoints it has been assessed to be **very high** and in the view from the bridge **medium**.

Again the criteria for the magnitude of effects has been split into 3 parts. These are as follows and can be found in Table 11: of appendix 1. I have only considered the effects in relation to the initial effects. Planting which has the potential to mitigate the effects for some views will not necessarily be protected and retained during the life of the proposed development.

#### **Visual: Size or Scale of Change**

Very High	The proposed development would become the most dominant feature in the view and that completely contrasts with the other existing features in the view. The contrasting feature of the development would be fully visible.
High	The proposal development would constitute a major change to the view, forming a prominent new feature in the view that noticeably contrasts with other existing features in the view. The development would be predominantly visible.
Medium	The proposals development would form a noticeable change to the view, forming a conspicuous new feature in the view that partially contrasts or harmonises with other features in the view. The contrasting features of the development would be partially visible.
Low	The proposal development would constitute a small change to the view, forming a minor new feature in the view that largely integrates with its surroundings with little discernible change. This could also be a result of being a glimpsed or filtered view through vegetation and/or at some distance relative to its scale.
Very Low	The proposed development would be a barely discernible change to the view, which could e.g. be due to a very filtered view through vegetation or considerable distance relative to scale.

#### **Visual: Geographical Influence**

Very High	The development affects all or nearly all of the view and forms the primary focus of the view to the extent that it is overwhelming. It is likely that the view is within the Site or very close to the Site.
High	The development affects a large extent of the view and at the centre of the view. It is likely that the view is close to the Site or possibly in the Site.
Medium	The development affects a moderate extent of the view and lies near the centre of the view or at a slightly oblique angle. It is likely that this is a localised view.
Low	The development affects a small extent of the view and and/or at a moderately oblique angle. It is likely that the development is in the mid distance of the view.

Very Low     The development affects a very small extent of the view and and/or at a very oblique angle. It is likely that the development is in the far distance of the

**Visual: Duration and Reversibility**

Very High     Long term development (over 30 years) and very difficult to reverse

High           Medium term development (10 to 30 years) and very difficult to reverse or long term development (over 30 years) and partially reversible

Medium        Medium term development (10 to 30 years) and partially reversible or short term development (1 to 10 years) and very difficult to reverse or long term development (over 30 years) and fully reversible

Low            Medium term development (10 to 30 years) and fully reversible or short term development (1 to 10 years) and partially reversible

Very Low      Short term development (1 to 10 years) and fully eversible

- g) Viewpoints 4,5,6,7 represent views from within the Broads executive area. The location of these viewpoints can be found at appendix 4 Figure 7. Their assessment on the effect of the development on views from these points are as follows:

**View 4 - Beccles marsh Trail.** The sensitivity of the user - **very high**. The magnitude of the effect **low adverse** which will result in a **moderate adverse effect on views** from this location.

**Response** I would concur with their assessment of very high sensitivity, however I consider their overall assessment of low adverse in response to the magnitude of effects to be too low. The turbines will break the skyline on the northern valley. The assessment notes that "the uppermost sections and blades of the proposed turbines would stand above the level and generally treed horizon line". It would also bring a sense of movement and disturbance it what is a tranquil landscape. I would therefore consider that the magnitude of effects when considering size or scale of change; geographical Influence; and duration and reversibility to be medium. As a result the significance on the effect on viewpoint 4 I would consider to be **Major-moderate**.

**View 5 - River Waveney river bank** The sensitivity of the user - **very high**. The magnitude of the effect **low adverse** which will result in a **moderate adverse effect on views** from this location.

**Response** I would concur with their assessment of very high sensitivity, however I consider their overall assessment of low adverse in response to the magnitude of effects to be too low. The viewer is much closer to the proposed development with the perception of the turbines being more elevated . The turbines will break the skyline on views from the Angles way. Again the assessment notes that the "towers and blades would be a new feature on the skyline" It would also bring a sense of movement and disturbance it what is a tranquil landscape. I would

therefore consider that the magnitude of effects when considering size or scale of change; geographical Influence; and duration and reversibility to be **high adverse**. As a result the significance on the effect on viewpoint 5 I would consider to be **Major**

**View 6 A146 – Beccles New Bridge** The sensitivity of the user – **medium** . The magnitude of the effect **medium adverse** which will result in a **moderate adverse effect on views** from this location.

**Response** I would concur with their assessment of medium sensitivity given the likely users of the highway, however again I consider their overall assessment of medium in response to the magnitude of effects to be too low. The viewer is in an elevated position and the turbines will form a prominent feature in the view. The turbines will break the skyline and introduce a sense of movement disturbance it what is a tranquil landscape. I would therefore consider that the magnitude of effects when considering size or scale of change; geographical influence; and duration and reversibility to be **high adverse**. As a result the significance on the effect on viewpoint 6 I would consider to be **Major**

**View 7 footpath** – on the northern boundary of the Broad. The sensitivity of the user – **High** . The magnitude of the effect **medium adverse** which will result in a **major moderate adverse effect on views** from this location.

**Response** I consider that the assessment of sensitivity should be **high** given that it is a public right of way. Given the proximity to the proposed development and the fully available views of the turbines I would therefore consider that the magnitude of effects when considering size or scale of change; geographical influence; and duration and reversibility to be **high adverse** . As a result the significance on the effect on viewpoint 7 I would consider to be **Major**

h) In conclusion generally I consider that the significance of the visual effects of the development have been much underestimated. Much of the area land and water local to the development is used for the quiet enjoyment of the countryside. The Broads National Park is a landscape which has been nationally designated for its landscape value increasing its sensitivity in both landscape and visual terms to developments of this nature. The introduction of the two turbines will introduce two dominant features into this tranquil pastoral landscape. These structures will also be given added prominence as they will interrupt the current uncluttered treed skylines that exist on the northern valley side. As discussed at 7c and d the views assessed are only a representative selection it is therefore important to recognise that views of the development will be available from many other vantage points due to the extensive network of footpaths and the fully navigable river Waveney.

Lesley Marsden CMLI

Landscape Architect

8<sup>th</sup> December 2015





Historic England

APPENDIX 2

Appendix 2a

EAST OF ENGLAND OFFICE

Mr Chris Bennett  
South Norfolk Council  
Swan Lane  
Long Stratton  
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Direct Dial: 01223 582738

Our ref: P00457022

15 May 2015

Dear Mr Bennett

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015**

**LAND TO NORTH OF HILL FARM HOUSE, YARMOUTH ROAD, GILLINGHAM, NORFOLK NR34 0EE**

**Application No 2014/2435 - to supply and install 2 x 60kw wind turbines (20m tower)**

Thank you for your letter of 28 April 2015 notifying Historic England of the above planning application.

**Summary**

The proposed application proposes the erection of two 22m wind turbines, with a maximum blade height of 34m in the vicinity of the grade II\* listed Gillingham Hall and the wider setting of a number of other designated heritage assets. This includes the grade II Brick Barn built for Gillingham Hall and the Gillingham Conservation Area. The relationship between these heritage assets in the open landscape makes a particular contribution to their significance and we are concerned that the proposed development would have a harmful impact on it.

**Historic England Advice**

The Grade II\* Gillingham Hall is two storey with attics, constructed in c1600 with early 18<sup>th</sup> and early 19<sup>th</sup> century additions. Previously limewashed, the hall now has red brick walls with a symmetrical, eleven bay western frontage, with 6 over 6 sliding sash windows with gauged skewback arches over openings. An off-center tower against the eastern wall is three storey, octagonal in form and with a lead covered domed roof, and provides a key feature when viewing the site from the east. The hall lies within the Gillingham Conservation Area, which also includes the grade I listed Church of St Mary. The application site is approximately 1km from this group of heritage assets.

A grade II agricultural barn, appropriately called Brick Barn, is an unusual rural threshing barn and is located to the east of Gillingham Hall. The western elevation



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contains a window intended to imitate the tracery of an ancient chapel, but has been constructed in rubbed brickwork, with masonry infill panels receiving a lime render. The scale and design gives a convincing appearance providing a very pleasing vista from the west and it is clear that the barn has been carefully designed and positioned to benefit the views from the grounds of Gillingham Hall. The application site is approximately 500m from this heritage asset.

In addition to this, the surrounding landscape to the east of Gillingham Hall includes an oak tree lined track and well positioned field boundary planting. Although not a designed landscape, this area does have a degree of formality derived from careful management which further suggests it was considered as part of the landscape to be experienced in views from the Hall's gardens. It therefore contributes to the significance of the listed buildings and conservation area, the boundary of which it straddles. The way that these assets are considered together, along with the agricultural and rural feeling of the area is important in the character of the wider landscape.

In the much wider landscape context the grade I listed detached bell tower of St Michael's church in Beccles can be seen to the north of the application site. This provides a prominent marker in the local area, which is a powerful symbol of its role in the community and wider society that illustrates its historic status. The ability of the tower and town conservation area to be experienced set in countryside which in the main contains agricultural and vernacular buildings enhances an understanding of its significance.

The Design and Access Statement provided within the application states that, 'of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects. However, the impact of turbines on the landscape would vary according to the size and number of turbines and the type of landscape involved.' We agree with this remark; however the Statement does not define the quality of the landscape, nor discuss its impact on it other than concluding that the proposals are not detrimental to the landscape. The statement also notes that the turbines should be considered as part of the farm plant and machinery, as it is not a wind farm. We wholeheartedly disagree with this and consider that the turbines would be an entity in their own right.

The National Planning Policy Framework defines setting as the 'area in which an asset is experienced'. Assessment should be carried out which is proportionate to the significance of the heritage assets, the contribution their setting makes to that significance and the scale and nature of the proposed development. The application does not address the heritage assets as part of the submission.



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If constructed, the proposed turbines would be the largest structures in the landscape around Gillingham Hall, being clearly visible from the outer edge of the historic garden. The intervisibility between the barn and the Hall is an important aspect of the significance of both heritage assets because of their historical association. The proposals would compromise this linkage by creating an obtrusive feature that detracts from an appreciation of the heritage assets.

The wireframes and photomontages provided with the application are useful in assessing the possible visual impact. Although the images do not refer to the exact view from Gillingham Hall, the sense of scale does indicate that the rotating blades would be very visible and the columns would be seen from a variety of angles. The imagery indicates that the turbine blades would be very visible when viewed from the far south, rising above Hill Farmhouse and breaking the tree lined horizon which is otherwise only broken by traditional buildings. Their height, unfamiliar form and motion would make them particularly noticeable in the setting of all these heritage assets.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (paragraph 72). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings and conservation areas can be harmed or lost by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favourably. We have considered the current proposals in light of this government policy and relevant English Heritage guidance.

Paragraph 128 of the NPPF requires applicants to describe the significance of heritage assets affected by proposed development and the contribution their setting might make to that significance. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the assets. As noted above, the heritage assessment submitted with this application does not consider the assets in the area and does not establish their significance or the contribution their setting makes to it. It also does not consider non-designated heritage assets. We consider the assessment inadequate and its conclusions lacking. Consequently the application does not satisfy paragraph 128 of the NPPF.



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Based on the information submitted and our assessment of the site we consider that the visual impact of the proposed turbines on the setting of Gillingham Hall, Brick Barn, the Gillingham Conservation Area and the wider landscape would detract from an understanding of the character and importance of the historic buildings. This would result in harm to their significance. Furthermore, this would have a negative impact on the wider setting of the more distant bell tower at Beccles. We conclude that the development would be harmful to designated heritage assets in terms of paragraphs 132 and 134 of the NPPF, would not achieve the aim of paragraph 137 and or the NPPF's overarching objective of delivering sustainable development.

Paragraph 134 of the NPPF states that public benefit deriving from a proposed development might be weighed against harm to the significance of designated heritage assets. We are not in a position to assess the merits of the case for renewable energy generation being delivered at this site, but in line with paragraph 134 the Council should weigh any public benefit deriving from it against the harm to heritage assets. If a clear and convincing justification for the harm (including arguments that the benefit could not be delivered on another site) is not found the Council should refuse the application.

**Recommendation**

The erection of two wind turbines in the locality of Gillingham Hall, Brick Barn, Hill Farm and the conservation area will result in harm to the significance of the heritage assets through inappropriate development in their setting. It will also have a negative impact on the wider landscape setting, including the bell tower at Beccles. We conclude that the development would be harmful to designated heritage assets in terms of paragraphs 132 and 134 of the NPPF and does not satisfy paragraph 137. The information submitted with the application also fails to satisfy the requirements of paragraph 128. The NPPF requires Local Planning Authorities to weigh any public benefit deriving from renewable energy generation against harm to the historic environment. If a clear and convincing justification for the harm is not found, (as required by paragraph 132) the Council should refuse the application.

Yours sincerely

**Matthew Kennington**

Inspector of Historic Buildings and Areas

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11 December 2015

Dear Mr Bennett

**Arrangements for Handling Heritage Applications Direction 2015 &  
T&CP (Development Management Procedure) (England) Order 2015**

**LAND TO NORTH OF HILL FARM HOUSE, YARMOUTH ROAD, GILLINGHAM,  
NORFOLK NR34 0EE  
Application No 2014/2435**

We have received amended proposals for the above scheme.

Thank you for consulting us on the additional information submitted to accompany the planning application for the erection of two 22m wind turbines, with a maximum blade height of 34m. Our previous correspondence has outlined the significance of the heritage assets, which we will not repeat.

The additional information includes a very thorough Landscape and Visual Impact Assessment. The Assessment is accompanied by viewpoint photographs and photomontage renders. Views from surrounding areas have been chosen based on public access. Unfortunately, this means that the key views from the grade II\* Gillingham Hall of the grade II Barn have not be provided. The Assessment carefully analyses the different parts of the surrounding landscape, and section 3.6 discusses Gillingham Hall, stating that, 'these parkland estates are one of the most characteristic features of the farmland landscape in the area'. The relationship between the heritage asset in the open landscape makes a particular contribution to its significance.

Section 4.35 of the Assessment evaluates the historic landscape character's sensitivity to wind turbines as moderate. It further states that loss of boundaries and the effect of modern development has reduced the overall sensitivity of the landscape. Whilst this is partially true, the summary of the Assessment concludes the Gillingham Hall historic parkland would suffer effect from the proposed development. We disagree with this statement, as the location of the turbines would be within the setting of the Hall and therefore would impact its setting, which would cause harm to its significance in terms of paragraph 132 of the NPPF.



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The submitted information has some useful information for the consideration of the impact of the wind turbines. However, it does not alleviate our concerns with the application and we would not wish to alter the recommendations we have previously set out. For clarity, this was as follows:

The erection of two wind turbines in the locality of Gillingham Hall, Brick Barn, Hill Farm and the conservation area will result in harm to the significance of the heritage assets through inappropriate development in their setting. It will also have a negative impact on the wider landscape setting, including the bell tower at Beccles. We conclude that the development would be harmful to designated heritage assets in terms of paragraphs 132 and 134 of the NPPF and does not satisfy paragraph 137. The information submitted with the application also fails to satisfy the requirements of paragraph 128. The NPPF requires Local Planning Authorities to weigh any public benefit deriving from renewable energy generation against harm to the historic environment. If a clear and convincing justification for the harm is not found, (as required by paragraph 132) the Council should refuse the application.

Yours sincerely

**Matthew Kennington**

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