

# WIND TURBINE DEVELOPMENT AT WELLOW, ISLE OF WIGHT

## COUNTRYSIDE AGENCY CONSULTATION RESPONSE TO ISLE OF WIGHT COUNCIL

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### Introduction

1. This note sets out the Countryside Agency's response in relation to the planning application for the development of a wind farm of 6 turbines near Wellow (the West Wight Technology Park) on the Isle of Wight. This response is based on a review of the Environmental Statement, specifically chapter 8 on Landscape and Visual Impacts. The chapter is based on a Landscape and Visual Impact Assessment undertaken by Terence O'Rourke on behalf of Your Energy Limited (YEL) and forms Technical Appendix D of the planning application.
2. The Countryside Agency is the statutory body that advises Government on matters affecting Areas of Outstanding Natural Beauty (AONB) and National Parks. Our comments here relate to landscape and visual effects (chapter 8) and particularly effects on the Isle of Wight AONB and the New Forest National Park. The Countryside Agency also has a statutory role regarding outdoor recreation and we make brief comment on this aspect (chapter 9).
3. The Agency would like to lodge an objection to the proposed development. Our key concerns relate to:
  - the impact of the development on the landscape character and setting of the Isle of Wight AONB, specifically the chalk ridge which is a fundamental and defining features of the AONB;
  - the visual impact in views from the AONB, notably panoramic views from chalk downland across the Isle of Wight to the Solent.
4. The Countryside Agency response is set out in three parts, namely policy context, quality and objectivity of the LVIA and conclusions setting out our main concerns regarding the proposal.

## **POLICY CONTEXT: STATUTORY PROTECTION OF THE ISLE OF WIGHT AONB AND ITS SETTING**

5. The development is located outside the Isle of Wight AONB, however turbines are proposed within 2km of the AONB boundary (closest is 1.1km). The site is surrounded on three sides by the AONB. The proposed wind farm site is on an area of rolling clay farmland at the foot of the elevated rolling chalk downland of Compton Down (within the AONB) which forms part of the chalk east-west 'backbone' of the island.
6. This section provides a summary of the statutory protection for the Isle of Wight AONB and its setting. It provides the policy justification for the Agency's response.

### **The AONB**

7. The Isle of Wight AONB was designated in 1963 and is made up of five separate areas of land, comprising most of the undeveloped coastline, and the ridge of downland which extends from the Needles at the western extremity eastward across the centre of the Island. In the north of the Island the Solent coast between Yarmouth and the western outskirts of Cowes is included in the AONB along with the coast east of East Cowes to Ryde which incorporates the Osborne Estate.
8. The landscape of the AONB reflects the highly varied geology of the Isle of Wight and its rich cultural history with the chalk cliffs and open downs contrasting with secluded woodlands, pasture and historic parkland.
9. The AONB Management Plan<sup>1</sup> states that *'We need to promote the landscape character of the AONB and encourage its assessment as part of the consideration for all proposals for change (either through the land use planning process, land management practice or policy formulation)'* (p. 34).
10. The AONB Management Plan contains a vision for the landscape character of the AONB in 2005 which states *'The Isle of Wight AONB has become renowned and valued for its natural beauty, tranquillity and lack of light pollution, which all contribute to the quality of life for the local community and visitors alike'* (p.38). It states that *'increasing pressure for new activities within the countryside, built development and traffic noise can all have an impact on peace and tranquillity of the AONB.'*

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<sup>1</sup> Isle of Wight Area of Outstanding Natural Beauty Management Plan 2004-2009. Produced by the Isle of Wight AONB Partnership on behalf of the Isle of Wight Council.

11. The Countryside and Rights of Way Act (CROW) confers a statutory purpose to conserve and enhance the natural beauty of all AONBs and creates an obligation to produce and review an AONB Management Plan. The plan is a legal requirement and all relevant authorities are required to have regard to the purpose of the AONB in pursuing statutory functions, including those under the Planning Acts.
12. PPS7: Sustainable Development in Rural Areas para. 21 notes that national designated areas, including AONBs, *'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'*.
13. With regard to Renewable Energy developments specifically, PPS22: Renewable Energy states that in sites with nationally recognised designations 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 effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.
14. The draft South East Plan (March 2006) is the Regional Spatial Strategy (RSS) for the South East. It is a full revision of Regional Planning Guidance 9 (RPG 9 – the current Regional Spatial Strategy for the South East). It was submitted to Government in March 2006 and is currently subject to Consultation. Regional Policy on Renewable Energy as set out in the South East Plan carries forward the policies of RPG and prioritises the development of renewable energy schemes, particularly larger scale ones, in less sensitive areas including previously developed and industrial land and areas where there is already intrusive development or infrastructure. Policy EN5 on the Location of Renewable Energy Development states that: *"Renewable energy development, particularly wind and biomass, should be located and designed to minimise adverse impacts on landscape, wildlife and amenity. Outside of urban areas, priority should be given to development in less sensitive parts of countryside and coast, including on previously-developed land and in major transport areas."*
15. In terms of development within protected landscapes the policy goes on to state that: *"The location and design of all renewable energy proposals should be informed by landscape character*

assessment where available. **Within areas of protected and sensitive landscapes including AONBs or the National Parks, development should generally be of a small scale or community-based.**"

16. The accompanying text provides further guidance and states: *".... wind and other renewable energy development should not be precluded in AONBs and the new national parks as there will be locations where small scale construction e.g. a wind development of between one and four turbines not generating more than 5MW can be accommodated where conflict with statutory landscape protection purpose set out in PPS7 can be avoided through careful siting and design including reducing the cumulative impact of a number of individual schemes."*
17. In the supporting statement for the West Wight Project it states that the above policy encourages proposals within or close to the boundaries of designated areas to demonstrate that development will not undermine the objectives that underpin the purposes of designation. The Countryside Agency does not agree with this interpretation of the policy, and considers that the proposed development may conflict with the statutory landscape protection purpose of the Isle of Wight AONB.

### **Protecting the Setting of the AONB**

18. The draft South East Plan (March 2006) is the Regional Spatial Strategy (RSS) for the South East. It is a full revision of Regional Planning Guidance 9 (RPG 9 – the current Regional Spatial Strategy for the South East). It was submitted to Government in March 2006 and is currently subject to Consultation.
19. Policy C2: Areas of Outstanding Natural Beauty states that *"Priority should be given to conservation and enhancement of natural beauty in the region's Areas of Outstanding Natural Beauty (AONBs) and **planning decisions should have regard to their setting**. Proposals for development should be considered in that context. Positive land management policies should be developed to sustain the Areas' landscape quality. ...."*
20. Policy B10 of the Isle of Wight UDP (1996-2011) states that *'Proposals that are likely to adversely affect... [a] landscape of national or local importance or its setting directly or indirectly will not be permitted.'*
21. Policy LC1 of the Isle of Wight AONB Management Plan states that *'The importance of the landscape character is recognised, widely understood and taken into consideration in **all** proposals for change'*. One of the objectives of Policy LC1 is to *'To identify*

*and recognise the non-physical elements of landscape character such as views, peace and tranquillity and 'dark skies' which make the AONB special'. The special qualities of the AONB landscape are outlined in the management plan and include "long distance views from coastal heaths and downlands".*

22. Under the section of the AONB Management Plan on Living and Working, the plan contains a specific reference to wind turbines and sets out the Countryside Agency and National Association of AONB Position Statement on wind turbines in AONBs. The aim being to ensure a balanced approach is achieved between the need to reduce greenhouse gases and the need to protect for future generations the nation's finest countryside. The position statement makes the following points.

- Large commercial wind energy developments within AONBs or locations outside the AONB which affect people's enjoyment of the AONB, are likely to be incompatible with the objectives of the designation and should be resisted.
- The character of the countryside in some parts of an AONB or its surroundings may mean that small-scale wind energy schemes (1 – 3 turbines) could be accommodated, where they do not compromise the objectives of designation.
- The Countryside Agency advocates a sequential approach:
  - First: brown field/regeneration sites
  - Second: non sensitive countryside
  - Third: sensitive countryside
  - Last: designated landscapes and their margins.

23. With regard to renewable energy developments PPS 22: Renewable Energy gives information on Buffer Zones and states "*The potential impact on designated areas of renewable energy projects **close to their boundaries** will be a material consideration to take into account in determining planning applications.*"

24. Regional Policy in the South East Plan regarding location of renewable energy development (EN5) states "**Proposals within or close to the boundaries of designated areas should demonstrate that development will not undermine the objectives that underpin the purposes of designation.**"

25. The Island Plan and Supplementary Planning Guidance on Wind Farms (2004) similarly refer to the need to take into consideration guidance set out in the AONB Management Plan.
26. It is clear from the above that there is a strong policy framework for protecting the setting of the Isle of Wight AONB from intrusive development. The Countryside Agency considers development at West Wight technology Park would not be in conformity with such policy. The Agency does not concur with the view of the applicant in the supporting statement (para. 4.17) that the proposal is located in an area largely unconstrained in landscape, nature conservation and planning policy terms.

## **REVIEW OF THE LVIA**

27. The following section considers whether the scheme has been assessed properly i.e. the quality and objectivity of the LVIA submitted by Terence O' Rourke.

### **Method and Approach**

28. The assessment has been based on current published guidance for landscape and visual impact assessment and landscape character assessment. The study has used information in landscape character assessments undertaken on behalf of the local planning authorities in the study area, in the various Local Development Plans that cover the study area, and on Ordnance Survey Explorer and Landranger maps. The methodology is clearly set out.
29. The Agency would like to register a concern that the chapter on landscape and visual effects only appears to consider the operation of turbines, and not the **meteorological mast**. Moreover, for completeness, the Agency would wish to see the assessment covering construction and decommissioning. In terms of construction we would require to see a clear analysis of access requirements and effects on rural character (e.g. the lane network). The emphasis of the chapter is on the landscape and visual impacts of the turbines themselves. We understand that proposals for a technology park for testing of turbines and development of a visitor/interpretation centre are no longer part of this planning application. We understand that all cabling is to be undergrounded and that the only other structure on site will be the access roads and small electrical switching station. The Agency requires the assessment of landscape and visual effects to cover these ancillary developments.
30. The chapter on Landscape and Visual effects classifies the effect on:

## Landscape Resources

- landscape character
- landscape fabric
- landscape designations (views from designated areas)

## Visual Amenity

- visual receptors (zone, linear and marine based)

31. In determining the significance of landscape effects, the assessment identifies landscape importance and magnitude of change, which are combined to give a resultant significance of impacts. With regard to landscape character, the Countryside Agency would ideally wish to see an indication of landscape sensitivity to change rather than a simple judgement of importance used in this assessment (which is largely based on designations).
32. In determining the significance of effects on visual amenity the assessment covers a selection of viewpoints (18) representing the main landscape units and visual receptor types. At each location the various receptor types are identified and the sensitivity of the location for each receptor type judged, and the magnitude of change in the view predicted. The sensitivity and magnitude of change are combined to give an indication of significance for each receptor type at each location. This process is essentially robust but the analysis is difficult to interpret.

## Baseline Conditions

33. The baseline condition is recorded by a process of description, classification and evaluation achieved by a combination of desktop study, field survey and analysis. The Countryside Agency make the following comments:
34. **Study Area:** The study area is 30km radius of the proposed site and encompasses the whole of the Isle of Wight, the Solent and on the mainland includes the New Forest. The Countryside Agency considers that a 30 km radius is appropriate for a development of this type and is pleased that the study includes an assessment of landscape and visual impacts on the New Forest National Park.
35. **Landscape Character:** Generally, appropriate use of existing landscape character information is made. In the case of the West Wight assessment the study defines detailed character areas, for example, within the Chalk Downland Type– the

character areas are 1A Tennyson Down and 1B Compton Down. The Countryside Agency suggests that these detailed character areas would be a more useful base for the LVIA than the generic landscape types used in the study. The Countryside Agency would also wish to see a more in depth analysis of **seascape** and the importance of views to the undeveloped wooded edge of the island on the approach across the Solent.

36. **Landscape Designations:** The baseline identifies three national landscape designations namely the New Forest National Park, Isle of Wight AONB and Heritage Coast (Tennyson, Hamstead). The baseline adequately sets out special qualities of the designations. For the Isle of Wight AONB it includes information from the AONB Management Plan – on Vision and special qualities and landscape character.
37. **Landscape Heritage:** The baseline notes that the landscape and visual impact assessment has been closely co-ordinated with the cultural heritage assessment and reference made to the historic landscape characterisation report. Ideally, the Countryside Agency would wish to see an explicit reference to effect of the proposed development on historic landscape designations (registered park and gardens) in chapter 8, since this is not covered in detail in chapter 7 on cultural heritage.  
  
**Choice of Viewpoints:** Eighteen viewpoints were chosen as a representative sample of the main landscape and visual receptors and potential views of the development in the study area. The chosen viewpoints incorporate fixed viewpoint receptors and linear route receptors. No clear indication is given on how or why the viewpoints were chosen and it is not clear from reference to the scoping report, whether the views noted by the Isle of Wight AONB unit have been taken into account. It would be especially helpful to have a map overlay of the viewpoints showing how they relate to different character areas and landscape designations.
38. Examination of Figures 8.7a and 8.7b indicate that the chosen viewpoints give a good sample of views from important landscapes, including long range views from the New Forest National Park (viewpoint 14). The Agency considers that it would be useful to include a shorter range view from within the New Forest National Park – the undeveloped coastal edge and hinterland.
39. The baseline condition section of the landscape and visual impact assessment highlights the importance of the AONB landscapes within the Isle of Wight and several viewpoints are

located within the AONB, such as the elevated ridge of downland at Compton Down (view 4) to the south of the island and Tennyson Down (view 9) and Newtown Estuary (7). However, the viewpoints chosen to represent views from the immediately surrounding environment (not in the AONB or views towards the AONB) do not cover all the most important views and possible receptors. For example, the Hamstead Trail runs north-south between Wellow and Compton Down with its route cutting between turbines 4 and 5 of the proposed development. There is no viewpoint taken from this position. The Countryside Agency consider that this is an oversight given the very close proximity to the proposed site, and the importance of the Hamstead Trail as a link between Wellow and the designated landscapes on the Isle of Wight. An assessment on effects on visual amenity from this trail is required.

40. There are no viewpoints shown from the two English Heritage Registered Historic Parks and Gardens (Westover and Swainston), which are located in very close proximity to the proposed windfarm site.

### **Assessment Results**

41. The method of the assessment is clearly set out. Having established a thorough description of the baseline landscape, the assessment looks at the effects on **landscape resources** (the landscape fabric, each of the character areas, and the designated landscapes) and an assessment of effects on visual amenity. The assessment of **visual effects** is broken down into towns and larger villages, small villages, farmsteads and individual properties, leisure and recreation facilities and views from linear route receptors.

The Countryside Agency has the following observations on the assessment:

### ***Landscape Character – Isle of Wight***

- **Open Farmland** - We agree that the effect on Open Farmland, within which the turbines will be located (Type 6: West Wight) is significant (adverse) due to the dominance of the turbines and effects on tranquillity. The assessment does not however state the level of significance and we suggest that this is an omission. We consider that it would be substantial or very substantial (adverse). The Countryside Agency would note that the effects on character of views **from** the area to the impressive landform of the high chalk ridge (AONB) that is upstanding and forms strong skyline and

backdrop to the south of this character area should also be considered.

- **Chalk Downs** – We agree with the conclusion that the effect on the chalk downs landscape type (Type 1 West Wight) will be substantial adverse. We suggest that it would be useful to have a more explicit separation of impacts on the two downland areas in closest proximity i.e. Tennyson Down (1A) and Compton Down (1B) We suggest that it would be useful for the assessment to place more emphasis on the effects of the development on the **character** of the downland landscape rather than simply on views from this landscape – this would include for example the vast open panoramic views across the Open Farmland and Solent, the peaceful tranquil, undisturbed and still character and sense of remoteness.
- **Estuaries** – We suggest that the proposed development may have more than a moderate adverse effect on estuaries (Type 5). Again it would be helpful for the estuaries to be subdivided into the individual relevant character areas – namely Newtown Estuary (5A) and Yar Estuary (5B). We do not agree that views will necessarily be seen in the context of boat masts – as the character of these peaceful, secluded remote areas, particularly Newtown Estuary, is partially derived from their undeveloped rural backdrop.

42. In the Island context., the Agency would also wish to see a brief analysis and understanding of the character of the seascape and view to the Isle of Wight from the Solent approach.

#### ***Landscape Designations – Isle of Wight***

- The Countryside Agency notes and agrees with the conclusions in paragraph 8.138. This states that development will affect “long distance views from downlands”, one of the special qualities of the AONB listed in the management plan. The assessment notes that the development itself is not located within the AONB boundary – the Agency suggests that the location of the development in or out of the AONB is not relevant – it is the effect on the **character** of the downlands that is important. We do not agree with the conclusion in paragraph 8.140 that the significant effect in views from Compton Down and Tennyson Down are **extremely limited**. Indeed these changes are substantial and adverse and it is the Agency’s view that they will have a fundamental effect on the character of the AONB and the special quality of open panoramic views from downland.

### **Landscape Designations – New Forest**

- The Countryside Agency would wish to see a more rigorous assessment on landscape and visual effects on the character and qualities of the New Forest National Park.

### **Tranquillity**

- The Countryside Agency does not agree with the conclusion that the turbines would not have a significant effect on tranquillity as a result of the 'restful' movement of the rotors. We consider that it would be more helpful to consider the context in which the blades are viewed i.e. from an active or still landscape. This is particularly relevant for the peaceful, remote and still landscape of the adjacent chalk downland.

### **Visual Amenity**

43. Visual effects are separated into different types of receptors. From the Agency's view it would be helpful if there had been a separate section on how views from the AONBs and other landscape designations will change, specifically as the landscape designations have been highlighted as being of particular importance within the baseline conditions section. A good example is the key viewpoint 4 on Compton Down which considered effects on walkers and golfers but does not separate out effects on visual amenity from the AONB *per se*.
44. The visual assessment could benefit from clearer headings explaining the process and the groupings of receptors, the body of the text is fairly detailed, giving information about which views will be altered and the distance of particular receptors from the proposed windfarm.

### **Scheme Design/Mitigation**

45. The proposed development is located on a large scale, largely undeveloped landscape which is overlooked by chalk downlands to the south. Given the scale of the development, the potential to incorporate secondary mitigation to offset impacts determined as part of the assessment process is limited- a fact which is recognised within the environmental statement. The Agency has the following concerns about the design of the windfarm and the proposals for mitigation:
  - The 6 turbines are placed in a linear formation within a landscape with very few other linear features and form a very prominent 'wall' in views from the chalk downland to the north. The formation is contrary to the existing landscape pattern. The Agency would wish to see an examination of

alternative layouts including a smaller group formation, with less horizontal 'spread'.

- The scheme design involves the segregation of an important recreational route across the Isle of Wight (the Hamstead Trail) linking the designated landscapes. The Agency would wish to see consideration of a layout to minimise impacts on visual amenity from this trail.
- Given the generally un-wooded character of the landscape, the proposed planting of a copse to screen the switching station, would need be carefully designed in order that it blend into the existing landscape.

### **Cumulative Impacts**

46. We support the statement that if both the Cheverton Down and West Wight Wind Turbines were to be built, there would be a significant effect on the character of the Chalk Downs.

### **CONCLUSION**

47. The Agency considers that the application for the construction of six wind turbines at Wellow will adversely affect the character of the Isle of Wight AONB to an extent that it will compromise the ability of the AONB to achieve its statutory purpose. Our key concerns are set out below:
- The proposed development is contrary to policy which seeks to ensure development respects the setting of designated landscapes and does not undermine objectives that underpin purposes of designation.
  - The proposed development will have a significant impact on the character of the Isle of Wight AONB, in particular the character of the remote chalk downlands which are one of the defining features of the AONB.
  - The development will have a significant effect on visual amenity notably the panoramic views from chalk downlands (e.g. Compton Down) across the lower lying landscape to the Solent. Views from downland are stated, in the AONB Management Plan, as one of the special qualities of the AONB.
  - The potentially significant cumulative impacts on the AONB landscape, notably the chalk downland, with the wind farm at Cheverton Down.

48. In addition, we also consider that there is insufficient information in the assessment to draw a robust conclusion on the effects of the development on the New Forest National Park.
49. For these reasons the Agency wishes to lodge an objection to the proposal.