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Mr Barry Fagg  
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ENVIRONMENTAL SERVICES  
PLANNING SERVICES

16 FEB 2009

FOR ATTENTION .....  
REPLY SENT .....  
FILE REF. ....

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13<sup>th</sup> February, 2009

Dear Mr Fagg,

**APPEAL AGAINST NON-DETERMINATION OF PLANNING CONSENT:  
NUTSGROVE FARM & WRYDECROFT PROPOSED WIND FARM  
DEVELOPMENTS  
LANDSCAPE ADVICE**

I refer to our discussions concerning the above matter held in your office late yesterday afternoon, following my site inspection and my meeting with your Principal Planning Officer colleague Dale Barker and Mr Ben Robinson, the City Council's archaeologist.

I had instigated the briefing meeting with Dale Barker and Ben Robinson subsequent to a protracted interchange of email and telephone correspondence between Mr Barker and myself since late December 2008. I was approached with a view to providing landscape expert witness services to Peterborough City Council at a possible appeal against non-determination of planning consent.

I have read the Planning Committee report from October 2008 and other appropriate documents relating to the deemed refusal of consent and the grounds for refusal in particular. I understand that the main remaining objection to the proposal is by the Ministry of Defence in relation to matters of air navigation. I also understand that the applicant is still engaged in discussions with the MoD as to whether their concerns can be addressed. If this negotiation were to result in the MoD objection being subsequently withdrawn, then Peterborough City Council would need to decide whether to progress to appeal on other grounds. The only remaining matters which appear to be able to be cited by the Council as possible grounds for refusal of planning consent would seem to be those of landscape and visual amenity. In spite of the presence of significant buried archaeological remains being present in the northern area affected by the Wrydecroft proposal, archaeology value was not cited as a potential ground for refusal, even though the Roman field system affected directly by the siting of the northernmost group of turbines is an integral part of the context of the nearby Chestnut Farm Scheduled Ancient Monument.

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I have appeared as a landscape expert witness at 7 planning inquiries concerning wind turbine developments of between 3 and 26 turbines since 2001, in each case appearing for the local planning authority or (in two instances) for the Countryside Council for Wales (CCW), the government's statutory adviser on landscape and nature conservation in Wales. One such scheme was the Deeping St. Nicholas windfarm, where I appeared for South Holland District Council, and which was upheld on appeal and implemented only relatively recently. I have also given landscape opinions to planning authorities on a further 3 wind turbine schemes. In addition I worked since 2007 as a professional advisor under contract to CCW providing landscape advice on wind turbine planning applications, of which there have been 10 to date

It is extremely difficult for an appeal to be dismissed purely on landscape grounds alone. I have only appeared at one planning inquiry involving wind turbines where this did occur; in this case, there were 3 turbines around 90 metres high sited less than 300 metres from the boundary of the Pembrokeshire Coast National Park.

I have examined the nature of the landscape in which the turbines would be set. From previous knowledge of working in the Fens and in east Lincolnshire, and travelling through this area, I had felt that the village of Thorney possessed sufficient special characteristics that a landscape case might have been able to be built upon its historical significance in the creation of the fenland landscapes we see today. The excellent in-depth briefing I received from your highly experienced archaeologist – of fenland origin, with a specialised knowledge of fenland landscape history and previous work experience with Cambridgeshire County Council – supported my pre-suppositions. However, in spite of the unique role played by the Earl of Bedford's estate of Thorney in fenland drainage and subsequent landscape change, and its estate village architecture and layout being unique within The Fens, the Peterborough Landscape Character Assessment reported in 2007 only graded the Thorney Island 'strength of character' as being 'moderate'. This I find difficult to understand and I believe that it very much understates the significance of this landscape. The archaeology officer provided a wealth of historical information to assist in the preparation of the Landscape Character Assessment, yet the outcome in respect of Thorney Island appears to have been very much diluted.

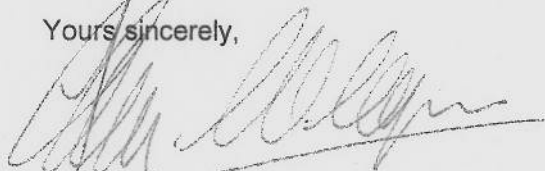
The landscape case against the erection of the proposed turbines at Nutsgrove Farm and Wrydecroft is therefore extremely weak. The Nutsgrove Farm applicant did not refer to the Peterborough Landscape Character Assessment study in the Environmental Statement, since it pre-dated the study. Although I would attempt to make a case that the applicant has understated the historical significance of the Thorney Island area in his assessment of the baseline landscape condition – and therefore that the landscape and visual impacts are understated - I cannot rely on any actions, decisions or evidence brought by the Council to support this. The predicted effects upon the setting of the Scheduled Ancient Monument at the Wrydecroft site have not been contested: conditions were recommended by way of safeguards. There are no real prospects of proving unacceptable cumulative landscape and visual impacts with existing windfarm schemes, since these are generally too distant and would rarely be seen in the same arc of view to be regarded as being significant. The proposed wind turbines would be too far from Thorney village to argue that unacceptable harm would occur to the setting of this unique fenland historic settlement with its Conservation Area.

Whilst we would reluctantly be prepared to continue with the preparation of a landscape Proof of Evidence and appear at a forthcoming planning inquiry, I would

not recommend that Peterborough City Council continue to progress this appeal if the MoD withdraw their objection.

If you wish to discuss any of the above matters, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Campion', written over a horizontal line. The signature is stylized and cursive.

John Campion CMLI

Director