

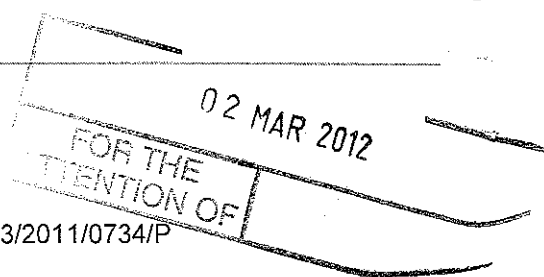

Graeme Thorpe

From: Brereton, Steven [Steven.Brereton@lancashire.gov.uk]

Sent: 01 March 2012 13:36

To: Graeme Thorpe

Subject: RE: Application for 2 x 15m turbines in AONB, near Longridge 3/2011/0734/P



Hi Graeme

In my previous comments I highlighted a number of weaknesses and omissions with the applicant's landscape and visual impact assessment (LVIA). I drew attention to these issues as I see the LVIA as a critical part of the applicant's documentation which should provide the local planning authority with the information needed to make informed judgements on the acceptability of impacts. Having reviewed the information posted on Ribble Valley Borough Council's website in connection with the above application I find that some of the issues I previously raised have still not been addressed, the principal being:

a) Photomontages

The information requested in my previous comments e.g. image production methodology, viewing distance and image height has still not been provided. Unhelpfully the viewpoint locations are not supported with six figure grid references which makes it difficult to determine exactly where they are and what the image should show. This might explain the following:

- Viewpoint 5 – image does not appear to match what would be seen.
- Viewpoint 10 – the road in the image bends to the right yet it should be straight for half a kilometre before bending to the left. The rear view mirror of a car is visible in the image.
- Viewpoint 11 – approximately one third of the image is occupied by a car.

Until these issues have been addressed, I recommend that little or no reliance be placed on the photomontages to represent the likely appearance of the wind turbines in the landscape.

b) Cumulative Impact

No details of operational or consented wind energy development that may be seen in combination with the proposed wind turbines at Brows Farm have been provided. In addition no reference is made to the developing proposal for a wind turbine at The Hills Farm which is just 190m away.

c) Zone of Theoretical Visibility Mapping

This essential information has not been provided.

In the absence of the above information I am reluctant, particularly given the site's location within the Forest of Bowland AONB which is a nationally important landscape, to make a final judgement on the acceptability of the proposed wind turbine's likely landscape and visual impacts. I simply do not have the tools that I need to undertake a thorough assessment of landscape and visual impacts.

I hope you find these comments helpful. Please do not hesitate to contact me if you wish to discuss these matters further.

Regards

06/03/2012

Steve

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From: Graeme Thorpe [mailto:Graeme.Thorpe@ribblevalley.gov.uk]
Sent: 24 February 2012 12:32
To: Brereton, Steven
Cc: Lorimer, Elliott
Subject: RE: Application for 2 x 15m turbines in AONB, near Longridge 3/2011/0734/P

Hi Steve,

You may remember the e-mail you sent below, but I was wondering if you have had chance to look at the revised plans that we notified you about on the 23rd of January 2012?

I am looking at taken the application to the March Committee and would appreciate your comments before next Weds if possible?

Thanks,

Graeme Thorpe BA (Hons) Dip TP MRTPI |
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From: Brereton, Steven [mailto:Steven.Brereton@lancashire.gov.uk]
Sent: 21 December 2011 18:50
To: Lorimer, Elliott
Cc: Graeme Thorpe
Subject: RE: Application for 2 x 15m turbines in AONB, near Longridge

Hi Elliott

The application site is within the Forest of Bowland Area of Outstanding Natural Beauty (AONB), a designated landscape which, according to *Planning Policy Statement 7: Sustainable Development in Rural Areas*, has "the highest status of protection in relation to landscape and scenic beauty". This status and importance in landscape planning terms has been carried over into the emerging *National Planning Policy Framework* which, *inter alia*, requires local planning authorities to "give great weight to protecting landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty".

It should be noted that the EIA threshold test for wind farms as set out in the *Town and Country Planning (Environmental Impact Assessment) Regulations 2011*. Schedule 2.3(i) is as follows:

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- (i) The development involves the installation of more than 2 turbines; or
- (ii) the hub height of any turbine or height of any other structure exceeds 15 metres.

Clearly the application for two wind turbines exceed these minimum requirements and the site is within the nationally important Forest of Bowland AONB

Judgements on whether development proposals within an AONB would bring about significant impacts on the designated landscape need to be informed by a rigorous assessment of likely landscape and visual impacts. This is particularly important when trying to determine the acceptability of the likely landscape and visual impacts of 2, 19.8m high prominently located wind turbines, the effects of which could be experienced over quite a large area that is within an AONB. A key element of the assessment process is the quality of the information provided by the applicant in support of his application particularly that in his landscape and visual impact assessment (LVIA). This document needs to demonstrate that likely impacts have been addressed and, crucially, provide local planning authorities with the information they need to make informed judgements on the acceptability of impacts.

Paragraph 4.4.3 of the Forest of Bowland AONB Renewable Energy Position Statement states;

"Environmental impact assessments will usually be required if the application is for more than two turbines or if height exceeds 15m."

Unfortunately the documents submitted in support of the application for a wind turbine do not contain sufficient information to enable a full assessment of likely landscape and visual impacts. Only a very basic assessment of landscape and visual impacts has been provided. However this assessment has a number of significant weaknesses and omissions the principal being:

a) Landscape character

Section 11. *Landscape and Visual Assessment* in the applicant's *Design and Access Statement* assesses the impacts of the proposals on landscape character with reference to Cumbria County Council documents (evidence of copying and pasting from another document?). The applicant should reassess impacts on landscape character with reference to *Forest of Bowland AONB Landscape Character Assessment, September 2009* (Lancashire County Council), the *Landscape Sensitivity to Wind Energy Development in Lancashire, February 2005* study (Lancashire County Council) and *A Landscape Strategy for Lancashire, December 2000* (Lancashire County Council).

b) Photomontages

Much reliance is placed on the applicant's photomontages to show the impacts of the proposals e.g. *Design and Access Statement*, *"The photo graphs in the Appendices highlight this"*. I have reservations regarding the submitted photomontages accuracy. The absence of critical information about them such as image production methodology, viewing distance, image height and height above ground level the picture was taken at suggests that they were not produced in accordance with current good practice such *Visual Representation of Windfarms, Good Practice Guidance, 29 March 2006* (Scottish Natural Heritage). This good practice has been developed to ensure that visualisations are as accurate a representation of the proposal as is currently possible; incorrectly produced visualisations can be very misleading.

c) **Landscape Sensitivity**

The refers to the landscape as being less sensitive to the presence of the wind turbines due to distinct aspects "*discussed above*". However this 'discussion' appears to be missing from the document.

d) **Capacity Assessment**

The sub section of the *Design and Access Statement* dealing with this issue simply confirms that the proposal is for a pair of very small turbines. There is no assessment of landscape capacity.

e) **Cumulative Impact**

The sub section of the *Design and Access Statement* dealing with this issue does not provide any details of operational or consented wind energy development that may be seen in combination with the proposed wind turbines at Brows Farm. The sub section merely states without any evidence that "*Due to the sheer distances involved and the landscape topography of the site and locality in general it is felt that the cumulative impact of the proposed turbine will be minimal*".

f) **Zone of Theoretical Visibility Mapping**

This essential information has not been provided.

g) **Proposed mitigation measures**

None have been provided.

I strongly recommend that the application should not be determined until the above issues have been addressed.

I hope you find these comments helpful. Please do not hesitate to contact me if you wish to discuss these matters further

Regards

Steve

Steven Brereton
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From: Lorimer, Elliott

Sent: 16 November 2011 09:08

To: Brereton, Steven

Subject: Application for 2 x 15m turbines in AONB, near Longridge

Morning Steve. Another application for micro turbines! Can you have a gander?

3/2011/0734

02/11/2011

Proposed erection of 2no. 10Kw Evoco wind turbines on
15m high masts.

Applications for full consent

Longridge

DATE VALID:

Development Description:

Development Address:

The Brows Farm Higher Road

06/03/2012

Longridge Preston PR3 2YX
Grid Reference
Officer: Graeme Thorpe
01200 414520
362194 438490

Thanks
Elliott

Elliott Lorimer

Principal AONB Officer

Forest of Bowland AONB, The Stables, 4 Root Hill Estate Yard, Whitewell Road, Dunsop Bridge, BB7 3AY

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06/03/2012