

Graeme Thorpe

From: Brereton, Steven [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 3/2011/0734/P

Hi Elliott

22 DEC 2011

FOR THE
ATTENTION OF

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:

- (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

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

Thanks
Elliott

Elliott Lorimer

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23/12/2011