

Graeme Thorpe

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

Sent: 17 April 2012 18:05

To: Graeme Thorpe

Cc: Lorimer, Elliott

Subject: RE: 3/2011/1069 - Stonecroft, Longridge

Hi Graeme

18 APR 2012

FOR THE
ACTION OF

Please find below my comments in relation to landscape aspects of the proposed wind turbine at Stonecroft, Jeffrey Hill, Longridge:

a) The application site is within the Forest of Bowland Area of Outstanding Natural Beauty (AONB).

According to Policy 116 of the recently published **National Planning Policy Framework** (NPPF) *"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."*

In addition the NPPF's core Land-Use Planning Principles confirms the Government's requirement that decision making should *"take account of the different roles and character of different areas"* through *"recognising the intrinsic character and beauty of the countryside"*.

The policies of the Regional Spatial Strategy (RSS) are still a material consideration. RSS Policy **EM 1 Integrated Enhancement and Protection of the Region's Environmental Assets** is particularly relevant for this application:

"Where proposals and schemes affect the region's landscape, natural or historic environment or woodland assets, prospective developers and/or local authorities should first avoid loss of or damage to the assets, then mitigate any unavoidable damage and compensate for loss or damage through offsetting actions with a foundation of no net loss in resources as a minimum requirement."

With regard to specific elements of this integrated approach, the following should be taken into account:

Policy EM1 (A): Landscape

Plans, strategies, proposals and schemes should identify, protect, maintain and enhance natural, historic and other distinctive features that contribute to the character of landscapes and places within the North West.

They should be informed by and recognise the importance of:

- the special qualities of the environment associated with the nationally designated areas of the Lake District National Park, the Yorkshire Dales National Park, the Peak District National Park, the Forest of Bowland Area of Outstanding Natural Beauty (AONB), the Arncliffe and Silverdale AONB, the North Pennines AONB and Solway Coast AONB and their settings;"*

b) Applicant's landscape and visual impact assessment (LVIA)

The recently revoked **Planning Policy Statement on renewable energy** (PPS22) stated that *"small scale development should be permitted within AONB's provided that there is no serious environmental detriment to the area concerned."* Judgements on whether development proposals would bring about 'serious environmental detriment' 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 impacts of wind energy as the effects can be very significant over a large area.

A key document that informs the assessment process is the applicant's 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. In recognition of this, the **Forest of Bowland AONB Renewable Energy Position Statement** recommends that an environmental impact assessment be produced if an application *"is for more than two turbines or if height exceeds 15m"*.

Unfortunately the documents submitted in support of the application do not contain sufficient information to enable a full assessment of the wind turbine's likely landscape and visual impacts. The principal weaknesses and omissions are:

- No assessment of the impacts of the proposed wind turbine in combination with consented and operational wind energy development has been provided. In addition the area in the vicinity of the proposed wind turbine is also subject to other wind energy development proposals. A planning application for two wind turbines approximately 327m to the south of the application site is currently being considered by the local planning authority and an application for a wind turbine at Hills Farm, which is approximately 230m to the south east, is likely to be submitted soon. Collectively these wind turbines could, if approved, result in a cluster that read as a 'wind farm' in the landscape. The potential landscape issues arising from all these schemes need to be addressed by the applicant in his LVIA.
- The single photomontage provided is of questionable value as it has clearly not been produced in accordance with current good practice such as that provided in **Visual Representation of Windfarms, Good Practice Guidance, 29 March 2006** (Scottish Natural Heritage). In fact there is not even a grid reference provided for the location of the viewpoint used to produce the photomontage nor are there any details of the methodology used to produce it. The photomontage has a relatively small field of view which means there is little opportunity to appreciate how the wind turbine would appear in the wider landscape. Because of these issues I am afraid that I cannot place any reliance on the submitted photomontage to provide an adequate representation of how the turbine would appear in the landscape. In addition I consider that additional photomontages are required to provide a more comprehensive coverage of the proposed wind turbine's likely impacts on the wider landscape. I would be happy to assist with the selection of additional viewpoints.
- The photographic survey pictures have no grid references for the viewpoints. In addition the photographs have a narrow field of view and show far too much sky.
- No Zone of Theoretical Visibility mapping has been provided.
- No assessment of the proposed wind turbine on the setting and character of heritage assets has been provided.
- Reference is made to a landscape character assessment being carried out but it has

not been provided in the LVIA. There is no reference to any of the published landscape character assessments, landscape strategies and supplementary planning guidance which cover the area.

- No judgements on the *significance* of landscape and visual impacts have been provided.
- The Residential Amenity assessment in section 12 is not supported by any visualisations, lacks detail, e.g. no addresses of the assessed properties have been provided and impacts on just two properties have been considered.
- No assessment of landscape amenity has been provided.
- No Design and Access Statement has been provided.
- No mitigation measures have been provided.

Considering the problems outlined above and the absence of key information, it would not be appropriate for me to complete my own assessment of the proposed wind turbine's likely impacts on the setting, landscape and scenic beauty of the Forest of Bowland AONB.

I recommend that Ribble Valley Borough Council obtain a satisfactory LVIA before determining the application. I would be happy to complete my assessment should this additional information become available.

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

Regards

Steve

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From: Graeme Thorpe [mailto:Graeme.Thorpe@ribblevalley.gov.uk]
Sent: 13 April 2012 11:09
To: Brereton, Steven
Subject: FW: 3/2011/1069 - Stonecroft, Longridge
Importance: High

From: Graeme Thorpe
Sent: 30 March 2012 10:23
To: Steven.Brereton@lancashire.gov.uk
Subject: 3/2011/1069 - Stonecroft, Longridge

Importance: High

Hi Steve,

I was just wondering if you have had chance to look at this one yet?

Thanks,

**Graeme Thorpe BA (Hons) Dip TP MRTPI |
Senior Planning Officer |**

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19/04/2012