

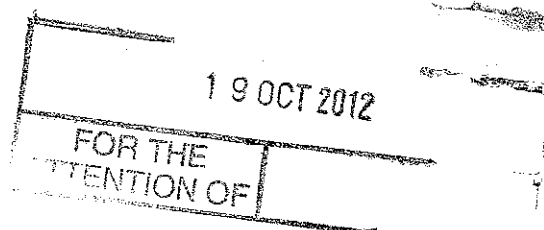
Graeme Thorpe

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

Sent: 19 October 2012 12:53

To: Graeme Thorpe

Subject: RE: RE - 3/2012/0402/P & 3/2012/0539/P



Hi Graeme

Sorry for the delay in responding.

Regarding the application for the erection of a 50kW wind turbine (34.2m to tip height) at Mason House Farm I make the following comments:

The applicant proposes to erect what would be according to the Forest of Bowland AONB Renewable Energy Position Statement, a small scale wind turbine in a nationally important landscape designed for its natural scenic beauty. Whilst the scale of development is considered to be 'small' this is of course relative to the wind energy industry where, in comparison with other forms of industrial development, the scale is generally large. In the context of the application site's rural, tranquil location within the Forest of Bowland AONB, a 34.2m (or 112' 2") high wind turbine is a substantial industrial structure that has the potential to have significant landscape and visual impacts.

With an application of this nature in a highly sensitive landscape, the following are essential:

- the applicant demonstrates that likely landscape and visual impacts would be acceptable.
- the applicant provides essential information which demonstrates the above and assists the local planning authority in making its judgements on overall acceptability of the proposals.

Unfortunately the applicant's submission has a number of **significant** weaknesses and omissions, the principal being:

a) an inadequate landscape and visual impact assessment.

Very little assessment work appears to have been provided and even less submitted. There is no assessment of the site and wider landscape's sensitivity and capacity, insufficient identification of visual receptors that may be affected by the proposals, no assessment of the significance of likely impacts on landscape character/value/amenity or fabric, no assessment of the significance of likely impacts on visual receptors, no assessment of likely cumulative impacts with operational and consented wind energy development and no details of proposed mitigation measures.

b) inadequate visualisations and zone of visual influence mapping.

No methodology detailing how the "ZVI - Map" or the visualisations were produced has been provided. Such information is essential as it helps us determine the accuracy and suitability of the maps and visualisations provided by the applicant; even something as basic as the wrong lens focal length or size of camera sensor can result in the production of extremely misleading visualisations. ZVI ('Zone of Visual Influence') mapping as produced by the applicant is intended to show the areas where the

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proposed development could actually be seen, i.e. where its 'influence' would be experienced. It is essentially a refinement of Zone of Theoretical Visibility (ZTV) mapping as account is taken of vertical elements within the landscape, e.g. trees and buildings, as well as the topography when determining the extent of the proposal's visibility. Production of ZVI mapping requires the use of substantial amounts of detail about the landscape's vertical features (costly) so it is rare that ZVI maps are submitted in support of planning applications, especially ones of this size (applicants generally produce ZTV mapping in support of their wind energy development applications). Having examined the applicant's ZVI map which, has a too small study area of just 2.3km radius from the proposed wind turbine, I am not convinced that it actually shows what it is supposed to as areas are identified that would have visibility of the turbine when, due to the presence of intervening landscape features, they would in fact not. Neither the 'ZVI' map or the visualisations appear to have been produced in accordance with good practice such as that provided by Scottish Natural Heritage (*if this had been used then I am sure that there would not have been the problems outlined here*). The visualisations are a particular cause of concern as the wind turbine – where visible – appears much smaller than it would be in reality. Even the size of the wind turbine's components varies in some of the visualisations (suggesting the use of two different types of wind turbine into the images?). In addition, not even the most basic of information on how to use the visualisations, e.g. viewing distance and image size, or viewpoint/camera metadata have been provided. The choice of viewpoint locations is far from ideal as they are all within 0.5km of the proposed wind turbine; there is just too much repetition of essentially similar locations. Viewpoints are usually selected to represent a range of locations e.g. public right of way, residence, road and recreation facility, at increasing distances from the proposed wind turbine. This helps, amongst other things, to determine at what distance the wind turbine ceases to become a prominent feature in the landscape. Finally, with regard to visual information necessary for the application, I note that no data on other in-planning, consented, in-construction and operational wind energy development has been provided or mapped and there is no cumulative zone of theoretical visibility mapping.

The significant weaknesses of the applicant's landscape and visual impact assessment – a document which is clearly not fit for purpose – greatly limits its value as an aid to determining the acceptability of the application for a 50kW wind turbine at Mason House Farm. Without the essential information identified above, I cannot complete my own assessment of the proposed turbine's likely landscape and visual impacts.

For all these reasons I conclude that it would not be appropriate to determine the above application until an acceptable landscape and visual impact assessment has been provided.

Whilst the absence of an acceptable landscape and visual impact assessment hinders my progress with assessing the application, I can at this stage advise of the following:

a) The *Landscape Sensitivity to Wind Energy Development in Lancashire, February 2006* (Lancashire County Council) study confirms that the application site is in an area of high sensitivity.

b) The previously approved wind turbine was of a scale and form that was appropriate for the area's landscape sensitivity and capacity.

c) The wind turbine would be just 77m from a public right of way.

d) The application site is within an area that forms part of the setting to the nationally important Browsholme Hall and its historic designed landscape. The proposed wind turbine

would be seen as a substantial industrialising feature in views of Browsholme's landscape.

e) The wind turbine would be visible from Longridge Fell.

f) The area has **moderate – high** levels of landscape tranquillity (ref CPRE Landscape Tranquillity mapping).

g) The area is notable for its strong rural character and cultural character.

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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Sent: 16 October 2012 13:05
To: Brereton, Steven
Subject: RE - 3/2012/0402/P & 3/2012/0539/P
Importance: High

Hi Steve,

Just wondered if you had had chance to look at these yet ?

Thanks,

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