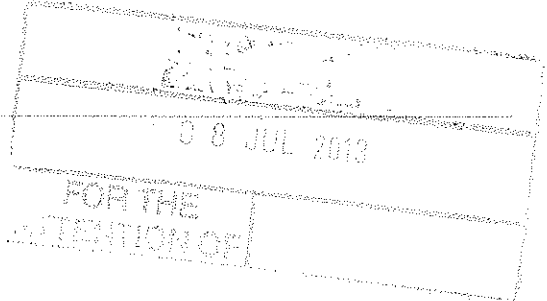


Jane Tucker

From: Brereton, Steven [Steven.Brereton@lancashire.gov.uk]
Sent: 28 June 2013 12:45
To: Jane Tucker
Cc: Graeme Thorpe; Lorimer, Elliott
Subject: RE: Consultation on planning application 3/2013/0357 land north of Huntroyde Home Farm, Huntroyde West, Whins Lane, Simonstone.



Hi Jane

Regarding the above application I make the following comments:

(Please note I am unable to provide as much detail as I would like to due to a high volume of applications and project work)

Documents Submitted in Support of the Application

The information submitted in support of the application has some significant weaknesses and omissions, the principal being:

a) the base photographs used for the photomontages were taken with a camera that has an undersized digital sensor. This is not acceptable for professional landscape photography. One of the main sources of good practice guidance, *Visual Representation of Windfarms, Good practice Guidance, 29th March 2006* (Scottish Natural Heritage) requires a 35mm film camera with a 50mm lens focal length (or digital equivalent). The applicant's digital camera – a Nikon D90 – is not of an equivalent specification as it has an undersized CMOS sensor. Infact, the D90 was only ever intended to sit between the company's entry-level and professional digital single lens reflex cameras. Photomontages produced from images taken with this camera cannot be technically correct; compression of the wind turbine's height in the visualisation and image distortion will likely be an issue.

b) a description of the methodology used to produce the photomontages should be provided. This might for example enable us to ascertain why the image height of the photomontages is not contrary to SNH guidance referred to above: *"Thus, while an image height of approximately 200mm is recommended, an image height over 130mm is considered acceptable"*. The applicants images are only 120mm high.

c) the choice of locations for the viewpoints is far from ideal – a real problem when only 6 have been used.

Viewpoint 1 is of little use as only the very tip of a turbine blade would be visible; information easily gleaned from the ZTV maps and topographical data. In viewpoint 2 the wind turbine is partly obscured by trees and in viewpoint 4 the turbine could not be seen.

In any event, I recommend – and this is in line with good practice – that the viewpoint locations are agreed with the relevant local authorities.

d) only a lens with a 50mm focal length has been used.

Research undertaken by the University of Stirling has shown that wind energy development photomontages based on an image taken with a 75 – 80mm lens focal length shows the wind turbines at a height in the landscape which closely resembles what the eye would see from the viewpoint when the turbine(s) has been installed. A 50mm lens focal length is useful for showing the wind turbine(s) in the overall landscape context but this must be supplemented with images taken with a 75 – 80mm lens focal length so that – and this is

especially important for lay people who it seems are heavily influenced by photomontages – the scale of the turbines can be fully appreciated.

e) Designated Landscapes map

This has a low resolution which makes it virtually unreadable at any meaningful level of magnification.

f) Radius of the study area

SNH guidance *Natural Heritage assessment of small scale wind energy projects which do not require formal Environmental Impact*

Assessment (EIA), March 2008 recommends a "ZTV map out to 30km" for schemes containing up to 3 turbines over 50m in height. By contrast, on the Huntroyde Home application a study area of just 7km radius has been used. Such a small radius means that the elevated areas to the north and north west of the site which are within the AONB e.g. Longridge Fell and Waddington Fell are not covered by the assessment.

The applicant in his response (17th June 2013 letter, ref. DS/146BN) to comments made by Natural England on the small radius of the study area attempts to justify a 7km study area radius by referring to other parts of the country where it was considered acceptable. In doing this the applicant fails to recognise that drawing comparisons between applications in completely different parts of the country is of very little use because all these areas have different topography, landscape character, levels of visibility, landscape tranquillity, etc, etc. The applicant in his response also draws attention to SNH guidance on the matter but omits to make reference to this key point from the guidance in relation to the radius of a study area: *"It is advised that determination of the extent of the ZTV should be discussed and agreed with the determining authority and consultees."*

Taking account of the location of the application site, scale of the proposed wind energy development, location of nationally important landscapes, topography and likely visibility of the turbine, I consider that a study area radius of 15km is appropriate and reasonable (although I have no objection to a 20km radius as highlighted by Natural England).

g) ZTV mapping

A description of the methodology used to produce the ZTV maps should be provided. In addition the applicant has used a gradation for the shading on the ZTV maps to depict areas of theoretical visibility and show that the magnitude of visual impact is mitigated by distance. This is very misleading because it cannot be assumed that there is a direct relationship between distance and relative visibility or magnitude of visual impact.

h) Copthurst Farm Wind Turbine

Is this application no longer being pursued?

Until these matters outlined above have been addressed, I recommend that the application should not be determined.

Other Considerations

The remit of my job at Lancashire County Council limits me to making comments on wind energy development proposals which are within the counties designated landscapes and those areas which provide the setting to them. Consequently, for the application to erect a wind turbine at Huntroyde Home Farm site which is just 420m from the boundary of the Forest of Bowland Area of Outstanding Natural Beauty (AONB), my comments will relate to impacts on the setting of this nationally important landscape. Whilst the application site lies outside the AONB, it is clearly within an area which forms part of the setting to the AONB

and provides a textural backdrop to views from towns and villages to the south and east such as Padiham, Read and Higham.

Although I have been unable to complete my assessment of the likely impacts of the proposed wind turbine on the setting of the AONB due to shortcomings of the applicant's information outlined above, I would like to draw attention to the following issues:

a) Application site landscape context

The site is on the southern facing slope of a narrow ridge which extends in a north easterly direction between Read and Higherford. This ridge is partly situated within the AONB and is, in landscape terms, of some importance due to its location in the 'foreground' and visual shadow of the nationally important Pendle Hill and as a provider of the skyline in views from the north and south. The ridge is also a key landscape feature within the area forming the setting to the southern boundary of the AONB. The relative narrowness of the ridge – just over 1km wide in the vicinity of the application site – ensures that the transition from heavily man influenced town or village landscape to the wilder moorland fringe of the AONB occurs within a relatively short distance; just 1.8km in the case of Padiham. The landscape of this ridge is essentially rural with moderate levels of landscape tranquillity. From its upper levels and in particular from the locally popular Black Hill picnic area which is just 530m from the application site, there are striking long panoramic views over the lowland and upland landscape.

In a narrow strip of open countryside between the AONB and built up areas to the south and east any tall vertical structure, particularly one which in certain viewpoints would be seen in part against the skyline, is bound to be a prominent feature that exerted a strong influence over the landscape character, more so than one set in an extensive open area.

b) Landscape character

Many of the key features of the **N: Farmed Ridges** Landscape Character Type (ref. *Forest of Bowland AONB Landscape Character Assessment 2009*, Lancashire County Council) that the site is situated within are well represented in the area e.g. low stone field boundary walls, mixed pastoral farmland and broadleaved woodlands, isolated stone built farmsteads and long open views from the ridge top.

The Forest of Bowland Landscape Character Assessment recommends in its guidelines that vertical structures are minimised on the skyline.

c) Landscape sensitivity to wind energy development

The well represented key features of the landscape character at the application site and wider landscape, generally good landscape condition, function of the area as an important backdrop, skyline and setting to the AONB, general narrow width of the rural 'space' between the built up areas to the south and ridge top, textural landscape qualities and distinctive vernacular architecture all indicate a **High** level of landscape sensitivity to wind energy development and as a consequence little or no capacity for such development.

The *Landscape Sensitivity to Wind Energy Development in Lancashire February 2005* study (Lancashire County Council) considers the **4g South Pendle Fringe** Landscape Character Area* that the site is within to have a **Moderate-High** level of sensitivity. This judgement differs slightly to mine but it should be born in mind that the County wide study contains a broad scale strategic assessment of sensitivity. I used this assessment and also the Forest of Bowland AONB landscape Character Assessment (not available at the time of the County wide landscape sensitivity assessment) to inform my much finer grain assessment of landscape sensitivity to wind energy development.

(*The landscape sensitivity study was informed by the 1:50,000 scale County wide

landscape character assessment)

These findings suggest to me that a wind turbine of the scale proposed at Huntroyde Home Farm could have significant landscape and visual impacts which may be unacceptable in landscape terms. However, I wish to reiterate that I have not yet completed my assessment of likely impacts.

I hope you find this email helpful. Please do not hesitate to contact me should you wish to discuss any matter further.

Regards

Steve

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From: Jane Tucker [<mailto:Jane.Tucker@ribblevalley.gov.uk>]

Sent: 30 April 2013 14:03

To: casework@britarch.ac.uk; e-nwest@english-heritage.org.uk; ENV EPP Customer Service Area East; ENV Archaeology; consultations@naturalengland.org.uk; casework@spab.org.uk; notifications@victoriansociety.org.uk; consult@georgiangroup.org.uk; office@ancientmonumentsociety.org.uk; Brereton, Steven; ENV Ecology; NATS; DIO-safeguarding-wind@mod.uk; planning@pendle.gov.uk; planning@burnley.gov.uk

Subject: Consultation on planning application 3/2013/0357 land north of Huntroyde Home Farm, Huntroyde West, Whins Lane, Simonstone.

Please can we have your comments on the above planning application? It is for the proposed erection of a 60.7m single wind turbine on land to the north of Huntroyde Home Farm, Huntroyde West, Whins Lane, Simonstone. I have attached the formal consultation letter and here is a link to view the application documents on our website

<http://www.ribblevalley.gov.uk/planningApplication?appNumber=3%2F2013%2F0357&submit=Go>

<<13 0357 consult.pdf>>

Jane Tucker | Planning Department |

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