

Item 6 - Report on Planning Applications

Application Ref: NP/12/0426

Application Type	Full
Grid Ref:	SM85842340
Applicant	Mr Peter Tyler
Agent	Mr Mike Tyler, Ventos Vox
Proposal	Erection of an endurance wind turbine-25m to the hub and 34m to the top of blade
Site Location	Brawdy Farm, Brawdy, Haverfordwest, Pembrokeshire, SA62 6LA
Case Officer	Richard James

Summary

This is a full application for a "Medium Scale" 55kW Endurance E3120 wind turbine to provide a renewable energy source for Brawdy Farm, an agricultural holding within the Brandy Brook area. This application has been brought to the Development Management Committee at the discretion of the Head of Development Management as it has generated a significant amount of public support, which conflicts with your officer's view. Whilst the proposal is considered acceptable in all other planning considerations, insufficient information has been submitted to enable the Authority to fully assess the potential impact upon the existing landscape character and biodiversity levels of the site and surrounding area. Furthermore, an initial desktop assessment has raised serious concerns in relation to the visual impact of the proposed turbine, which the application has failed to address. The proposal is therefore considered to conflict with LDP Policies 1, 8, 11, 15, 29, 30 and 33, in addition to the advice set out in the Renewable Energy SPG for siting medium scale turbines within this Landscape Character Area (LCA). The application is subsequently recommended for refusal.

Consultee Response

Brawdy Community Council: Supporting

Dyfed Archaeological Trust: Conditional Consent - Recommend grampian condition

Ecologist - Pembrokeshire County Council: Objecting

Environment Agency Wales: Conditional Consent - See attached standard guidance advice.

Hayscastle Community Council: No Response Received

MOD: No objection

NATS: No objection - No safeguarding objections to the proposal

Nolton & Roch Community Council: No Response Received

PCC - Head of Public Protection: Conditional Consent - The applicant is confident that the data demonstrates that the operation of the turbine will not result in significant detriment to the amenity of the neighbourhood and to this end I recommend the conditions as recommended be attached to any

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planning consent to provide reasonable protection to any premises in the vicinity.

PCC - Transportation & Environment: No objection

Public Response

The application has been appropriately advertised in the form of site notices and neighbour notification letters. 37 letters have been received in support of the application, raising the following points:

- The proposed turbine will have no impact on existing flight lines of residential and migratory birds in the area.
- Support the principle of green sustainable energy.
- This is a worthy application in respect of rising energy costs.
- Large amounts of electricity and oil are used to dry grain/oil seeds, so this renewable energy proposal is supported.
- The small visual intrusion of the turbine will be worth it if it will save valuable fossil fuels.
- The turbine's position is next to a large grain drying and storage facility, there is an obvious use for the power the turbine would produce, greatly reducing the need to burn oil, gas or coal.

2 letters of objection have been received, raising the following points:

- The turbine is unacceptable within the National Park, which is an area of great beauty.
- The days of turbines are numbered as the government realises that future power needs to be met by nuclear power.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokehire Coast National Park website - <http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokehire Coast National Park

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 33 - Renewable Energy

LDP Policy 53 - Impacts on traffic

PPW5 Chapter 04 - Planning for Sustainability

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PPW5 Chapter 05 - Conserving and Improving Natural Heritage and the Coast

PPW5 Chapter 06 - Conserving the Historic Environment

PPW5 Chapter 12 - Infrastructure and Services

PPW5 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG05 - Sustainable Design

SPG06 - Landscape

SPG11 - Coal Works - Instability

SPG13 - Archaeology

SPG14 - Renewable Energy plus Addendum on Field Arrays

Officer's Appraisal

Background

Brawdy Farm is an agricultural holding located on the Northern edge of the National Park boundary, in Brawdy. The proposed site lies in the centre of an agricultural field surrounded by open countryside, located on elevated ground on top of the South facing hillside of Newgale valley. Pen-y-cwm is located to the East, another holding/hamlet approximately 350m to the North East and the main farm complex to the North. Neighbouring properties are screened from the site by existing trees and hedgerow. A strip of woodland/scrub also runs down the hill from the site boundary to the South. A public right of way runs along the South and East boundaries of the site. It is accessed via existing unmade farm tracks to the North and North West. An agricultural shed is located on the other side of hedgerow to the East, which is used for grain/seed drying and storage. This shed has been cut into the hillside and sits on a lower land level than the site itself.

History

There is no relevant planning history on the site.

Constraints

- Safeguarding Zone - Brawdy Airfield – impact to be assessed below.
- Public Right of Way – impact to be assessed below.
- Adjacent to a Coal Standing Advice Area – standing advice can be placed on the decision notice, should approval be given.

Current Proposal

This is a full application for a 55kW Endurance E3120 wind turbine, measuring 24.8m to the hub and 34.4m to the blade tip, with a blade diameter of 19.2m, to provide a renewable energy source for Brawdy Farm. The cable

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route will link into the existing shed to the East, wrapping around the Northern side of the boundary hedgerow.

Key Issues

The application raises the following planning matters:-

- The planning policy context and the principle of development;
- The visual impact upon the existing landscape character of the area;
- The impact upon amenity and public safety;
- The impact upon existing levels of biodiversity and the physical environment;
- The impact upon the archaeological interest of the site;
- The impact upon the integrity of surrounding trees and hedgerow;
- The impact upon highway safety;
- The impact upon air traffic.

The planning policy context and the principle of development

National guidance in relation to renewable energy is set out in PPW5 and TAN 8 and advises that renewable energy projects should generally be supported so long as the designated areas such as National Parks are not compromised. National guidance, together with the main policies of the LDP (1, 8, 15 and 29) seeks to balance this support with the need to conserve and enhance the special landscape character and natural beauty of the National Park.

LDP Policy 33 states that, amongst other things, small scale proposals will be considered favourably subject to there being no over-riding environmental and amenity considerations. Medium scale schemes also offer some potential and will be permitted subject to the same considerations.

Having regard to the thresholds set out in the Authority's SPG on Renewable Energy, the size and output of the proposed turbine is considered as a "Medium Scale" turbine. The Landscape Character Assessment SPG identifies this area (LCA 13 – Brandy Brook) as having a "High" sensitivity to medium scale turbines. The policy guidance does not reject the principle of erecting medium scale wind turbines in this area, although careful consideration of the above key considerations is required.

The visual impact upon the existing landscape character of the area.

In order to obtain a full Landscape Visual Impact Assessment (LVIA), in relation to small scale turbines, the Authority's approach to date has been to produce a Zone of Theoretical Visibility (ZTV) map, request a temporary structure to be erected on site to the proposed turbine height and then view the structure from various viewpoints within the surrounding landscape (informed by the ZTV). This approach enables the Authority to obtain a "real perspective" of the scale and siting of the proposed turbine. However, this

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approach is not considered appropriate for medium scale turbines, due to the difficulties of erecting a temporary structure to the higher required heights on site. As a result, for medium scale proposals, the onus is on the applicant to provide the Authority with a comprehensive LVIA, in order to properly assess the proposal.

An LVIA has been submitted with the application and provides three photomontages of the turbine, two from within Roch and one from Cuffern Mountain to the South East. Unfortunately, your officer does not consider that the submitted LVIA presents the level of information required, in order to fully consider the visual impact of the proposed turbine. The viewpoints provided do not provide a 360 degree representation, being concentrated to the South East of the site. No wire frames have been provided, to test the soundness of the images and the images themselves are of relatively poor resolution. No methodology or reference to "best practice techniques" has been provided.

Despite this, an initial assessment has been carried out by the Authority. From the site itself, wide panoramic views to the South, East and North are available, indicating that the whole site is highly visible within the surrounding landscape. An internally produced ZTV map shows that the proposed turbine is potentially visible from many public viewpoints, including along stretches of the roads, coastal footpath and inland footpaths of both the National Park and Pembrokeshire County Council area. The ZTV also shows the turbine being fully visible from sections of Newgale beach. In this respect, after conducting a site visit and a desk top study, the Authority has initial concerns over the potential visual impact of the proposal, with the view that it would be likely to cause a significant detrimental impact upon the existing rural and tranquil landscape character of the area. It is acknowledged that the proposed siting is within proximity to the existing agricultural building, however due to the scale of the turbine and its siting on a higher land level, it is not considered to remain within the same visual context. The submitted LVIA is not considered to alleviate these concerns.

Whilst the environmental benefits of the proposal, as raised within the public representations received, are noted, the Authority has a primary and statutory duty to either conserve or enhance the natural beauty of the National Park and this should hold greater weight. The proposal is therefore not supported on visual impact grounds.

The impact upon amenity and public safety

The application is accompanied by details of expected noise output, the Environmental Health department of Pembrokeshire County Council has been consulted and raise no objections, subject to the placing of appropriately worded conditions, should approval be given. In addition, the turbine is not considered to cause any shadow flicker disturbance to the nearest properties. Although a public right of way runs adjacent to the site boundary, the turbine is located a safe distance away from the defined route. All reasonable precautions have been taken to ensure the safety of users of this footpath. The proposed turbine is not therefore considered to cause any harm to

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existing amenity levels in terms of noise and shadow flicker or upon the existing levels of public safety.

The impact upon existing levels of biodiversity and the physical environment

An Ecological Walkover Survey has been submitted with the application, the survey, undertaken on the 4th October 2012, assessed the impact of the proposed turbine on birds, bats, badgers and other protected species. However the report identified that 'a dedicated bat survey is still to be carried out', no evidence of the additional survey work has been provided with the submitted application. Given that it was only identified in October, at the end of the survey season that further work was required, it will not be possible to undertake the surveys until April next year when the bats become active again.

The submitted application does not therefore provide sufficient information to fully assess the potential impact of the proposed turbine on protected species. The proposal cannot therefore be considered to comply with LDP Policy 11 Protection of Biodiversity.

The Environment Agency, whilst raising no objections, has highlighted that wind turbine developments cause the greatest threat to the environment during their construction. It is advised that, in the interests of best practice, a Method Statement detailing all necessary pollution prevention measures during the construction phase of the development should be submitted to the Authority and agreed, to prevent contaminated water entering existing watercourses. A condition to this effect can be placed on the decision notice, should approval be given.

The impact upon the archaeological interest of the site

Dyfed Archaeology has been consulted and has advised that the site lies within proximity to several sites of historical and archaeological interest. Whilst no objections are raised, in order to protect potential archaeological interests, it is recommended that a condition requiring a written scheme of investigation should be submitted to, and approved by the Authority, prior to the commencement of development. This can be placed on the decision notice, should approval be given.

The impact upon the integrity of surrounding trees and hedgerow

The cable route does not intersect the hedgerow to the East and no new access tracks through vegetation are proposed. Furthermore the site is located in the centre of the field, away from the boundary hedging. The proposal is not considered to cause any detrimental impact upon surrounding trees and hedgerow.

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The impact upon highway safety

The proposal utilises the existing access points and also proposes no new tracks. Although no response has been received by The Highways Authority to date, it is not anticipated that the proposal will cause an unacceptable impact upon road safety. The site, by virtue of its existing agricultural use, already attracts large transport vehicles to the site. Large delivery and construction vehicles attracted to the site during the construction phase of the turbine should be able to access the site relatively easily. Once constructed, the proposal will attract little vehicular movements, only those for annual maintenance. The Committee will be informed of The Highways Authority response at the meeting.

The impact upon air traffic

Wind turbines of a certain scale can cause disruption and physical obstruction to air traffic movements and radar installations. Both the Defence Infrastructure Organisation of the MOD and National Air Traffic Services have been consulted. No objections have been raised. The MOD have requested that they be notified of the date construction starts and ends, the height of construction equipment and the latitude and longitude of the turbine for their flying charts, this can be controlled via a planning condition should approval be given. The proposal is considered acceptable on air traffic grounds.

Conclusion

Whilst considered acceptable in all other planning considerations, insufficient information has been submitted to enable the Authority to fully assess the potential impact upon the existing landscape character and biodiversity levels of the site and surrounding area. Furthermore, an initial desktop assessment has raised serious concerns in relation to the visual impact of the proposed turbine, which the application has failed to address. The proposal is therefore considered to conflict with LDP Policies 1, 8, 11, 15, 29, 30 and 33, in addition to the advice set out in the Renewable Energy SPG for siting medium scale turbines within this LCA.

Recommendation

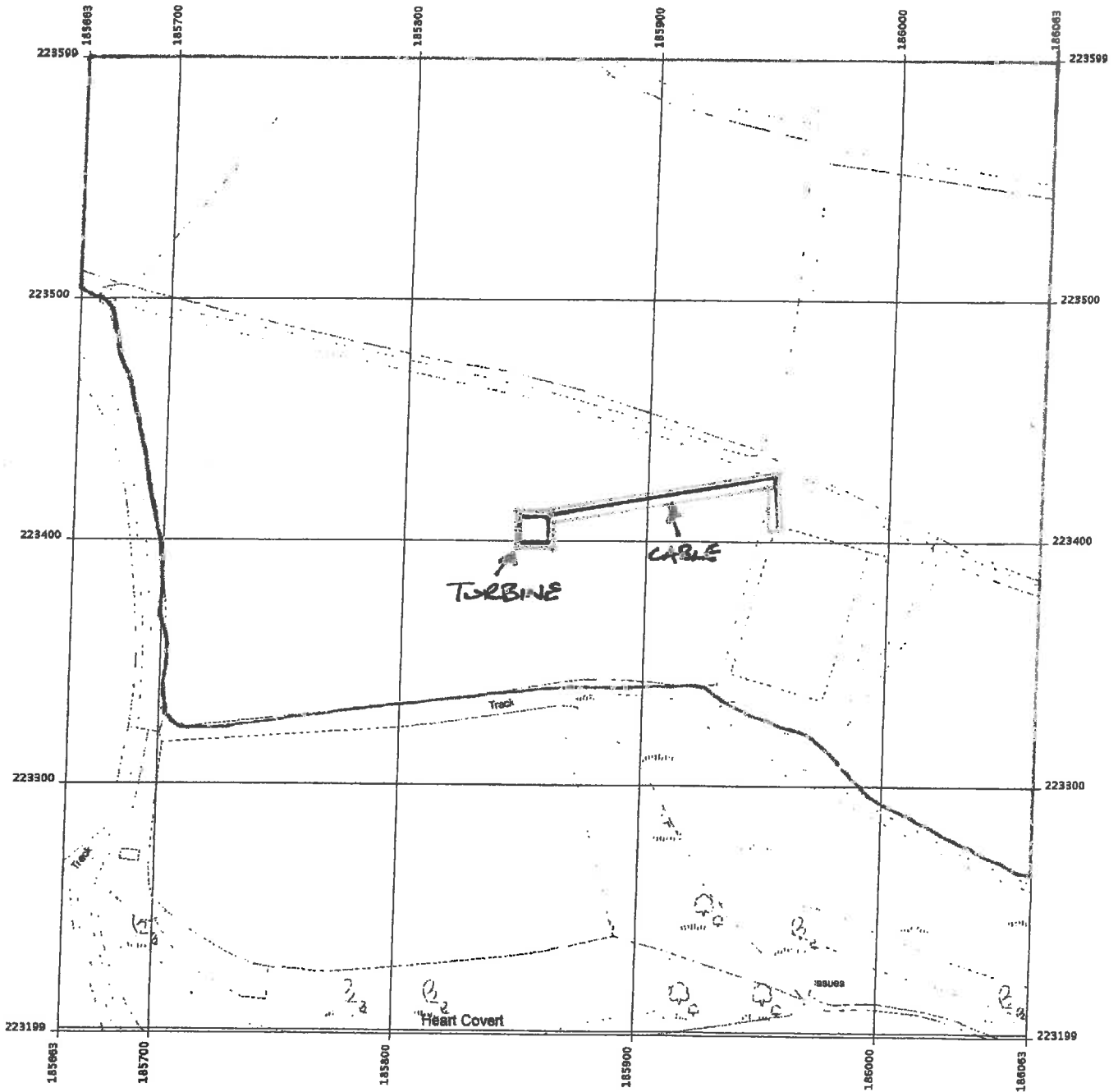
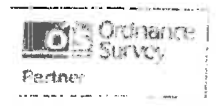
That the application be refused.

Reasons

1. Insufficient information has been submitted in order for the Authority to properly assess the potential impacts upon the existing landscape character and levels of biodiversity of the site and surrounding area.
2. Notwithstanding (1) above, on the basis of the information available, the proposed turbine, by virtue of its scale and siting on an exposed, elevated site, where it would represent skyline development and would be visible from many public vantage points, is considered to cause an unacceptable

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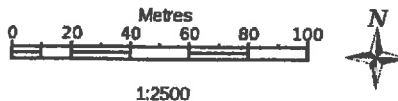
detrimental impact upon the existing landscape character of the Brandy Brook and St Brides Bay area, in addition to areas within the Pembrokeshire County Council to the North and East. The proposal is therefore contrary to Pembrokeshire Coast National Park Development Plan (adopted September, 2010), Policy 1 National Park Purposes and Duty (a and b); Policy 8 Special Qualities (a and c); Policy 15 Conservation of the Pembrokeshire Coast National Park (a, b and d); Policy 29 Sustainable Design (a), Policy 30 Amenity (b and d); and Policy 33 Renewable Energy.



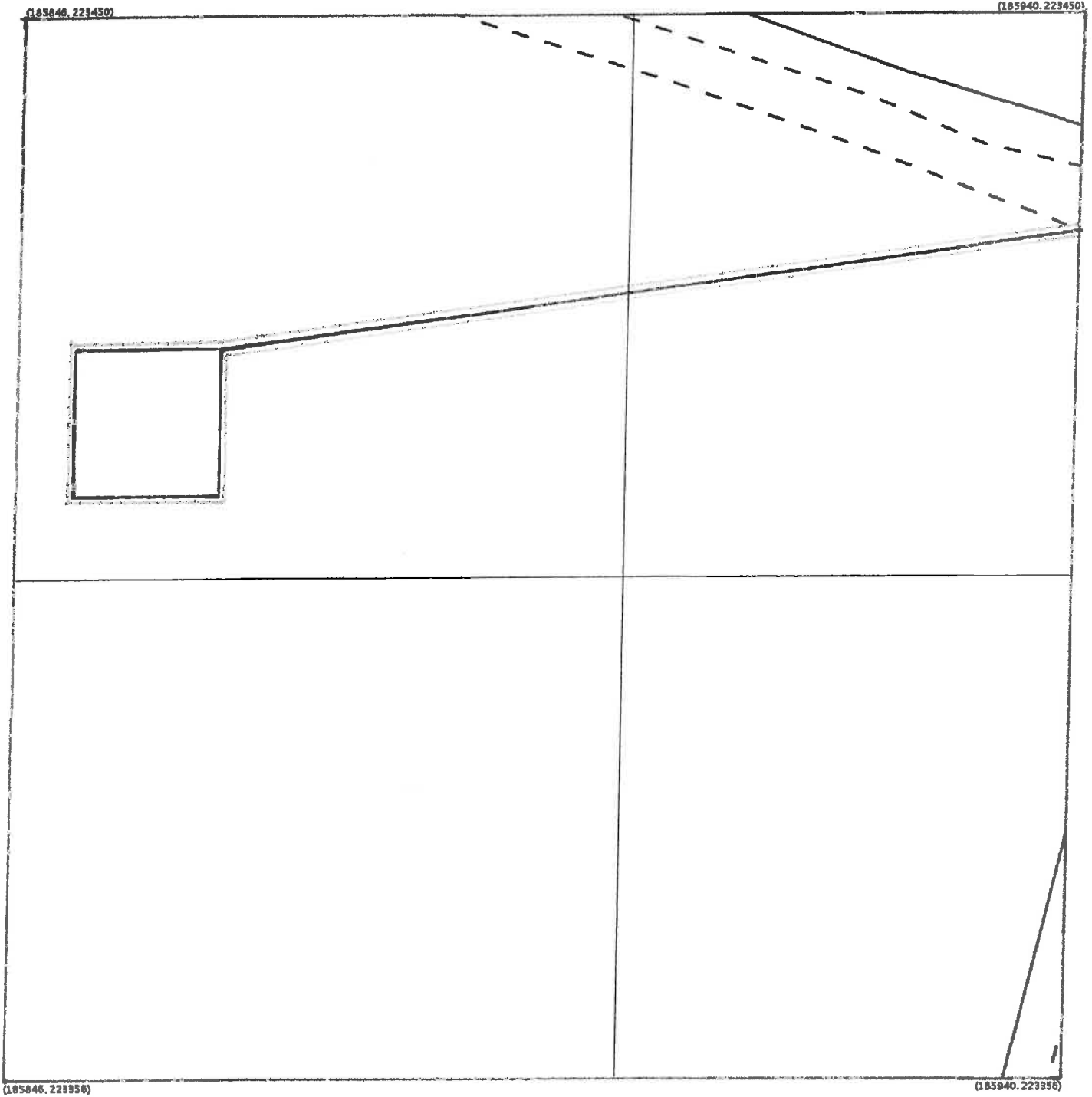
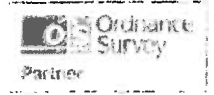
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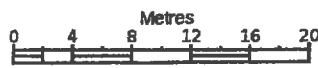
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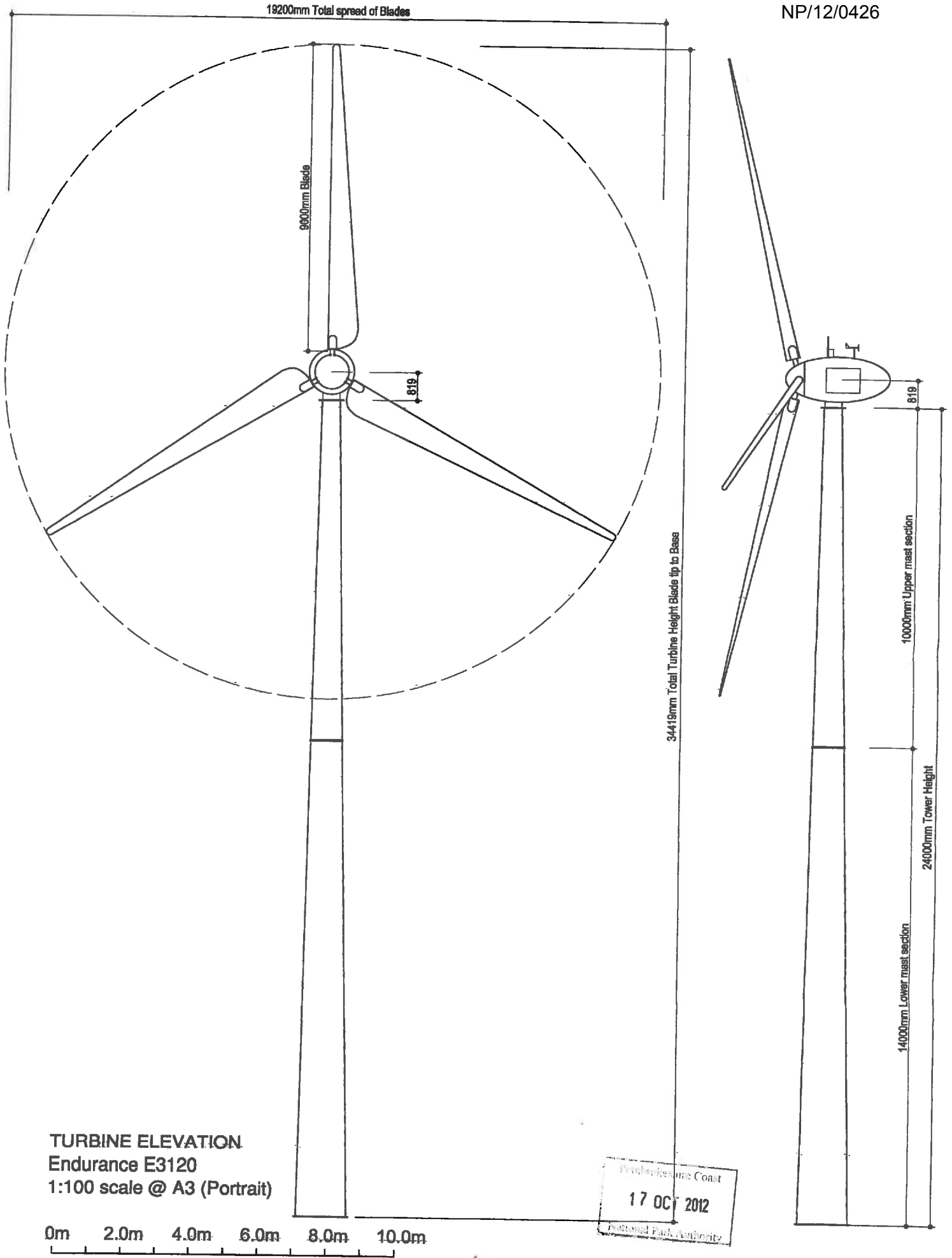
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TURBINE ELEVATION
 Endurance E3120
 1:100 scale @ A3 (Portrait)

0m 2.0m 4.0m 6.0m 8.0m 10.0m

Scale Bar 1:100

Wharfedale Coast
 17 OCT 2012
 National Park Authority

NP 12 4 26