

Item 6 - Report on Planning Applications

Application Ref: NP/13/0174

Application Type	Full
Grid Ref:	SN04403400
Applicant	Mr W Davies
Agent	VG Energy Ltd
Proposal	Installation of 50kw wind turbine (25.25m to blade tip) & associated infrastructure
Site Location	Penrallt Ddu, Pontfaen, Fishguard, Pembrokeshire, SA65 9TU
Case Officer	Richard James

Summary

This is a full application for a "Medium Scale" 50kw wind turbine to provide a renewable energy source for Penrallt Ddu, an agricultural holding in the Gwaun Valley in North Pembrokeshire. This application is brought before the Committee as the views of your officers' conflict with those of the Community Council. The proposed turbine, by virtue of its siting and scale, is considered to cause an unacceptable detrimental impact upon the existing landscape character of the National Park. Furthermore, the Authority has insufficient information in order to fully assess the proposal's impact upon the existing levels of biodiversity in the area. The proposal is therefore considered to conflict with the policies and supporting guidance of the LDP and as such, is recommended for refusal

Consultee Response

Cwm Gwaun Community Council: Supporting
Ecologist - Pembrokeshire County Council: Objecting
MOD: No objection
NATS: No objection
Natural Resources Wales: Objecting
PCC - Transportation & Environment: Conditional Consent
Rights of Way: No objection

Public Response

The application has been appropriately advertised in the form of site notices and neighbour notification letters. Fifty two letters have been received; fifty one of which object to the application (from forty five different addresses) and one letter supports the application. In summary, the letter of support raises the following points:

- Most of the power generated will be used by the farm. The turbine will help to run the farm which provides much needed local employment.
- The turbine should not harm the view from the National Park as the farm buildings will form the backdrop to the turbine.

Item 6 - Report on Planning Applications

In summary, the letters of objection raise the following points:

- Wind turbines are ugly and inappropriate for Pembrokeshire which is renowned for its spectacular and unspoilt landscape. Cornwall and Mid Wales are ruined by turbines. Let's not ruin Pembrokeshire as well.
- The turbine would have a negative impact on visitors for our important tourist industry.
- The turbine is of a size inappropriate in the surrounding landscape; it will be visible for miles around and inappropriate on the lip of the glorious Gwaun Valley, next to an SSSI and the Preseli Hills. It will have a detrimental visual effect on the area, it would be a visually prominent moving structure.
- The turbine may present dangers to the local birdlife and other wildlife, which includes many rare species.
- Many turbines cause noise and shadow flicker distress to nearby residents and users of footpaths/bridleways. The turbine would detract from their enjoyment of the landscape.
- Turbines are inefficient and a waste of money apart from the exorbitant subsidies enjoyed by the landowner. It is morally wrong to use government subsidies to industrialise otherwise sparsely populated and rural areas of North Pembrokeshire.
- The proposed turbine would set a precedent for the many farms in the area.
- The proximity of turbines to public footpaths and bridleways are a health and safety concern.
- Turbines can cause disturbance to media reception.
- The foundation of a turbine requires a lot of CO2 emitting concrete, risking the disruption and pollution of underground water courses and river tributaries.
- Turbines should be out to sea not on land.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire 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 Pembrokeshire 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

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

TAN 08 - Renewable Energy

Officer's Appraisal

Background

Penralltddu is an agricultural holding located along the Southern side of the Gwaun Valley, within North Pembrokeshire. The complex sits on a plateau, with the wooded valley to the West and North, this comprises a designated Ancient Semi Natural Woodland (ASNW). The site also neighbours a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), located to the West, within the valley and woodland. The application site comprises an agricultural field immediately to the North West of the complex. The farm is accessed via a lane from the East, which also forms part of a bridleway which runs through the complex. There are no immediate neighbouring properties, although scattered farmsteads/dwellings do exist in the area.

The landscape character comprises a large upland area, forming part of the Preseli region. The area has open moorland and heath, with rocky summits, an exposed mountainous feel with long ranging 360 degree views of open countryside. The wooded Gwaun Valley is overlooked by numerous Public Right of Ways which surround the area.

History

- NP/12/0089 – 50kw photovoltaic installation, withdrawn in February 2012.
- Three previous approvals for agricultural buildings and extensions within the farm complex.

Constraints

- The proposed site neighbours an ASNW (Area of Semi-Natural Woodland), SAC (Special Area of Conservation) SSSI (Site of Special Scientific Interest) and bridleway, the impacts upon which will be assessed below.

Current Proposal

This is a full application for a 50kw wind turbine, measuring 16.8m to the hub and 25.05m to the blade tip, with a blade diameter of 16.5m, to provide a renewable energy source for Penrallt Ddu farm. The cable route will link into an existing agricultural shed to the South East. A small inverter house will be located at the base of the turbine. The turbine will be located approximately sixty metres North West of the edge of the existing complex within an agricultural field.

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 historic environment and 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 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. Large scale renewable energy schemes will only be permitted where they do not compromise the special qualities of the National Park.

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, although it is worth noting that the proposed scale is on the lower end of this category, which includes all turbines from twenty five metres to sixty five metres to blade tip. "Small Scale" turbines are classed as being less than twenty five metres to tip.

The Renewable Energy SPG identifies this Landscape Character Area (LCA 26 – Mynydd Preseli) and its neighbouring LCA 22 Mynydd Carningli as

Item 6 - Report on Planning Applications

having a "High" landscape sensitivity to all scales (Small, Medium and Large) of turbines. LCA 26 Cwm Gwaun, which divides the above LCA's also has a "High" landscape sensitivity to "Medium Scale" turbines, it has a "Moderate-High" landscape sensitivity to "Small Scale" turbines. The LDP Policy and SPG is relatively constrictive in terms of siting this scale of turbine at the proposed location due to the landscape sensitivity of the area, however detailed guidance is provided within the SPG for siting turbines within the area, which the application needs to be considered against.

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

A detailed Landscape Visual Impact Assessment (LVIA) has been submitted with the application and provides a number of photomontages from key viewpoints in the surrounding landscape, which were agreed with your officer prior to submission of the application. The assessment works through the visual impacts upon the general landscape area and upon the individual viewpoint locations provided.

Within the LVIA, it is concluded that the proposal will have a "Moderate Adverse Impact" up to a "Severe Adverse Impact" upon the general landscape character of the area and the National Park designation. When assessing the individual viewpoint locations, which include key viewpoints from surrounding Public Rights of Ways and highway routes, the impacts range from "Moderate Adverse Impact" up to "Major Adverse Impact". Overall, the LVIA concludes that the proposed turbine will have a "Moderate Adverse Impact" upon the visual amenity of the landscape. It defines "Moderate Adverse Impact" as a noticeable deterioration, the proposal would be out of scale with the landscape or at odds with the local pattern and landform, it will leave an adverse impact on a landscape of recognised quality and intrude upon local receptors.

The LVIA does however raise points which mitigate the visual impact of the turbine and follow advice contained within the Renewable Energy SPG. It highlights that the proposed turbine is located down in a valley, away from the undeveloped skylines, is sited close to the existing farm complex and benefits from natural screening to the West from the wooded valley.

In addition to the consideration of the above submitted LVIA, your officer has visited the viewpoints provided and considered the submitted photomontages on site. Overall, your officer agrees with the above conclusions. The turbine would be clearly visible for prolonged periods along many key receptor areas. Its scale and visual prominence would introduce an incongruous moving structure into an otherwise natural, undeveloped landscape, intercepting key views along the Gwaun Valley.

Your officer agrees that the mitigating circumstances raised above, in relation to the siting of the turbine, remains consistent with part of the advice contained within the Renewable Energy SPG for the area (LCA 22, 26 and 27). However, it is also considered to conflict with the SPG in that it would be sited in a prominent location which would be visible from much of the

Item 6 - Report on Planning Applications

surrounding area and would sacrifice the overall integrity of the National Park landscape and its special qualities.

As a result, the proposal is considered to conflict with the thrust of both national and local planning policy and as such, is considered to be unacceptable on visual impact grounds.

It is noted that a previous pre-application response (PA/12/0108) highlighted that it may be possible to site a wind turbine at Penrallt Ddu Farm, however this was in relation to a smaller turbine, in a less visually prominent location in the field directly South of the proposed site, on lower ground. The proposal under this application is considered to be materially different in this respect. Furthermore, the proximity of the Southern field to the bridleway has since raised concerns in relation to public safety and so would require further assessment in this regard.

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, although at the time of writing the report, no response has been received. The Committee will be updated of the Environmental Health Department's response at the meeting.

In respect of the turbines proximity to the bridleway which runs through the farm complex, approximately one hundred and fifty eight metres away, the impact upon public safety requires consideration. The turbine is considered to be in accordance with British Horse Society (BHS) guidance in that it is sited greater than three times the tip height, from the bridleway. Due to existing screening from trees and hedgerow and farm buildings, the level of visibility from this route is considered to be low. It is concluded that the turbine is not likely to cause an unacceptable risk to horse riders or walkers along the bridleway. In addition, no other bridleways or Public Rights of Ways are affected in this respect.

With regard to shadow flicker, due to the distance of the turbine from neighbouring properties (greater than ten times the blade diameter), the proposal is not considered to cause an unacceptable impact in this regard.

The impact upon existing levels of biodiversity and the physical environment

An Ecological Appraisal has been submitted with the application. The report identifies that the proposed turbine is located on land of little or no ecological interest. However the surrounding hedgerows and neighbouring environmental designations were considered of interest in that they are likely to provide resources for reptiles, nesting birds and foraging/commuting/roosting bats as well as contributing to local habitat connectivity. Further bat survey work is recommended within the appraisal, although this has not been submitted with the application.

The Authority's Ecologist and NRW have been consulted and have both objected to the application on the grounds of lack of information, in respect of

Item 6 - Report on Planning Applications

requiring further bat activity surveys to fully assess the ecological impact of the proposal. As a result, the application in its current form is considered to conflict with LDP Policy 11 Protection of Biodiversity, as the Authority cannot confirm that no unacceptable detrimental impact upon the local biodiversity will be caused.

In addition to the above objection, NRW 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, prior to the commencement of development. A condition to this effect can be placed on the decision notice, should approval be given.

The impact upon the historic environment and archaeological interest of the site

An Historic Environment assessment, including the cultural heritage and archaeological interests of the local area has been submitted with the application. It concludes that the proposed turbine will not impact upon the historic environment due to the lack of identified sites of historical significance within the area. Dyfed Archaeology and CADW have been consulted, although at the time of writing this report, no response has been received from either organisation. The Committee will be updated of any received responses at the meeting.

The impact upon the integrity of surrounding trees and hedgerow

The turbine will not require the removal of any trees. Since submitting the application, the agent has confirmed that no new access tracks will be required on site. It is not clear whether the proposed cable route will intersect the existing hedgerow to the South East, however this can be clarified and controlled by a planning condition should approval be given, to ensure that minimal disruption is caused. The proposal is not considered to cause any detrimental impact upon surrounding trees and hedgerow.

The impact upon highway safety

The proposal utilises the existing access points and also proposes no new tracks. The Highways Authority has been consulted and recommends conditional approval. Should the application be approved, the condition would tie the developer to the submitted travel plan, which identifies the highway route to be used by delivery vehicles. As a result, the proposal is considered acceptable on highway safety grounds.

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 has 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

Item 6 - Report on Planning Applications

flying charts, this can be controlled via a planning condition should approval be given. The proposal is considered acceptable on air traffic grounds.

Other Material considerations

All other material planning considerations have been considered, including those raised by the public representations received. The economic benefits to the existing farm business are not considered to outweigh this Authority's statutory duty to conserve and enhance the National Park landscape.

The Authority has not received any credible evidence to suggest that turbines can interfere with media reception or cause a detrimental impact upon the tourist industry of an area and so these would not constitute valid reasons for refusal of the application.

All other material planning considerations have been addressed in the above report.

Conclusion

The proposed turbine, by virtue of its siting and scale, is considered to cause an unacceptable detrimental impact upon the existing landscape character of the National Park. Furthermore, the Authority has insufficient information in order to fully assess the proposal's impact upon the existing levels of biodiversity in the area. The proposal is therefore considered to conflict with the policies and supporting guidance of the LDP and as such, is recommended for refusal.

Recommendation

That the application be refused.




Reasons

1. The proposed turbine, by virtue of its scale and siting, would be clearly visible for prolonged periods at many key and sensitive receptor viewpoints and routes. Its scale and visual prominence would introduce an incongruous moving structure into an otherwise natural, undeveloped landscape, intercepting key views along the Gwaun Valley and from within the National Park. 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.


2. Insufficient information has been submitted in order for the Authority to properly assess the potential impacts upon the existing levels of biodiversity of the site and surrounding area and as such conflicts with policy 11 of the Pembrokeshire Coast National Park Local Development Plan.

Figure 1: Site Map Penrallt Ddu

Legend

-  Turbine
-  Boundary
-  Cable Route

18 APR 2013
NP 13 1 74

0 0.0350.07 0.14 Kilometers

 1:5,000

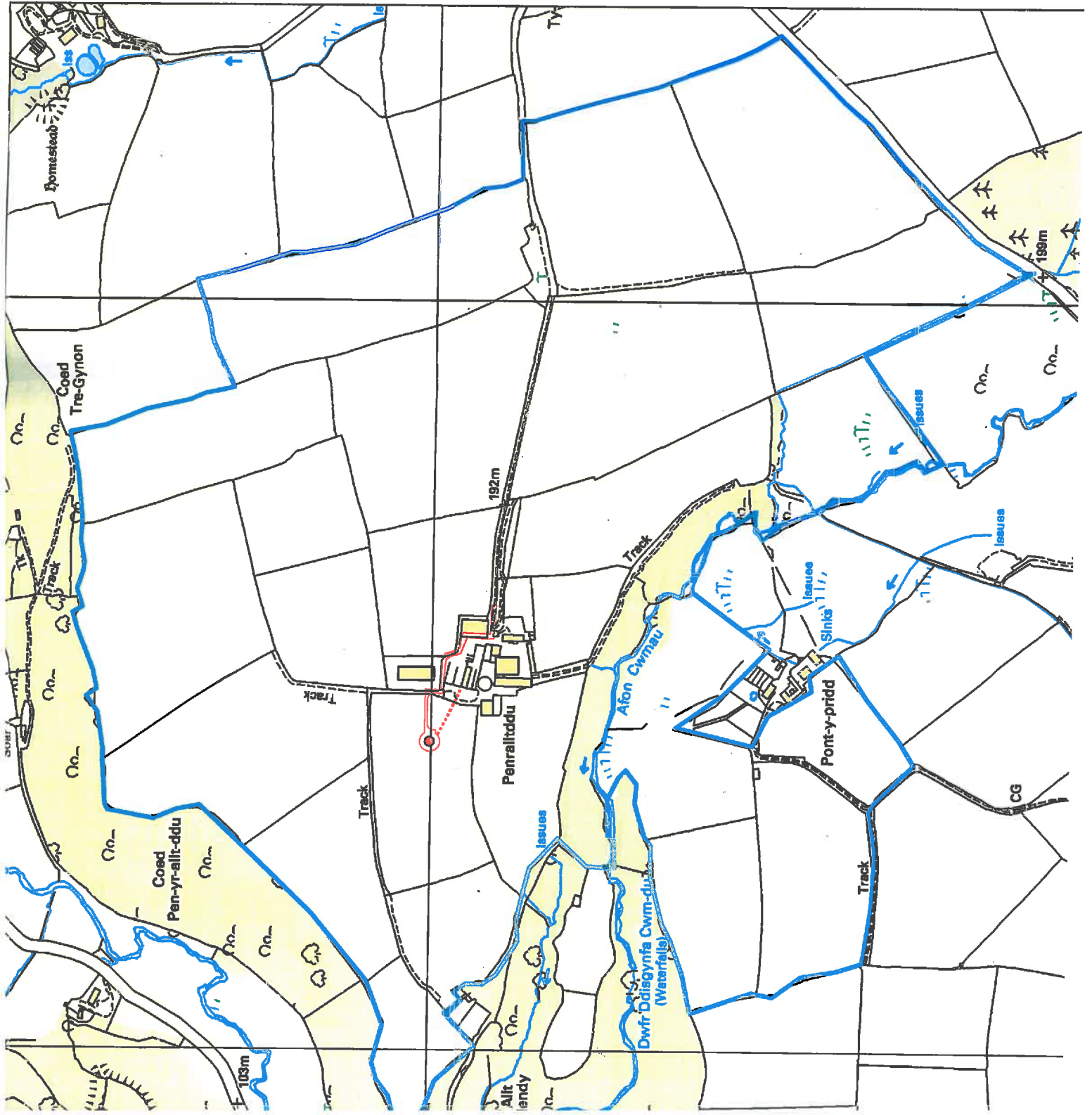


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Site Name: Penrallt Ddu
 Client: Mr Davies
 Site Reference: 08220
 Date: 08/04/2013
 Drawn by: Chris.McDonagh



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NOTES

TOTAL SITE AREA AMOUNTS TO 1171 SQUARE METRES

TURBINE BLADE TIP HEIGHT TO BE 25.05 METRES

TURBINE POSITIONING TO BE A 26.5 METRE CIRCLE TO ALLOW FOR MINOR REPOSITIONING DUE TO GROUND CONDITIONS, MICRO-SITING ALLOWANCES, ETC

CRANE PAD TO BE 14 X 7 METRES

PROPOSED ACCESS TRACK TO BE 3.5 METRES WIDE, WIDER AT CORNERS

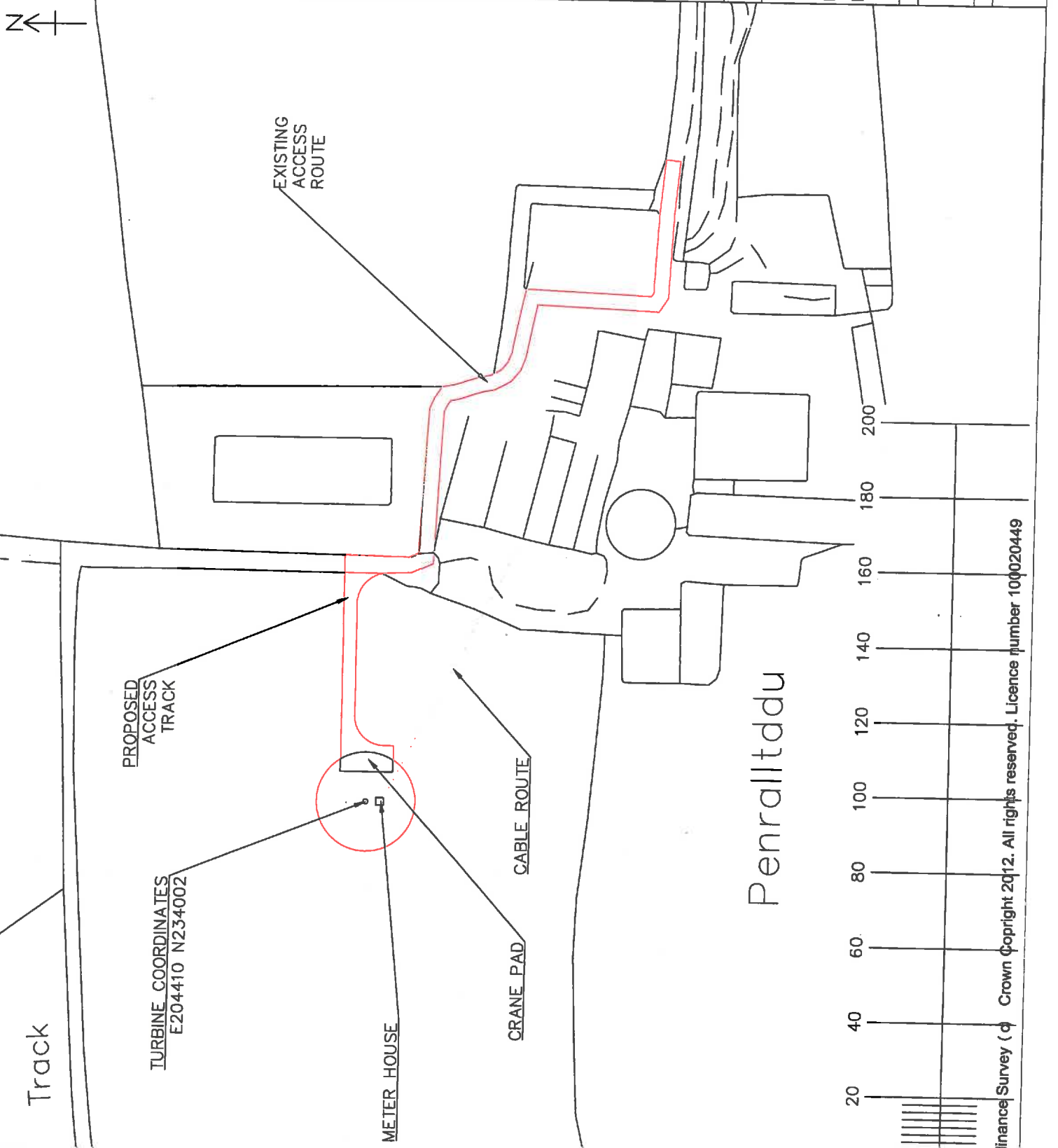
18 APR 2013



PROJECT

PROPOSED ERECTION OF ONE 25.05 metre TO TIP POLARIS WIND TURBINE for MR DAVIES at PENRALLTDDU, PONTFAEN, FISHGUARD, PEMBROKESHIRE, SA65 9TU

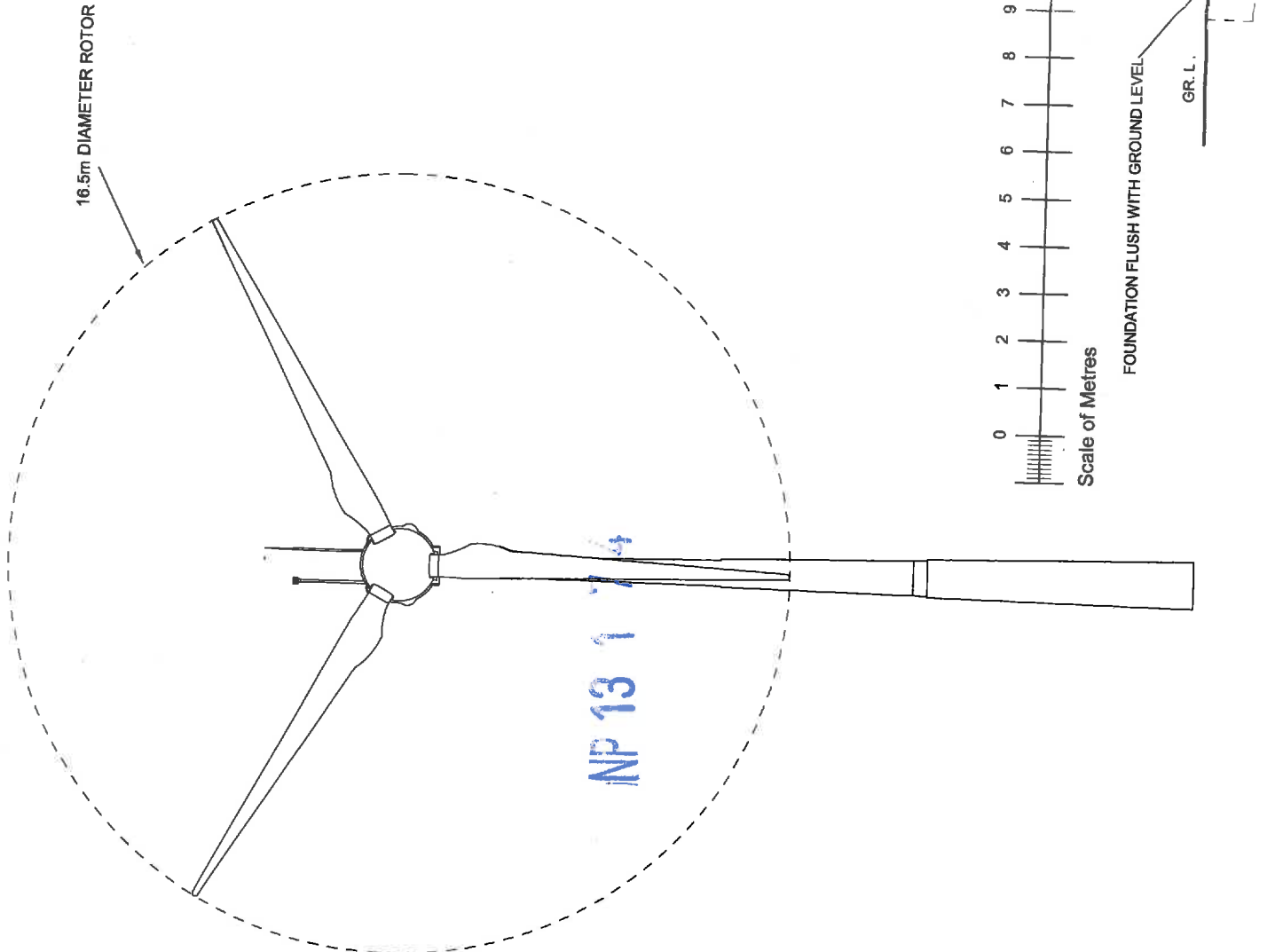
DRAWING NO.	REVISION
08220/02	
SCALE	DATE
1:1000	11/04/2013



P17/50i POLARIS TURBINE

Drawing No. P50/16

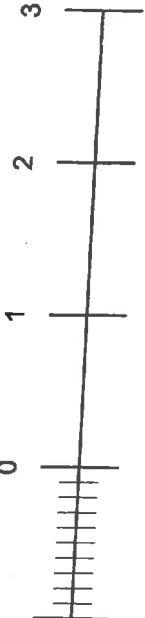
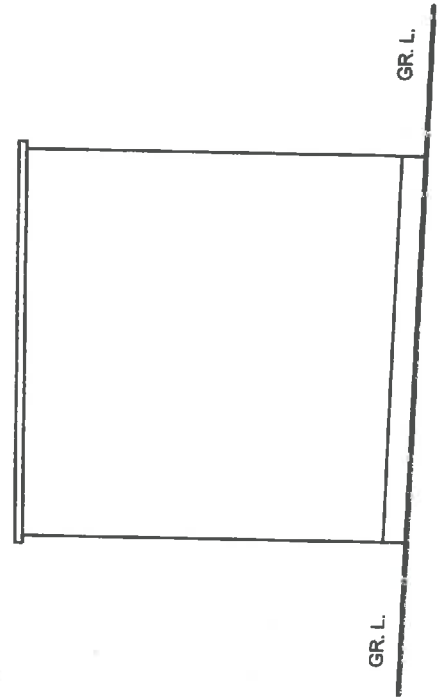
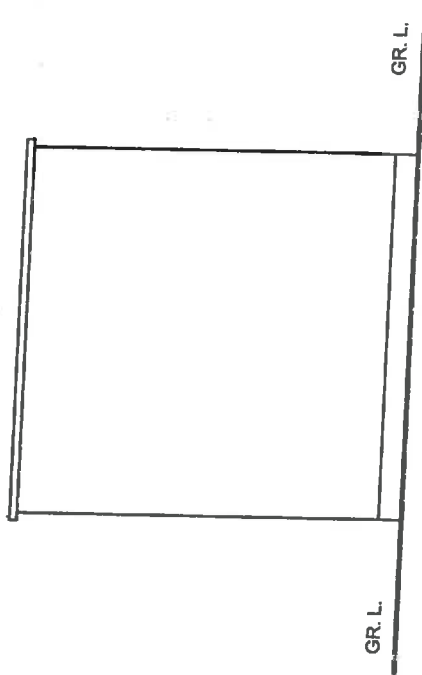
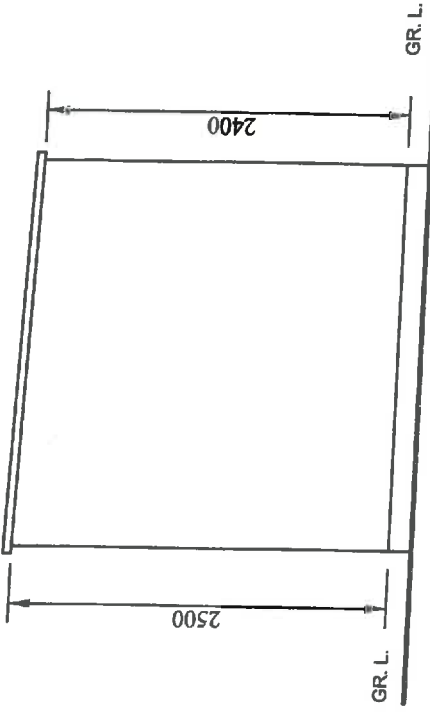
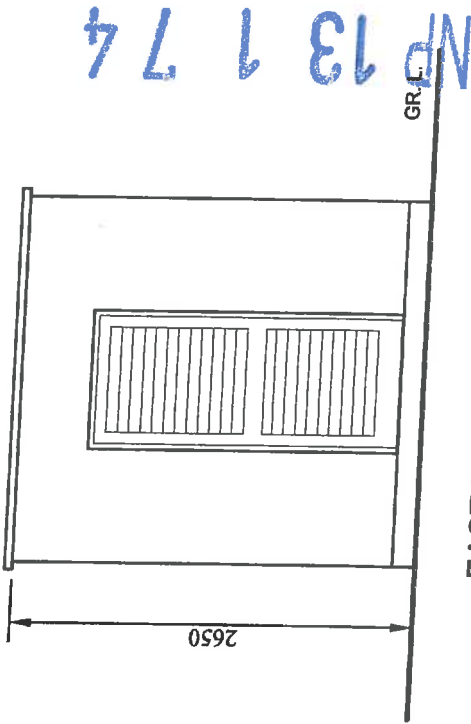
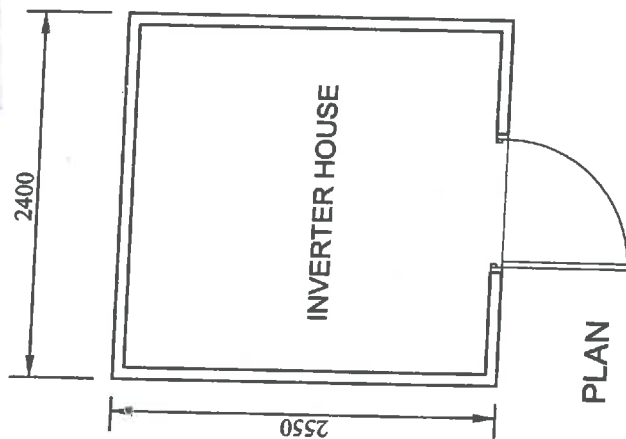
Scale :- 1:100



- BASE : 150mm C35 GRADE CONCRETE ON 1 LAYER VISQUEEN 1200 DPM ON MINIMUM 100mm BLINDED AND COMPACTED HARDCORE.
- WALLS : 100mm DENSE CONCRETE BLOCK WITH 19mm WET DASH RENDER
- ROOF : PROPRIETARY PROFILED METAL SHEETING (coloured green)
- DOOR : 900 x 2000mm METAL LOUVRED

PROPOSED INVERTER HOUSE

Scale :- 1:50



18 APR 2013