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Email: Joy.tetsill@shropshire.gov.uk
Your Ref:
Our Ref:

Date: 25th June 2008

Dear Mr Mullineux

Re: Application no; DCNW2008/1289/F Proposed erection and operation of 4 wind turbines and associated infrastructure, Reeves Hill near Knighton

Thank you for your consultation on this application, which has been considered by the Shropshire Hills AONB Partnership.

The Environmental Statement accompanying this application states that there would be a significant visual impact on parts of the Shropshire Hills AONB – specifically on the hill slopes around the villages of Stowe and Weston. The Landscape and Visual Assessment (LVA) defines a distance threshold of 4.5km from the proposed development site within the AONB, beyond which visual and landscape impacts are deemed not to be significant. However, the justification for this threshold is not explained. There may also be a significant impact on part of Offa's Dyke within the AONB as it runs along the top of Panpunton Hill, some 5.5km from the site. Unfortunately, the LVA does not include a viewpoint analysis from these closer parts of the AONB, even where the LVA itself identifies a significant impact to the AONB, and it is thus difficult to be clear about the actual impact of this proposal on the designated area.

The policy background to AONBs is as follows:

1. Section 85 of the Countryside and Rights of Way Act 2000 requires local authorities to "*have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty*".
2. Paragraph 21 of Planning Policy Statement 7 states that "*the conservation of the natural beauty of the landscape (in AONBs) ... should be given great weight....in development control decisions in these areas.*"
3. Policy CF4 of the Herefordshire UDP states that '*Development proposals for the production of renewable energy will be permitted providing that.....The objectives of the designation of nationally important sites and areas (such as Sites of Special Scientific Interest, National Nature Reserves, the Malvern Hills and Wye Valley AONB, Scheduled Ancient Monuments and other nationally important archaeological remains) will not be compromised and any significant adverse effects on the qualities of the area are clearly outweighed by the environmental, social and economic benefits;*

Other relevant guidance when considering this application is:

1. The government's good practice guide '*Environmental impact assessment: A guide to procedures (amended reprint 2001)*' states in section 4 of appendix 5 that '*Where significant adverse effects are identified, a description of the measures to be taken to avoid, reduce or remedy those effects, e.g.:*

a. site planning;

b. technical measures, e.g.: (i) process selection ;(ii) recycling; (iii) pollution control and treatment; (iv). containment (e.g., bounding of storage vessels).

c. aesthetic and ecological measures, e.g.: (i) mounding; (ii) design, colour, etc; (iii) landscaping; (iv) tree plantings ;(v) measures to preserve particular habitats or create alternative habitats; (vi) recording of archaeological sites; (vii) measures to safeguard historic buildings or sites.

...should be included.

2. Section 42 of the Planning and Compulsory Purchase Act 2004 states that:

'(3) The local planning authority may require that an application for planning permission must include -

(a) such particulars as they think necessary;

(b) such evidence in support of anything in or relating to the application as they think necessary.'

The Shropshire Hills AONB Partnership is concerned at the potential impact of this proposed development on the nationally protected landscape of the Shropshire Hills AONB but feels that there is insufficient information for a proper assessment. **Accordingly the Partnership objects to this planning application, pending provision of the following information:**

1. A viewpoint analysis of the proposal from viewpoints within the High Enclosed Plateau landscape type in the AONB, including from Stow Hill and Offa's Dyke at the top of Panpunton Hill. Any assessment should be carried out using the methodology set out in '*Guidelines for Landscape and Visual Impact Assessment second edition (The Landscape Institute and the Institute of Environmental Management and Assessment)*'. All photomontages should conform to the guidelines set out in Appendix 9 of these Guidelines with respect to film format, lens focal length and an accompanying explanation where this differs.
2. Justification for the 4.5 km threshold of significance within the AONB for visual and landscape impacts.
3. Where the effects on the AONB and on Offa's Dyke within the AONB are assessed as significant, then a description of proposed mitigation measures to avoid, reduce or remedy those effects should be submitted.
4. Information on the environmental, social and economic benefits of the proposal should be accurate in order to be weighed realistically against any impacts. Other objectors have raised queries about the estimates of electricity generated and of carbon emissions saved. These points should be addressed and revisions to the estimates or justification made if appropriate.

I suggest that such additional information is necessary for a proper determination of this planning application and if not provided, may provide a legitimate reason for refusal.

Please do not hesitate to contact me if you require clarification on any of these points (note that I work part-time Mon- Weds).

Yours sincerely

Joy Tetsill
Planning and Policy Officer