

PLANNING APPLICATION REPORT

Case Officer: Miss Kati Owen

Parish: Sparkwell

Application No: 49/0853/14/F

Agent/Applicant:

Peter Wonnacott
Drawfun Ltd
Rodds Bridge Farm
Lower Upton
Bude
Cornwall
EX23 0LS

Applicant:

Boringdon Golf Club
55 Plymbridge Road
Plymouth
PL7 4QG

Site Address: Proposed Wind Turbine at SX 5332 5789, Boringdon Park, Plympton, Plymouth

Development: Erection of a single wind turbine (estimated output of 500kw) with a 50m hub height, 77m tip height with associated infrastructure and formation of access track

Recommendation: REFUSE

Reasons for refusal (list not in full)

- Harm to historic interests
- Unacceptable landscape and visual impacts
- Dominate outlook of nearby residential properties
- Harm to neighbouring amenity – shadow flicker
- Absence of measures to secure acceptable access and delivery of component parts

Key issues for consideration:

Whether there are any adverse effects that outweigh the presumption in favour of sustainable development and the strong policy support for the production of renewable energy. In this case, the significant harm to historic interests and landscape character, visual impacts and harm to neighbours are considered to outweigh the benefits of the production of renewable energy.

Financial Implications (Potential New Homes Bonus for major applications): N/A

Site Description:

The site lies within South Hams countryside, close to the administrative boundary with Plymouth City Council, to the north east of Plymouth. The application site is on Boringdon Golf Course, approximately 400 metres to the north of the existing northern development line of Plympton. It is situated approximately 400 metres east of the

Plymbridge Road and the site is used as part of the golf course. The site lies on the northern slope of rising land, which reaches a peak approximately 120 metres to the south of the application site. The field within which the site is set is enclosed by mature hedgerows.

The landscape, with the exception of the golf course, is mainly agricultural, with wooded areas and wooded sloping flanks of the River Plym to the northern aspect. To the south, the residential development of Plympton lies a couple of fields away. Plympton is a densely populated area on the fringes of Plymouth.

The nearest residential properties, which lie within the Plymouth City Council administrative area, are Hilltops (approximately 420 metres west of the site of the turbine) and, those along the north east side of Plymtree Drive, northern side of Lynmouth Close and north side of Meadow Way (approximately 420 metres south of the site at closest). There are numerous other properties nearby within the suburban residential areas. Within the South Hams administrative boundary, the nearest residential properties are found along Larch Grove, approximately 680 metres north east of the site.

There are numerous nearby historic assets, comprising Scheduled Ancient Monuments, Listed Buildings, Registered Parks and Gardens and, Medieval and Post Medieval Archaeological Historical sites. The nearest and most notable are as follows:-

- Boringdon Arch, Grade II* Listed, approximately 500 metres to the west of the site;
- Boringdon Hall, Grade I Listed, approximately 580 metres east of the site;
- Pair of Grade II* Listed gate piers, approximately 550 metres north west of the site;
- Pair of Grade II* Listed gate piers, approximately 750 metres north west of the site;
- Plym Bridge, Grade II* Listed, approximately 1.2 kilometres north west of the site
- St Mary the Blessed Virgin Church, Grade II*, approximately 1.65 kilometres south of the site;
- Old Newnham, Grade I Listed, approximately 2 kilometres east of the site;
- Little Woodford Farmhouse, Grade II Listed, approximately 750 metres south of the site;
- Great Woodford Farmhouse, Grade II, approximately 1.2 kilometres south of the site; and
- Saltram House Park and Garden, Grade II* Listed, approximately 1.8 kilometres south west of the site.

The Proposal:

The application seeks full planning permission for the erection of a wind turbine, measuring 50 metres to hub height and 77 metres to blade tip. The blades would have a 27 metre radius and the proposed tower for the turbine would be steel clad.

The turbine would be situated approximately 420 metres east of Plymbridge Road and 135 metres north of an existing hedgebank, which delineates the administrative boundaries of South Hams District Council and Plymouth City Council. The site is approximately 320 metres north west of the highest point of the hill.

The turbine would be supported on a steel clad tower and sat on a 10 metres by 10 metres concrete base. A control cabinet would be sited approximately 7 metres south west of the turbine radius. This would measure 3 metres in length, 3 metres in width and 2 metres in height. It would be clad in a dark green polycarbonate material. The turbine would utilise the existing vehicular access and track to the north west and a temporary steel plate track would be laid for the construction of the turbine. Links to the control cabinet and grid connection would be underground. Construction traffic would access the site via the A38 to Marsh Mills, the B3416, Larkham Lane and Plymbridge Road.

The turbine would have an output of 500kW. Half of the electricity generated would be used for the Golf Course business and half would be exported to the national grid. The agent explains that this is anticipated to rise to 100% use associated with the Golf course business as it expands.

The application has been accompanied by an Environmental Appraisal Report, which assesses the following:-

- Construction and Environmental Management
- Shadow Flicker
- Electro-Magnetic Interference and Aviation
- Landscape and Visual Amenity
- Noise
- Ecology & Nature Conservation
- Archaeology & Cultural Heritage

The agent's Design and Access Statement sets out the public consultation undertaken prior to the submission of the application, as required under the Town and Country Planning (Development Management Procedure and Section 62A Applications)(England)(Amendment) Order 2013, which came into effect on 13 December 2013.

The agent states that the applicant undertook a "mail shot of affected residential properties within a 1 km radius, which included a location plan, information about the proposal and a feedback form". A copy of the information was also sent to Sparkwell Parish Council and Boringdon Hall Hotel. The applicant used a Royal Mail website that relies on data from the edited electoral role, which the agent states is not always fully up to date and explains how it does not include details of people who have requested not to be contacted for commercial or marketing purposes.

The agent also states that a notice was posted in the local press, published on 7 March 2014 and that the applicant has offered to post or email the “consultation leaflet” to any interested local resident.

The agent has submitted their summary of the feedback received from the Community Engagement. It consists of 15 responses; 7 against, 4 in favour and 4 neutral or requesting additional information.

Consultations:

- County Highways Authority
Objections

- SHDC Drainage Engineer
No objections

- SHDC Environmental Health Section
No objection subject to noise limit conditions.

- SHDC Wildlife Officer
No objection subject to condition requiring measures to enhance the wildlife value of adjacent hedgerows.

- SHDC Landscape Officer
Objections

- English Heritage
Objections

- Devon Gardens Trust (Historic Gardens Society)
Objection on the grounds of unacceptable visual competition with Boringdon Arch (Triumphal Arch) and resulting adverse effect on the setting of Saltram Park, a Grade II* Garden of Special Historic Interest.

- RSPB
No objection.

- Barn Owl Trust
No specific objection.

- Natural England
Offers standing advice only.

- Devon County Council Archaeology

Notes the sensitivity of the site in terms of archaeology, but raises no objections subject to conditions.

- MOD

No objection

- National Trust

The National Trust has objected to the proposed development as the harm to historic interests outweighs the environmental benefits of the generation of renewable energy.

- Plymouth City Council

Objects to the proposed development on the grounds of harm to historic interests, harm to landscape character, harm to visual amenity and harm to potential airport activity if re-opened.

- Town/Parish Council

Sparkwell Parish Council objects the proposed development on the grounds of its high visual impact from woodland to the north and housing to the south and west.

Nearby Parish Councils were also consulted-

Cornwood Parish Council: No objections

Shaugh Prior: No objections

Wembury Parish Council: No comments

Ermington Parish Council: Objection – harm to landscape and visual impact on Dartmoor National Park and surrounding Parishes, harm to heritage assets and impact on a National Trail (West Devon Way).

Yealmpton Parish Council : No comments

Brixton Parish Council: No comments

Representations

4 letters of objection have been received to the proposed development, on the following summarised reasons:-

- Excessive size;
- Prominent siting;
- Harm to landscape and environment;
- Visible on skyline;
- Dominate views from a number of local areas and public view points over a large area;
- Harm to historic interests, including the Triumphal Arch and Boringdon Hall;
- Impacts on residential amenity from noise;
- Proximity to residential dwellings;
- Overbearing impacts on local residential properties;
- Impacts on health;
- Harm to long distance footpath West Devon Way

- Disturbance to local residents during construction;
- Harm to wildlife;
- Danger to aircraft;
- Lack of public consultation prior to the application;
- No community benefit;
- Possible interference with TV/phone/radio signals; and
- Impact on property prices.

No letters of support have been received.

Relevant Planning History

49/1048/97/3 Creation of golf course with erection of club house and driving range - Approved Conditionally 24/9/97

49/2306/03/F Creation of 27 Hole Golf Course - Approved Conditionally 26/5/04

49/1307/06/F Construction of a green keeper's store/compound - Approved Conditionally 18/10/06

49/1886/13/SCROP Request for screening opinion for single 500 KW wind turbine at Boringdon Golf Course - Environment Statement under Environmental Impact Assessment not required

ANALYSIS

Principle of Development/Sustainability

NPPF

Paragraph 14 states that "At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means approving development proposals that accord with the development plan without delay; and

- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

Sustainable development has been made a core principle underpinning government planning guidance which is considered to be central to the economic, environmental and the social success of the country. These three principles are to be pursued in an integrated manner to provide for solutions and deliver multiple goals. The Framework considers that there need not be an inherent contradiction between achieving increased levels of development and protecting and enhancing the environment, provided that

development is planned and undertaken responsibly and the planning system is expected to take an active role in guiding development to sustainable solutions.

Core planning principles

Paragraph 17 sets out the core land-use planning principles which should underpin decision-taking which include

- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- support the transition to a low carbon future in a changing climate... and encourage the use of renewable resources (for example, by the development of renewable energy);
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations

Climate change & renewable energy

Section 10 of the NPPF relates to “Meeting the challenge of climate change, flooding and coastal change”.

Paragraph 93 states that “Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.”

Paragraph 97 states that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:

- have a positive strategy to promote energy from renewable and low carbon sources;
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;

- support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.

Paragraph 98 states that, when determining planning application local planning authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions

Other national guidance includes:-

- the Companion Guide to PPS22 – Renewable Energy; and
- PPS5 Historic Environment Practice Guide.
- the Department for Energy and Climate Change’s Overarching National Policy Statement for Energy (EN – 1) and National Policy Statement for Renewable Energy Infrastructure (EN – 3);
- Climate Change Act 2008
- English Heritage wind energy and the historic environment document
- The Devon Landscape and Renewable Energy Advice Note 2
- SHDC Interim Renewable Energy Guidance
- Secretary of State’s Ministerial Statement 6th June 2013

National Energy Policy contained within the National Policy Statement (NPS) EN-1 and EN3 have been subject to public consultation and Parliamentary scrutiny and published as national policy in respect of renewable energy infrastructure since July 2011.

Overarching National Policy Statement for Energy (EN-1):

The Overarching Energy Infrastructure Policy NPS-RN1 sets out the national need for the different types of energy infrastructure required over the next 10 – 15 years in respect of reducing emissions, with a government target is for around 30% of electricity to be generated from renewable sources. This will primarily be from wind generation (on-shore and off-shore) with smaller amounts of solar and ‘bio-energy.’ It also sets out five key principles which are:

- If the development contributes to meeting the need and is in accordance with the NPS, then consent should be given;
- Regard should be had to local impact reports (produced by local authorities) and other matters considered relevant and important;
- National, regional and local benefits (environmental, social and economic) should be taken into account;
- Adverse impacts should be considered within the context of longer term and cumulative impacts together with proposed mitigation; and;

- If the adverse impacts (after mitigation) outweigh the benefits, then consent should be refused.

If the development contributes to meeting the energy need and is in accordance with the NPS-EN1 then consent should be given. The Overarching Energy Policy NPS-EN1 must be read in conjunction with the technology specific NPS (in this case EN3), relevant to wind energy infrastructure development in England and Wales, and, is likely to be a material consideration in decision making on applications that are determined under the Town and Country Planning Act 1990 (as amended) or Section 36 of the Electricity Act (DECC applications). In the event of a conflict with existing planning policy, the NPS should be followed.

The proposed development would generate an installed capacity of 500kW of electricity.

The development would make a valuable contribution towards generation of renewable electricity and cutting greenhouse gas emissions. There is strong policy support for renewable energy development at national, regional and local level, where such development is appropriate.

The policies contained in the South Hams Local Development Framework seek to promote the development of renewable energy sources whilst conserving and enhancing the landscape, heritage assets, neighbour interests and wildlife interests.

The remainder of this report addresses the material considerations that have been taken into account by officers when considering whether or not the proposal is appropriate with regard to the particular characteristics of the site.

Landscape/Visual Impacts

The proposed development is situated within DCA 46 – Plymouth Northern Wooded Slopes, which is characterised by the wooded Plym Valley and surrounding pastoral farmland. It forms a distinctive feature to the setting of Plymouth, as well as contrasting with Dartmoor to the north-east. There are several key historic features such as listed buildings and scheduled ancient monuments, as well as prehistoric landscape features. The area has a high scenic quality as the setting to Dartmoor, and is extensively used for recreation and an escape from the city. Increased pressure for renewable energy development is a force for change in the area.

The landscape surrounding the proposal is highly sensitive, mainly owing to its proximity to Dartmoor, value as the setting to Plymouth and for recreation. It is felt that the proposed development, by way of its scale and conspicuousness, will fail to protect the setting of both Plymouth and Dartmoor, contrary to guidance within the Devon Landscape Character Assessment. In addition, the proposal will compromise the sense of isolation and remoteness by being a conspicuous vertical feature, especially when viewed from the valleys to the north. The presence of the wind turbine will lower the value of the area in terms of a setting to Plymouth and Dartmoor and as such, is unacceptable.

The Zone of Theoretic Visibility demonstrates how the proposed turbine would be theoretically visible over the majority of the 5 kilometre radius of search. Although this does not account for screening features, such as hedges and trees, it does demonstrate the widespread extent and potential visual impact of the turbine.

Owing to its large size (DPLG Advice Note 2 2013), the proposed development will be highly visible from the surrounding area and will affect several key sensitive receptors. These include: users of the West Devon Way / Plym Valley Trail; visitors to the prehistoric Boringdon Camp; residents of Plympton, Leigham and Estover; and visitors to Dartmoor.

There are very few similar vertical structures and no other wind turbines in the surrounding area; this means that the proposal will be conspicuous in its surroundings. It will interrupt the clear visual link between Plymouth City and Dartmoor and cause an unduly harmful visual impact.

Plymouth City Council has commented in relation to the contents of the environmental Appraisal Report, stating:-

“We disagree with the conclusion that users of the two golf courses are low sensitivity receptors. Whilst golf is a sport it is a relatively passive activity and the enjoyment of the environment is a key component of the attraction to the sport. The majority of golf courses are located in appealing places and these two courses are promoted for their scenic views (as per their website marketing). Therefore, we consider recreational users to be high sensitivity (as per section 7.30) and the magnitude of impact to be high (as per viewpoint 2). This results in a major effect on recreational amenity for golfers at Boringdon Park.”

In relation to landscape and visual impact, Plymouth City Council concludes:-

“This development will result in a number of impacts on landscape character and visual amenity. The site is in a prominent location on the edge of Plymouth and the landscape and heritage assets are both an important component of the urban fringe character and an important component of many peoples visual amenity. As identified in the ZTV this development will be visible from a large number of residential properties and public spaces in Plymouth. The development will substantially change the character of the landscape in which it sits and will impact the amenity of views from the City to the surrounding countryside. It is considered that the impacts on character and particularly visual amenity are potentially a valid reason to refuse this application.

The amount of impact (moderate, substantial or major) on residential and recreational amenity is high for what is a relatively minor development and it is

important that these impacts are given appropriate consideration in decision making.”

“We agree with the assessment of impacts on Landscape Character and note that the development will have a significant impact on the local landscape character area and moderate impacts on County and District level character areas.”

The proposed wind turbine would cause significant harm to landscape character and have unacceptable visual impacts and, for the reasons above, the proposed wind turbine would conflict with the aims of LDF Policies CS7, CS9, DP1 and DP2 and, the aims and objectives of the NPPF.

Historic Interests

The National Planning Policy Framework states a presumption in favour of sustainable development, but recognises that there is a need to balance any adverse impacts against the benefits. Within the 12 core planning principles, the NPPF states that planning should “conserve heritage assets in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.” Paragraph 126 states that “heritage assets are an irreplaceable resource....and conserve them in a manner appropriate to their significance”.

Due to the proximity of the proposed development to important historic assets, English Heritage was consulted on the application. It has commented as follows:-

English Heritage is the Government’s adviser on the historic environment. Central to our role is the advice we give to local planning authorities and government departments on development proposals affecting historic buildings, sites and areas, archaeology on land and underwater, designed landscapes and historic aspects of landscapes as a whole. The designations for which English Heritage has a statutory responsibility are: grade I and II listed buildings; scheduled monuments; registered parks and gardens; and registered battlefields.*

English Heritage welcomes the Government’s commitment to reduce carbon emissions. We support measures to reduce fuel consumption, increase energy efficiency and exploit renewable energy sources. Nevertheless, we also recognise that some renewable energy project proposals have the potential to cause serious damage to heritage assets which are themselves an integral part of the wider environmental and sustainability agenda. With this in mind English Heritage has drawn up guidelines for planners and developers, Wind Energy and the Historic Environment (October 2005), The Setting of Heritage Assets (2011) and Seeing History in the View (2011). These, our current, guidelines are designed to be used alongside other current standard methodologies associated with the development of such proposals.

On the basis of the information about the proposals, received by us on 11/4/14, I

offer the following advice.

Summary

English Heritage has concerns about the cumulative impact of terrestrial wind energy schemes on the historic landscape, particularly where applications are in a rural context and they replace church towers as the dominant man-made landscape feature. However, we recognise the vital role terrestrial wind farms play in meeting Government targets for the production of energy from renewable sources, and, as such, English Heritage is minded to support applications which do not directly impinge upon historic assets, but which may have a minor but reversible impact on the wider historic landscape. It is important to ensure applications for wind farm development are properly supported by an appropriate assessment (as outlined below) to allow a full consideration of the likely impact upon historic sites and landscapes.

*Under the NPPF it is a **core planning principle** to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** should be given to the asset's conservation. No other planning concern is given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, **any harm or loss should require clear and convincing justification** (para.132 NPPF). The onus is therefore on you to rigorously test the necessity of any harmful works.*

NPPF .128, requires 'an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.'

*The proposal would result in substantial harm to designated heritage assets and does **not** meet the requirements of NPPF. English Heritage **object** to the current proposals as submitted. We would advise that the application should be **refused**.*

English Heritage Advice

Whilst the supporting information is sufficient to confirm that the proposal would result in 'substantial harm' to designated heritage assets, it is not of a suitable quality to allow a full understanding of the extent of that harm.

The Archaeology and Cultural Heritage Section (Chapter 10 of the Planning

Statement), does not address indirect effects, setting. These are, inexplicably, covered in the LVIA (Chapter 7), rather than as a specific Cultural Heritage assessment. It is unclear whether the assessments failings are a result of non-specialist authorship or unfamiliarity with the current guidance. The result is a very basic treatment that fails to adequately consider assets adequately on many levels, be that designed views and vista from Registered Parks and Gardens to the need to consider a range of views affecting designated heritage assets, such as views across, to and from the asset.

A fundamental failure of the assessment is the almost complete failure to consider the significance of assets, the 'what matters and why' referred to in *The Setting of Heritage Assets* (English Heritage 2011). Without a full understanding of the significance of an asset it is not possible to understand the full contribution that setting makes to that significance.

The above notwithstanding, it is clear that, owing to the topography and elevation of the proposed location for the turbine, it will be highly visible.

The treatment of individual assets at 7.90 and 7.91 appears to rely solely on a very limited, and unsubstantiated, consideration of views with further unsubstantiated statements regarding impact. None of which are supported by assessment as recommended in *The Setting of Heritage Assets*, or by a consideration of 'what matters and why'.

At 7.91 it is claimed that 'beyond 2km, the turbine is likely to be no more than noticeable', this would tend to indicate a practical unfamiliarity with the visibility and potential visual dominance of wind turbines of this size.

We have concerns relating to the potential for harm to the settings of a number of designated heritage assets. These **include**;

Scheduled Monuments: Boringdon Park, Boringdon Camp, Newnham Park, barrow cemetery on Crownhill Down, Wasteberry Camp, Fort Efford, Plympton Castle, Plympton Priory.

Grade I Listed Buildings: Boringdon House, Saltram House and Plympton House.

Grade II* Listed Buildings: Boringdon Arch, Newnham

Grade II* Registered Park and Garden: Saltram House.

Our initial advice is that we believe the above assets are all likely to suffer damage to their setting to a greater or lesser extent that has not been adequately addressed by the assessment. Whether impacts are 'less than substantial' or 'substantial', is not entirely clear without adequate supporting information, however, it is clear that there will be at least 'less than substantial harm' to a number of high grade designated heritage assets.

We also note that the assessment supports our advice that the impact on the

Grade I Listed Boringdon Arch, both as a landscape feature in itself and on its relationship with the Grade II Registered Saltram will amount to ‘**substantial harm**’ and is, in itself reason to **reject** these proposals under NPPF 132.*

We would further note that the effects of passing views across other designated churches has not been adequately considered, as with passing views in general.

Recommendation

*The proposal would result in substantial harm to designated heritage assets and does **not** meet the requirements of NPPF. English Heritage **object** to the current proposals as submitted. We would advise that the application should be **refused**.*

Devon Gardens Trust has commented on the application, which is considered to impact upon Saltram Park, a historic designed landscape of national importance, which is included by English Heritage on the Register of Parks and Gardens of Special Historic Interest at Grade II*.

Saltram is an 18th century garden and parkland landscape developed from the mid 18th century with advice from Lord Grantham and landscape designer Nathaniel Richmond, who began working, in 1754, from Lancelot “Capability” Brown. The Trust has referred to the description of for Saltram House in the English Heritage Register, which stresses the importance of the Boringdon Arch in relation to Saltram. The Arch was built for Lord Boringdon in 1783 to a design by Robert Adam and both served as an “eye catcher” from Saltram House and, provided a sudden and dramatic view of Saltram when approached from the north, via a former drive from Boringdon House. The Trust has also corrected an error contained within Environmental Appraisal Report, which asserts that Saltram landscape addresses the House and the estuary. In actual fact, the Boringdon Arch was the focal point of the overall landscape design, linking the new seat at Saltram with the ancestral seat of the Parkers at Boringdon. The Trust further refers to the register description, which states how the ornamental walks laid out by Lord Boringdon and the new entrance drive, created by the First Earl of Morley in circa 1800 offer a series of extensive views northwards to the Triumphal Arch and beyond to Dartmoor.

The National Trust is not a statutory consultee, but has submitted comments as owner of Saltram House and who have a duty, under the National Trusts Act to promote the conservation of places of historic interest and natural beauty. The Trust highlight deficiencies within the Environmental Appraisal Report, such as the lack of assessment of significant views from the Amphitheatre (within the Saltram designed landscape on the bank of the estuary) and from the north side of Hardwick Plantation and Pomphlet Plantation. It also shares the concerns expressed by Devon Gardens Trust and considers that the applicant’s submitted assessment has downplayed the impacts on Saltram and failed to adequately assess the contribution of setting to historic assets. The Trust considers the application should be refused as it would result in substantial harm.

Plymouth City council has raised objection with regard to the proximity of the proposed turbine to the Boringdon Arch and its substantial effect.

The Local Planning Authority considers that the proposed development will have inevitable impacts upon the interplay between views from Saltram Park and the Boringdon Arch/Triumphal Arch due to the combination of its vertical form, moving components and scale and its proximity to the Arch and, considers these impacts to be significantly harmful. Although the supporting documentation asserts that views would be disrupted from existing vegetation, it wrongly assesses the impacts based on the incorrect fact that the landscape addresses Saltram House and the estuary. Furthermore, the vegetation would do little to prevent the many vistas from the designed landscape towards the Arch from being dominated by the proposed turbine, which would project above the skyline and unduly compete with the setting of the historic assets.

Devon County Council's Archaeologist has commented on the application. He notes that the location of the site is in a sensitive archaeological and historic area, referring to the proximity of the Scheduled Ancient Monument consisting of a Post Medieval Deer Park, Medieval Fishpond, an eighteenth century Grade II* Triumphal Arch (Boringdon Arch) and, a nineteenth century lead mine, ore works and smelt mill. He also refers to Grade I Listed Boringdon House and Boringdon Camp Hillfort Scheduled Ancient Monument and, to a possible pre-historic enclosure to the east of the proposed turbine. However, no objections to the proposed development have been raised, as it is considered that the below-ground archaeological impact of this scheme is limited. This is subject to archaeological mitigation in the form of 'archaeological monitoring and a recording' (an archaeological 'watching brief') being carried out for those parts of the access track and cable route which lie in areas not archaeologically monitored in 2007.

Therefore, subject to a condition securing the implementation of a programme of archaeological work in accordance with a written scheme of investigation, the proposed development is not considered to harm archaeological interests.

Notwithstanding the lack of harm to archaeological features, the proposed development would have a significantly harmful impact on historic assets and as such, the proposed development is considered to conflict with the aims and objectives of Local Development Framework Policies CS7, CS9, DP1 and DP6 and the NPPF.

Neighbour Amenity

Visual impact

The proposed turbine is situated on elevated ground to the north east of Plymouth/Plympton, west of Hemerdon and Sparkwell and south west of Lee Moor, Shaugh Prior and Bickleigh. A large majority of residential properties within the South Hams administrative area would be little affected by the turbine, due to separation distances. However, the properties along Larch Grove would be subject to the intrusion of a visually dominant feature, at odds with the rural character and appearance of the area.

The proposed turbine would project above the top of the hillside upon which it is situated and would appear as skyline development from a large number of public vantage points throughout Plympton and the north eastern edge of Plymouth. Whilst some of these views would be from more of a distance, due to the densely built up suburban area to the south of the site and, the topography of Plympton, a large number of properties would view the turbine projecting well above the skyline as a dominant and alien feature. This is also true of the properties along Larch Grove. The nearest property, Hilltops, would be most affected due to its proximity, but others on the north eastern edge of Plympton and those along Larch Grove would also be significantly affected by the introduction of such a dominant structure in an elevated and prominent position.

The views of the turbine projecting above the skyline would be far reaching and it would be seen from eastern areas of Plymouth, including along the Plym estuary, as well as the suburb of Plympton and South Hams fringes. The prevalence of skyline views contributes towards its perception of dominance.

The Environmental Appraisal Report has assessed the impacts on residential properties within 1 kilometre of the site. It accepts that the impacts on Hilltops and "front row" properties along Plymtree Drive and Cranfield would amount to significant and that the turbine would be perceived from at least some of these properties as overbearing. It also accepts that the impacts on the properties along Larch Grove would also be significant.

Plymouth City Council considers that the Environmental Appraisal Report downplays the impacts on residential areas on the Plymouth urban fringe (Leigham, Mainstone etc.), stating how, due to the local topography these areas, looking out east to north-east in the direction of the development site. Currently the principal view is a rural and open landscape (as described in the Boringdon Ridge and Downland LLCA) that would be subject to a substantial change in character from the introduction of the turbine. Given the high sensitivity of these receptors this results in a substantial effect on residential amenity.

The Local Planning Authority considers that the impacts on nearby residential properties in terms of outlook is unacceptable and, that the wind turbine would cause significant deterioration in their level of amenity enjoyed. As such, the proposed development is considered to conflict with the aims and objectives of Local Development Framework Policy DP3 and the NPPF.

Noise

A number of the letters of objection submitted raise concern about the impacts on residential amenity from the noise produced by the turbine. The Council's Environmental Health Service has raised no objection to the proposed turbine, being satisfied that the predicted noise levels at the nearest noise sensitive properties are within the limits recommended by ETSU-R-97 The Assessment and Rating of Noise

from Wind Farms (the current government guidance recognised by the Planning Inspectorate) which states that :-

“for single wind turbines or wind farms with very large separation distances between the turbines and the nearest properties a simplified noise condition may be suitable. We are of the opinion that, if the noise is limited to an $L_{A90, 10 \text{ min}}$ of 35dB(A) up to wind speeds of 10m/s at 10m height, then this condition alone would offer sufficient protection of amenity, and background noise surveys would be unnecessary. We feel that, even in sheltered areas when the wind speed exceeds 10m/s on the wind farm site, some additional background noise will be generated which will increase background levels at the property....The Noise Working Group recommends that both day- and night-time lower fixed limits can be increased to 45dB(A) and that consideration should be given to increasing the permissible margin above background where the occupier of the property has some financial involvement in the wind farm.”

Nevertheless, in order to ensure that nearby residential occupiers are not disturbed by the proposed development, noise conditions are recommended to be attached to any planning permission. These conditions would prevent noise from exceeding 35dB(A) $L_{A90, 10 \text{ min}}$ during wind speeds of up to 10 metres per second when measured at the curtilage of neighbouring properties (except Boringdon Golf Club). And would prevent noise from exceeding 45dB(A) $L_{A90, 10 \text{ min}}$ during wind speeds of up to 10 metres per second when measured at the curtilage of Boringdon Golf Club.

With the appropriate conditions, the Council is satisfied that the residential amenity of properties close to the site would be protected with regards to noise impacts.

Shadow Flicker

The Environmental Appraisal Report includes assessment of shadow flicker on nearby residential properties. There is one property within the zone of potential effects, Hilltops, which is situated to the west of the site and immediately west of Plymbridge Road, and could potentially be affected by shadow flicker. Although the extent of this impact depends on brightness of conditions/sunshine, wind direction, existing vegetation and time of year, there are occasions when the occupants of this property could be subjected to shadow flicker. This would have potentially significant impacts on their amenity. For this reason, the proposed development is considered to conflict with the aims and objectives of Local Development Framework Policy DP3 and the NPPF.

Other

Other concerns expressed by neighbours include the impacts on television/radio and phone reception, disturbance during construction and impacts on health.

The Environmental Appraisal Report sets out how consultation has been undertaken with Ofcom and mobile telephone operators, who have not raised any concerns in relation to the proposed turbine. The disturbance occurring during construction is not a

reason to refuse the application and, other than the above issues there would be no impacts on public health.

Wildlife

The Council's Wildlife Officer has assessed the proposed development. He has referred to the Ecology chapter of the Environmental Appraisal reports on findings from an Extended Phase 1 Habitat Survey and desk study which included searches with the DBRC and Devon Bats Group.

As part of a golf course, the site is characterised by improved grassland and areas of rough grassland (both of limited botanical interest), bunkers and water features. Surrounding hedgerows vary in quality including defunct, flailed, or containing mature trees.

With reference to the peregrine nests some 830m to the west of the proposed turbine location, this accords with suggested guidance maintaining a buffer zone of 4-800 metres given in *'Mapped and written guidance in relation to birds and onshore wind energy development in England'*, RSPB Research Report No 35. With regards to Natural England Guidance Note TIN069, it is reasonable to concur with the findings of the applicant's ecologist, in that there is insufficient evidence of risk to birds to justify further detailed bird surveys based upon records and site characteristics.

The turbine is sited some 135m from the nearest hedgerow, which exceeds the recommended 50m separation between wind turbine blade tip and hedgerow feature (as per Natural England Guidance Note TIN051). Given the exposed nature of the site, limited local records, absence of nearby roosting potential and limited commuting features it is reasonable to consider that the siting of the turbine will minimise any risk to the majority of bat species. With regards to high-risk species, the nearest Noctule record is some 1.3km to the south-west of the site. The level of records of high-risk bat species locally considered with the site exposure and characteristics do not suggest that the site is likely to be of importance to foraging or commuting noctules, and accordingly further bat activity surveys are considered unnecessary. It is considered reasonable to accept the applicant's ecologist's conclusions that the siting of the turbine ensure that the risk of death to any bat species has been minimised to a very low level, and would not be considered deliberate (with regards to the Habitats Regulations, 2010).

Mitigation is detailed within the report with regards to supervision during construction, and the method of cutting vegetation to minimise potential disturbance to small mammals and reptiles.

No enhancements to the surrounding landscape/habitat features have been included within the submission. There is scope for improving the wildlife value of the surrounding area, both by relaxing flailing regimes of the surrounding hedgerows, 'gapping up' with native hedgerow species and planting of native trees adjacent to gaps in the stone walls (as noted in 9.105 of the Ecology chapter of the Environmental Appraisal). Given that the Ecology chapter acknowledges that there might be some limited residual impact on wildlife, I would consider such measures to compensate/enhance the wildlife of the wider site to be necessary and reasonable. I note also, the RSPB comment to this

effect. Seeking enhancements is an approach in accordance with the NPPF, NERC Act and the SHDC LDF.

Highways/Access

The Highway Authority notes that the delivery roads and access are within Plymouth City Council's jurisdiction. However, following a site visit, the Authority notes that the access onto the site is quite narrow and off a fairly narrow road and, that works are likely to be required to facilitate access for the large deliveries, such as access widening, access surfacing and drainage works to prevent water and mud from entering the public highway.

A largest vehicle swept path analysis and details of widening, surfacing and drainage would overcome this current lack of information.

A standard Construction Management Plan condition would normally be added to overcome some of the Authority's concerns. However, given that a large number of works would be required on land outside the administrative boundary of South Hams, it is not possible to attach a condition to overcome the objections/lack of information.

As such, the Local Planning Authority is including a holding reason for refusal, due to the absence of measures, such as a s106 agreement, to secure an acceptable access to the site for delivery of component parts of the turbine.

Therefore, the proposed development is considered contrary to the aims of LDF Policy DP7 and guidance contained in the NPPF.

Other Matters:

Plymouth City Council has also objected to the application on the grounds of the unacceptable impact upon Plymouth City Airport. It states:-

“Plymouth City Airport ceased to operate in December 2011. Nevertheless, the future of the site has not yet been determined and there remains a possibility that the airport could reopen. Plymouth City Council aims to ensure that the development of a wind turbine at Boringdon would not obstruct flights to and from a reopened Plymouth City Airport. The City Council would therefore urge South Hams District Council to investigate this issue and to be satisfied that a wind turbine in this location would not prevent the reopening of Plymouth City Airport in the future.

In the event that South Hams District Council is not satisfied on this point, the City Council would urge that the application is refused on the basis of Policies CS27 and CS34 of the adopted Plymouth Core Strategy.”

The above and other matters raised within letters of objection, relating to danger to aircraft, lack of public consultation prior to the application, no community benefit and, impact on property prices are considered as follows.

The Environmental Appraisal Report contains an assessment of the impacts on the proposed turbine on aviation. It states that the site is within the former Airfield Safeguarding Zone (Civilian) of Plymouth City Airport. It refers to the Aviation Impact Assessment undertaken by Wind Farm Aviation Consultants Ltd which concludes that there would be no interference with the airport, based on the Physical Safeguarding criteria that would have previously been in place at the airport.

There is a statutory duty on the applicant, as required under the Town and Country Planning (Development Management Procedure and Section 62A Applications)(England)(Amendment) Order 2013, which came into effect on 13 December 2013, to undertake public consultation prior to the submission of the application. The Local Planning Authority is satisfied that this was undertaken to an extent that complies with the recent legislation.

The fact that there is no direct benefit to the community from the proposed turbine would not be reason to refuse the application and the impact on property prices is not a material planning consideration.

Conclusion

The proposed development for renewable energy is well supported in principle within national and local planning guidance/policies and, it is generally accepted that the UK falls short of achieving renewable energy target. However, in terms of coming to a decision on this planning application, this support has to be balanced against the impact that such a development will have in terms of landscape, historic interests, visual amenity, residential amenity and wildlife. Although the proposal would not have an adverse impact in terms of noise or protected species and wildlife (subject to planning condition), the turbine would have other significantly harmful impacts.

The proposed turbine would, due to its large scale and prominent siting, result in significant harm to the local landscape character, failing to conserve the landscape setting of Plymouth or Dartmoor National Park and, compromising the sense of isolation and remoteness when viewed from the valleys to the north. Furthermore, the proposed development would have an unacceptable visual impact, particularly on sensitive visual receptors, including the West Devon Way/Plym Valley Trail, local golf courses and local vantage points.

The proposed development would have a significantly harmful impact on local historic assets and their settings.

With regards to the potential impacts on residential amenity, notwithstanding the absence of material harm resulting from noise, the Local Planning Authority considers that there would be significant harm to local residential amenity from the overbearing and dominating impact the turbine's assertive presence would have in terms of outlook and potential significant harm to Hilltops from shadow flicker.

The proposed development has not demonstrated that an acceptable access to the site for delivery of component parts of the turbine can be achieved without further highway works.

Therefore, the proposed development is recommended for refusal.

This application has been considered in accordance with Section 38 of the Planning & Compulsory Purchase Act 2004 and, with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Planning Policy

South Hams LDF Core Strategy

CS1 Location of Development
CS7 Design
CS9 Landscape and Historic Environment
CS10 Nature Conservation
CS11 Climate Change

Development Policies DPD

DP1 High Quality Design
DP2 Landscape Character
DP3 Residential Amenity
DP4 Sustainable Construction
DP5 Conservation and Wildlife
DP6 Historic Environment
DP7 Transport Access and Parking
DP15 Development in the Countryside

National Planning Policy Guidance

Planning Practice Guidance

National Policy Statements EN-1 and EN-3

Considerations under Human Rights Act 1998 and Equalities Act 2010

The provisions of the Human Rights Act 1998 and Equalities Act 2010 have been taken into account in reaching the recommendation contained in this report.

The above report has been checked and the plan numbers are correct in M3 and the officers report. As Senior Officer I hereby clear this report and the decision can now be issued.

Name and signature:

Date:

KO telephoned Councillor Blackler, out of courtesy, to inform of proposed 4 reasons for refusal. As no letters of support, application is officer delegated, but Councillor Blacker agreed with KO's reasons for refu