



Date: Tuesday, 24 June 2014

Time: 2.00 pm

Venue: Shrewsbury/Oswestry Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

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SOUTH PLANNING COMMITTEE

- 8. Criddon Hall Farm, Criddon, Upton Cressett, Bridgnorth, WV16 6JJ**

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<u>Committee and date</u>
South Planning Committee
24 June 2014

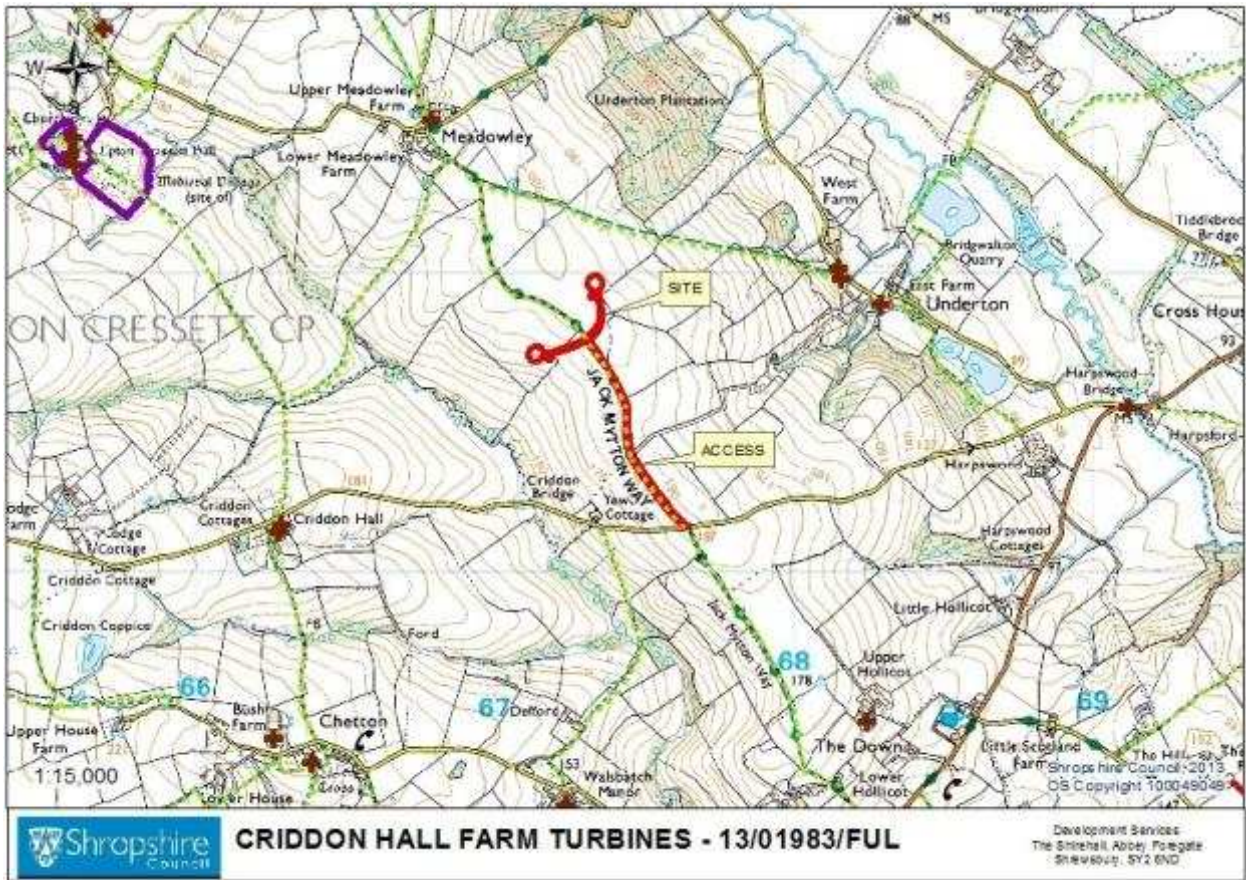
<u>Item</u>
8
Public

Development Management Report

Responsible Officer: Tim Rogers
 email: tim.rogers@shropshire.gov.uk Tel: 01743 258773 Fax: 01743 252619

Summary of Application

<u>Application Number:</u> 13/01983/FUL	<u>Parish:</u> Morville
<u>Proposal:</u> Erection of 2 no. wind turbines up to a height of 80.0m to tip and associated infrastructure including new access tracks, one control building, (amended to 77m tip height)	
<u>Site Address:</u> Criddon Hall Farm, Criddon, Upton Cressett, Bridgnorth, WV16 6UJ	
<u>Applicant:</u> Sharenergy	
<u>Case Officer:</u> Grahame French	<u>email:</u> planningdmse@shropshire.gov.uk



Recommendation:- Refuse Permission for the following reason:

The scale and location of the proposed turbine would have an unacceptably adverse effect on the character and scenic quality of the local landscape, on the setting of local heritage assets including Upton Cressett Hall and also on local amenities and leisure and tourism interests, including equestrian use of the Jack Mytton Way. This would be contrary to the objectives of Core Strategy Policies CS5, CS6, CS13, CS16, CS17 and sections 28 and 109 of the National Planning Policy Framework.

1.0 THE PROPOSAL

- 1.1 It is proposed to construct and operate two wind turbines together with associated infrastructure including foundations, transformer and crane hard-standing areas; and new on-site access tracks. Each turbine would have a generating capacity of between approximately 0.5 and 1.0 MW, resulting in a total capacity of up to 1.5 MW.
- 1.2 The proposals as originally submitted specified a height of 80m for each turbine but the applicant has recently reduced this to 77m in order to address an objection by the MOD. Other associated infrastructure would include foundations, transformer/switchgear building, crane hard standing areas, new access tracks and underground cabling. The planning application site area is 50 ha but the finished operational site would consist of approximately 0,7 ha, leaving the remaining land undisturbed.
- 1.3 The finish and colour of the wind turbines is likely to be semi-matt and pale grey and the wind turbines will be of a variable speed type, so that the wind turbine rotor speed will vary according to the energy available in the wind. The wind turbines will have a rotational speed of between approximately 8 and 20 revolutions per minute (dependent on variations in wind speed). The sections of new access track that will be built will be constructed using type 1 material. Any excavated material will be spread alongside the tracks and re-graded to the existing ground levels and reseeded to minimise the visual impact.
- 1.4 The turbine delivery vehicles will constitute abnormal loads during delivery to the site turbine components would most likely be delivered by and transported to site via the M54 at junction 4 continuing on to the A464, A442, A458, B4364 and the minor road to the site. Approximately 24 abnormal load trips would be required, associated with wind turbine component delivery towards the end of the 30 approximate week construction period. During the approximate 30 week construction period vehicular access to site would also be required for:
- Low loaders and other heavy goods vehicles to deliver equipment and plant;
 - 20-tonne lorries, to deliver/move material and stone for access tracks;
 - Flat-bed lorries to deliver control building components;
 - Extendable semi-low and platform trailers to deliver turbine components (requiring private or police escort);
 - Cranes delivered as mobile units and on low-loaders;
 - Deliveries of fuel and water by tanker; and
 - Construction personnel, by private car, light vehicles or minibus.

- 1.5 Up to 15 workers would be on site at any one time during the construction phase. The operational site would generate occasional routine maintenance visits by a small four wheel drive vehicle. There may be an occasional need for an HGV / road-going crane or similar to access the site for heavier maintenance and repairs.
- 1.6 An existing track leads to the proposed access point from the public highway. The junction with the minor road may need to be suitably surfaced. An estimated 400 m of onsite access tracks would also be required to provide access within the site. These would be constructed of stone chippings on geotextile to a width of up to 5m. The edges of the tracks would be allowed to re-vegetate following construction. The track layout has also been designed to complement existing agricultural activities onsite.
- 1.7 There are two public rights of way which run through the planning application red line site boundary. The proposed wind turbines are located well outside of either the oversail or 'fall over' distances from these public rights of way. The 'Jack Mytton Way' does follow the existing access track that would be used to access the site of the proposed turbines for the temporary construction period. Any disruption to users of this right of way would therefore be temporary. The construction compound would be used for storage and parking of vehicles to prevent obstruction of the right of way. The Applicant is also proposing to offer an alternative of additional permissive route running through the north west part of the site, located approximately further 50-75m further away from the proposed turbines.
- 1.8 The development is a community led scheme (the 'Crida Community Wind Project') which the applicant advises has been jointly developed with Sustainable Bridgnorth, a local voluntary environmental organisation. It is stated that the local community has been involved in all stages of the environmental assessments, and will continue to work with the Applicant throughout the planning and post-planning stages of the Development.

2. SITE LOCATION / DESCRIPTION

- 2.1 The site lies approximately 1.6 km south east of Upton Cressett and 3.5km west of Bridgnorth. The turbines would be sited on a ridgeline c.350m apart at an elevation of approximately 180 and 195 m AOD. The Application Site and surrounding area mainly comprises agricultural land interspersed with areas of woodland. A road approximately 650 m to the south of the proposed turbine locations would serve the development via an existing access and new access tracks. The B4364 is approximately 1.6 km to the east, and the A458 Bridgnorth by-pass is located approximately 3,5km to the east. The layout of the Development is shown in Drawing 002 accompanying the planning application.
- 2.2 The easternmost of the 77m turbines would sit on the top of a ridge which stands 110m above the level of land at the Mor Valley to the immediate east. The western turbine would be 310m south west and 20m lower on the south-east facing slope of the minor valley which leads to Upton Cressett.

3. REASON FOR COMMITTEE

- 3.1 The Parish Council has objected to the proposal, and following consultation with the Development Manager the application is referred to the committee for determination.

4. CONSULTEE RESPONSES

- 4.1 Morville Parish Council – Objection.

- 4.2 Neenton Parish Council (nearby parish council): Objection. I write to you as Chairman of Neenton Parish Meeting in connection with various proposals for industrial-sized wind turbines in neighbouring parishes, including those that are the subject of the following planning applications:

- Upton Cressett (13/01983/FUL)
- The Down (13/02194/FUL)
- Upper House Farm, Chetton (13/0253/SCR)
- Middleton Priors (13/03126/FUL)
- Upton Park Farm, Upton Cressett (13/0319/SCR)

Our Parish Meeting discussed these proposals at its meeting on 27th August. There was real concern and a unanimous view that such developments would be highly prejudicial to both quality of life and the economy of the local area of which Neenton is a part. In particular, the siting of these turbines in prominent positions on high ground would destroy the unspoiled character of the local landscape, ruining its appeal both for local people as well as for tourists looking to this part of Shropshire as a place of escape from the modern built environment. Such turbines sited on local hills as proposed would not only deter the many visitors who approach the area from the east by blighting the landscape in front of the Shropshire Hills AONB, they would blight the AONB itself. The AONB was designated in part in recognition of the outstanding panoramic views from places such as Brown Clee Hill, the highest point in Shropshire. The proposed turbines would sit in the middle of the view north-east across the midland plain, obscuring it and destroying its appeal and thus seriously diminishing the qualities of the AONB. Neenton is presently engaged on an ambitious project to regenerate the village and our surrounding area and the ability to attract visitors and tourists is critical to the success of that endeavour. We urge you in the strongest possible terms to reject these proposals, and any others of a similar ilk that may appear, because of the damage even one of them would do to the character and quality of the landscape that the Shropshire Core Strategy recognises to be Shropshire's greatest asset.

- 4.3 English Heritage: Objection:

- i. Setting makes an important contribution to the significance of the group of designated heritage assets at Upton Cressett. The proposed development is within that setting and would cause harm to the significance of the historic environment. English Heritage Advice Two turbines are proposed, south east of Meadowley, sited on locally high ground, one at about at 180metres and the other at about the 195 metre contour. They would be about 350 metres apart and 80 metres tall. The proposed location of the turbines is about 1.6 km to the east, and within the

setting of a group of highly designated heritage assets clustered together in a manorial complex at Upton Cressett. They are: Upton Cressett Hall (Grade I listed); Upton Cressett Gatehouse (Grade I listed); the former St Michael's Church, Upton Cressett (Grade I listed); and the Moated Site and Fishponds, Upton Cressett (Scheduled Monument). Two further sites are detached from this group, namely a Roman Wayside Settlement (a Scheduled Monument about 650 metres to the west of Upton Cressett Hall), and St Giles' Church, Chetton (Listed II* located about 1.5 km to the south west of the nearest turbine). Each of the assets at Upton Cressett has particular significance, but because they are also closely interrelated this adds to the overall significance of the manorial complex as a whole.

- ii. Significance of Upton Cressett: The Romanesque chancel arch of St Michael's Church indicates Anglo-Norman origins for the medieval manorial complex. The adjacent moated site was probably constructed in the high Middle Ages on a gentle hillside offering wide views to the south-east, and is likely to be partly contemporary with the adjacent medieval village site. The original manor house was replaced with the present half-timbered house in the mid C15. The house was encased in brick, and a detached brick gatehouse added in 1580. The complex includes remarkable historic fabric spanning the period C12-C16. Upton Cressett has a strong association with the Cressett family, significant members of the Tudor and Stuart Royal Court, involved in numerous national events. The manor was associated with a deer park, although its exact extent has not been defined within the present landscape. From available evidence, however, it is most likely that the proposed location of the turbines is not within the former park. The complex is, in our view, designed to take advantage of views to the south and east. These views remain essentially rural without significant C19 and C20 influence. This setting is important to the significance of Upton Cressett as it contributes to a strong sense of remoteness and tranquility which enhances the quality of design and composition. The spiritual value of St Michael's and St Giles' Churches is enhanced by this sense of remoteness.
- iii. Impact on significance: The turbines would introduce new, large, industrial elements into the setting that would result in harm being caused to the significance of the Upton Cressett manorial complex because of their contrasting scale, appearance and movement that would diminish from the experience of this unusual and sensitive historic environment complex.
- iv. Planning and legislative context: English Heritage's assessment of the proposal rests on the Planning (Listed Buildings and Conservation Areas) Act 1990; the Government's planning policies as set out in the National Planning Policy Framework, the Development Plan and relevant guidance. NPPF policies 6,7,8,9 and 17 outline that heritage assets should be conserved in a manner appropriate to their significance, and that proposals that do not conserve are not sustainable development unless outweighed by another competing objective, and, avoidance of conflict between competing objectives has been sought. In terms of the NPPF the tests of paragraph 17, 131, 132, and 133 and 134 are also relevant in terms of the impact upon setting.
- v. Recommendation: Having considered those tests in overall terms, we consider that the significance of the Upton Cressett assets would be harmed by the proposed

development within their setting. We assess the harm as being at the upper end of scale of less than substantial harm. In this case we place emphasis on Section 66 (1) of the LBA 1990, which requires the SoS to have. 'special regard to the desirability of preserving the building or its setting.' This accords with the NPPF requirement for conservation of the Upton Cressett assets to be afforded 'great weight'. Any harm should have a clear and convincing justification and in our view public benefit will not outweigh the harm that would be caused. We recommend that the application should therefore be refused. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

- 4.4i. Natural England - No objection. – no conditions requested. This application is in close proximity to Devil's Hole Morville and Thatcher's Wood and Westwood Covert Sites of Special Scientific interest (SSSIs). Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which these sites have been notified. We therefore advise your authority that these SSSIs do not represent a constraint in determining this application. This is because Devil's Hole Morville SSSI is a geological SSSI and will not be directly affected by the proposal. Thatcher's Wood and Westwood Covert is approximately 3 kilometres from the development site and is notified for its woodland features which are not likely to be affected by the construction and operation of the proposed turbines. Should the details of this application change, Natural England draws your attention to Section 28(I) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.
- ii. Landscape: This application is approximately 6 kilometres from the Shropshire Hills Area of Outstanding Natural Beauty (AONB). Natural England has no comments to make on this proposal as we do not believe that this development is likely to adversely affect the purpose of the Shropshire Hills AONB designation. All proposals however should complement and where possible enhance local distinctiveness and be guided by your Authority's landscape character assessment where available, and the policies protecting landscape character in your local plan or development framework. Given the location of the development, your Authority should seek the view of the AONB Partnership prior to determining this planning application, as they may have more detailed comments to make on the location, nature or design of this development. These two proposed wind turbines up to 80m height may be visible from elevated parts of the heritage land at Burwarton, notably Brown Clee Hill. Due to the distance from the estate of approximately 9km I consider that the proposed turbines would not have a significant adverse impact on the outstanding interest of the land at Burwarton.
- iii. Other advice: We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:
- local sites (biodiversity and geodiversity)
 - local landscape character
 - local or national biodiversity priority habitats and species.
- Natural England does not hold locally specific information relating to the above.

These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at Wildlife and Countryside link.

If the LPA is aware of, or representations from other parties highlight the possible presence of further protected or Biodiversity Action Plan (BAP) species on the site, the authority should request survey information from the applicant before determining the application. The Government has provided advice¹ on BAP and protected species and their consideration in the planning system.

- iv. Biodiversity enhancements: This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. It is noted that a survey for European Protected Species has been undertaken in support of this proposal. Natural England does not object to the proposed development. On the basis of the information available to us, our advice is that the proposed development would be unlikely to affect bats.

- 4.5i. National Trust – Objection. The National Trust is a charity founded in 1895 to promote the permanent preservation of places of historic interest and natural beauty for the benefit of the nation. Although independent of the government we have been given the unique ability to declare our property inalienable, meaning that it cannot be sold and that it will be protected for ever, for everyone. The Trust believes strongly in the need to reduce our energy consumption where possible, grow renewable energy generation and wean ourselves off fossil fuels. We have a target to generate 50 per cent of our own energy from renewables by 2020 and are trying to show how this can be done without putting at risk our beautiful natural and built heritage. We believe that there is a place for wind in a mix of renewable technologies which we must pursue to help us meet the country's low carbon energy and energy security needs. But each wind proposal should be located, designed and on a scale that avoids compromising the special qualities of its locality. Several historic properties within the Trust's protective ownership are close enough to the proposed turbines that they might be affected: Morville Hall, a grade I listed building; Dudmaston, a grade II* listed building set in a grade II registered historic park and garden; and Wilderhope Manor, a grade I listed building set within the Shropshire Hills AONB.

- ii. In addition, we own and care for countryside along Wenlock Edge, also within the Shropshire Hills AONB. We have carefully assessed the proposed turbines in relation to their impacts on property in our protective ownership and more generally considered their implications for the Shropshire Hills AONB. The ZTV shows that the turbines would not be visible from Morville Hall at ground level and would not affect views of the hall. We have independently confirmed this and checked whether the turbines would be visible from the upper floors of the hall. They would not. While the ZTV shows theoretical visibility from Dudmaston, the direction of view and extent of tree cover at Dudmaston mean that the impact of the turbines would be negligible. We do not consider that they would be harmful to the significance of the heritage assets at Dudmaston or to their visual amenity. The ZTV also shows that the turbines would not be visible from or in views of Wilderhope so again there would be no impact. While the ZTV shows some degree of theoretical visibility from the AONB, this would be at such a distance and so mitigated by intervening tree and hedge cover that we do not consider that they would harm the natural beauty of the AONB.
- iii. The National Trust's core purpose is to protect and care for the special places in its ownership and therefore does not object to the proposed turbines. However we are aware of other factors that the council will need to take into account when reaching a decision. We would particularly like to draw your attention to two features of the area that may be affected by the development. The first is the group heritage assets at Upton Cressett. This includes three grade I listed buildings and three scheduled ancient monuments. The ZTV and viewpoint 9 indicate that both turbines would be clearly visible from Upton Cressett. We suggest that advice is obtained from your conservation officer and English Heritage on whether the proposed development would harm the significance of the heritage assets. Full weight should be given to any harm that is identified, in accordance with the National Planning Policy Framework and the statutory duty under s66 the Planning Listed Buildings and Conservation Areas Act 1990 to give special regard to the desirability of preserving the setting of listed buildings. I have attached a recent High Court judgment regarding the weight to be given to heritage considerations. Secondly, the proposed turbines are proposed very close to the Jack Mytton Way, a very popular recreational route used by tourists and local people for walking, cycling and horse riding. Impacts of the proposed turbines on the public enjoyment of this route should also be given serious consideration.
- 4.6 Ministry of Defence – No objection. The application is for 2 turbines at 77 metres to blade tip. This has been assessed using the grid reference below as submitted in the planning application or in the developers' pro-forma. Turbines should be fitted with 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point. The principal safeguarding concern of the MOD with respect to the development of wind turbines relates to their potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control and Air Defence radar installations. Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of the progression of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests. If planning permission is granted we would like to be advised of the following:

- the date construction starts and ends;
- the maximum height of construction equipment;
- the latitude and longitude of every turbine.

This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area. If the application is altered in any way we must be consulted again as even the slightest change could unacceptably affect us.

- 4.7 Historic Houses Association: As you may know, the HHA represents 1,550 historic houses (including Upton Cressett Hall) and gardens in the UK, welcoming 13 million visitors a year, with owners dedicated to the stewardship of these places for future generations. Our locus here is to seek to ensure, alongside other heritage organisations, that the safeguards contained in Planning policy and guidance, including the National Planning Policy Framework (NPPF), for the proper recognition of the special circumstances and the major contribution of heritage to the success of the country, in economic, cultural and social terms, are observed in the handling of individual planning applications affecting significant heritage assets. Given this Planning policy and guidance, in particular in relation to Grade 1 buildings of national importance, the HHA believes there are a number of issues that need addressing in relation to this application at Criddon, Upton Cressett (13/01983/FUL) for the erection of two 80m wind turbines adjacent to Upton Cressett Hall and Gatehouse. These issues are detailed below. However, in summary, the HHA's considered view is that approval for the turbines would be inconsistent not only with the Department for Communities and Local Government's planning guidance on the historic environment, but also the protection for the settings of historic sites provided in the Government's National Planning Policy Framework. We recommend permission for the turbines to be refused on the grounds that the application fails to comply with planning law relating to landscape and heritage sites. You will no doubt be aware of the recent decision, in the case of Lyveden New Bield in Northamptonshire, to refuse permission for wind turbines on the basis that approval would contravene the protection which should exist for the setting of a Grade 1 historic site, as a consequence of current planning guidance on the historic environment and the relevant section of the National Planning Policy Framework. We believe that the case against approval is every bit as strong in regard to this application. Supporting evidence for the HHA's recommendation to refuse permission

1) Section 17 of the NPPF sets out the general requirement 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'. The proposed wind turbines should not, therefore, be allowed to undermine the owners' capacity to conserve the significant asset which Upton Cressett Hall represents. These heritage assets of national significance at Upton Cressett include an award-winning Grade 1 historic house and Gatehouse that is one of the better known heritage tourism sites in Shropshire, as well as being one of the few privately owned historic houses in the county open regularly to the public (since the 1970s). The property and gardens are also used as a community venue for local festivals, including hosting Shakespeare plays in the grounds. The Gatehouse (also Grade 1) also offers holiday heritage accommodation (nationally shortlisted at the Hudson's Heritage Awards) whose appeal would be seriously affected by the presence of 80m industrial turbines just 1600 metres away. Off-season, the Gatehouse

operates as a residential literary retreat for writers looking to work in the peace of remote and ancient countryside.

2) Section 126 of the NPPF states 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'. If, as seems almost certain from Jeremy Musson's independent 'Heritage Report', which we have seen, the turbines would affect the viability of Upton Cressett's offer to visitors, either as a consequence of visual or noise pollution, this could seriously damage the viability of Upton Cressett Hall's business operation and thereby its conservation. We understand the proximity of the turbines to the Gatehouse (just 1600 metres) units could have a particularly damaging effect on the Hall's heritage holiday letting business, not to mention appeal to walkers and riders visiting the site from the nearby Jack Mytton Way tourist trail.

3) Section 128 of the NPPF identifies the need to take the settings of listed buildings into account: 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting'. Historic setting is critically important for the safeguarding of heritage assets. This is certainly the case at Upton Cressett where there are unique Grade 1 'group assets' very close together, which comprise Upton Cressett Hall, Gatehouse and the Norman church of St Michael. We understand that the church (adjacent to the Hall) has been awarded a brown tourist sign by Shropshire Council and was recently selected by the Churches Conservation trust as only one of four Anglo-Saxon or Norman churches in the UK to be featured in a book entitled 'Beautiful Churches Saved by The Churches Conservation Trust', with a foreword by HRH Prince of Wales. We understand that it was also recently voted as one of the top 20 country churches to visit – mainly because of its ancient setting in unspoilt countryside against the backdrop of the Hall - in the UK by the members of the CCT. In addition there are three Scheduled Ancient Monuments at the site (medieval moat and fish-ponds; Roman settlement and Deserted Medieval Village); all are surrounded by remote and ancient countryside. Jeremy Musson has considered that the impact of the proposed turbines on the 'historic setting' of Upton Cressett is likely to be very harmful.

- 4.8 British Horse Society: I am writing on behalf of Telford and Wrekin horse riders, and tourist horse riders to this area, to oppose this forthcoming application which seriously threatens horse and rider security along the national flagship trail known as the Jack Mytton Way and an adjacent local bridleway leading to West Farm. At initial local consultations, Sharenergy, the joint proposers, falsely claimed that the proposed location was in line with British Horse Society recommendations; it is not. BHS safety recommendations are that a separation distance of four times the overall height should be the target for National Trails and Ride UK routes. The Jack Mytton Way is such a trail, and is therefore likely to be used by tourist equestrians unfamiliar with turbines and who are strangers to the locality. We understand that Sharenergy are proposing turbines with a height from the ground to the tip of blade of approximately 80m which would require a minimum distance of 320 metres from the JMW to meet BHS safety guidance and not the 150 - 180 metres as in the current plan. A wind mast (anemometer), of approximately 40 metres in height, has however already been erected, at a distance of only 150 metres from the JMW trail.

This mast aims, we understand, to measure wind force and frequency in preparation for the forthcoming planning application. Horses are instinctively animals of flight, and research and policy development carried out by the BHS, refers to dangers to horseriders from the following wind turbine hazards (Mark Weston BHS 2008):

- moving blade shadows;
- blades starting to turn;
- noise levels (indicative levels should be detailed);
- ice falling off blades (mechanisms to stop turbines automatically when iced are required and distance of ice scatter trajectory when blades are restarted);
- structural failures (as recently occurred near Shrewsbury);
- HGV impact on trails during construction and maintenance;

Riding south-east along the JMW will particularly expose riders to dangerous flickering sunlight in the early to mid-morning from this proposed location, as well as to the other hazards listed above. Frightened horses can lead riders to lose control, be unseated & cause serious falls, sometimes raising complex liability issues. The JMW is Shropshire's flagship long distance bridleway and it would be a tragedy to make it dangerous for tourists & locals to ride along it, when a serious or even fatal accident could result. One BHS survey of riding near wind turbines recorded:

- 100 incidents of distressed &/or bolting horses
- at least 5 riders falling
- 3 riders required hospitalisation
- 66% of respondents said they would not take their horses on holiday where turbines were
- present as they constitute an unnecessary risk

Since it does not seem possible to re-site these proposed turbines to a safe distance from the two bridleways, due to the constraints of the site (on a hillside and in the fork between two adjoining bridleways), we therefore recommend most strongly that this planning application be refused.

- 4.9 Bridgnorth & District Tourism Association: – Objection. As Chairman of the Bridgnorth and District Tourist Association, and on our members' behalf, I am gravely concerned with this application for two 80m turbines at Upton Cressett. I am led to understand your predecessor Dyanne Humphries did say she was inviting our organisation to be a "consultee" on the proposals so I am now writing to you in that capacity. The Bridgnorth and District Tourist Association voluntarily, with a great deal of time on behalf of our members — ranging from quality bed & breakfast owners like myself to the Severn Valley Railway — actively promotes the rural natural beauty and tranquillity of this part of Shropshire. As you will be aware the Shropshire Core plan has specific policies in place designed to promote tourism (including equestrian and heritage tourism) as well as providing "high quality accommodation" for over 11 million visitors who come to Shropshire every year, In the Council's own Local Development Framework for Shropshire, the countryside is described as the county's "greatest asset". Policy 6.37 The rural and tranquil nature of Shropshire's countryside is also a key component of Shropshire's attractiveness as a visitor destination and significantly adds to the quality of life for residents. It is therefore vital that all tourism, cultural and leisure facilities, particularly in rural areas, are compatible with their location so that Shropshire's unique character and tranquillity is retained. This tranquil and unspoilt countryside around Bridgnorth, Morville and Much Wenlock is inherent to the attraction of the area for visitors and

subsequently for the whole Shropshire Visitor economy. The Bridgnorth Area Tourism Strategy from data prepared by Shropshire Council Research and Development Team put a value to this visitor economy in the Bridgnorth area alone of £92m in 2011, supporting 2979 jobs out of a total of 15,200. Although technically outside the AONB, the area around Bridgnorth Hills is particularly attractive to visitors with tourist attractions including the Severn Valley Railway, the Dower House Gardens at Morville Hall, Upton Cressett Hall and the Norman Church of St. Michael. Upton Cressett was the winner of the 2011 Hudson's Heritage Award for "Best Hidden Gem" as a heritage tourism site in the entire UK. The Norman church was voted one of the Top 20 churches in the UK by the Churches Conservation Trust. Recent similar large turbine proposals in the area have already been refused by your Planning Committee for the harm they would do to the local countryside and landscape. As chairman of the Bridgnorth area's local tourism body, I recommend this planning proposal is not recommended for approval due to the significant and detrimental impact on unspoilt landscape and local heritage. Our members are also aware of low flying military aircraft and helicopters flying above the Bridgnorth Hills. The Corvedale is an extensive helicopter training area from RAF Shawbury to a beacon near Ludlow. Whatever the MOD might say, these proposals must pose an inherent risk of collision with such a huge height of turbine. We also concur with Mrs Sarah Bury's objection on behalf of the Shropshire CPRE. The environmental damage and the effect on tourism will be irrevocable. The recently released "Shropshire Hills & Ludlow Visitor Survey Report" commissioned by the Shropshire Hills Destination Development Partnership dated October 2013, states that 92% of visitors said that "Landscape/scenery" is what appeals most about the area, followed by 52% saying "peace and tranquillity". When asked for words associated with the Shropshire Hills, 91% said "High Quality and unspoilt countryside", So the landscape of South Shropshire is a very important driver, if not the most important for tourism businesses. In the applications at the Hills at the Down and at Sydnall Farm, both of which were recently refused, the planning committee had the advantage of a site visit prior to the meeting to judge for themselves what environmental considerations there may be. We would urge that members of the committee should certainly have a similar opportunity to see what a significant impact there would also be with this application for large wind turbines upon the unspoilt landscape and countryside around Upton Cressett, Morville and nearby.

- 4.10 Campaign to Protect Rural England: CPRE campaigns to protect the landscape of Rural England, whilst accepting the need to provide energy from sustainable sources. The government through its NPPF directed Planning Authorities to give priority to Alternative Energy Projects. However a more recent letter to Local Authorities from Eric Pickles, Secretary of State for Communities and Local Government (June 6th) does redress the balance to direct Planning Authorities to take due account of the Environment and the concerns of Local Communities. "We need to ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment". "Meeting our energy goals should not be used to justify the wrong development in the wrong location!". "The need for renewable energy does not automatically override environmental protections and planning concerns of local communities." "Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views

important to the setting”.

I would like to apply these quotes from the Minister’s letter to this application:

The site of these turbines and other nearby proposals which may be in the pipeline are on the lower slopes of the Brown Clee; a landmark at the easterly approach to the Shropshire Hills. The Brown Clee along with the Titterstone Clee are part of the Shropshire Hills referred to by Houseman as ‘Those Blue Remembered Hills.’ They also form a major part of the Shropshire Hills AONB and these sites are only excluded from the AONB by a few contour lines on the OS map. Were these slopes to be littered with Turbines the views which tourists from all over the world enjoy would be devastated. Mr Pickles refers to heritage assets; the site is within 2 kilometers of 22 heritage sites and within half a kilometre of a grade 1 listed building, Upton Cresset Hall. Wildlife habitats include an Area of Ancient Woodland, 500 m north of the proposed site and a county wildlife site, Lye Woods which is an area of ancient and semi-natural woodland. Details of the Ecological report have already been forwarded to the Council but these are two sites which are important in the landscape. The site is up a very narrow lane and construction of the concrete aprons and access routes would involve the destruction of hedges and completely change the character of the lanes. The turbines would be visible from a large surrounding area. When approaching Shropshire from the West Midland conurbations the Clee Hills stand up from a great distance. Their wildness and sparse settlements create a contrast for those who work in the urban areas. The wind Turbines would be on the Jack Mytton Way (an important trans Shropshire bridleway) and in an area much visited by tourists.

I have been careful to confine my response to the landscape aspects of this application but I would like to reiterate the view held by Shropshire CPRE that the Shropshire Hills are not a suitable site for large Turbines. Even in areas outside the AONB they affect the views and character of the AONB, a designation which I know Shropshire Council have always valued and which has guided many of their planning policies. Whilst small scale businesses which provide employment for the local economy have been encouraged in the market towns and in some rural sites, notably conversion of redundant farm buildings they have always recognised the overriding need to protect the countryside from unsuitable and unsightly development. In Mr Pickles’ words: “Meeting energy goals should not be used to justify the wrong development in the wrong location”.

Following the Foot and Mouth outbreak of 2001, it became very apparent that Tourism was one of the most important industries in rural Shropshire. More people were employed in tourism than in agriculture. This tourism depends on the attraction and amenities of our countryside. The Clee Hills are not only beautiful, they are also rich in cultural association, heritage and archaeology from the Iron Age Fort of Nordy Bank to the many historic houses and gardens which are open to the public. To disfigure our hills with Wind Turbines would deter visitors, who so value the peace and tranquillity of these hills. Consultation with the local communities via Parish Council open meetings has produced a resounding rejection of this application and I hope that due account will be taken of the wishes of these communities.

To conclude, when the Turbines in this application were first considered, and an anemometer was erected, Government policy was to favour Alternative Energy sources even when they threatened the Environment. I believe that public opinion and the response to this by MPs has shifted the balance to the one outlined in Mr Pickles’ letter so that the need for renewable energy does not automatically

override environmental protections. For this reason, and for the sake of our beautiful county, I urge councillors to reject this application and give a lead which will deter other applications in the South Shropshire Hills.

Internal Comments:

4.11 SC Historic Environment: Objection:

- i. Direct Impacts upon Heritage Assets: There are no known heritage assets with archaeological interest on, or within the immediate vicinity of, the proposed development site. The proposed development site is located on a prominent ridge on either side of the Jack Mytton Way, which at this location follows an ancient ridgeway route. There is currently no evidence to suggest that this locale was settled in the medieval period, and given its position on a watershed and the apparent focus of Roman settlement c. 2.5km to the north-west, it is unlikely that it attracted significant activity in the prehistoric or Roman periods. As a consequence, the archaeological potential for unknown archaeological remains to be present on the proposed development site is deemed to be low. It should be noted, however, that this potential remains untested at present and that the proposed development would involve soil striping to create new access tracks and infrastructure. It is therefore recommend that if planning permission were to be granted for the proposed development that a programme of archaeological work, to comprise an archaeological watching brief during the groundworks, should be made a condition of any consent. An appropriate condition would be: -

Suggested condition in the event that the application is approved contrary to this objection:

No development approved by this permission shall commence until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation (WSI). This written scheme shall be approved in writing by the Local Planning Authority prior to the commencement of works.

Reason: The site is known to hold archaeological interest.

- ii. Indirect Impacts upon Heritage Assets: The proposed development would fall within the setting of the cluster of high grade designated heritage assets focussed at Upton Cressett, comprising Upton Cressett Hall (Grade I listed - NHLE1 ref. 1190045), Upton Cressett Hall gatehouse (Grade I listed – NHLE ref. 1053757), St Michaels Church, Upton Cressett (Grade I – NHLE ref. 1367566), moated site and fishponds, Upton Cressett (Scheduled Monument – NHLE ref. 1013512.) and deserted medieval settlement, Upton Cressett (Scheduled Monument – NHLE ref. 1409739). We consider that the proposed development would cause harm to the significance of these heritage assets as a consequence of development within their setting and we agree with English Heritage’s assessment, stated in their consultation response of 15 May 2014, that the degree of harm would be “...at the upper end of scale of less than substantial harm.”. Having considered the tests contained within Section 12 of the NPPF (see section 2 below), and having also had regard in particular to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and to English Heritage’s advice, we are of the opinion that the benefits of the proposed development would not outweigh the harm it would cause to the significance of of the non-designated heritage assets of Upton

Lodge Farm (HER PRN 29293). In our opinion the proposed development would again cause a similar degree of harm to its significance. We consider that a slightly lower degree of harm would also be caused to the significance of Upper Meadowley farmhouse (Grade II listed – NHLE ref. 1188886) and Criddon Hall (Grade II listed – NHLE ref. 1188132) as a result of the impact on their settings. Taking account of the above considerations, we therefore recommend that the application be refused.

- iii. **Methodology:** The applicant submitted an Archaeology and Cultural Heritage Assessment Report by SLR with their application. As a consequence of our initial assessment of the application we requested additional information in our consultation response of 8 July 2013. English Heritage also requested additional information in their initial consultation response of 30 July 2013. A meeting between the applicant, the Local Planning Authority and English Heritage was held on 11 September 2013 to clarify the scope of these requests and the applicant has subsequently submitted an Archaeology and Cultural Heritage Supplementary Statement, again by SLR. We consider that through the submission of these documents the applicant has now satisfied requirements of Paragraph 128 of the NPPF. We have also considered the representations made by objectors to the proposed development, and in particular the detail information submitted on behalf of the Stop Bridgnorth Windfarm group and Mr William Cash by The Landscape Partnership. With regard to the potential direct impact of the proposal, we additionally have used the information available on the Shropshire Historic Environment Record (HER) and professional judgement to make an assessment of the archaeological potential of the proposed development site itself. Based upon the policies and guidance outlined in Section 2.2 above and our professional judgement, we have used the following methodology in order to evaluate the Heritage Impact Assessment and make our own assessment of the impact of the proposals on the significance of heritage assets, as required by NPPF Paragraphs 129 & 131 and English Heritage's Guidance on The Setting of Heritage Assets (2011). For each potential impact (either direct or indirect):
- The significance of the heritage asset affected.
 - The contribution to that significance made by their setting.
 - Assess the effects of development on significance (and appreciation of significance)
 - Explore mitigation
 - Document decision
- vi. **Cumulative Impact:** We are aware that a number of applications for other turbines in the area around the proposals have recently been refused and for which planning appeals are pending. As a result, the issue of cumulative impact for these turbines has not been considered as part of this consultation response.
- v. **Direct Impacts:** We agree with SLR's assessment of the archaeological potential of the proposed development site, as set out in section 6.2 of the Archaeology and Cultural Heritage Assessment Report, as being low. The construction of the access track, turbine base and associated cabling would, however, have a moderate – high impact on any archaeological features or deposits which are present. Given this, and relation to Paragraph 141 of the NPPF, we recommend that a programme of archaeological work, to comprise an archaeological watching during the

groundworks, be made a condition of any planning permission for the development (see recommended condition in 1.1 above).

vi. Indirect Impacts:

a) Upton Cressett:

Upton Cressett Hall Listed Building – Grade I NHLE ref. 1190045

Upton Cressett Hall gatehouse Listed Building – Grade I NHLE ref. 1053757

St Michaels Church Listed Building – Grade I NHLE ref. 1367566

Moated site and fishponds Scheduled Monument NHLE ref. 1013512 The significance of this group of inter-related, high grade designated heritage assets is described in SLR's Archaeology and Cultural Heritage Assessment Report and in greater detail in their Archaeology and Cultural Heritage Supplementary Statement. Additional information is contained in The Landscape Partnership's Landscape and Heritage Report. It is not our intention therefore to repeat this information in detail here. In brief we note the Anglo-Norman origins of St. Michael's, that the nearby moated site is likely to have been constructed in the 12th or 13th century, and that it is therefore likely to be at least partially contemporary with the now deserted medieval settlement to the east. Together these components thereby formed the focus of a medieval manorial complex. The hall retains part of a medieval open hall which was subsequently remodelled and encased in brick c1580 by Richard Cressett; the Cressett family being prominent members of Tudor and Stewart society. The gatehouse is also understood to have been added at this time, and its significance derives in part from the intended function of the upper floor as a viewing platform that afforded views out across the surrounding landscape. We would further note that as one of the earliest brick houses in the county, constructed at a time when this was a fashionable and prestigious building material, it is therefore likely that the substantial chimney stacks on the prominent eastern facade of the hall were intended in part to display the family's status to those using the principal approach to the house along the lane from Meadowley. We would argue that the setting of these assets extends more widely across the surrounding landscape than SLR have allowed for in their reports. In particular, whilst the moat and church would have formed the main axis of social authority and religious observance for the community that resided within the now deserted settlement to the east, their daily and seasonal rounds of routine agricultural activities would also have extended out across the surrounding landscape. The topographical location of the settlement, moat and church in an elevated position on a valley side means that when one is stood within the site of medieval settlement, or is using the rights of way which converge upon it, one is able to experience and appreciate how this complex formed a focal point in the landscape. Similarly, whilst the axis of the hall and gatehouse is in part intended to be oriented towards the deer-park which once late to the southwest, the position of the hall and gatehouse means that filtered views out across the surrounding landscape through the screen trees can be obtained from the gardens and some windows of the house and gatehouse. As noted above, the brick stacks on the eastern façade of the hall are likely to have been deliberately placed in order to be seen by those approach along the road from Meadowley to the southeast. Whilst the hall is now partially screened by trees, one can still experience and appreciate this aspect of its significance when approaching from this direction. We would further observe that historic character of surrounding landscape remains agricultural and exhibits a significant degree of time depth. The

only significant modern structures comprise the shed buildings at nearby farms; there are no tall structures of industrial character of the type which the proposed development would introduce. This to a large degree why the landscape around Upton Cressett has been noted for its sense of isolation, remoteness and tranquillity, which we would argue form an intrinsic element of the aesthetic and spiritual values that form an important component of the significance of this group of heritage assets. We consider that of the proposed wind turbines would introduce new, large scale structures of an industrial appearance into the setting of these assets. Their visual prominence and the movement of their blades when seen from some locations within and adjacent to these assets, and when moving along the routeways which converge upon them, would detract from one's ability to experience and appreciate their significance. As a consequence, in our opinion their significance would be harmed, and we would concur with English Heritage's assessment that this would be "...at the upper end of scale of less than substantial harm.". Having regard to the policies set out in section 2 above, and with emphasis on Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in our opinion this harm would not be outweighed by the public benefits the proposed development would deliver.

b) Upton Lodge Farm Non-designated Heritage Asset HER PRN 29293

Upton Lodge Farmhouse was originally constructed in the later 16th century as a hunting lodge towards the south-eastern end of the former Upton Cressett deer park. Although now heavily altered through the addition of a 19th century range and recent additions, the significance of this building derives from the frame, together with its historic and group values derived from its relationship to the designated heritage assets at Upton Cressett. Although recently assessed as not being eligible for Listing by English Heritage, we would consider this to be a non-designated heritage asset of at least county, if not regional importance. Within their Advice Report on the building English Heritage note that the original structure would have included "...large windows which would have allowed a clear view of the chase across the Upton Cressett estate.". We would further observe that the building would have been oriented towards the north-east, thus affording extensive views across the landscape towards the proposed development site, which should thereby be considered to fall within its setting. We would argue that the introduction of the proposed turbines into the setting of this building would therefore significantly diminish the ability to experience and appreciate the significance of this non-designated heritage asset.

c) Upper Meadowley Farm house Grade II NHLE ref. 1188886

This building comprises several brick ranges, the earliest of which incorporates a timber frame which is currently thought to date to the 17th century. Whilst we would broadly agree with SLR's definition of the Archaeology and Cultural Heritage Assessment Report of the significance and setting of this designated heritage asset, we would observe that the principal elevation of the farmhouse is on the south side of the building facing the lane. Whilst the views south from this building are not deliberately designed, they do extend across the landscape to the south along the trackway utilised by the Jack Mytton Way. Further, SLR observe that the setting of this heritage asset extends to the routeways into and out of the hamlet. The LVIA assessment of Viewpoint 11 indicates that at least the upper parts of the proposed turbines would be a conspicuous within views south from Meadowley and

in our opinion they would detract from the experience of the significance of this heritage asset. Taking account of the above considerations, we would assess the resultant level of harm to be less than substantial.

d) Criddon Hall Grade II NHLE ref. 1188132

The hall comprises a large Georgian brick farmhouse whose principal elevation is on the eastern side of the building, away from the yard to the rear. We note that this orientation affords extensive and open views across the landscape towards the proposed development site, which we would therefore consider to fall within its setting. Further, the LVIA assessment of Viewpoint 8 indicates that there will be a clear view of the turbines from this location and that the magnitude of change that the turbines would introduce is assessed as substantial. One also gains a clear view of this elevation of Criddon Hall from the Jack Mytton Way within the vicinity of the development site itself. In our opinion the proposed turbines would therefore detract from the experience of the significance of this heritage asset. Taking account of the above considerations, on balance we assess the resultant level of harm to be less than substantial.

(Details of heritage policy are included in section 10 of this report)

4.12 Public Protection - Given the proposed turbine type, locations and predicted noise emissions, I do not consider that significant noise disturbance is likely to arise from the installation. I therefore have no objection to the proposals. However, I would recommend that the following conditions are attached to any approval granted.

1. The noise emissions from the combined effects of the wind turbines (including the application of any tonal penalty) shall not exceed the values for the relevant integer wind speed set out in, or derived from, the tables attached to this condition at the curtilage of any dwelling (including garden areas) lawfully existing or has planning permission at the date of this consent.

Table 1 – Between 07:00 and 23:00 – Noise limits expressed in dB LA90,10 minute as a function of the standardised wind speed (m/s) at 10 metre height as determined within the site averaged over 10 minute periods.

Location	Standardised wind speed at 10 meter height (m/s)								
	4	5	6	7	8	9	10	11	
Yew Tree Cottage	35.0	35.0	35.0	37.4	40.9	44.5	48.0	51.1	
Little Meadowley	35.0	36.2	39.6	43.2	47.0	50.8	54.2	57.1	
The Barn Underton	35.0	35.0	36.5	39.9	43.6	47.5	51.3	54.7	

Table 2 – Between 23:00 and 07:00 – Noise limits expressed in dB LA90,10-minute as a function of the standardised wind speed (m/s) at 10 metre height as determined within the site averaged over 10 minute periods.

Location	Standardised wind speed at 10 meter height (m/s)								
	4	5	6	7	8	9	10	11	
Yew Tree Cottage	43.0	43.0	43.0	43.0	43.0	44.2	48.1	51.5	
Little Meadowley	43.0	43.0	43.0	43.0	46.7	51.1	55.0	58.3	
The Barn Underton	43.0	43.0	43.0	43.0	43.0	47.1	51.3	55.0	

Table 3: Coordinate locations of the properties listed in Tables 1 and 2.

Property	Easting	Northing
Yew Tree Cottage	367339	291176
Little Meadowley	366823	292394
The Barn, Underdon	367925	291718

(Reason: In order to protect the amenities of the occupiers of nearby properties and the area in general)

2. The wind turbines hereby permitted shall be maintained to operate and perform in accordance with the manufacturer's specifications/recommendations.

(Reason: In order to protect the amenities of the occupiers of nearby properties and the area in general)

3. Following notification from the Local Planning Authority (LPA) that a justified complaint has been received, the wind turbine operator shall, at their own expense, employ a consultant (approved by the LPA) to measure and assess, by a method to be approved in writing by the LPA, whether noise from the turbines meet the noise emission limits specified in the permission. The assessment shall be commenced within 21 days of the notification, or such longer time as approved by the LPA. A copy of the assessment report, together with all recorded data and audio files obtained as part of the assessment, shall be provided to the LPA (in electronic form) within 60 days of the notification. The operation of the turbines shall cease if the specified level is confirmed as being exceeded.

(Reason: In order to protect the amenities of the occupiers of nearby properties and the area in general)

4. The development shall not commence until full details of the final choice of Turbines to be utilised have been submitted to and approved in writing by the Local Planning Authority.

(Reason: In order to protect the amenities of the occupiers of nearby properties and the area in general)

- 4.13 Highways Development Control – No objection. From a highway aspect, the operation and maintenance of the wind turbines does not raise any concerns or implications. Once erected, the vehicle movements to/from the site will be minimal and undertaken in light vehicles. The position of the turbines is such that they will not form an undue distraction to drivers using the public highway or endanger them if the machinery fell over at any time. The construction phase of the project does have significant highway implications when the large component elements of the wind turbines and construction equipment are delivered to the site. The only measure stated in the DAS to cater for this, is the possible surfacing of the junction between the access track and the adjacent minor road. I would suggest that this work is essential to protect the edge of the highway. I consider that as part of this application a construction management plan should be drawn up by the applicant, detailing how the large component elements of the wind turbines and construction equipment will be delivered to the site. Particular regard should be given to the minor roads near to the site, where pinch points along the route should identify and remedial measures / works (temporary or permanent) to protect the integrity of the

carriageway structure and associated verges/margins may need to be undertaken. Also details of the traffic management arrangements to be put in place when vehicles requiring the full width of the carriageway are in transit. I do not raise any highway objections in principle to permission being granted for this application and recommend that the following condition is attached to any permission granted:

Condition: Prior to the commencement of the works, a construction management plan shall be provided to and approved in writing by the Local Planning Authority in which details of the arrangements for the delivery of the component elements of the wind turbines and construction equipment are given.

Reason: In the interest of highway safety and protecting the highway infrastructure.

4.14 SC Rights Of Way: No objection subject to the following comments:

It appears that the application will impact on two public rights of way namely Bridleway 0132/11/3 which runs down through the middle of the proposed development site and Bridleway 0132/10/1 which runs generally east to west to the north of the site. The Outdoor Recreation Team have some concerns with this proposal:

1) The Design and Access Statement part 3.2.5 states: The proposed wind turbines are located well outside of either the oversail or fall over distances from these public rights of way. Utilising the location plan it appears that the turbines are approximately 165 metres from both Bridleways mentioned earlier. Bridleway 0132/11/3 is the Jack Mytton Way which is a promoted long distance bridleway used a great deal by the public on foot, horseback and on bicycle. While the design and access statement part 3.2.5 covers the areas oversail or fall over of the turbines, shadow flicker does not appear to have been considered. The Outdoor Recreation Team has concerns over the potential Health & Safety risks posed to equestrian users of the bridleways. There is a general recognition that light flicker and noise from wind turbines has the potential to cause serious spooking in some horses and the British Horse Society have recommended that turbines should be sited at least 3 x their total height from public highways used by equestrians such as Bridleways, Restricted Byways, Byways Open to all Traffic and Roads on the Highway network, with a minimum distance of 200m. The 200m figure is recognised in paragraph 56 of Wind section of the Technical Annex to the companion guide to PPS22 which states: The British Horse Society following internal consultations has suggested a 200 metre exclusion zone around bridle paths to avoid wind turbines frightening horses. Whilst could be deemed desirable, it is not a statutory requirement, and some negotiation should be undertaken if it is difficult to achieve this. The Outdoor Recreation would ask the applicants to contact them to discuss the proposed location of the turbines and any mitigation measures that may be able to be employed to address the issue if a 200metre exclusion zone is difficult to achieve. The information above also relates to bridleway 10 which passes west to east to the north of the site. The design and access statement also mentions the possible provision of a permissive access bridleway to the north west of the site, whilst this could be beneficial to users, it should be noted that for permissive access to work, the original definitive line of the bridleways need to remain open and available!

2. The Design and access statement states that construction vehicles will access the site using the Jack Mytton Way as a means of accessing the site from the north. The Outdoor Recreation Team has the responsibility for the maintenance of the surface of all public rights of way including the bridleways mentioned and as such

permission would need to be sought from the Outdoor Recreation Team for the applicants to alter the surface. Also the applicant should contact the Outdoor Recreation Team if they intend to widen the bridleway at any point as the Outdoor Recreation Team should be contacted as potential works could affect the route. Please also add the following informatives:

The right of way must remain open and available at all times and the public must be allowed to use the way without hindrance both during development and afterwards. Vehicular movements (i.e. works vehicles and private vehicles) must be arranged to ensure the safety of the public on the right of way at all times. Building materials, debris, etc. must not be stored or deposited on the right of way. There must be no reduction of the width of the right of way. The alignment of the right of way must not be altered. The surface of the right of way must not be altered without prior consultation with this office; nor must it be damaged. No additional barriers such as gates or stiles may be added to any part of the right of way without authorisation. Should the applicants feel the safety of the public is at risk while construction takes place, they should contact the Outdoor recreation Team to apply for a temporary closure(fees apply)

4.15 SC Ecology: No objection:

- i. Bats: Natural England's guidance states that industrial scale wind turbines should be over 50m from the nearest hedge, tree or building with bat roost potential. Turbine 1 is to be sited 56m, and turbine 2 over 80m, from the listed features. The bat survey report conducted by Ecology Matters concludes that the siting of the turbines at this distance should not have a detrimental effect on bats using this site. Natural England has been formally consulted and has responded stating: 'on the basis of the information provided to us, our advice is that the proposed development would be unlikely to affect bats'.

Informative: All species of bats found in the UK are European Protected Species under the Habitats Directive 1992, the Conservation of Species and Habitats Regulations 2010 and the Wildlife & Countryside Act 1981 (as amended). If there is ever any evidence of a bat strike then the turbine should be shut off and discussions held with Natural England before it is allowed to resume activity.

4.16 SC Drainage: No objection.

4.17 SC Trees: No objection. It is noted that the extended phase 1 habitat survey expresses concern over the proximity of a mature oak tree to the northern-most of the two turbines. However, the survey was carried out in June 2011 and a more recent aerial photograph shows that the oak tree is apparently no longer there.

4.19 Councillor Robert Tindall (Brown Clee) has been informed of the application.

5.0 PUBLICITY AND REPRESENTATIONS

- 5.1 The application has been advertised in the press and by site notice and the nearest properties have been individually notified. The application has attracted a high level of public interest with 870 representations of which 572 are objections, 1 is neutral and 297 are in support (a high proportion for a wind turbine scheme).

5.2 The main concerns of objectors can be summarised as follows:

- i. Tourism & leisure: The landscape of South Shropshire is a very important driver, if not the most important, for tourism businesses. It would be totally wrong to allow a high wind turbine to be built in such an unspoilt and beautiful area of the county. Structures of this size which are out of scale with any other natural or manmade structure would change the face of South Shropshire and impact on local life, tourism and heritage. What happens to the economy of Wales when the tourists are disappointed with the scenery? We cannot understand why this particular application is being even remotely considered. As an increasing number of people do, particularly those who live in towns and cities, we like to escape to the countryside as frequently as possible. On one of our walks several years ago we had the good fortune (as many others have) to stumble upon the small rural settlement of Upton Cressett. We simply could not believe that such a collection of architectural gems could exist in such a peaceful, relatively low-key, unspoiled environment. The hilly and wooded setting also tends to emphasize it's magic; as you approach the settlement from different directions, so the view unfolds in different ways, thereby emphasizing it's uniqueness. The silence, broken only by birdsong, gives it a magical quality that is difficult to explain using words alone. Unless you have in fact experienced this phenomenon for yourself it would be difficult to understand or appreciate this very special experience. There is absolutely no doubt that this special place will in the future become more widely known and appreciated, for all the right reasons by people who care passionately about our special English heritage. I have since done some research and concluded that very few places of this calibre exist in this country (let alone Shropshire). People visiting Upton Cressett will, as a matter of course, also visit other local countryside, architectural and tourist attractions ? this means that they will be spending money, thereby boosting the local and county economy (possibly contributing more financially in fact than two wind turbines of this size). It is our opinion that if this application were to be approved, it would have a profoundly negative effect upon this and other aspects of the locality. The quiet magic of this unique place would be lost, probably for ever! We feel very strongly that this should not be allowed to happen. As an affectionate visitor to Upton Cressett, interested in its history which reaches back to Roman times, I am horrified by this proposal. The countryside surrounding the ancient manor house and Norman church is of particular quality, a serene landscape free from recent intervention. Wind turbines, in any case, represent a technology the benefits of which are far from established. In addition it is outrageously costly in terms of damage to wildlife and environmental integrity. I hope that the environmental damage represented by this application will be recognised by the Council's decision to refuse it. I lived in the hamlet of Upton Cressett for nearly two years. I strongly object to the proposal for erecting two wind turbines. It has the potential to completely destroy the beautiful countryside and will mean that Shropshire will no longer become the UK county of choice for bridleways, footpaths and all other outdoor country pursuits. This was one of my salient reasons for moving to near Bridgnorth. It will have a detrimental effect on all aspects of tourism in the surrounding area. People travel great distances to ride their horses or walk their dogs in Shropshire, especially the Jack Mytton Way. The Jack Mytton Way is Shropshire's premier tourist trail used by walkers, riders and cyclists. The turbines have the potential to drive these people away from the area. This is inconsistent

with the key status that the Way holds on the Bridgnorth Place Plan. The turbines will be too close to the Jack Mytton way and will have a negative effect on tourism. I believe that the application threatens the 'asset value' of Shropshire and in particular that in the vicinity of Bridgnorth. This local area attracts many day and longer term visitors who contribute to the economy of the area and the employment prospects of those that live locally. Agreement for two industrial sized 80m wind turbines at Upton Cressett will have a devastating impact on the landscape; they will have a damaging effect on heritage assets; they will deter tourism from several sites including Shropshire's premier bridleway, the Jack Mytton Way, they will cause harm to people and cause blight to residential amenity for people living in the area near the turbines. Our area of South Shropshire is particularly recognised for its heritage attractions and landscapes of natural beauty and this is what makes it so attractive for tourism and visitors. The planning application documents contain limited information and assessment of the impact of this proposal on tourism; The Shropshire Local Development Framework : Adopted core strategy states ... Tourism is an important part of the local economy, with appropriately 11 million people visiting each year. Overall, tourism directly supports over 8,000 full time equivalent and more than 6% of all Shropshire based jobs are tourism based. It goes onto state... Much of Shropshire's appeal is due to it being a tranquil rural area with attractive countryside... where a range of leisure activities such as walking and cycling can be enjoyed. The proposed site abuts the Jack Mytton Way ? a long distance footpath and bridleway for horse riders, hill walkers and mountain bikers. This footpath is nationally known and frequently used by many. The proposed site is only 150m from the Jack Mytton Way ? this is 25% closer than the closest distance that the British Horse Society recommends for turbines. One of the key aims of the Government's tourism policy document (March 2011) is to increase the proportion of UK residents who holiday in the UK. Visit England's strategic framework for Tourism in England 2010-2020 has as its vision to maximise tourism's contribution to the economy, employment and quality of life in England; If prosperity is to increase and the local economy is to grow it will be important to ensure that the factors that attracted the visitors to this area are not lost or reduced in value. This proposal combined with other wind turbines applications in the area has the potential to prevent the realisation of the ambition to enhance the atmosphere/ambience of the area. It is important to ensure that the small number of accommodation providers in the locality of the site, who meet the needs of visitors, are not unduly affected by customer's perceptions of insensitive and inappropriate development. I am a user of the Jack Mytton Way and would be unable to use any of the access routes whilst work is in progress as the roads would become much too dangerous and would certainly not wish to encounter any more traffic than exists currently. As for siting these turbines on the bridlepath, I would be unable to ride the existing track as I would not want to risk riding in the vicinity of such big and noisy constructions. There are few bridlepaths in this area and the siting of turbines on the Jack Mytton way would mean yet further restrictions as I and many other riders would no longer be able to use this access route? I understand that the British Horse Society would not endorse such a proposal. Impact on Heritage and Tourism ? the turbines will create a material adverse effect on the setting of historic sites within the area. It is notable that the applicant's archeological annex shows there are 53 heritage assets sites within 2km of the turbine site including Grade 1 sites at Upton Cressett and Morville. The impact of the turbines on the Jack Mytton Way is unacceptable to riders and

walkers straddling the track within 150m.

- ii. Visual impact: These massive moving giants that will blight the unspoilt beautiful scenery for miles around. It will be visually incongruous in this otherwise beautiful part of the county, and will industrialise the landscape. In Wales they scar the vistas towards the headlands of the coast. I go there to soak up the beauty not look at those monsters. Any wind turbine of industrial scale erected either randomly or in concentrated numbers will create in my opinion adverse visual impacts on these unique and beautiful local sceneries. The landscape character and quality are worthy of preserving, and this form of development would destroy the perception of the landscape in this area - not only locally but on a county-wide scale. Erection of wind turbines of this size in prominent positions would have a massive, detrimental visual impact, blighting the landscape that is so vital for the future sustainability of the whole area. As a resident in a neighbouring parish I oppose the application on the grounds that erecting such towering turbines on high ground visible for miles around would dominate and destroy the views that this part of Shropshire is famous for. This application has a direct impact on the Shropshire Hills AONB as it will impact on the views. This is contrary to National policy on AONB's. The turbines will be visible from as far away as Wolverhampton. Anybody driving out of Bridgnorth on the A458 towards Shewsbury or Ludlow, or people living anywhere around Bridgnorth, Chetton, The Down, Criddon, Stapeley, Upton Cressett, Meadowley, Underton, Tasley, Aldenham and Monkhopton will suffer a detrimental impact to their lives and enjoyment of their neighbourhoods and countryside. Impact on Skyline ? whereas the visual assessments clearly show the major impact of the turbines on the skyline this is dismissed in the assessments by the applicant. It cannot be denied that the turbines, particularly T1, will break the existing skyline of rolling hills to the west of Bridgnorth. The fact that the turbines will be visible from Wolverhampton is incontrovertible evidence of the damage that this will create. These structures will be totally out of character with the surrounding area creating damage out of proportion to the electricity generated.
- iii. Heritage: We live at Criddon in a house, part of which is Tudor in origin and built at the same time as Upton Cressett Hall, more than likely by the same builders. It was constructed to serve as the hunting lodge of the ancient Upton Park deer park, the boundary of which is still in evidence today, bordering a field adjacent to our land. Although the house is not listed we felt it important to preserve as much of the ancient fabric as possible and have gone to some lengths to reinstate the rooms in the Tudor part of the property. The view from these rooms across the parkland must now be very similar to that surveyed by the original Tudor inhabitants as they watched the progress of the hunt - in the middle of which it is now proposed to erect two giant wind turbines! We feel that the historic context of this landscape is of utmost importance and it is our duty to conserve it for the benefit of future generations - an opinion recently endorsed by English Heritage. So much of our countryside is at present under assault from encroaching industrialisation but once destroyed, like the ancient field boundaries that are rapidly disappearing, they can never be recreated and, as such, are priceless.
- iv. Highways / traffic safety: The will increase traffic along a rural road & bring heavy traffic along a road which is supposedly for light traffic only. The council have maintained the roads very poorly along this part of the road, recently only patching

up an area of road where the road surface has completely broken down rather than resurfacing which was what was needed. The roads are narrow in places and there are steep banks which will mean that increased traffic will cause problems for local people trying to go about their daily business. I am concerned at the size of the vehicles that would be required to erect and maintain the wind turbines as the lanes that run to the main A458 Bridgnorth road are very narrow and often impassable. It is only a matter of time before there is a serious accident caused by HGV vehicles. Access ? the applicant?s documentation does not explain what work will be undertaken to enable the transport of the turbines and blades to the site after leaving the A458. The road widening required to enable the 6.6m wide generator would appear substantial. Additionally the access report only deals with delivery of the turbines. There is no mention of the volume of traffic involved in delivery of concrete, steel and the other materials to site required for the construction of foundations and roadways. This is a material omission in the applicant's submission.

- v. Ecology: No adequate assessment of any ornithology impacts has been evidenced in the submitted information. The application does not demonstrate compliance with Natural England's wind turbine guidance Technical Information Note 069. Turbines are proven killers of bats. This area is rich in biodiversity and the moving blades will have a destructive effect on nesting birds, bats and other wildlife. Protected species of birds have been recorded in the conservation area next to Bridgwalton quarry (1km from T1 site). There have been sightings of curlews and lapwings neither of which is mentioned by the applicant. The applicants bat report describes the extent of bat activity within the area of the development and states (in para 5) that ?of the 5 species recorded in the survey noctule bat colonies are noted as being of high potential risk from wind turbines and individual pipistrelle bats as medium risk?. In Spain, 110 to 330 birds and 200 to 670 bats are killed per turbine per year (Spectator Jan 2013). There is also an SSI close to the site. Furthermore no ecology report is present on the Council planning portal at the time of writing.
- vi. Noise: The low frequency hum produced by wind turbines can be heard over large distances and will be detrimental to the residential amenity of neighbours. The noise could affect sleep patterns. The wind turbines would be located less than 1km from people's homes in Meadowley and Underton giving a noise nuisance which can affect health and residential amenity. The prevailing wind direction is from the west which means that the whole of the residents of Underton will be particularly affected. The nearest dwellings are only 600 metres from the proposed site, much closer than the generally accepted 2 km distance, which is actually a legal requirement in Scotland. Noise pollution should not be underestimated. I have been subjected to noise pollution in the past and found it severely impacted on my enjoyment of the local amenity. I had to endure this, infrequently, for a period of some 8 hours and could not sit outside and enjoy the peace and quiet of my own property. The residents living near the proposed site, however, will be far worse off. They will have little respite from the continuous noise caused by the turbines, if the wind is to be as consistent as the developers claim and I believe that their health and enjoyment of their properties will be adversely affected.
- vii. Cumulative impact: There are several proposals for wind turbines in a very small area, this is the first & has opened the floodgates for local landowners to get on the

subsidy bandwagon.

- viii. Questioning the extent of community involvement / benefits: It would appear that much of the more recent support for this application comes from those who may have or intend to have a share in the co-operative and therefore have a financial interest in spite of any other considerations. The output, such as it is extremely expensive, requiring subsidies when the wind doesn't blow or is too strong and back up from conventional stations! Believe me nobody was more deflated when I looked into the reality behind wind turbines being an avid supporter previously. Solar panels are far more efficient and improving all the time, unobtrusive by comparison and far less land and labour intensive. This application is being presented as a community project when it is not. This is an application for electricity to be generated and go into the national grid by a landowner, a turbine supply company and a small group of local people, Sustainable Bridgnorth. The latter no doubt have a genuine desire to improve sustainability in the Bridgnorth area but cannot claim to represent Bridgnorth as they have few members and did not communicate with local people about this idea adequately before forging ahead with the application. I do not accept that this is a 'community led project' as suggested by 'Share Energy', the developers. This is a ruse. The application is taking advantage of national Government subsidy and it is a money making concern that benefits the few and not the many. This proposal is SUBSIDY driven as part of attempting to meet the ill-conceived government policy on renewable energy. The efficiency, reliability and cost effectiveness of such turbines is suspect and the "sweetener" of an annual £20,000 worth of generated electricity and a £2,000 contribution to local councils is small fry in comparison to the annual subsidy to the land owner and the actual costs of installation.
- ix. Precedent for further development: It would create a precedent and before we know it there would be tens of these towers in our local area. This area is on the fringes of an AONB. If one permission is given that will set a precedent, for the arrival on any number of turbines in an environmentally sensitive area. I strongly object to the proposed wind turbines in Upton Cressett. If these are allowed to go ahead it will tempt other local farmers and landowners to do the same (already happening!) and we will change our beautiful and much envied landscape for generations to come. People do not understand the consequences of having these Industrial wind turbines in their neighbourhood. Once one goes in, there will be many more. Your neighbours and community will be torn apart!!! Neighbour against neighbour, people get sick and have to leave their homes...walk away from their life savings...really...think about it before you say yes to this!!! It is a terrible thing and all it is is big business making money off others misfortunes. This from personal experience.....Don't say yes!
- x. Questioning renewable energy benefits: The manufacturer's data on turbine output is totally misleading. They will, by their very nature only ever be around 20% efficient. So, where do we get the other 80% of our requirements from? They will never be green as the manufacture, transport and construction requires a large negative footprint. There has been no global warming AT ALL this century, despite steadily increasing carbon dioxide levels. This is a beautiful part of the country and the erection of large turbines to generate a pathetic amount of intermittent power whilst causing a significant blight within the landscape should never be permitted.

The degradation of the landscape is out of all proportion to the derisory amount of electricity generated. Even assuming the "climate change" assumptions underlying windfarm construction to be correct (and it is becoming increasingly apparent that they are not), windfarms (together with their construction and infrastructure) do not constitute an efficient means of carbon saving, and, may even cause the production of more CO₂ than would otherwise be the case. It is common knowledge that wind turbines only exist because of huge government subsidies; their 'green' credentials are non-existent and probably more damaging with the mining of raw materials, the sea journeys from China and then the road haulage required to transport these ugly monstrosities. Damage to existing roads and the ripping up of hedgerows are part and parcel of this madness. Their ability to provide power is hugely exaggerated (this too is well-known by now) and conventional power stations need to be running constantly to provide the energy we need when the wind doesn't blow at the required speed which is most of the time especially in cold weather. Turbines makes ordinary people's lives a misery; as their power output is always exaggerated their noise and unsightliness is always underplayed by the makes and developers. Odd, don't you think? The value of their homes also plummets thus making it a virtual prison for the poor afflicted homeowner who therefore cannot sell and move away from the ceaseless noise. Add to that the destruction of our countryside: how green is that? Wind is intermittent and variable. It cannot be used for base load supply where the greatest need for new generating capacity arises. For example, the recent winter freeze was caused by an anti-cyclone over almost the entire UK. As a result wind produced less than 1% of supply during a period of maximum demand.

- xi. Decommissioning: Wind turbines are great whilst the landowners are getting their Government subsidies, but when that ends the countryside will be blighted with redundant turbines - the energy companies should be responsible at that stage for decommissioning, but having seen so many companies go bust, what will happen if and when that happens, who gets rid of them then?
- xii. Equestrian: I keep my horses at a livery Farm at Tasley and ride along the Jack Mytton Way at Criddon and Meadowley on a regular basis, only people with no understanding of the unpredictable nature of the horse would possibly consider sighting these 2 monstrosities in such a location, this is a well-used route by both local people and visitors to the area and when someone on horseback gets seriously injured or even killed because of the turbines who is going to take responsibility? It would be a shame to risk accidents on these beautiful bridleways that surround Upton Cressett. Horses in particular are animals of flight and most would be terrified of moving blades and the noise that a wind turbine would make. Wind farms will cause the majority of horses to spook and if the wind turbine or its equipment suffered structural failure whilst passing on a horse, the result could be catastrophic. The British Horse Society (BHS) recommends that turbines should be four times the height, in distance, away from bridleways for safe riding. At Criddon the turbines will be sited at an unacceptable 150 metres from the bridleway, less than 50% of the recommended distance. I support the suggestion that the Council consider BHS advice fully to either refuse the application or fully mitigate any risk to the satisfaction of local horse riders. The Wind Turbines will be sited within less than the recommended distance from a Public Bridleway/Footpath. I ride a horse along these Bridleways on average twice a week & my son rides his bicycle there.

I consider the proposed turbines will make it unsafe & ruin the outstanding views not to mention the disruption during construction.

- xiii. General / other: Why should one family make a nice little income at the expense of hundreds of local people, whose properties would also suffer from noise, vibration and reduction of the value of their homes? The only winners are the farmers who will get inducements in having these structures which when they breakdown cannot be repaired. These wind farms also create massive financial implications to the regions property prices, resulting in a lot of people losing huge amounts of equity in their hard earned and beloved homes. As a tax payer and therefore contributor to the government's renewable energy subsidies, I would rather see my money being spent on thoughtful and responsible projects rather than intrusive ones which create unnecessary tensions within local communities and to an extent favour personal financial gain to the detriment of others. These Turbines in this application at 80M high (260 feet high) will be a total misery to the people who live close by. They will endure noise, flicker plus seeing a moving blades on the skyline. As an ex-member of the former Bridgnorth district council I strongly object to the erection of wind turbines of this magnitude in this very sensitive area .I am supportive of renewable energy schemes and have interests in water and solar but surely we do not need to go this far and threaten this outstanding countryside and listed buildings. I believe that the application will have overwhelmingly negative impacts upon the individual and collective quality of life of the parishioners of Chetton and other parishes and the asset that is the Shropshire countryside and its interwoven parish communities. The negative consequences of this proposal far exceed any benefits to our community. The only people who will benefit will be the landowner and the investors; profit is the only reason they are putting it forward. The very fact that they are being sited at half the recommended distance from a right of way should immediately get the alarm bells ringing - and the application rejected. I understand that an alternative route around the windmills has been suggested but as it is only "permissive" it means nothing - as it could be removed at any time. If the Landowner offered a permanent dedicated optional route - still leaving the original route - there may be room to negotiate. My family have lived in Upton Cressett for the past 40 years. The Shropshire countryside has brought us great joy in the repose it's quietude offers. There is often little to hear save the wildlife around us, a thing that would be greatly altered by the intrusion of the wind turbines on this area of exquisite beauty. Noise and flicker are of great concern, as is the impact the turbines will have on the bridle path on the Jack Mytton Way. It will grossly subsume all that is restorative about this landscape, whilst bringing with it an infernal industrial presence. I am concerned by recent remarks made by a highly respected scientist that in twenty years time wind farms will be thought of as one of the greatest scandals in Britain, namely for their dismal industrial presence and impact on our beautiful rural settings. What's more is that the proposed turbines will interfere with the manner in which residents of the community go about our daily lives. The noise pollution, as well as the flicker, will systematically cause a destruction of the rural landscape and our heritage offering. It is a totally inappropriate addition to the local area and takes no heed of our position as a historical site of local and national value. A.E.Housman in his famed poem 'A Shropshire Lad' considered our 'blue remembered hills'. It is now our turn to consider them, and to ensure their safekeeping for now and forever.

Local Community: the Government has recently announced an amendment to the

NPPF which states 'the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities'. The volume of local objection from residents in the immediate vicinity of the turbines demonstrates that this application is not acceptable to the local community who wish to preserve the amenity and historic environment of the area. Policy - local policy CS17 (environmental networks) which requires development to 'identify, protect, enhance and expand Shropshire's environmental assets to create a multifunctional network of natural and historic resources, ensuring that development does not adversely affect the visual, ecological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors'. This application does not meet this policy. Bridgnorth local plan (D11) states, with regard to renewable schemes, that 'the Council will require that (3) they do not detract from the residential or recreational amenities of the area by reason of noise, vibration, increased risk to health or public safety or (in the case of wind turbines) shadow flicker; (4) wind turbines are located so as to avoid sensitive skylines where they would dominate long distance views; This proposal does not meet these policies.

5.3 The main comments of supporter can be summarised as follows:

- i. Renewable benefits: This is a valuable contribution to sustainable development in Shropshire in a suitable location (manmade farmland) where windmills are not out of place. This is a fantastic project, cooperatively owned, generating local work, power and funds. It will increase the west midlands shamefully low wind energy production. I live in Shropshire and support this community initiative for the generation and use of renewable energy. The county is behind many other counties in this regard and will be better placed if this type of project proceeds to resist the frightening and mistaken prospect of fracking. The UK needs to reduce its carbon emissions, provide stable electricity prices over many years, address a looming shortage of generation capacity and greatly reduce net energy imports. This application contributes to all of these objectives and does so in an elegant and clean way. I fully support this project, the environmental damage is far less than any other means of energy supply and has the added advantage of zero pollution and no need for constant heavy traffic to fuel the site. I live in Shrewsbury and whilst I do not know the exact location and details of this project I have long been a shareholder in three similar cooperatives. These are Baywind (Cumbria), Fenland (near Peterborough) and Westmills (Oxfordshire). From attending AGMs I know the tremendous enthusiasm and pride that is generated - no pun intended - by such coops. That is a very positive local benefit. At a national level locally produced energy lacks the problems of loss during transmission. It helps diversify the energy base. It stops us having 'all of our eggs in one basket'. Surveys over the years indicate that once a wind farm is up and running enthusiasm and support grow even among those who had initially been sceptical. I understand that this wind farm will supply about 10% of the domestic electricity needs of Bridgnorth. It is vital to support this sort of application as the combination of community ownership and small number of turbines makes it the very best sort of wind turbine development. If it is not allowed or delayed to death it will mean that either we fail to develop enough renewable energy production and have to fall back on fracking and new nuclear or only the big multinational firms will be able to see the planning hurdles to a conclusion for wind farms of dozens of turbines causing maximum impact on

neighbours and minimum local benefit. If every community had one or two turbines with local investment everyone would share the burdens of decarbonisation and the benefits of secure electricity and the financial returns. More wind power is essential to achieve the legally required reduction in greenhouse gas emissions. Therefore, the current low success rate of planning applications is against the law. It is free energy from nature. We would be stupid not to exploit it. We have a comparable advantage in this field and it's just what we need in Shropshire to attract young people and keep young people in the area with cool green jobs and well paid jobs not just farming and lowly paid retail, cafe and tourism type work. Enemies of wind are wrong when they claim wind does not reduce Co2 emissions the clear fact showed by the engineers and scientific experts prove that they do. They are miles away from people's homes and they don't make any significant noise anyway! The excuses people give on here are pitiful they just don't like change there's nothing wrong with them. We have led the way on green energy in south shropshire with our biodigester now we need to lead on wind energy too as it is the best way to make electricity with almost no environmental impacts. I Chair both Energize Stur Valley and www.dorsetenergized.com and would like to add our support for this project. It is well planned and will add to growing the UK's sustainability for energy and in the process really effects no-one in a bad way. It's time for us to move forward as one to ensure the future of our children. The needs of the majority outweighs the desires of a small minority this will cause a tiny nuisance for three local houses yet provide power to 1,000 houses, so that's 333 to one! Sorry but that means we win massively because the majority rules that democracy put it to a plebiscite in Bridgnorth there's thousands of us who want low carbon energy here and just a few villagers complaining. This is a fantastic example of what the UK needs private sector investment in green infrastructure to drive the economy out of the doldrums, there is no taxpayer money going into wind it is false if people say that, the roc support mechanism comes from the utility bills instead and is pennies literally adding less than 6% to you bill so the biggest impact on bills was the Coalition's decision to rise vat tax and the gas price hikes are driving bills up, wind won't even need a subsidy in ten years' time it will be the cheapest energy around that's thanks to us nurturing the industry when it was in infancy like we did with coal gas and nuclear then it pays back for years with jobs and taxes, so the smart money is on wind to expand. If planners stopped blocking decent windy sites wind could already be price competitive with gas and coal it's just forced onto less economic locations by overly zealous planning regulations and nimby locals. It's such a shame that yet again the UK is missing out on growth to our competitive countries around us who are investing right left and centre in this technology. Man-made climate change is without doubt the greatest global threat that we face today. We have a duty of care for the environment and a responsibility for generations yet to come, that means taking climate change seriously, we will be judged by our action or inaction. Wind farms in the UK are an essential part of our efforts to combat climate change, by offsetting CO2 emissions that would otherwise be produced by fossil fuel plant generation.

- ii. Concerns exaggerated: I can see and have visited windfarms near my mother's house and assure you that when they are working people will like them and be proud of them. The opponents so often exaggerate the negative side and sometimes invent problems that do not exist. I cannot see what all the fuss is about, everyone I'm speaking to in Bridgnorth has not got a problem with this whatsoever

they only stand on a small concrete pad they will take up an insignificant amount of land so what's the fuss they go up wards to the sky so no one owns the sky, if anything I think they will enhance the landscape and of course they will create jobs and wealth for local people so approving this is a good thing for the community as a whole. As a fairly frequent visitor to Bridgnorth, I have a good understanding of the tourist attractions. The proposed area for the turbines will not affect the tourism trade as it is not viewable from the main town. Many places which do have wind turbines have found that some tourists go to the area with intentions to see the turbines, therefore boosting their tourist trade. It is not acceptable to take a position of "not in my back yard" with a technology, which is clean and sustainable, and where there are no objections from independent organisations that look after our heritage and countryside. What's all the fuss about it is not harming anyone and cannot be seen or heard for miles around. Sadly the opposition to this is ideologues who don't have a clue about energy production and should butt out of their neighbours business interests on their own private land if this is blocked it will set a worrying precedent for all business owners in Shropshire saying you don't run your business, the council does. I live in Bridgnorth and I want this to be built to help keep our lights on and I want Bridgnorth to be a business friendly town and a pro-farming town not a place which deters investment and turns its nose up at new business. Please stop spoiling it for people in Bridgnorth by being nimby this is a good thing for our town and must be supported by all right minded people who value jobs and growth and want our town to thrive. I have been to far larger wind turbines and you can talk without raising your voice it's less noise than having the TV or radio on it cannot be used as a legal basis to object to this new business. The sight of wind turbines is, to me, inspiring. They are fairly unobtrusive in development terms as they can be put up and taken down quicker than most houses. If turbines scare horses - then why was there recently a 150ft turbine at Shade Oak Stud in Bagley, near Ellesmere, which has been granted planning permission and is soon to be operational on the site of a horse ranching operation! Clearly horses are not scared of them then. As a horse rider, the proposed separation distance seems adequate because it is greater than the turbine topple distance. There is no statutory right to a view and this is not a valid reason for refusal of any planning application. Local renewable energy production is more reliable and preferable to relying on energy imports from foreign countries. A good mix of energy generation methods makes us a sustainable nation. The presence of tall masts and equipment is a familiar sight on the top of major landmarks in Shropshire; including the Wrekin, Brown Clee and Titterstone Clee. They cannot be said to have a detrimental effect on property values or tourism, despite most of these being sited in AONB's. The turbines are not a permanent construction. They will be up for 20-25 years. Construction of them is reversible, unlike houses and other buildings which are intended to be permanent. fossil fuels like uranium, coal, oil and gas are running out! We have to move over to other sources because all the others are finite - this means they will run out - we will exhaust supplies so we will have to move to wind power. Most people nowadays believe turbines to be pleasing to the eye. They are signs of a forward thinking, greener future and are often placed on an already man-made landscape. Amazing claims for the visual impact of the Crida wind turbines have been made even to the extent that they will be seen from distant Wolverhampton. To see them with any clarity this would require a very high powered telescope. The use of simple trigonometry would show their visual impact to be minimal after a relatively short distance. I am a resident of Bridgnorth for over

ten years now and I regularly cycle on this route. It's not actually part of the Aonb if you look on a map and though pretty it's not a special landscape like some other parts of the county so the landscape here can take it, it won't put me off from visiting if anything will be more likely to come out of curiosity to have a look at them. It's really is not impacting on the community and yet it is benefiting us all with clean power and income for local people. This will be massive for the area financially it's a huge boost and we would be crazy to turn down direct inward investment in this way. I moved to Morville from a village in Powys which has turbines and I can officially confirm you can't hear them from a distance and even right next to them you don't have to raise your voice to be heard, how opponents can simultaneously say they are stationary most of the time yet constantly churn out noise is beyond me !! Look at the wind rose even in 12 m/s wind the noise won't carry more than the road noise, at serious winds the turbines switch off anyway so noise won't carry. Just read the noise assessment which is factual / scientific, perceptions of noise are false and perception is not a material planning consideration so cannot be held against the plans. All in all I think this is a good thing for the area and yes it is in my back yard and I welcome it!

- iii. Community benefits: This is a community project, local residents will be shareholders and other local projects will benefit from the community fund it will create. This is a cooperative in action. It is wholly wrong to suggest otherwise, and in particular that there will be no profiteering by the few. My understanding is that this is a community project. It was initiated by the local community and it will be co-operatively owned by members of the local community. Therefore the financial benefits will be for the members of the local community that support it. The Crida proposal is a local initiative with the costs being found from a share issue so the taxpayer is not having to pay for the construction and installation.
- iv. Other: We the people of Bridgnorth want this to happen I've lived here all my life and respect the countryside but it needs to develop and create income for people or its useless it can't just exist for its own intrinsic value it has to do something to pay its way and food and energy are the main ways it can do that it's ridiculous to suggest an economy can run purely off the back of museums and other tax payer funding it needs to really make something and electricity is a valuable commodity. Development of Upton Cressett will be positive for the area creating new business opportunities which I hope will help keep young people in the area. We don't want to be dying village full of retired people who take out of the taxpayers pension pot but put nothing in we need young working people in the area and they need jobs and houses and this means developing some of the idle farm land which is completely uneconomic to farm without subsidies from the EU taxpayers so let's use the land for something more productive and more useful too. I think it is important that when hundreds of people contribute towards democratically determined local planning policies and a community strategy for Shropshire through public consultations and attending endless evening community meetings and come up with an agreed written strategy which makes economic development and fighting climate change its two core priorities that the Council's planning committees must then seek to honour that and give spatial recognition to the community's aspirations through the planning system. Please understand the difference between this community initiated, sensitively placed, meticulously researched small scale wind power initiative and the kind of large scale wind farm people tend to have an

issue with. I strongly support this proposal as it would bring huge benefits to Bridgnorth in terms of sustainable energy and is absolutely in line with Local Economic Partnership goals on renewable energy for Shropshire. I urge you to look beyond the knee jerk reactions and see the excellent opportunity that you are being offered! I would urge the council to support this application as local people want it but we are being drowned out by a tiny group of vocal people who want to keep us in the dark ages, I'm sorry but this town needs to grow and modernise and we need electricity to cook, heat and light our homes it's insane to suggest a windy hill on the outskirts of town is not the best place to generate our power, where would they have us put it in the middle of town!? Farmers need our support to develop their land and grow their business stop strangling farming with red tape and planning nimby ism, support this development now or the sake of the farming landscape and countryside in general, we desperately need jobs here, unlike all the wealthy retired objectors we need jobs for real local people who are born and bred here and work the land for low wages, we can't afford luxury homes in listed buildings and converted barns , we need barns for cattle!!! We also need energy for farming so lets have more wind turbines to supply that

- 5.4 Stop Bridgnorth Wins Farms (SBWF): have commissioned a consultant to undertake an alternative assessment of the proposals. The main conclusions are as follows:
- 5.5 Mr Bill Cash MP: I strongly oppose this planning application. I have lived at Upton Cressett for over 40 years now, and during that time the property has undergone a major transformation from derelict building to three Grade I listed buildings. Upton Cressett Hall, the Gatehouse, and St. Michael's Church are all heritage buildings of intrinsic worth to local and national history. The invasion of planned wind turbines that are only 450 metres from the site would have grave consequences for an area of such enormous historic value. Our work here has been a lifetime's commitment, which we treasure greatly. The concerns we have include the effect on the landscape and local heritage, highways and transport, including the likelihood that HGV will have to fight their way along roads that are entirely unsuitable, causing significant danger other users of the road. There is also the problem of it's destroying the Jack Mytton Way, a well-used bridle path. This would have terrible consequences for local equestrian life. I am deeply concerned that the guidelines regarding the destruction of heritage environments, as set out in the NPPF, has not been consulted, nor have English Heritage. The impact of the proposed wind turbines on the surrounding area would be devastating, decimating landscape that has intrinsic historic value. I look to and urge Shropshire Council to fully investigate every aspect of these proposals and to protect us from them. I strongly object to them.
- 5.6i. Mr William Cash (Upton Cressett Hall): My family have been resident at Upton Cressett for 40 years and we firmly object to the proposed wind turbines. These towering industrial turbines, each over twice the height of Nelson's column and specialising in regularly killing the sort of rare and migrating birds (such as curlews) who regularly fly over the hamlets of Chetton, Morville and Upton Cressett will change the face of Shropshire forever. As a lover of heritage and the unspoilt beauty of the ancient English countryside, we need to fight back, before it is too late. The turbines will be visible from as far away as Wolverhampton. Anybody

driving out of Bridgnorth on the A458 towards Shewsbury or towards Ludlow or living anywhere around Bridgnorth, Chetton, The Down, Criddon, Stapeley, Upton Cressett, Meadowley, Underton, Tasley, Aldenham and Monkhopton will have their lives impacted. Some residents are less than 650 metres away from the proposed turbines, a distance that is illegal in Scotland.

- ii. Described by Sir Simon Jenkins, chairman of the National Trust, as an 'Elizabethan gem', Upton Cressett, its Gatehouse and the Norman church of St Michael, with three Grade 1 listed buildings and three Scheduled Ancient Monuments (all within approx 1600 metres of the proposed turbines) is one of the most heavily protected heritage sites in the West Midlands. If commercially minded wind developers can simply breeze through Upton Cressett's Grade 1 protected defences, (also protected by Shropshire Council's own SAM-DEV principles) then what hope is there for the rest of the Bridgnorth area - or indeed other sites in Shropshire which does not have the highest level of statutory protection from English Heritage? The beauty of our Shropshire Hills, and what it means to us lucky enough to live here, is priceless. We cannot be bought off with token promises of a new coat of (ecology friendly) paint for the local village hall. Landowners and farmers may own the land, but they do not own our Shropshire landscape. That ancient landscape is owned by all of us, by the real community who live and work here - and nobody has the right to impose Triffid-like industrial structures that destroy the very beauty of what makes this part of Shropshire so unique.
- iii. Then there is the irrevocable loss of heritage/tourism appeal to the entire Bridgnorth area which is rightfully regarded as the 'gateway' to the rest of Shropshire for visitors and tourists. Much of Bridgnorth's economy is dependent on heritage tourism and visitors, with 8% of Shropshire's entire economy being tourism related. That will all be put at perilous risk, along with local jobs, especially in the accommodation sector and equestrian tourism. The Bridgnorth Town Plan clearly states that 'maintaining heritage' is a priority for the town, and surrounding area, a heritage that anybody lucky enough to live around Bridgnorth and the surrounding Shropshire Hills is justly proud of. Of the heritage and garden jewels in the Bridgnorth area, one of the highlights are the Dower House gardens of Dr Katherine Swift at Grade 1 Morville Hall, whose approach and 'historic setting' will also be harmed by the turbines. Shropshire was once the birthplace of the Industrial Revolution. Those days are long gone. It is now our wild unspoiled countryside and our beautiful gardens & listed buildings which provide jobs and incomes for residents and solace for visitors. All this will be under threat if this application is allowed to go ahead? At Upton Cressett, we have played a small but important part over the centuries in the story of Bridgnorth, with Shropshire's history books reporting famous visitors including the young King Henry V in April 1483 - the eldest of the Princes in the Tower - who stayed before crossing the River Severn at Bridgnorth on route to London from Ludlow Castle; and Prince Rupert of the Rhine who hid in the Gatehouse around the Battle of Bridgnorth in 1646. The local community around Bridgnorth do not want our treasured and iconic landscape despoiled for the sake of turbines. (Mr Cash raises further concerns regarding the green credentials of the scheme, impact on birds, noise, equestrian interests, the Jack Mytton Way).

5.7 Society for the Protection of Ancient Buildings: Our interest in this matter is the setting of Upton Cressett Hall and its equally important gatehouse. These are historic buildings with which the Society has had involvement over many decades.

Their national importance has been recognised by a Grade I listing as has that of the nearby Norman church. The buildings' high listing grade requires that very careful consideration is given to any application for planning permission that might harm their setting. We trust that your council will give extremely careful consideration to this issue when assessing the current application for the wind turbines.

- 5.8 Friends of the Earth (Mr R Saunders): Supports the proposals. Comments summarised as follows: The Shropshire Community Strategy 2010-20 makes eleven references to climate change. Priority is responding to climate change. 'By 2020 we will ensure that Shropshire has a lower carbon footprint, inspired and implemented through community leadership. The proposed community owned wind turbines fit neatly into the ambitions of the Community Strategy. The Strategy highlights 'Shropshire Low Carbon Network, communities across Shropshire are keen to reduce their carbon emissions and there are now at least 12 groups working in their communities to encourage residents to think about climate change and how they can act on a local level. Objectors often make reference to negative impacts on the landscape, heritage and tourism but these are counterbalanced by comments such as "I find the turbines an attractive addition to the countryside". Such comments indicate that views on visual impact are subjective. The proposals have been presented as a threat to Shropshire's tourism when in reality they represent an attractive opportunity. The opportunity is also reflected in the 'Sustainable Tourism Strategy for The Shropshire Hills and Ludlow 2011-16. It emphasises 'being ambitious about the sustainable aspects of tourism and shifting to low carbon is a strategic policy of the AONB Management Plan and there are excellent examples of touring, businesses and whole communities where this has been embraced'. It is stated that the turbines represent an opportunity to bring tourists to Shropshire.

Representations from consultants acting for objectors

- 5.9 Billingsley (The Landscape Partnership) Landscape and Heritage Report (for Mr W Cash) – This report assesses the landscape and heritage information submitted in support of the application and makes the following conclusions:
All five of the principal heritage assets at Upton Cressett are of national significance. The three Grade 1 listed buildings are within the top 2.5% of all listed buildings. Moreover, as a group, they exhibit a remarkable collective within a most distinctive setting. This setting is not only in the immediate close grouping but also as experienced in the wider landscape. They have strong historical, architectural and cultural associations with links to key steps in the evolution of a manorial setting together with national events and historical figures. The proposed development of the two turbines would interpose into the views and setting from the Hall, Gatehouse and gardens to the east from a number of locations. In the case of the Hall the designed views towards the Gatehouse from the principal rooms of the ground and first floor Master Bedroom of the Hall will be significantly and adversely affected by the detracting presence of the turbines in the view. For the gatehouse there will also be significant effects, most notably from the second floor looking to the east. The degree of impact from both locations would increase in the winter months due to the largely deciduous nature of the trees present. There would be further harm to the significance of the Deserted Medieval

village located south east of the Hall as a result of the development being clearly visible within the setting on the higher ground to the south east. The effect on St Michael's church and the Moat has still not been verified or detailed by illustrative material produced during the winter by the applicant. However, it is accepted that the effects would not be greater than those on the Hall and Gatehouse. The results of the ACHA in the original application were not supported by sufficient analysis of the assets affected nor were they assessed from the features directly affected. This undermines the findings together with subsequent changes in the vegetation cover. The ACHSS (Feb 2014) by SLR provides a much fuller assessment of the heritage assets at Upton Cressett. It fairly, and in our view correctly, identifies a number of the special qualities of the individual assets. However, while the appreciation of the evidential, historic aesthetic and communal values are recorded in the report, the assessed levels of effect on the four selected viewpoints in our opinion considerably under-estimates the heritage effects on the heritage assets that together form the very special character and place of Upton Cressett. The location is a remarkable 'time capsule' that gives the visitor a tangible connection with the past. The findings of SLR from all four assessed locations on this heritage complex and the surrounding landscape are that they would be 'Imperceptible/None'. We consider this to be an unbalanced judgement. In contrast, we find major and moderate effects not only on three of the four locations assessed, but also on three further locations assessed with additional imagery in closer proximity to the Hall and Gatehouse complex. The LVIA provides a fair and reasoned study of the Landscape and Visual effect on the area. This identifies that the receiving landscape, which includes the settlement at Upton Cressett, is of 'high sensitivity' to wind turbines and that there would be significant adverse effects on the landscape character of the valley in which Upton Cressett is situated. The LVIA also notes that there would be significant visual impacts on all of the representative viewpoints selected in the LVIA within 3km. This includes Viewpoints 1, 11 and 9, all en route or at Upton Cressett. However, both the Planning Statement and The Design and Access Statement, submitted with the application, do not accurately record these significant findings, limiting the reporting to being 'small', 'localised' or in 'close proximity'. This is considered to be a misrepresentation of the findings of the LVIA. We find the individual and collective effects on the heritage assets at Upton Cressett result in significant harm to assets of great weight and importance at the national level. These adverse effects should be weighed alongside other adverse effects on the landscape and amenity, etc. against any benefits arising from the scheme in accordance with NPPF para 134. Based on the above report and conclusions, it is our view that the significant adverse impacts on the heritage and landscape assets at and around Upton Cressett should count materially and substantially against the proposed development in the decision maker's judgement.

- 5.10 Camlad Ecology Review of the published ecology and bat survey reports (for Mr W Cash) This report has the following conclusions:
The Extended Phase 1 Survey and Report by Ecology Matters was limited in its scope and selective in its reporting. The record search did not cover the area recommended in existing guidance and gave very little information about the local habitats and the wider landscape. It did not therefore provide any reason to reduce the level of bat survey on site. The opportunity to carry out activity survey and automatic survey during 2011, in the summer following the Phase 1 survey, was

missed, as was the opportunity to inspect the mature trees during winter. A single period of survey work in June 2012 was undertaken; this is far less than is recommended in guidelines from the Bat Conservation Trust and from Natural England, both in relation to wind turbine developments and in relation to potential tree roosts. The surveys recorded activity by noctule bats, a species described as being at high risk from wind turbines, but the assessment of the risk to these bats, and to species with similar habits, was inadequate. The level of survey was less than recommended in TIN 051, published in early 2012, and less than recommended by the BCT guidelines. Edition 1 of the BCT guidelines did not have specific recommendations for wind turbine sites, but edition 2 did; this was published in 2012 and even if the surveyors were not aware of its recommendations in June 2012, they would have been able to carry out further survey in late summer and early autumn. Their reports were not published until 2013. Given the limited nature of the survey data available, it is not safe to conclude that the proposed turbine development will not present a risk to bats.

- 5.11 Sinclair, Critique of the submitted information relating to landscape and visual effects, impacts on residential receptors, and related matters (For Stop Bridgnorth Wind Farm Ltd). The main conclusions are as follows. More detailed conclusions of the Sinclair report are included in Appendix 1:
- i. In the light of this submission, other comments by members of the SBWF group, and relevant further reports, it is considered that the proposal is harmful to acknowledged interests on a broad front and should be refused planning consent for the reasons itemised above. Its unquantified output is minimal, improbably and unjustifiably expressed in terms of other benefits, and is insufficient to over-ride its comprehensive conflicts with relevant local and national policies. In respect of these impacts and policy conflicts, the application could and should be safely recommended for refusal, and so determined by members. The potential cumulative effects with the turbine at The Hills, which remains subject to appeal and is a material consideration, reinforce this recommendation.
 - ii. In colloquial and descriptive terms - which always lie at the heart of the more formal language of assessment and policy compliance - the exceptional qualities of the area affected should be fully recognised; members and officers should not feel insulated from them or shy of responding to or expressing them.
 - iii. This so-called 'Community' project has no merit in those terms on planning grounds, is universally opposed by the local community it affects, while its minimal benefits fed into the national grid are ill-defined and exaggerated. Its landscape and visual impacts are greater and more adverse than stated by the applicants, while no assessment was made of the cumulative impact should The Hills proposal be successfully appealed. No rational reason is advanced as to why such a conspicuous site was ever selected with an almost wilful effect on the amenities of the County's premier riding, walking and cycling route, on the safety of its equine users and on their opportunity to use any locally-based network.
 - iv. The simultaneous damage to the approach to the nationally recognised grouped assets at Upton Cressett is without justification when weighed in the planning balance and considered in the light of recent appeal decisions. The adverse impacts of the proposed machines on the setting, significance and appreciation of

this unique and sensitive hidden gem, on its views over the historic parkland and on the ethos embodied in the Hall, the church and the unique Gatehouse would negate the area's identity as a time-capsule of immense importance set within the County's unspoilt landscape. This would in turn erode the local tourism resource and become seen as a grave error which would compromise other similar proposals and send a damaging signal through the planning, heritage and tourism sector in Shropshire and far beyond.

6. THE MAIN PLANNING ISSUES

- i) The justification for the proposals in relation to sustainability, climate change, energy policy and agriculture;
- ii) Whether the site is an appropriate location for the proposed development and other off-site impacts are acceptable including with reference to:
 - Landscape, visual and heritage impacts;
 - Noise and vibration;
 - Shadow flicker;
 - Ecology;
 - Access and traffic;
 - Tourism and leisure;
 - Equestrian interests;
 - Archaeology;
 - Aviation;
 - Process efficiency;
 - community benefits.

7.0 OFFICER APPRAISAL

7.1 Justification – general: The NPPF advises (s98) that 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 project provide a valuable contribution to cutting greenhouse gas emissions; and
- Approve the application if its impacts are or can be made acceptable.

7.2 Notwithstanding this, the applicant advises that there are a number of reasons for selecting the current application site:

- Suitable wind speed;
- Free from obstruction that would affect wind flow;
- Large amount of available land (turbines will generally require an area in the region of up to 6 times the rotor diameter by 4 times the rotor diameter);
- Suitable road network for turbine component deliveries;
- Suitable ground conditions to support the structures;
- Availability of grid connection;

- Suitable separation from residential property to avoid noise effects.
- The Development is a local community led initiative, and thus has a clear locational need to be in this area.
- Remote from residential properties;
- It is stated that the likely impacts on landscape character and visual impact are likely to be limited to small areas in close proximity to the Applicant Site. The undulating landform and intervening tree and hedgerow planting would be likely to limit the impact of visual amenity;
- It is stated that there would be little or no impact on the majority of heritage assets and tourism;
- The wind turbines would not over-sail or be located within ‘fall over distance’ from the nearest public rights of way;
- It is stated that the proposals would not impact on aviation or telecommunication interests;
- No other significant adverse environmental effects are predicted including with respect to amenity, ecology and hydrology.

The applicant’s statements with regard to environmental effects are assessed in succeeding sections. It is considered however that the above issues would in principle represent valid justifications for the current choice of site.

7.3 Justification – Energy and climate change: The UK Renewable Energy Strategy (July 2009) requires the UK to provide 14% of its final energy production from renewable sources by 2020. The government has stated that on-shore wind energy will have a major role to play in achieving this. Locally produced electricity also has the added benefit of being consumed locally, which offsets the significant transmission losses experienced with respect to conventional power generating plants which in the UK vary between 7 to 9% of generated electricity. The proposed facility would produce equivalent electricity to that used by up to 900 residential properties. It is accepted that this would contribute locally to the objective of achieving the UK Renewable Energy Strategy target and providing more secure and diverse sources of energy supply. This is a significant material consideration. Objective 9 of the Shropshire Core Strategy seeks to promote a low carbon Shropshire, mitigating the effects of climate change by promoting, among other things, the generation of renewable energy. The proposals would also assist in helping to address the effects of climate change by replacing energy from fossil fuels and associated greenhouse gas emissions. This is also in accordance with the climate change objectives of the NPPF (section 10).

7.4 Justification for development in the Countryside - The proposals must be assessed against Core Strategy policy CS5 (Countryside and Green Belt), which advises that in the open countryside, new development will be strictly controlled in accordance with national planning policies. Development proposals on appropriate sites which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability of rural communities by bringing local economic and community benefits, particularly where they relate amongst other matters to small-scale new economic development diversifying the rural economy, including farm diversification schemes.

- 7.5 The proposals comprise a form of farm diversification and would improve the sustainability of the farm. The NPPF advises (s98) that renewable energy should be accommodated where technology is viable and environmental, economic and social impacts can be satisfactorily addressed. The wider environmental and economic benefits of renewable energy projects, whatever their scale, are material considerations that should be given significant weight. The Government recognises that if the renewable energy targets are to be met, a greater diversity of renewable energy schemes will need to be developed in a wider variety of locations than in the past. The Government expects each authority to contribute to meeting the targets. Given the importance attached by planning policy and guidance to renewable energy and addressing climate change it is considered that although the current proposals would involve development in the open countryside, there would be no conflict in principle with Core Strategy policy CS5. This is provided however that the proposals are also capable of satisfying other development plan policies with respect to environmental and other land-use issues.
- 7.6 Farming in Shropshire is undergoing significant change. The current proposals would provide a stable source of supplementary income for the farm enterprise. The NPPF and Core Strategy Policy CS5 advise that local planning authorities should be supportive of well-conceived farm diversification schemes that contribute to sustainable development objectives and help to sustain the agricultural enterprise. It is considered that the proposals would comply with this objective by facilitating a sustainable and diverse farming business supporting the rural economy. It is therefore considered that the need for the proposals and the associated benefits in terms of renewable energy, climate change and farm diversification are capable of being supported in principle. This is provided however that the proposals are also capable of complying with other relevant development plan policies, guidance and other material considerations.

Landscape and visual impact

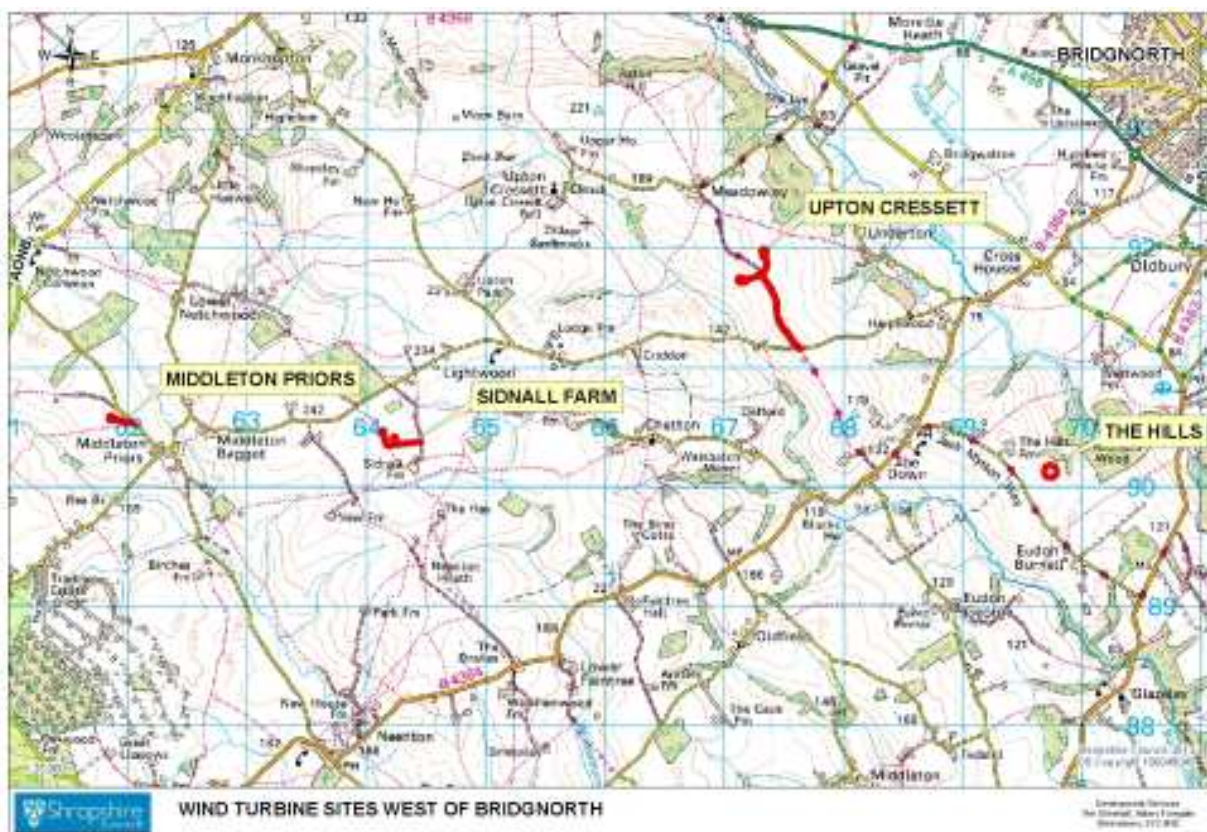
- 7.7 Landscape policy: Core Strategy Policy CS17 seeks amongst other matters to conserve, enhance and, where necessary, restore the quality, diversity and distinctiveness of Shropshire's landscape character. The supplementary guidance on renewables accompanying the NPPF advises that local planning authorities should recognise that landscape and visual effects will only be one consideration to be taken into account in assessing planning applications and that these must be considered alongside the wider environmental, economic and social benefits that arise from renewable energy projects.
- 7.8 LVIA: A landscape and visual assessment (LVIA) advises that the Application Site is not subject to a landscape designation. Policies CS5, CS6, CS17, Strategic Objective 11 of the Core Strategy and saved Policy D11 of the Bridgnorth Local Plan set out the context for protection of landscape quality. The LVIA considers the effect of the proposals from 12 viewpoints surrounding the site, based on the Zone of Theoretical Visibility ("ZTV"). The Application Site lies within the Timbered Plateau Farmland Landscape Character Type. The likely impacts on the landscape character, as described in the LVIA, are considered to be major and significant for a localised area within the application site and the small valley between Chetton, Criddon, Upton Cressett and Meadowley. The LVIA

advises that beyond this area, the effects on landscape character would reduce quickly, bearing in mind also the screening effect of existing topography and vegetation. At greater distances where views may be open, such as the Clee Hills, it is stated that the development would be seen as a minor component of the landscape.

- 7.9 The LVIA includes an assessment on the AONB, including a viewpoint from Abdon Burf. It is stated that visibility from the AONB to the north-west and Wenlock Edge is restricted and screened by the large extent of woodland along Wenlock Edge. The LVIA concludes that the effect on the AONB would be largely restricted and would not be significant. The application site lies beyond the 5km buffer zone which the Shropshire Hills AONB Management Plan 2009-2014 seeks to impose around its boundaries on major wind turbine development. The LVIA recognises that there would be a significant visual effect on users of the Jack Mytton way, in close proximity to the development, but distance and partial screening would limit the extent and duration of such views beyond the immediate environs of the site.
- 7.10 The LVIA predicts no significant visual effects on any Historic Parks and Gardens or Morville Hall, which lies approximately 2km from the Application Site. In respect of Upton Cressett Hall and Gate House, which lies approximately 1.6 km from the application site, it is stated that planting between these receptors and the site would reduce visual impact. Walkers/riders outside of these assets may experience some visual effect but the report advises that this would be more in terms of the appreciation of the general countryside. The LVIA concludes that the impacts on landscape character and visual impact are likely to be limited to small areas in close proximity to the Site. Impacts further away are limited by topography and screening and there would be no significant effects on the AONB. It is stated that the development would not be overly intrusive when viewed from a distance and that this is helped by the design and light grey colour of the turbines. It is further stated that any localised effects need to be countered against the significant renewable energy benefits of the development. These conclusions have been challenged by objectors to the scheme, particularly with respect to the visual impact on heritage assets (see succeeding section).
- 7.11 Officers have inspected the site and its environs. In general terms the site is located on a prominent ridge and the landscape surrounding the site is of a high scenic quality, being generally pristine and devoid of other tall / industrial scale structures. Historic Environment officers advise that the landscape around Upton Cressett has been noted for its sense of isolation, remoteness and tranquillity, and they contend that this forms an intrinsic attribute which adds to the significance of this group of heritage assets. Saved Policy D11 of the Bridgnorth Local Plan aims amongst other matters to avoid the introduction of larger scale wind turbines in prominent plateau edge locations. The proposed turbines would be 2/3 of the height of the existing ridge upon which they would be situated and 3-4 times the height of mature trees in the landscape. It is considered that this would result in structures which from some local views may appear 'out of scale' with the landscape. The LVIA concludes that the proposals would not give rise to an unacceptably adverse visual impact from most of the identified viewpoints. It is however considered that there would be the potential for a succession of lower magnitude impacts on the wider landscape surrounding the site, given the scale

and location of the proposals. It is not considered that these visual / landscape effects would be sufficient on their own to justify planning refusal. They are however a material consideration to be taken into consideration. (Core Strategy Policy CS5, CS6, CS17, Policy D11 of the Bridgnorth Local Plan).

- 7.12 Cumulative Visual Impact: An assessment advises that there are only two other proposed wind turbines of any significant height within the vicinity of the Application Site when the application was submitted. A single turbine of a height of 34.2 m, approximately 5.4 km to the west of the site at Home Farm, Middleton Priors (12/02160/FUL); and a single turbine of a height of 39.6 m, approximately 15.5 km to the south of the site at Mawley Town Farm, Cleobury Mortimer. Both of these schemes have received planning consent. The assessment concludes that there would be no significant cumulative visibility impacts due to their distances. This assessment has been challenged by a consultant for the Stop Bridgnorth Wind Farms campaign group who advises that 2 further schemes have since been refused by this committee. The schemes at The Hills (13/02194/FUL) and Sidnall Farm (13/03126/FUL - see plan) and are both now the subject of planning appeals. If they were to proceed on appeal then it is considered that there would be increased potential for cumulative visual impact, given in particular the potential for inter-visibility between the sites at the Hills (77.5m) and Upton Cressett, which are separated by 2.8km.



- 7.13 Visual impact – MOD lighting: The MOD requires flashing red or infra-red omnidirectional aviation lighting to be installed at the highest practical point on the turbine in the interests of air safety (the top of the nacelle). The introduction of

aviation lights to the 2 turbines in this hillside location would have the potential to add to overall levels of visual disturbance.

7.14 Heritage: Relevant policies and national guidance for assessing heritage impacts are listed in section 10 of this report. In general, the level of protection of a heritage asset should have regard to its significance as well as the extent of any impact. Proposals that do not conserve heritage assets are not considered to be sustainable and should be refused unless the need for the development outweighs the harm to the heritage interest. The advice also recognises that it can be necessary to protect the wider setting of an asset in order to avoid an adverse impact. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness (NPPF 131).

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss... (NPPF 133). Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (NPPF134).

7.15 A cultural heritage report assesses the significance of heritage assets, and potential impacts on the assets and settings of designated heritage assets in the area surrounding the site. Three scheduled ancient monuments, 20 listed buildings and one conservation area were identified within 2 km of the site. The impact on the setting of these designated assets has also been considered. A number of the assets are found at Morville, including the Hall, St Gregory's Church, a number of grade 2 listed buildings and a conservation area. The report finds that there would be negligible impact on the wider setting for these assets. The manorial complex at Upton Cressett contains a number of Grade 1 listed assets including the Hall, Gate House, Church of St Michael and the moat and fishpond. The report finds that the main appreciation of the Hall, its associated buildings and the setting of these assets would not be compromised by the Development. Any potential impact on these assets would also be diffused by existing planting that breaks up the horizon in proximity to these assets.

7.16 The closest heritage asset would be Upper Meadowley Farm, which lies 800m to the south east of the Development. However, the report finds that the Development would be sited well outside of the setting of the listed farmhouse, and would have a low impact. It would also be located well outside the setting of heritage assets at Chetton, Harpswood, Underton and Lye and would have no discernible impacts on these assets. Criddon farm forms the setting for the designated assets of Criddon Hall and the Old House. There may be some views from the listed

building from the approach to Criddon from Chetton, and due to the orientation of the Hall to the Development. This would however only be a small change in the landscape. There would be no or negligible impact on the majority of heritage assets. The report concludes that the impact on the Upton Cressett complex and Criddon farm would be limited and the significant benefits of the Development as a community led renewable energy development need also to be considered.

- 7.17 A consultant acting for the Stop Bridgnorth Wind Farms campaign group has queried these conclusions, stating that the level of significance of individual assets and the magnitude of effects has been underestimated. Further details of this response are included in appendix 1. A consultant acting for the owner of Upton Cressett Hall also concludes that “the individual and collective effects on the heritage assets at Upton Cressett result in significant harm to assets of great weight and importance at the national level and that this should count materially and substantially against the proposed development”.
- 7.18 English Heritage advises that each of the Grade 1 listed buildings at Upton Cressett Hall 1.6km south west of the site has particular significance, but because they are also closely interrelated this adds to the overall significance of the manorial complex as a whole. The Hall is located in a distinctive landscape setting at the head of a south east-facing valley, surrounded on 3 sides by hills and at the end of a ‘cul-de-sac’ approached from the east over the ridge from Meadowley. The layout of the complex is considered by English Heritage to be designed to take advantage of views to the south and east. The site of a deserted medieval village with extensive earthworks occupies the wider environs extending from 2-400m from the hall itself. The area is crossed by a number of rights of way which provide links with other heritage assets in the surrounding area (referred to above). A number of these footpaths radiate from the Hall and locally afford medium distance views towards it from surrounding land. The LVIA identifies that the receiving landscape, including the settlement of Upton Cressett, is of ‘high sensitivity’ to wind turbines and that there would be significant adverse effects on the landscape character of the valley in which Upton Cressett is situated. The Heritage Appraisal accompanying the application and the Sinclair report commissioned by objectors confirm that the proposed turbines would potentially be visible from some locations within the curtilage of the hall and its immediate environs, although screening is provided elsewhere by trees.
- 7.19 Historic Environment officers agree with English Heritage that the proposals would cause harm to the setting of the heritage assets at Upton Cressett “...at the upper end of scale of less than substantial harm.” as a consequence of development within their setting, and that the setting of these assets is more extensive than has been assumed by the applicant’s heritage consultant. English Heritage consider that the turbines would introduce new, large, industrial elements into the setting that would result in harm being caused to the significance of the Upton Cressett manorial complex because of their contrasting scale, appearance and movement. It is stated that this would diminish from the experience of this unusual and sensitive historic environment complex. Some harm is also predicted to other designated and non-designated heritage assets in the local area including Criddon Hall and Upper Meadowley Farmhouse (Grade II).

- 7.20 English Heritage have advised that in the above circumstances Section 66 (1) of the Listed Buildings Act 1990 should apply, which requires special regard to be had 'to the desirability of preserving the building or its setting'. They state that the conservation of the Upton Cressett assets should be afforded 'great weight' in accordance with the requirements of the NPPF and that any harm should have a clear and convincing justification. English Heritage does not consider that the public benefit for the proposals would outweigh the harm that would be caused and are accordingly recommending refusal. The Historic Houses Association cites a recent case at Lyveden, New Bield in Northamptonshire in support of their own objection to the scheme, where it was found that approval for wind turbines in a similar context would contravene the protection which should exist for the setting of a Grade 1 historic site.
- 7.21 The NPPF advises that the generation of renewable energy is a significant material consideration and that such proposals should be approved where any impacts are or can be made acceptable (NPPF s98). It is necessary therefore to consider whether the adverse effects of the proposals on the setting of Upton Cressett Hall referred to by heritage objectors would be outweighed by the benefits of the proposals. These relate to the generation of up to 1.5MW of renewable energy through a 'community' scheme and the associated benefits for climate change. The applicant has not put forward any mitigation measures to overcome heritage objections. Given the importance of the heritage assets at Upton Cressett, the interrelationship with their setting and the clear advice provided by heritage consultees it is not considered that the impact of the proposals on the heritage interests can be justified in this instance. The proposals therefore are considered to conflict with policies CS6 and CS17 of the Core Strategy and policy D11 of the Bridgnorth Local Plan, in respect of the historic environment. Other potential impacts on general landscape quality and leisure / tourism and equestrian interests are considered in succeeding sections.
- 7.22 Noise and vibration A noise assessment accompanying the application includes baseline noise measurements around the site to determine whether the proposals would comply with relevant guidance for noise from wind turbines. The predictions indicate that noise levels are comfortably within relevant ETSU-R-97 noise limits, although wind turbine noise will be audible at a low level under some circumstances. This conclusion has been queried by consultants acting for objectors who also question the methodology applied. The applicant has responded by advising that whilst the consultant may not agree with the method, it has been widely accepted and represents good practice. It is stated that planning conditions can also address concerns about the accuracy of turbine noise predictions. The applicant acknowledges that noise levels at low wind speeds will exceed the background noise level at night. However, in absolute terms it is stated that the noise levels are well below the ETSU-R-97 noise limits and also below relevant guidelines for ensuring good sleep protection. The objector's consultant also refers to the potential for the turbines to give rise to a phenomenon known as 'other amplitude modulation' (OAM). The applicant accepts that OAM has caused problems in a few isolated cases but advises that planning conditions could be imposed to control OAM should it occur. The applicant concludes that the objector's consultant has not set out any valid reason why ETSU-R-97 noise limits will be exceeded, nor why the application should be refused for noise reasons.

- 7.23 The noise report accompanying the application predicts that noise in the area between turbines along the Jack Mytton Way would approach a maximum of 48 decibels and would exceed 45 decibels for a distance of approximately 400 metres. It is considered that this may potentially impact on the sense of tranquillity enjoyed by bridleway users at certain times. Public Protection have not however objected to the proposals provided a condition is imposed which specifies individual noise limits for sensitive properties in the area surrounding the site. It is considered that this would provide sufficient protection to the nearby residents in principle and that an objection on noise could not be sustained.
- 7.23 Shadow flicker and Reflective Light: Shadow flicker refers to the shadows that a wind turbine casts on a structure and observes at times of the day when the sun is directly behind the turbine rotor from an observer's position. Shadow flicker is most pronounced in northern latitudes during winter months because of the lower angle of the sun in the winter sky. During intervals of sunshine, wind turbine generators will cast a shadow on surrounding areas as the rotor blades pass in front of the sun, causing a flickering effect while the rotor is in motion. The document 'Onshore Wind Energy Planning Conditions Guidance Note, October 2007' advises that 'Only dwellings within 130 degrees either side of north relative to a turbine can be affected and the shadow can be experienced only within 10 rotor diameters of the wind farm'. In addition, potential nuisance from shadow flicker occurs at frequencies between 2.5Hz and 40Hz. There are no dwellings within the relevant distance. Therefore, the applicant concludes that there will be no adverse impacts. However, The Jack Mytton Way passes within the potential zone where shadow flicker effects could occur (in the evening for the western turbine and the morning in a different area for the eastern turbine). Whilst any such effects would be fleeting and localized it is considered that there could potentially be implications for equestrian interests (see below).
- 7.24 Ecology An ecological assessment concludes that the few valued ecological receptors that were present on or around the site had very low potential for risk associated with the proposal. A mature oak is located 50m south east of the north east turbine (turbine 1) and has bat roost potential. The report recommends that the separation distance is maintained, including during the construction phase. Subject to this the report considers that the proposals will not have any significant adverse impact on ecology. The Council's ecologist has not objected subject to the inclusion of an advisory note on bats and Natural England has also advised that the proposals would be unlikely to affect bats. A survey by a bat consultant acting for an objector has however advised that the survey undertaken by the applicant was limited in its scope and selective in its reporting and area. The survey recorded activity by noctule bats, a species described as being at high risk from wind turbines. It is stated however that the assessment of the risk to these bats, and to species with similar habits, was inadequate and less than recommended in relevant BCT guidelines. The consultant advises on this basis that it is not safe to conclude that the proposed turbine development will present no risk to bats. SC Ecology has been informed of this information and any subsequent comments will be reported verbally to committee. However, in view of the current stance of Natural England and SC Ecology and the fact that the oak tree is outside the recommended stand-off distance it is not considered at this stage that an objection on the grounds of ecology could be substantiated. (Core Strategy Policy CS17)

- 7.25 Access and traffic: The temporary construction period would involve visits to the site by HGV's. SC Highways have not objected subject to the imposition of a condition requiring the submission of a traffic management plan. Whilst the approach route to the site is narrow and steep in places it is considered that abnormal loads are capable of being accommodated subject to appropriate safeguards. There would be very limited highway implications during the operations stage, with occasional maintenance visits. It is concluded that the proposals are capable of being accepted in principle in highway terms subject to a construction management plan condition.
- 7.26 Tourism and leisure: Policy CS16 of the Core Strategy aims to promote the growth of sustainable tourism interests and facilities, subject to environmental capacity. Policy CS7 of the Core Strategy and saved policy D6 of the Bridgnorth Local Plan also aim to protect the interests and promote the improvement of cycling, walking and horse riding. Section 6.37 of the Core Strategy advises that 'the rural and tranquil nature of Shropshire's countryside is also a key component of Shropshire's attractiveness as a visitor destination and significantly adds to the quality of life for residents. It is therefore vital that all tourism, cultural and leisure facilities, particularly in rural areas, are compatible with their location so that Shropshire's unique character and tranquility is retained'.
- 7.27 The applicant advises that the Scottish Government's Economy, Energy and Tourism Committee found that there was no empirical evidence that suggested the Scottish tourism industry had been adversely affected by wind turbines. Objectors have however expressed concerns that the proposed turbine would deter visitors from the area by adversely impacting on visual amenities, heritage assets and the visitor's appreciation of leisure assets such as the Jack Mytton Way. This is one of the most frequently cited concerns in the 572 objections received against the proposals. The Bridgnorth and District Tourism Association advises that data prepared by Shropshire Council Research and Development Team for the Bridgnorth Area Tourism Strategy from puts a value to the visitor economy in the Bridgnorth area alone of £92m in 2011, supporting 2979 jobs out of a total of 15,200. They refer to the "Shropshire Hills & Ludlow Visitor Survey Report" commissioned by the Shropshire Hills Destination Development Partnership (October 2013), which states that 92% of visitors said that "Landscape/scenery" is what appeals most about the area, followed by 52% saying "peace and tranquillity". They advise that tourism is one of the most important industries in rural Shropshire, employing more people than agriculture. This depends on the attraction and amenities of our countryside which attract visitors with their peace and tranquillity which would be affected by wind turbines.
- 7.28 The Historic Houses Association (HHA) also advises that the heritage assets at Upton Cressett include an award-winning Grade 1 historic house and Gatehouse as well as one of the few privately owned historic houses in the county which is open regularly to the public. It is stated that the property and gardens are also used as a community venue for local festivals, including hosting Shakespeare plays in the grounds. The Gatehouse (also Grade 1) offers holiday heritage accommodation (nationally shortlisted at the Hudson's Heritage Awards). The HHA expresses concerns that the appeal of these visitor facilities would be seriously affected by the presence of industrial turbines 1600 metres away. Whilst views towards the turbines from the hall curtilage would be partly obscured by trees it is considered that the wider landscape surrounding the hall, including the medieval village site and connecting footpaths

forms an integral part of the hall's tourism attraction which could also be adversely affected by the turbines. The Jack Mytton Way passes 180m from the proposed turbines. This is a promoted recreational route well used by tourists and local people for walking, cycling and horse riding. Rights of Way have not objected but National Trust advises that impacts of the proposed turbines on the public enjoyment of this route should be given serious consideration. Objections from the British Horse Society are considered in the succeeding section.

- 7.29 It is acknowledged that tourism forms an important component of Shropshire's economy and is sensitive to the county's intrinsic natural and built environment qualities. It is concluded that there are a number of heritage assets in the vicinity of the wind turbine sites which could potentially be affected by proximity of the turbines. Landscape and tranquility is a key component of Shropshire's tourism offer and there is a concern that this could be adversely affected by the introduction of such large scale man-made structures into an environment which attracts visitors due to its pristine and unspoilt nature. There is no evidence to support the conclusion that the effect on any leisure / tourism interests would on its own be sufficiently adverse to justify planning refusal. However, it is considered that the potential for adverse impact and associated damage to visitor perception of the Shropshire environment is a material consideration to be weighed against the benefits of the proposals. (Core Strategy Policy CS16, CS17)
- 7.30 Equestrian interests: The British Horse Society has objected on the basis that the propose turbine would be sited close to the Jack Mytton Way which they describe as a 'flagship' long distance bridleway. They advise that the turbine is to be sited approximately 180m from the public highway, and far closer than the British Horse Society (BHS) recommended safe minimum separation distance of 4 times the overall height (308m). They express concern that horses may be startled by the turbine causing danger to riders and other bridleway users. They cite a survey which showed a number of serious equestrian incidents near turbines. This concern is noted, although it should be recognized that the BHS guidance is a recommendation as opposed to a statutory provision and detailed circumstances will differ with individual sites. The DCLG renewable and low carbon energy guide advises in this respect that 'Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances (16)'.
- 7.31 In this case it is considered that views towards the turbines would be available from a significant distance along the Jack Mytton Way to the north and south of the turbines and that these would appear sufficiently distant and to one side of the direction of the bridleway to reduce the potential for a horse to be startled by sudden appearance of the turbines. However, it has been noted above that noise levels for a 400m stretch of the bridleway between the turbines would potentially be elevated significantly above background levels. It has also been noted that the orientation of the turbines and bridleway mean that shadow flicker effects may be encountered locally in the morning and evenings. It is considered that the combination of visibility / movement / noise and potential shadow flicker effects may have the potential to undermine the popularity of this route for equestrian use. The extent of any such effect is unknown and is not considered sufficient on its own to justify a planning refusal, given the spatial relationships of the bridleway and the proposed turbines. This is however a material consideration to be balanced against the benefits of the proposals.

- 7.32 Rights of way: The proposed turbines have been sited to be a minimum of 150m away from the from the two public rights of way which are closest to the site, the Jack Mytton Way and the bridleway between Meadowley and Underton. The Applicant is also prepared in principle, in conjunction with the landowner, to provide a permissive right of way between Meadowley and Underton to provide greater distance between the relevant bridleway and the turbines as a 'planning gain'. The Jack Mytton Way follows the existing access track that would be used to access the site. Any disruption to users of this right of way would be temporary during this period. A construction compound would be used for storage and parking of vehicles to prevent obstruction of the right of way. The applicant is also prepared to accept a condition preventing disruption to the right of way during the construction period. The propose turbines are located sufficiently far from rights of way that ice throw is not considered to be an issue. The Rights of Way section has not objected.
- 7.33 Aviation: The MOD has confirmed that it does not object to the proposals on the basis that it has been confirmed that the height of the turbines would be reduced from 80m to 77m.
- 7.34 Community benefits: The proposals have been put forward a community led initiative offering shares in the enterprise to local investors. Greater local community involvement in renewable energy development is advocated in the renewable energy guidance accompanying the NPPF. In addition, in June 2013 the Government announced that the community benefit payment associated with major on shore wind development would change from £1000 per installed Megawatt to £5,000. This has been reflected by the wind turbine industry in 'Onshore Wind: Our Community Commitment - A commitment by the onshore wind industry to local communities. Renewable UK - October 2013). The current proposals would fall below the energy threshold at which the Renewables UK community benefit payment is targeted. Other recent turbine schemes in Shropshire have volunteered a 'pro-rata' contribution towards a community benefit fund but the applicant has not entered into any equivalent dialogue with officers. It is recognised that the proposals would also deliver wider benefits to the local community by supporting local employment and investment, improving energy robustness and helping to address the effects of climate change at a local level. These benefits must be weighed against any impacts of the scheme.
- 7.35 Electro-Magnetic Interference: Consultation have not revealed any objections from microwave link operators. The terrestrial digital TV signal is less susceptible to interference and is considered unlikely to be affected given the distance to and relative location of the nearest properties.
- 7.36 Property prices: Whilst house prices are not a planning matter, studies on this subject conclude that there is no correlation between property prices and proximity to wind turbines.
- 8.0 CONCLUSION
- 8.1 The proposals to construct two 77m high turbines on land at Criddon Hall Farm west of Bridgnorth have attracted a significant number of representations, both for and against. The benefits of the proposals in terms of renewable energy generation,

climate change and the extent of local community involvement and support are acknowledged. These benefits must however be weighed against the potential impacts. The NPPF advises that if the impacts are or can be made acceptable then renewable energy schemes should be approved.

8.2 The individual issues raised by the proposals have been assessed. It is considered that the proposals are capable of complying in principle with many relevant policies, including with respect to highways, ecology and noise. However, English Heritage and the Council's Historic Environment section have objected on the grounds that there would be adverse impacts on the setting of the group of Grade 1 listed buildings at Upton Cressett Hall. This objection has also been supported by other organisations with heritage interests including the HHA, CPRE, National Trust and the Bridgnorth Tourism Association. It is considered that the pristine landscape surrounding the listed buildings at Upton Cressett contributes significantly to the setting of this important group of heritage assets and would be adversely affected by the proposed development. It is considered that this would represent an unacceptable impact on the setting of the listed buildings at Upton Cressett which would be counter to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant heritage policies including sections 131, 132, 133 and 134 of the NPPF and Core Strategy Policy CS17.

8.3 It is also considered that the proposals would have the potential to result in a number of other negative impacts including on local visual amenities, landscape including tranquility, associated leisure / tourism interests including equestrian interests and use of the Jack Mytton Way. It is not considered that the level of these other potential adverse impacts would be sufficient individually to justify planning refusal. However, it is considered that such impacts would add to the heritage concerns referred to above.

8.4 Whilst the benefits of the scheme are acknowledged, it is not considered that these are sufficient to outweigh the adverse effects on the setting of the heritage assets at Upton Cressett. There is concern that given the prominent location of the site on a ridge bisected by the popular Jack Mytton Way there is also the potential for adverse visual impacts to impact adversely on leisure / tourism interests which form an important component of the local economy. This would be counter to Core Strategy Policy CS7 and Saved Bridgnorth Local Plan Policy D11. It is concluded on balance that the development is not sustainable and that planning permission should be refused.

8.0 RISK ASSESSMENT AND OPPORTUNITIES APPRAISAL

8.1 Risk Management: There are two principal risks associated with this recommendation as follows:

- As with any planning decision the applicant has a right of appeal if they disagree with the decision and/or the imposition of conditions. Costs can be awarded irrespective of the mechanism for hearing the appeal, i.e. written representations, hearing or inquiry.
- The decision may be challenged by way of a Judicial Review by a third party. The courts become involved when there is a misinterpretation or misapplication

of policy or some breach of the rules of procedure or the principles of natural justice. However their role is to review the way the authorities reach decisions, rather than to make a decision on the planning issues themselves, although they will interfere where the decision is so unreasonable as to be irrational or perverse. Therefore they are concerned with the legality of the decision, not its planning merits. A challenge by way of Judicial Review must be made a) promptly and b) in any event not later than three months after the grounds to make the claim first arose.

Both of these risks need to be balanced against the risk of not proceeding to determine the application. In this scenario there is also a right of appeal against non-determination for application for which costs can also be awarded.

8.2 Human Rights: Article 8 gives the right to respect for private and family life and First Protocol Article 1 allows for the peaceful enjoyment of possessions. These have to be balanced against the rights and freedoms of others and the orderly development of the County in the interests of the Community. First Protocol Article 1 requires that the desires of landowners must be balanced against the impact on residents. This legislation has been taken into account in arriving at the above recommendation.

8.3 Equalities: The concern of planning law is to regulate the use of land in the interests of the public at large, rather than those of any particular group. Equality will be one of a number of 'relevant considerations' that need to be weighed in Planning Committee members' minds under section 70(2) of the Town and Country Planning Act 1970.

9.0 FINANCIAL IMPLICATIONS:

9.1 There are likely financial implications if the decision and / or imposition of conditions is challenged by a planning appeal or judicial review. The costs of defending any decision will be met by the authority and will vary dependent on the scale and nature of the proposal. Local financial considerations are capable of being taken into account when determining this planning application – insofar as they are material to the application. The weight given to this issue is a matter for the decision maker.

10.0 BACKGROUND:

10.1 Relevant guidance

National Planning Policy Framework (NPPF) (DCLG – July 2011)

10.1.1 The National Planning Policy Framework (NPPF) was published on 27 March 2012. The Framework replaces most former planning policy statements and guidance notes and is a key part of Government reforms to make the planning system less complex and more accessible. The NPPF clearly states from the outset that there is a presumption in favour of sustainable development and that local plans should follow this approach so that development which is sustainable can be approved without delay. One of the core planning principles is to '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’). The NPPF expands further on this principle in paragraph 97: “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 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 areas that are being taken forward through neighbourhood planning; and
- Identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

10.1.2 Paragraph 98 advises that when determining planning applications, local planning authorities should:

- Not require applicants for energy developments 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; and
- Approve the application if its impacts are (or can be made) acceptable...”

10.1.3 Paragraphs 6,7, 8, 9 and 17 define the contribution the Historic Environment makes to sustainable development, the need to conserve heritage assets in a manner proportionate to their significance, and the consideration that proposals which do not achieve this are not sustainable unless outweighed by competing objectives . Section 12 contains specific policies relating to the conservation and enhancement of the historic environment: Paragraph 128, “In determining applications, local planning authorities should require 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.” Section 129, “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”

Paragraph 131, “In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.”

Paragraph 132, “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. 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. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.” Paragraph 133, “Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss” Paragraph 134, “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.” Paragraph 135. “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” Paragraph 139 “Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.” Paragraph 141 “Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.”

10.2 Relevant planning policies:

- 10.2.1 The Shropshire Core Strategy (Adopted February 2011) sets out a Spatial Vision for Shropshire and the broad spatial strategy to guide future development and growth during the period to 2026. The strategy states, “Shropshire will be recognised as a leader in responding to climate change. New development which has taken place within Shropshire will be acknowledged by others as being of high quality sustainable design and construction that promotes safer communities, is respectful of local character, and planned to mitigate, and adapt to, the impacts of climate change.”

10.2.2 The Core Strategy has 12 strategic objectives, the most relevant is Objective 9 which aims “To promote a low carbon Shropshire delivering development which mitigates, and adapts to, the effects of climate change, including flood risk, by promoting more responsible transport and travel choices, more efficient use of energy and resources, the generation of energy from renewable sources, and effective and sustainable waste management”. Policies of relevance include:

Policy CS5 - Countryside and the Green Belt:

New development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt. Subject to the further controls over development that apply to the Green Belt, development proposals on appropriate sites which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability of rural communities by bringing local economic and community benefits, particularly where they relate to:

- Small-scale new economic development diversifying the rural economy, including farm diversification schemes;
- Dwellings to house agricultural, forestry or other essential countryside workers and other affordable housing/accommodation to meet a local need in accordance with national planning policies and Policies CS11 and CS12;

With regard to the above two types of development, applicants will be required to demonstrate the need and benefit for the development proposed.

Policy CS6 - Sustainable Design and Development Principles

To create sustainable places, development will be designed to a high quality using sustainable design principles, to achieve an inclusive and accessible environment, which respects and enhances local distinctiveness and which mitigates and adapts to climate change. And ensuring that all development:

- Is designed...to respond to the challenge of climate change
- Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character, having regard to national and local design guidance, landscape character assessments and ecological strategies where appropriate
- Makes the most effective use of land and safeguards natural resources including high quality agricultural land.

Policy CS8 – Infrastructure provision positively encourages infrastructure, where this has no significant adverse impact on recognised environmental assets, that mitigates and adapts to climate change, including decentralised, low carbon and renewable energy generation, and working with network providers to ensure provision of necessary energy distribution networks.

Policy CS13 Economic Development, Enterprise & Employment - recognises the importance of farming for food production and supporting rural enterprise and diversification of the economy, in particular it focusses on areas of economic activity associated with agricultural and farm diversification.

Policy CS16 - Tourism, Culture and Leisure

To deliver high quality, sustainable tourism, and cultural and leisure development, which enhances the vital role that these sectors play for the local economy, benefits

local communities and visitors, and is sensitive to Shropshire's intrinsic natural and built environment qualities

Policy CS17 - Environmental Networks seeks to protect and enhance the diversity, high quality and local character of Shropshire's natural environment and to ensure no adverse impacts upon visual amenity, heritage and ecological assets.

10.3 The Shropshire and Telford and Wrekin Joint Structure Plan There are no relevant saved policies in this plan.

10.4 Bridgnorth Local Plan - The site is not affected by any other specific designations in this Plan. Most formerly relevant policies have been superseded by the Core Strategy. Policy (D11) states, with regard to renewable schemes, that 'the Council will require that (3) they do not detract from the residential or recreational amenities of the area by reason of noise, vibration, increased risk to health or public safety or (in the case of wind turbines) shadow flicker; (4) wind turbines are located so as to avoid sensitive skylines where they would dominate long distance views.

10.5 Site Management and Allocation of Development Document (SAMDEV) – The site is not subject to any specific designations within the emerging SAMDEV. Draft policies are being prepared. Whilst these cannot yet be accorded any weight it is considered that the proposals are in general compliance with the objectives of this emerging planning policy.

10.6 Other Relevant Guidance

10.6.1 The UK Renewable Energy Strategy (July 2009) - The UK Government published the Renewable Energy Strategy in July 2009. The strategy explains how it intends to "radically increase our use of renewable electricity, heat and transport". It recognises that we have a legally binding commitment to achieve almost a seven-fold increase in the share of renewables in order to reach our 15% target by 2020. It suggests that the amount of electricity produced from renewables should increase from 5.5% to 30%.

10.6.2 Planning practice guidance for renewable and low carbon energy (DCLG, April 2014). This practice guide reaffirms the importance of renewable energy and advocates community led renewable energy initiatives. The following advice has specific relevance to onshore wind energy:

Do criteria based policies have a role in planning for renewable energy?

Policies based on clear criteria can be useful when they are expressed positively (i.e. that proposals will be accepted where the impact is or can be made acceptable). In thinking about criteria the National Policy Statements⁶ published by the Department of Energy and Climate Change provide a useful starting point. These set out the impacts particular technologies can give rise to and how these should be addressed.

In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:

- the need for renewable or low carbon energy does not automatically override environmental protections
- cumulative impacts require particular attention, especially the increasing impact

that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases

- local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas
- great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting
- proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration
- protecting local amenity is an important consideration which should be given proper weight in planning decisions

Energy development and other land uses

Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set-back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis.

What are the particular planning considerations that relate to wind turbines?

The following questions should be considered when determining applications for wind turbines:

How are noise impacts from wind turbines assessed?

The report, 'The assessment and rating of noise from wind farms' (ETSU-R-97)13 should be used by local planning authorities when assessing and rating noise from wind energy developments. Good practice guidance on noise assessments of wind farms has been prepared by the Institute Of Acoustics. The Department of Energy and Climate Change accept that it represents current industry good practice and endorses it as a supplement to ETSU-R-97. It is available on the Department of Energy and Climate Change's website.

Is safety an issue when wind turbine applications are assessed?

Safety may be an issue in certain circumstances, but risks can often be mitigated through appropriate siting and consultation with affected bodies:

- Buildings - Fall over distance (i.e. the height of the turbine to the tip of the blade) plus 10% is often used as a safe separation distance. This is often less than the minimum desirable distance between wind turbines and occupied buildings calculated on the basis of expected noise levels and due to visual impact
- Power lines - National Grid, and/or the relevant Distribution Network Operators will be able to advise on the required standards for wind turbines being separated from existing overhead power lines
- Air traffic and safety - Wind turbines may have an adverse effect on air traffic

movement and safety. Firstly, they may represent a risk of collision with low flying aircraft, and secondly, they may interfere with the proper operation of radar by limiting the capacity to handle air traffic, and aircraft instrument landing systems. There is a 15 kilometre (km) consultation zone and 30km or 32km advisory zone around every civilian air traffic radar, although objections can be raised to developments that lie beyond the 32km advisory zone. There is a c.15km statutory safeguarding consultation zone around Ministry of Defence aerodromes within which wind turbine proposals would be assessed for physical obstruction. See the Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002. Further advice on wind energy and aviation can be found on the Civil Aviation Authority¹⁵ and National Air Control Transport Services websites¹⁶

- Defence - Wind turbines can adversely affect a number of Ministry Of Defence operations including radars, seismological recording equipment, communications facilities, naval operations and low flying. Developers and local planning authorities should consult with the Ministry of Defence¹⁷ if a proposed turbine is 11 metres (m) to blade tip or taller, and/or has a rotor diameter of 2m or more
- Radar - In addition to air traffic radar, wind turbines may affect other radar installations such as weather radar operated by the Meteorological Office
- Strategic Road Network - The Highways Agency / Department for Transport¹⁸ have produced advice for siting wind turbines safely in relation to the strategic road network.

Is interference with electromagnetic transmissions an issue for wind turbine applications?

Wind turbines can potentially affect electromagnetic transmissions (e.g. radio, television and phone signals). Specialist organisations responsible for the operation of electromagnetic links typically require 100m clearance either side of a line of sight link from the swept area of turbine blades. OFCOM acts as a central point of contact for identifying specific consultees relevant to a site.

How can the risk of wind turbines be assessed for ecology?

Evidence suggests that there is a risk of collision between moving turbine blades and birds and/or bats. Other risks including disturbance and displacement of birds and bats and the drop in air pressure close to the blades which can cause barotrauma (lung expansion) in bats, which can be fatal. Whilst these are generally a relatively low risk, in some situations, such as in close proximity to important habitats used by birds or bats, the risk is greater and the impacts on birds and bats should therefore be assessed. Advice on assessing risks is available from Natural England's website.

How should heritage be taken into account in assessing wind turbine applications?

As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of wind turbines on such assets. Depending on their scale, design and prominence a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset.

Is shadow flicker and reflected light an issue for wind turbine applications?

Under certain combinations of geographical position and time of day, the sun may pass behind the rotors of a wind turbine and cast a shadow over neighbouring properties. When the blades rotate, the shadow flicks on and off; the impact is known as 'shadow flicker'. Only properties within 130 degrees either side of north, relative to the turbines can be affected at these latitudes in the UK – turbines do not cast long shadows on their southern side.

Modern wind turbines can be controlled so as to avoid shadow flicker when it has the potential to occur. Individual turbines can be controlled to avoid shadow flicker at a specific property or group of properties on sunny days, for specific times of the day and on specific days of the year. Where the possibility of shadow flicker exists, mitigation can be secured through the use of conditions.

Although problems caused by shadow flicker are rare, where proposals for wind turbines could give rise to shadow flicker, applicants should provide an analysis which quantifies the impact. Turbines can also cause flashes of reflected light, which can be visible for some distance. It is possible to ameliorate the flashing but it is not possible to eliminate it.

How to assess the likely energy output of a wind turbine?

As with any form of energy generation this can vary and for a number of reasons. With wind turbines the mean wind speed at hub height (along with the statistical distribution of predicted wind speeds about this mean and the wind turbines used) will determine the energy captured at a site. The simplest way of expressing the energy capture at a site is by use of the 'capacity factor'. This though will vary with location and even by turbine in an individual wind farm. This can be useful information in considering the energy contribution to be made by a proposal, particularly when a decision is finely balanced.

How should cumulative landscape and visual impacts from wind turbines be assessed?

Cumulative landscape impacts and cumulative visual impacts are best considered separately. The cumulative landscape impacts are the effects of a proposed development on the fabric, character and quality of the landscape; it is concerned with the degree to which a proposed renewable energy development will become a significant or defining characteristic of the landscape.

Cumulative visual impacts concern the degree to which proposed renewable energy development will become a feature in particular views (or sequences of views), and the impact this has upon the people experiencing those views. Cumulative visual impacts may arise where two or more of the same type of renewable energy development will be visible from the same point, or will be visible shortly after each other along the same journey. Hence, it should not be assumed that, just because no other sites will be visible from the proposed development site, the proposal will not create any cumulative impacts.

What information is needed to assess cumulative landscape and visual impacts of wind turbines?

In assessing the impact on visual amenity, factors to consider include: establishing the area in which a proposed development may be visible, identifying key viewpoints, the people who experience the views and the nature of the views.

In identifying impacts on landscape, considerations include: direct and indirect effects, cumulative impacts and temporary and permanent impacts. When assessing the

significance of impacts a number of criteria should be considered including the sensitivity of the landscape and visual resource and the magnitude or size of the predicted change. Some landscapes may be more sensitive to certain types of change than others and it should not be assumed that a landscape character area deemed sensitive to one type of change cannot accommodate another type of change.

The English Heritage website provides information on undertaking historic landscape characterisation and how this relates to landscape character assessment.

Guidance is provided on Information to inform landscape and visual impact assessments

Decommissioning wind turbines

Local planning authorities should consider using planning conditions to ensure that redundant turbines are removed when no longer in use and land is restored to an appropriate use.

- 10.6.3 The UK Low Carbon Transition Plan (July 2009) aims to deliver emission cuts of 18% on 2008 levels by 2020. This will be achieved amongst other matters by getting 40% of our electricity from low carbon sources by 2020 (30% from renewables) and by substantially increasing the requirement for electricity suppliers to sell renewable electricity. The plan also sets out measures to promote greener homes and industries. The Government has put in place a legally binding target to cut emissions 80% by 2050 and a set of five-year “carbon budgets” to 2022 to keep the UK on track.
- 10.6.4 The Climate Change and Sustainable Energy Act 2006 sets out the Government's long term goal of reducing carbon dioxide emissions by 60% by 2050.
- 10.6.5 Planning (Listed Buildings and Conservation Areas) Act 1990 Section 66(1):
“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 10.6.6 PPS5 Practice Guide: The PPS Practice Guide remains extant. Paragraphs 113 to 122 relate primarily to the setting of heritage assets. Paragraph 19 refers to the English Heritage document “Conservation Principles” which can be used as a method of assessing the significance of a heritage asset. Paragraph 25 (below) may also be worth noting as it specifically relates to similar types of scheme as that proposed. Paragraph 25 “Proposals for large-scale schemes, such as wind farms, that have a positive role to play in the mitigation of climate change and the delivery of energy security, but which may impact on the significance of a heritage asset, such as a historic landscape, should be carefully considered by the developer and planning authority with a view to minimising or eliminating the impact on the asset. Ideally the proposals should be discussed at the pre-application stage to establish an acceptable balance between the necessity for measures that meet the challenge of climate change and the importance of conserving the significance of the asset. Some local planning authorities may find it useful to prepare specific policies for the handling of proposals for wind farms or other renewable energy infrastructure in their area.”

Paragraph 60 refers to the Communal Significance of an asset:

“The values that a place holds for some communities may not be obvious from expert advice or research alone. Where a heritage asset may have, for example, a cultural or faith interest to a particular community, it is important to consult them as they may have views and information that would add to the understanding of the asset’s significance”. The definition of ‘Setting’ is outlined in Paragraph 113 (below):

“Setting is the surroundings in which an asset is experienced. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.” Paragraph 114 “The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration; by spatial associations; and, by our understanding of the historic relationship between places. For example, buildings that are in close proximity but not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. They would be considered to be within one another’s setting.” Paragraphs 115 to 117 go on to outline aspects of setting in more detail. Paragraph 118 to 124 concern the assessment of the impact of development affecting the setting of heritage assets. 2.2.4 Planning Practice Guidance for Renewable and Low Carbon Energy (DCLG 2013). This guidance can be a material consideration in planning decisions. Paragraph 5 states that the responsibility to increase the supply of renewable energy does not automatically override environmental protection. Paragraph 15 highlights that “great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance”. This is further expanded upon in Paragraph 34 of the document.

10.6.7 English Heritage Guidance Documents:

- The Setting of Heritage Assets (2011). This highlights a methodology for assessing the potential impact upon the significance of heritage assets.
- Wind Energy and the Historic Environment (2005).
- Conservation Principles, Policies & Guidance (2008). This provides a methodology for defining and assessing the significance the significance of heritage assets.

10.6.8 Ministerial letter: Objectors to the scheme have pointed out that in a letter aimed at Local Planning Authorities and dated 6th June 2013 Eric Pickles, Secretary of State for Communities and Local advises that “we need to ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment”. “Meeting our energy goals should not be used to justify the wrong development in the wrong location.” “The need for renewable energy does not automatically override environmental protections and planning concerns of local communities.” “Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to the setting”. “Meeting energy goals should not be used to justify the wrong development in the wrong location”.

10.6.9 Recent caselaw - Lyveden New Bield: West Coast Energy planned to build four turbines in East Northamptonshire in the vicinity of 40 designated heritage assets,

including the Grade I listed Drayton House and the National Trust property Lyveden New Bield. The scheme was initially refused by East Northamptonshire District Council. But the developer appealed the decision, and Barnwell Manor Wind Farm was granted permission by a planning inspector in March 2012. The council, English Heritage and the National Trust challenged this decision in the High Court, arguing that the wind farm would threaten a number of listed buildings of national significance. The case later reached the Court of Appeal after West Coast Energy contested the High Court ruling. The inspector had concluded that, while the four turbines would appear as an "alien and incongruous feature in the landscape, especially one with such historic and literary association", the renewable energy benefits of the proposal would outweigh the harm to the setting of the assets, which he deemed "less than substantial". Following a High Court battle, the case reached the Court of Appeal in February 2014, where top judges described the planning inspector's decision as "fatally flawed". The Court of Appeal cited the Planning (Listed Buildings and Conservation Areas) Act 1990, which says decision-makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings when carrying out a balancing exercise in planning matters. Lord Justice Sullivan said he agreed with the High Court that the inspector did not give "considerable importance and weight" to this factor. The barrister representing the local authority, English Heritage and National Trust said the Court of Appeal ruling was an important decision. "The Court of Appeal has confirmed that, in considering whether or not to grant planning permission to developments, decision-makers must give considerable weight to any harm caused to a listed building or its setting."

11.0 RELEVANT PLANNING HISTORY:

11.1 No previous applications relate directly to the current application site.

12.0 Additional Information

[View details online:](#)

<http://planningpa.shropshire.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=MN7ORFTDF0000>

List of Background Papers: Planning application reference 13/02579/FUL and plans.
Cabinet Member (Portfolio Holder): Cllr M. Price
Local Member: Cllr Robert Tindall, Brown Clew
Appendices: Appendix 1 – Heritage Appraisal Critique (summary) – Sinclair (for Stop Bridgnorth Wind Farms campaign group)

APPENDIX 1

Critique of the submitted information relating to landscape and visual effects, impacts on residential receptors, and related matters. Geoffrey Sinclair for Stop Bridgnorth Wind Farm Ltd. Detailed conclusions.

- i. The proposal -
Queries are raised about the application area, the ability to accommodate micro-siting, the exclusion of 650m of the Jack Mytton Way between the new tracks and the highway and the absence of detail on any construction compound. Other than avoiding the AONB and being near Bridgnorth, there is no explanation as to why this ultra-sensitive site was selected. The proposed model has only 500kW and 900kW options and so two cannot reach the 1.5MW capacity indicated. Wind turbines are a unique form of development with a small footprint contrasting with a huge zone of visibility. On this elevated site the proposed machines would each be large in context at 77m (253ft) to tip with blades sweeping an area more than half an acre of sky, rotating for 70 – 85% of the time, and reaching a tip-speed of 164mph. There is only an inadequate desk-top draft assessing the impacts (and even feasibility) of transporting turbines and components to the site, with key issues left unresolved, and no 'dummy-run' proposed. Despite its title, the proposal is not a community-led initiative as defined in PPG 5-4 which could incur a further positive weight in planning terms. In contrast, the level of community opposition is considerable, articulate and sustained. In considering its planning merits, decision makers should not be influenced by promises of financial benefit made to the affected locality. The application fails to quantify its renewable energy benefits - thus making any balancing exercise difficult, but the Crida Co-operative's own assessment over-claims the equivalent number of households supplied by almost 50%, and CO2 emissions savings by at least 21%.
- ii. The landscape and visual assessment process -
The applicant's Landscape and Visual Impact Assessment [LVIA] assesses landscape sensitivity at a series of viewpoints, but only considers it at their location, rather than that seen in the view containing the turbine. It also uses an incomplete range of assessment criteria which causes the more important impacts to be under-recorded. There is no assessment of the cumulative effects with The Hills project. Most people will not have time or chance to see the few hard copies available, and when using a normal domestic computer screen will be ill-informed by looking at electronic images designed to be seen at the much larger A3 size. Far worse, and despite my complaints at an early stage, the representative viewpoint illustrations with predicted views of the turbines are shown smaller and darker on the Council's planning portal web-site than on the applicant's CD Rom - supplied on request. The true impacts of the turbines are thus dulled and under-stated on the medium used by the public and most consultees.
- iii. Assessment of landscape and visual effects - Section 4
There are no turbines this large in Shropshire; the local area of visibility has no large vertical features. The site is on the rim of a dissected plateau defined by a conspicuous woodland scarp over 100m above the Mor Brook and forms the wider area from which the area's isolated Cleve Hills rise abruptly. The turbine tips would

be c257m - 272m AOD, a height which is not exceeded throughout the plateau. They closely straddle the Jack Mytton Way, the County's premier walking, riding and cycling route, as it follows a scenic ridgeline with views of and from the Grade 1 group of historic buildings at Upton Cressett. The LVIA assesses the landscapes defined by the Shropshire Landscape Typology as High sensitivity for the Plateau Farmlands containing the site but only Medium for most of the remainder (save for those in the AONB). I disagree and rate many of these others as High. The visual 'receptors' consist of all those people who may view the site whether as residents (High sensitivity); footpath and recreation area users (High); and local road users (Medium for utility users and Medium/High otherwise). The LVIA tends to assess the sensitivity of some receptors at unrealistically lower levels. The choice of many local viewpoints is rational, but there are gaps in coverage (notably along the Jack Mytton Way) and north of the A458 where I illustrate an additional location. Some views obscure turbines. The LVIA under-rates the magnitude of impact at the most important closer views, thus compromising the rest of its assessment. I find a greater degree of landscape sensitivity at many viewpoints, mainly because the LVIA uses a crude three-fold ranking rather than progressing to intermediate categories where necessary. I agree with most of the LVIA's visual receptor sensitivities as High with the key exception of the composite views from Upton Cressett, which, informed by the specialist responses, should be Very High. The LVIA does concede that 6 of its 12 viewpoints incur independent significant landscape impacts (and adverse in my analysis). There is a similar pattern for visual effects, but here the greater sensitivity of views from various parts of the Upton Cressett grouped asset is evident. Contrary to the Council's Scoping Opinion and despite my request there is no cumulative assessment in terms of The Hills proposal. Despite rejection by members, it remains extant until the 6-month appeal period elapses in October 2014. Using the crude ZTV in The Hills proposal and further fieldwork my cumulative illustrated Appendix [C] shows that if combined, the effect would be greater than the sum of their parts, particularly due to the sequential impacts along the Jack Mytton Way.

iv. Impacts on occupiers of residential properties - Section 5

Visual Amenity: Residents do not have a legal right to a view, but serious impairment of their visual and domestic amenity experienced from houses, gardens, surroundings and the locality is an adverse impact persisting 'in the mind's eye' as they move around in the locality. While these are valid planning considerations, unlike the resultant devaluation of property, the latter can be considered simply as a 'barometer' or yardstick of that impact. Where impacts are excessive, close and potentially 'overbearing' they become unacceptable and a matter of public interest sufficient to derail a planning application, sometimes called 'the Lavender Test'. That rarely occurs and does not do so solely for visual impacts here, but it is still necessary to consider the spread of these many other impacts as part of the planning balance. The applicants make a series of generalised comments about settlements, and although noting a small selection of properties do not carry out a systematic house-by-house assessment. Of 86 properties within c2km I assess 42 as having Moderate/Major or greater effects, half of which are Major - and 3 of the latter being due to the enhanced level of sensitivity at Upton Cressett.

Noise: The report by MAS Environmental comments that the applicants' methodology 'under-predicts noise impact' and identifies exceedance or 'lack of

headroom' with the relevant ETSU limits at the three closest properties. These findings are amalgamated with the list of visual impacts to form a combined assessment of the impacts on the living conditions of occupiers.

Living Conditions: This is the combined effect on the overall sensitivities of people as they enjoy the amenities within, around and centred on their homes. When visual and noise impacts are brought together as a single measure, two properties The Barn at Underton and Little Meadowley fail the public interest test. Nevertheless the remaining visual impacts on residential amenity at the other properties are still relevant and should be part of the overall planning balance.

v. Other matters:

Sequential and recurrent views: The Criddon turbines occur and re-appear when viewers move about as part of the daily life or on journeys as locals or visitors, whether on foot, on cycles, on horseback or in vehicles. The enormity and incongruity of wind turbines makes this a disruptive experience and forms an adverse impact.

The network of local roads: Sequential impacts on the A458 from Much Wenlock to the Bridgnorth roundabout are of Moderate/Major significance for most of the 9km, augmented by views of The Hills turbine, while the 5km route from the roundabout via the B4364 and then the local road to Lightwood is equally impacted, more so in the reverse direction. However, many visitors may take these two routes as part of an extended journey of exploration which would then become characterised by turbine views.

The Jack Mytton Way and equestrian issues: The LVIA concedes intermittent impacts for a 12.5km section even though failing to include any contribution from The Hills turbine. My more detailed linear assessment reveals greater impacts, reaching 'extreme' where the two turbines straddle the route at c160m on each side, thus contravening the British Horse Society [BHS] guidelines of 3x height (231m) for any route and 4x height (308m) for such a key promoted route (irrespective of turbines on both sides). The JMW is doubly vulnerable travelling towards Meadowley where it also forms the main axis of appreciation of the setting of the heritage assets around Upton Cressett - (see 6.5 below).

The local network of other Public Rights of Way: The local area has few Bridleways other than the JMW, save for the route from Meadowley to Underton where Turbine 1 at c190m also contravenes BHS guidelines and would become progressively visible and seem threatening to horses. Any proposed permissive diversion linking this already-jeopardised route back to the JMW is therefore not acceptable, and no safe local network would be available. Many local footpaths would have repeated views of the turbines, especially those approaching and appreciating Upton Cressett in its setting by foot - by far the most sympathetic and appropriate way to do so.

vi. Cultural Heritage impacts - mainly around Upton Cressett: The status and national importance of the grouped assets at Upton Cressett has become even clearer and given enhanced statutory recognition as a grouped Grade 1 asset by English Heritage, which continues to raise concerns. Its setting extends widely down the valley and its enfolding ridgelines as recognised by the frequent descriptive use of phrases such as the secret or hidden gem, the contained environment, the surprise effect. I list seven major submissions on this topic, but emphasise (and summarise) the recent up-dated report by Jonathan Billingsley of The Landscape Partnership

report, which analyses impacts, vulnerability and the applicants' submission in great and critical detail, concluding that the turbines will cause 'significant harm' to the setting and heritage assets of Upton Cressett with a number of viewpoints producing 'major harm'.

- vii. Environmental assets and tourism: The interlinked policies CS16 and 17 recognise the subtle but pervasive role of well-conserved and enhanced heritage assets in underpinning a rural economy in which sustainable tourism plays a major role, with Upton Cressett a key venue. Examples are the nationally successful writers' retreat in the Upton Cressett Gatehouse, open air concerts and Shakespeare on the Moat Lawn, the Wenlock Poetry Festival, the Bridgnorth Haydn Festival and the Much Wenlock Arts Festival. This has already been reflected in the reasoning for refusing the two recent (and less contentious) wind turbine planning applications at The Hills and Sidnall which were perceived as posing a threat to the environmental capital of the area and by implication to its tourism-based rural economy. This proposal would deal an enduringly negative blow to this sensitive, memorable and celebrated countryside and its perception and enjoyment by the public, with, at its heart, the 'very significant harm' to the setting and assets of Upton Cressett.
- viii. Ecological impacts - birds and bats: The applicants' ecological material was critically reviewed by Ecotext Ltd with a further independent recent review by Camlad Ecology Ltd. When taken together these are serious and damaging criticisms suggesting that a precautionary approach should be taken in relation to this topic 7 Considerations for Decision Makers - Section 7
- ix. Government policy and the local response: The Council welcomed the DCLG Ministerial Statement and 2013 Guidance on wind turbine proposals * which 'will help Shropshire Council to resist proposals which would cause unacceptable impacts on neighbours and the highly-valued environment and heritage features'. There is well-documented and overwhelming local opposition on all these grounds.
* now re-issued as document 5 in Planning Practice Guidance suite in March 2014.
- x. Output and Benefits of the proposal: Promised donations or benefits which are not directly related to the proposal should have no place in influencing decision makers. The electrical output is not defined, but is slight and uncertain. Other aspects are much exaggerated.
- xi. The Planning Balance: The proposal is contrary to Policy D11 (Renewable Energy) of the Bridgnorth Local Plan and Policies CS5 (Countryside and Green Belt), CS6 (Sustainable Design and Development Principles), CS8 (Facilities, Services and Infrastructure), CS13 (Economic Development, Enterprise and Employment), CS16 Tourism, Culture and Leisure and CS17 (Environmental Networks) of the Shropshire Core Strategy. It is also contrary to items 14, 28, 98, 109, 196 and 197 of the National Planning Policy Framework of March 2012, the DCLG and DECC Written Ministerial Statements of 6 June 2013, and 9 April 2014, and sections 5-7, 5-10, and 5-21 of the March 2014 Planning Practice Guidance.
- xii. Court of Appeal and High Court Decisions: Recent cases at Lyveden New Bield, Pond Farm, Cromer and Kimbolton Castle have all involved rulings that clearly protect heritage assets of the same Grade 1 significance as Upton Cressett. Senior

Judges over-ruled Inspectors who had failed to recognise that the serious harm to the setting of these assets was non-compliant with statutory heritage and landscape protection as enshrined in NPPF and contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990. Planning magazine has twice recently noted that this has clear implications for all decisions involving wind turbines close to Grade 1 heritage assets.