

18th April 2013

Agenda Item: 4

**REPORT OF THE CORPORATE DIRECTOR FOR POLICY, PLANNING AND
CORPORATE SERVICES**

**STRATEGIC PLANNING OBSERVATIONS ON A PLANNING APPLICATION
FOR A SINGLE WIND TURBINE, STOKE BARDOLPH**

Purpose of the Report

1. To seek Committee approval for comments set out in this report to be sent to Gedling Borough Council (GBC) in response to the request for strategic planning observations on the above planning application for a single wind turbine.

Information and Advice

2. A full planning application was submitted to Gedling Borough Council on the 12th December 2012 for the erection of a single wind turbine, Stoke Bardolph. A site plan is provided at Appendix 1.
3. Nottinghamshire County Council (NCC) has been consulted for strategic planning observations on the application and this report compiles responses from Departments involved in providing comments and observations on such matters. On the basis of Committee's decision, comments will be sent to Gedling Borough Council in their role as determining planning authority for this application.
4. The planning application is accompanied by an Environmental Statement, Design and Access Statement and a range of other supporting documents. This report is based on the information submitted with the application in the context of national, regional and local policy

Background

5. The County Council previously commented on a planning application for two, 132m wind turbines at the above site at Cabinet on the 14th July 2010, stating support in principle for renewable energy projects, however, raising concerns over the impact of the proposal on the landscape and openness of the Green Belt. This planning application was subsequently refused by Gedling Borough Council in April 2012.

Description of the Proposal

6. The principle components of the proposal are as follows:
 - A single wind turbine operating for 25 years with an installed rated capacity up to 2.5MW comprising a hub height of up to 60m and a rotor diameter of up to 80m giving a maximum tip height of up to 100m;
 - Approximately 300m of existing road within the sewage works will need to be upgraded from the site entrance to the existing northern boundary, approximately 1,100m of upgraded existing farm track, and 180m of new track;
 - A 33kV substation building;
 - A temporary construction compound, lay down storage area and crane hardstanding area on-site during a four month construction phase; and
 - Underground cabling to connect the turbine to the national grid.
7. The temporary components would be required during the construction and decommissioning phase only. During the operational phase the construction compound would be removed. The lay down storage area and crane hardstanding would remain in situ but the appearance of the site would be reinstated by covering with soil, re-profiled and re-seeded.
8. The proposed turbine will generate electricity by harnessing the power of the wind. Calculations based on a generating capacity of up to 2.5MW predicts that the turbine will provide enough electricity for approximately 1,526 average UK households and provide carbon dioxide reductions of 2,166 tonnes annually.
9. Based on an operational lifespan of 24 years (1 year discounted for construction and decommissioning) it can be estimated that the wind turbine could offset approximately 51,984 tonnes of CO₂ over the proposed lifetime of the development.

Planning Policy Context

National Planning Policy Framework (NPPF)

10. One of the core principles of the National Planning Policy Framework (NPPF) is to support and deliver economic growth to ensure that the housing, business and other development needs of an area are met. The principles and policies contained in the NPPF also recognise the value of and the need to protect and enhance the natural, built and historic environment, biodiversity and also include the need to adapt to climate change.
11. A key aspect of the NPPF is that it includes a presumption in favour of sustainable development which means that, for decision-taking, local planning authorities should approve development proposals that accord with the development plan without delay or where a development plan is absent, silent or out of date, grant permission unless any adverse impacts of the proposal outweigh the benefits, or specific policies in the NPPF indicate that development should be restricted.

12. The NPPF also discusses the weight that can be given in planning determinations to policies emerging as the local authority's development plan is being brought forward. The weight given to these policies will be very dependant on; their stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF.
13. Planning plays a key role in helping shape places to secure radical reductions in green house gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy associated with infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. Local Planning Authorities are actively encouraged to support proposals for renewable energy.

East Midlands Regional Plan (RS)

14. On the 6th July 2010 the Secretary of State announced the revocation of Regional Strategies. On the 20th March 2013 the Secretary of State laid in Parliament a statutory instrument to revoke the Regional Strategy for the East Midlands. This came into force on 12th April 2013 as such the East Midlands Regional Plan no longer forms part of the Development Plan.

Strategic Planning Issues

Green Belt

15. The NPPF indicates that very special circumstances need to be demonstrated to justify such a proposal in the Green Belt.
16. The proposal is inappropriate and thus by definition harmful to the Green Belt. The proposal impacts upon one purpose for establishing Green Belts; that of "assisting in safeguarding the countryside from encroachment". It also impacts upon the openness and visual amenity of the Green Belt, which the NPPF seeks to protect.

Landscape and Visual Impact

17. The County Council consider the proposed turbine would have a 'significant visual impact' within a localised area on a specified number of residential receptors, traveller receptors over a limited distance on an 'A' road, and recreational receptors on a long distance footpath and the immediate Public Rights of Way network. The effects on visual amenity are major to major/moderate for these receptors, and Nottinghamshire County Council would add "are major to major/moderate adverse", which is the highest end of the scale of impact. Nottinghamshire County Council accept that these visual impacts are contained by the ridgelines that bound the Trent but nevertheless localised impact extends from this point up and down the valley for a distance of up to 3.5 kilometres.
18. The physical impact of the proposal is minimal and has been quantified by the applicant and is further reduced by the mitigation proposals described.

19. The impact on the character is as described in the Landscape and Visual Impact Assessment (LVIA) document as adding 'a *new characteristic*' to the surrounding Policy Zone of the Trent Washlands Landscape Character Area (County Level) which Nottinghamshire County Council would agree with. At a wider scale of 1.5 – 2 kilometres, new landscape regional landscape sub-types will be developed – 'Floodplain Valleys with Wind Turbine' and 'Wooded Village Farmlands with Wind Turbine' This would have a significant effect on localised parts of the landscape character of these sub types, which we would also agree with.
20. There would be limited but significant effects on a small part of the Lambley and Burton Joyce MLA at its southern extension, to the area above and surrounding Gedling House.
21. There would be limited but significant effects on a small part of the Bulcote Conservation area both from important views out of the village and from residences on the fringe of the CA.
22. It is accepted by NCC that there are likely to be limited points on the ridgelines where the proposals can be viewed but these include those shown from Viewpoint for viewpoint 5.
23. The cumulative impacts have been described from both fixed points and where sequential visual impacts are possible. Cumulative impacts are possible from limited areas which include from the village of Stoke Bardolph for some residents (Viewpoint 7), and from the Trent Valley Way west of Newton (Viewpoint 7) and from a bridleway at Lambley airfield (Viewpoint 8), . Sequential cumulative impacts are possible from limited properties in Burton Joyce, Stoke Bardolph and Shelford, as well as the local road network including the A612, the Newark – Nottingham railway line and the public rights of way network including the Trent Valley Way. This cumulative assessment assumes that all currently planned turbines will go ahead which is not necessarily the case.
24. Nottinghamshire County Council agrees that the visual impact of the proposals is 'significant' over a localised area, in our opinion from 7 of the 12 viewpoints within 3.5 kilometres of the site, as also stated in the LVIA report. Although the scale of turbine has been reduced and the number has reduced to a single structure we do not think that this is sufficient to reduce the visual impacts to an acceptable level and consider that this constitutes 'harm' to the visual amenity. On the grounds of impact on visual amenity Nottinghamshire County Council do not support this application. However this conclusion must be balanced against all other issues to be considered by Gedling Borough Council as part of the application including long term benefits in terms of production of renewable energy and reduction in greenhouse gas emissions.
25. Detailed landscape comments are set out at Appendix 2.

Ecology

26. The area covered by the Phase 1 Habitat Survey does not contain the location of the proposed wind turbine which has a knock on effect in terms of other surveys

which have been based on the Phase 1 survey area and as such it is suggested that Gedling Borough Council seek further information from the applicant which updates the relevant surveys in light of the proposed location of the wind turbine.

27. The level of survey effort expended in relation to bats does not appear to match the Minimum Survey Standards as detailed in the Bat Conservation Trust's "Good Practice Guidelines – surveying for onshore wind farms" in relation to a "moderate" risk (identified in the original 2009 surveys). The assessment of the impacts of the proposal on bats is unclear as the applicant states that an 80m stand-off distance has been implemented, however, this 80m stand-off does not appear to relate to the current proposed location of the wind turbine. As such confirmation should be sought that the proposal is at least 70.4m from the nearest boundary feature that could be used by foraging bats. In addition, any condition relating to micro-siting should ensure that a stand-off of at least 70.4m is maintained. It is suggested that Gedling Borough Council seek justification from the applicant with regard to the level of bat survey effort.
28. As with bats, above, the level of bird survey effort expended does not appear to match the current guidelines as set out in Natural England's guidelines; "Assessing the effects of onshore wind farms on birds". Vantage point surveys were completed between April and September 2012 (spring, summer and early autumn) and amounted to 45 hours which falls short of Natural England's recommendation of 36 hours per season. The Trent hosts wintering waterfowl species and it is concerning that this period was not covered in the 2012 vantage point surveys. It is suggested that Gedling Borough Council seek justification on this matter.
29. The applicant proposes a range of mitigation measures in relation to habitats, birds, bats and other species present on the site or in the immediate area and also proposes that an Environmental Management Plan will be produced prior to the commencement of the development which will include mitigation measures and post-development monitoring. Nottinghamshire County Council requests that the production and implementation of such an Environmental Management Plan should be made a condition of a permission granted. In relation to the proposed areas of habitat creation, the Plan should include details of species/seed mixes, establishment methods and maintenance regimes.
30. Detailed ecology comments are set out at Appendix 3.

Archaeology

31. Due to the location, close to the course of the River Trent, it is suspected that there could be significant buried archaeological remains at variable depths. This archaeology can be both difficult to locate and highly significant as organic remains can survive in the waterlogged conditions associated with riverine environments.
32. The archaeological report undertaken by Oxford Archaeological Associates identifies that archaeological deposits are unlikely to survive to a depth of over 3 metres.

33. The views of Oxford Archaeological Associates and Woodhall Planning and Conservation are concurred with in that the overall archaeological potential is low but is not completely negligible. As such, if Gedling Borough Council are minded to approve this planning application, Nottinghamshire County Council requests that the production of a scheme of archaeological mitigation and implementation is submitted to the Local Planning Authority and approved in writing prior to development taking place.

34. Detailed Archaeology comments are set out in Appendix 4

Other Options Considered

35. This report considers all of the relevant issues in relation to the above planning applications which have led to the recommendations, as set out below. Alternative options considered could have been to express no or full support for the application.

Reason/s for Recommendation/s

36. It is recognised that significant weight is given to renewable energy at a National and strategic planning level. However, there are concerns over the potential impact of the proposal on the ecology, landscape and archaeology of the County. These concerns can not be addressed until significant further work has been undertaken satisfactorily and relevant information has been provided by the applicants.

37. On the grounds of impacts on visual amenity Nottinghamshire County Council do not support this application.

Statutory and Policy Implications

38. This report has been compiled after consideration of implications in respect of finance, the public sector equality duty, human resources, crime and disorder, human rights, the safeguarding of children, sustainability and the environment and those using the service and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

Financial Implications

39. There are no direct financial implications.

Implications for Sustainability and the Environment

40. There are no direct implications for Sustainability and the Environment.

RECOMMENDATION

1. That Gedling Borough Council be advised that whilst the principle of such development in terms of strategic and National renewable energy policy is supported, Nottinghamshire County Council objects to the proposal on the grounds that insufficient information has been submitted with the planning application to allow valid and robust conclusions to be drawn on the applications potential impact upon the landscape and ecology of the County and that the proposal will significantly impact of the Visual Amenity of the County.

Jayne Francis-Ward

Corporate Director, Policy, Planning and Corporate Services

For any enquiries about this report please contact: Nina Wilson, Principal Planner (Planning Policy) – 0115 977 3793

Constitutional Comments (SHB. 19.01.13)

41. Committee have power to decide the Recommendation

Financial Comments (DJK 19.03.2013)

42. The contents of this report are duly noted; there are no financial implications.

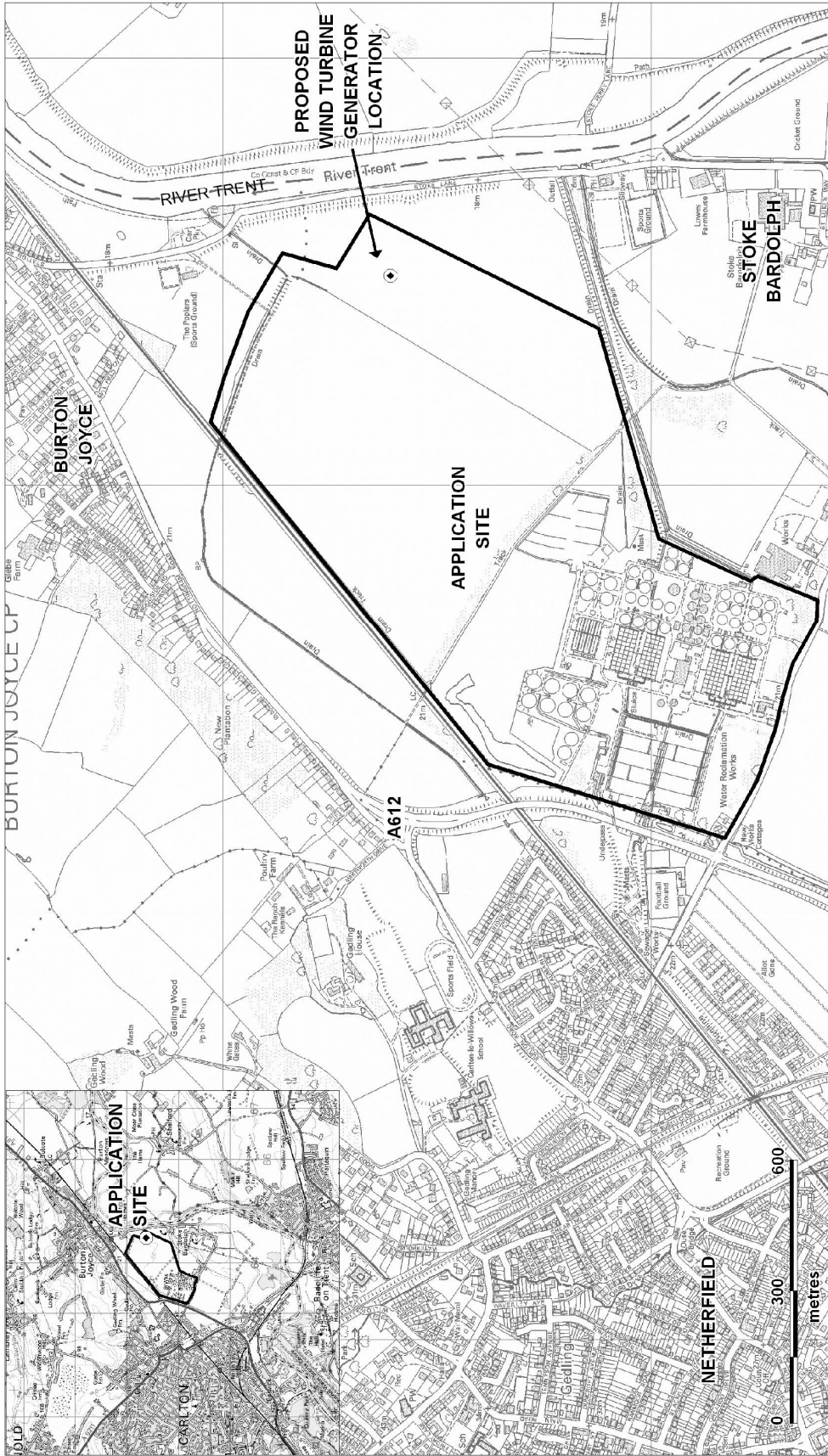
Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

Electoral Division(s) and Member(s) Affected

Radcliffe on Trent – Councillor Kay Cutts
Carlton West – Councillor Jim Creamer


Appendix 1 – Site Location Plan



Scale: 1: 12,000
 Produced by: JW
 Date: MARCH 2013

Proposed erection of a single wind turbine (rated capacity up to 2.5 MW) and other ancillary development
 Severn Trent Water Plc, Stoke Lane, Stoke Bardolph, Nottinghamshire.
 Planning Application No. GED2012/121472

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Trent Bridge House, Fox Road
 Nottinghamshire West Bridgford, Nottingham, NG2 6BU
 County Council Tel: 0115 982 3823

Appendix 2 – Detailed Landscape Comments

Landscape Team comments on Planning application reference 2012/1472

**Volume 1 – Environmental Report (ER) Main text – November 2012 –
Section 9 – Landscape and Visual Assessment – Stephenson Halliday**

Volume 2 – Environmental Report - Figures – November 2012

Volume 3 – Environmental Report - Visualisations – November 2012

Volume 4 – Environmental Report - Appendices – November 2012

Appendix F – Landscape and Visual Impact - November 2012

Volume 1 - Section 9.2, 9.3,9.4 Introduction, Consultation, Scope of appraisal - No comments

Paragraphs 9.5.1 9.5.2, 9.5.3, 9.5.4, 9.5.5, 9.5.6

These paragraphs include all guidance and methodology – these are accepted as current best practice, and include definitions for magnitude of effect and sensitivity.

Paragraph 9.6.1 Baseline description – This is accepted as accurate and the relevant planning policy framework has been referred to including saved Policy ENV 37 relating to Mature Landscape Areas (MLAs).

Section 9.7 Landscape Context – no comments.

Paragraph 9.7.1.1 The description of National Landscape Character refers to NCA 48 Trent and Belvoir Vales.

Paragraph 9.7.1.2 The description of Regional and County Landscape Character refers to the East Midlands Regional Landscape Character Assessment (EMRLCA) and the Greater Nottingham LCA .

Paragraph 9.7.2 Landscape designations – no comments.

Section 9.8 The proposed development and mitigation

It is accepted that the proposed mitigation will compensate for the amount of hedgerow and broadleaved woodland that will be removed as a result of the development. The proposals to strengthen the hedge-line to the south east of Nottingham Road (A612) are welcomed but more detail needs to be provided concerning this.

Section 9.9 Visual analysis – Methodology – No comments.

Section 9.10 Viewpoint analysis – the viewpoints were agreed in advance with GBC and NCC, at NCCs request an additional viewpoint was added to the original 11 viewpoints (viewpoint 5 -View south from Bridleway above Burton Joyce) to take into account views from PROWs on the ridgeline overlooking the development.

9.11 Assessment of effects at construction stage

9.11.1 Potential construction effects on landscape fabric and character

This is summarised in the applicants LVIA report (P116), the physical construction stage impacts of the proposals are considered to be of moderate effect and are not significant, which is accepted.

The construction phase will involve the removal of 25m of hedgerow, and 270m² of plantation woodland and 3 trees (Figure 4.2) The scheme will replace this with 150m hedgerow and 4100 m² broadleaved woodland. It is agreed that this is a moderate adverse impact and that it can be reduced.

It is not stated but it is accepted that any impacts on landscape character are not significant and temporary.

9.11.2 Potential construction effects on visual amenity

This is summarised in the applicants LVIA report (P116), the physical construction stage impacts of the proposals are considered to be of moderate effect and are not significant.

The impacts will be due to vehicular movements and cranes, for a 4 month period, it is agreed that this is a moderate effect, and that it is temporary.

9.12.2 Potential operational effects on landscape fabric

There will be no physical impacts on the landscape fabric at the operational stage except for those involved in the reinstatement following construction works, it is agreed that these are minor and not significant.

9.12.3 Potential operational effects on landscape character

It is agreed with the report (P118) that for close viewpoints 1 – 4 the presence of the turbines will affect this landscape character area, described as Floodplain valleys RLCT and Stoke Bardolph village farmlands (TW05), substantially. The report states:-
' the turbine would be viewed as a new vertical element within the view, and from parts of this landscape the vertical emphasis of the turbine would contrast with the more horizontal aspects of the landscape.'

The summary of the above is that the proposed development would cause a Major/Moderate effect over much of the TW05 area, which is agreed. It is accepted that the County level assessment area TW05 has a 'Create' landscape action, as it has a poor landscape condition and very low landscape sensitivity.

The proposed development would cause a Major/moderate effect over a localised part of the Floodplain Valleys RLCT and would not characterise this area as a whole, which is agreed.

At distances beyond 1.5 – 2km the turbine would be viewed in the context of the wider landscape and the scale would correspond with the larger scale elements of the landscape, which is accepted.

There would be no direct effects on other adjacent landscape character types, which is accepted.

9.12.4 Indirect effects on other landscape character areas

9.12.4.1 EMRLCA Wooded Village Farmlands (5b) – *‘ the proposal will give rise to a local characterising influence on landscape character, where it will become one of the key elements of landscape and a new landscape sub type may be established’* – it is agreed that a landscape sub type will develop as more proposals are granted approval in the area (see cumulative assessment) within 1.5 – 2 km of the turbine and the effect would be major/moderate and significant. At distances of greater than 2km the effect would not be significant, which is accepted.

9.12.4.2 EMRLCA Unwooded Vales (4a) – because of distance from the site (1.5km east), the proposal would not cause an alteration of the key characteristics of the landscape type, the effect would not be significant, which is accepted.

9.12.4.3 EMRLCA Sandstone forests and heaths (10b) – because of distance from the site (6km north), the proposal would not cause an alteration of the key characteristics of the landscape type, the effect would not be significant, which is accepted.

9.12.4.4 EMRLCA Clay Wolds (8a) - because of distance from the site (7.5km south), the proposal would not cause an alteration of the key characteristics of the landscape type, the effect would not be significant, which is accepted.

9.12.5 Potential effects on landscape designations

9.12.5.1 Mature Landscape Areas MLAs (saved policy ENV37 of Gedling Replacement Local Plan)

The closest MLA is Lambley/Burton Joyce MLA, this is a large MLA in comparison with many others in Nottinghamshire, it extends up and over the ridgeline and is 1 km from the proposed site at its closest point near to Gedling House (Grade II listed building, in private ownership). There would not be a direct impact on the MLA, the effect would be a change to the composition of views from and to this southern part of the MLA where the house sites at the base of the wooded ridgeline. This impact is assessed as major/moderate and moderate and significant.

There are no significant effects to other MLAs which are all too distant from the site.

9.12.5.2 Ridgelines (Saved Policy ENV32)

The Policy seeks to protect the open character and visual quality of the ridgelines.

The report states that there are no direct impacts on the ridgelines and no effect on the open character of the ridgelines themselves. There is potential for views of the turbine in front of the ridgelines near to Burton Joyce when viewed from east and south east from within the Trent Valley (viewpoints 1,3,6,7 and 11). We would add that there is no situation where the view of turbine breaks the ridgeline, the structure is always seen with the ridgeline as a backdrop.

It is accepted that the turbine will not affect the perception of openness but it will have an impact on the visual quality of the ridge from these viewpoints.

9.12.5.3 Ravenshead SLA

There are no impacts on this designation which is located 13 km to the north west.

9.12.5.4 Registered Parks and Gardens

No significant effects from any designated sites such as registered Parks and Gardens are predicted. There may be a glimpsed view of turbine tips in winter from the rear of the church in the grounds of the grade 2 listed gardens of Holme Pierrepont Hall.

9.12.5.5 Bulcote Conservation area

These views are considered in greater detail in the archaeology and cultural heritage chapter of the ES.

The report considers what views of the turbine there will be from 'significant views' described in the Bulcote Conservation area appraisal (2001). It reports that from 4 of these viewpoints within the Conservation Area that there will be partial views screened by tree cover or farm buildings, including from Corporation Cottages which will have a more open view set within open countryside. It concludes that some residents will have significant effects on their residential amenity. These views are at over 2 kilometres therefore NCC would agree that they are not 'overbearing or unacceptable.'

9.12.5.6 Green Belt

It is agreed that significant effects upon the openness of the Green Belt would not occur as a result of the proposed development.

9.12.6 Effects on visual amenity

Visual Impact of the Proposals - With reference to Appendix F4 Viewpoint analysis

The visual impact of the proposals on 12 previously agreed viewpoints is summarised in Table 9.7 of the report. The purpose of the LVIA assessment is to identify significant impacts as a result of the scheme. Of these 12 viewpoints, the effects on visual amenity are Major or Major – Moderate for 7 of them. Table 9.5 sets out that Major or Major to

Moderate impacts are 'significant' in terms of the Environmental Impact Assessment regulations, therefore the visual impact is 'significant' in 7 out of 12 viewpoints.

Viewpoint 5 Bridleway above Burton Joyce is an additional viewpoint which has been added at the request of NCC since the previous application in 2010.

The significance of impact is not recorded as 'adverse' in the LVIA documents produced by the applicant, for example a 'major adverse visual impact' is described as 'major visual impact'. NCC do not consider there to be any ambiguity about this degree of impact, as this represents a change to the baseline situation where there is currently an open view and should the development go ahead there will be a 100 metre structure, this can only be described as an adverse impact.

We do not agree with the statement '*the conclusion that some effects are significant must not be taken to imply that they are necessarily adverse or should warrant refusal in any decision making process*' (P40 Cumulative LVIA) and this contradicts with paragraph 9.5.5.6 which says '*taking a precautionary approach in making an assessment of the 'worst case scenario' the assessment considers that all effects on views which would result from the construction and operation of the proposed development to be adverse....*'

Nottinghamshire County Council has considered below each of the viewpoints in turn where the visual effect is categorised as 'significant,' and considers the scale over which it is felt, that is whether the impact is '*locally significant, or significant with respect to a small number of receptors, but not significant when judged in a wider context.*'

Viewpoint 1. View north west from the Trent Valley Way long distance footpath

Effects on visual amenity

The report says that there will be views of the site at 751 metres distance from this long distance route and provides a photomontage to illustrate this. The predicted visual effect is 'major' and is considered significant to recreational receptors on a long distance path. Recreational receptors are of high sensitivity (Reference Table 9.3) as this activity is focussed on the landscape. It should be added that these impacts will also affect some residents of Stoke Bardolph and visitors to the Ferry Boat Inn.

The photomontage visualisations 1A and 1B appear to be incorrect in that the turbine appears to be placed too far to the right of the visualisation, this is made clear if this is compared with Photomontage visualisation Ai and Aii - Cultural Heritage Viewpoint A - where the turbine appears to be in the correct position.

The report states that the '*Turbine would constitute a new, prominent feature within the view.*' which NCC agree with.

Effects on landscape character

The predicted effect is 'major' and significant. A new characteristic would be introduced to the 'Floodplain Valleys' regional landscape character type (RLCT).

Viewpoint 2. View south east from A612 on the edge of Burton Joyce

Effects on visual amenity

The report quantifies the number of residential properties that are affected in a visual impact schedule contained in Appendix F5. Approximately 15 properties on Nottingham Road (A612) will have unrestricted views (some from upper floors) and approximately 50 will have partial views screened to differing degrees by vegetation. A photomontage is provided to illustrate the typical view, this is at 775 metres distant. The predicted impact to these properties with an unrestricted view is 'major' and 'significant'. The effect could be summarised as locally significant to approximately 65 residences. Residential receptors are accepted as being the most sensitive type of receptor (Reference Table 9.3) There are also impacts on travellers on A612 and users of the Nottingham – Newark railway line, road and rail users are less sensitive and effect on their visual amenity is 'major/moderate' and 'significant.'

The report states '*the turbine would form a new and prominent vertical feature in the middle ground of this view....*' '*Movement of the blades would attract attention along this busy road and rail route.*' which NCC agree with.

Effects on Landscape character

The predicted effect is 'major/moderate' and significant. A new characteristic would be introduced to the 'Floodplain Valleys' RLCT.

Viewpoint 3. View north form Stanhope Crescent, Stoke Bardolph

Effects on visual amenity

The report quantifies the number of residential properties that are affected in a visual impact schedule contained in the Appendix. F5. Approximately 14 properties will have partial views of the development. A photomontage is provided to illustrate this view at a distance of 1.04 kilometres. The effect could be summarised as locally significant to approximately 14 residential receptors. Residential receptors are accepted as being the most sensitive (Reference Table 9.3) There will also be an impact on road users of adjacent roads.

The predicted impact is 'major' and 'significant', road users are less sensitive and effect on their visual amenity is 'major/moderate' and 'significant.'

The report states '*the turbine would form a new and prominent and the movement of the blades would attract attention contrasting with the more static qualities of the local area.*' which NCC agree with.

Effects on landscape character

The predicted effect is 'major/moderate' and significant. A new characteristic would be introduced to the 'Floodplain Valleys' RLCT.

Viewpoint 4. View east from A612 on the bridge crossing the railway

Effects on visual amenity

The report says that there will be views of the site from an 'A' road crossing the railway bridge and provides a photomontage to illustrate this view at a distance of 1.19 kilometres. Again this view could be summarised as being locally significant to traveller receptors on a major route. Traveller receptors are less sensitive than residential or recreational receptors (medium sensitivity Table 9.3).

The predicted effect is 'major/moderate to moderate' and significant.

The report states that the turbine '*... would form a prominent vertical moving feature contrasting with the flat topography of the Trent Floodplain*' '*The blade rotation would attract attention and introduce movement along this busy road and rail route.*' which NCC agree with.

Effects on landscape character

The predicted effect is major/moderate and significant effect. A new characteristic would be introduced to the 'Floodplain Valleys' RLCT.

Viewpoint 5. View south from bridleway above Burton Joyce

Effects on visual amenity

The report says that there will be views of the site from this bridleway and provides a photomontage to illustrate the view at 2.21 kilometres. This could be summarised as locally significant to recreational receptors on a bridleway. Recreational receptors are of high sensitivity (Reference Table 9.3) as this activity is focussed on the landscape.

It should be noted that the date of the photomontage is November 2012 however the trees appear to be in full leaf, NCC would therefore add that the impact of the turbine will be more prominent in the winter months than as shown on the visualisation.

The predicted impact is 'major /moderate' and 'significant'. It is accepted that open views such as the one in the visualisation are intermittent along this route.

The report states '*The turbine would form a clearly noticeable, moving feature rising up from the valley below ...*' which NCC agree with.

Effects on landscape character

The predicted effect is 'moderate' and not significant. '*The visual composition to the south would change as a result of the introduction of the wind turbine...*'

Viewpoint 6. View north from the Trent Valley Way long distance footpath, on edge of Radcliffe on Trent

Effects on visual amenity

The report says that there will be views of the site from this part of the long distance route and provides a photomontage to illustrate the view at 2.68 kilometres distant. This could be summarised as locally significant to recreational receptors on a long distance path. Recreational receptors are sensitive (Reference Table 9.3) as this activity is focussed on the landscape.

The predicted impact is 'major /moderate' and 'significant'. It is accepted that open views from this elevated section of route would be limited especially in summer.

The report states the turbine '*...would form a prominent feature within the flat valley landscape and although blade movement would attract attention, it would be perceived in the context of movement in the greater landscape.*' which NCC agree with.

Effects on landscape character

The predicted effect is 'moderate' and not significant. The visual composition to the north would change as a result of the introduction of this wind turbine when viewed from the Unwooded Vales RLCT.

Viewpoint 7. View east from the Trent Valley Way long distance footpath, west of Newton

Effects on visual amenity

The report says that there will be views of the site from this part to the long distance route and provides a photomontage to illustrate the view at a distance of 3.52 kilometres. This could be summarised as locally significant to recreational receptors on a long distance path. Recreational receptors are sensitive (Reference Table 9.3) as this activity is focussed on the landscape. There will also be views from local roads which are less sensitive.

The predicted impact is 'major /moderate' and 'significant' for recreational users of the footpath and 'moderate' and 'not significant' for road users.

The report states '*The turbine would constitute a new large feature within the valley landscape, with blade movement clearly visible.*' which NCC agree with, and would add that the turbine would be perceived in the context of movement in the greater landscape as viewpoint 6 .

Nottinghamshire County Council would agree and add that as the site is now over kilometres from the proposed development the effects of distance will reduce the prominence of the structure and it will also form a smaller proportion of the total field of view.

Effects on landscape character

The predicted effect is 'moderate' and not significant. The visual composition to the west would change as a result of the introduction of this wind turbine when viewed from the Unwooded Vales RLCT.

Viewpoint 8. View south from Bridleway at Lambley Airfield

Effects on Visual amenity

The report says that there will be views of the site from this bridleway and provides a photomontage to illustrate this view from a distance of 4.06 Kilometres. This could be summarised as locally significant to recreational receptors on a bridleway. Recreational receptors are sensitive (Reference Table 9.3) as this activity is focussed on the landscape.

The predicted impact on recreational users on the bridleway is 'moderate' and not significant'. The predicted impact on users of the airfield is 'moderate/minor' and 'not significant.'

The report states '*The turbine would form a minor element in the view, with the buildings of the airstrip and other agricultural building forming more prominent features.*'

Nottinghamshire County Council would agree and add that as the site is now over 4 kilometres from the proposed development the effects of distance will reduce the prominence of the structure and it will also form a smaller proportion of the total field of view.

Effects on landscape character

The predicted effect is 'minor' and not significant. The wind turbine would form a minor new visual element in the view when viewed from the Wooded Village Farmlands RLCT.

Viewpoint 9. View east from new residential development off Plains Road, Arnold

Effects on Visual amenity

A number of residential properties are being constructed at this site. A photomontage is provided to illustrate this view at a distance of 4.79 kilometres. Residential receptors are accepted as being the most sensitive (Reference Table 9.3).

The predicted impact on the residential development is moderate/and not significant.

The report states '*The turbine would form a minor element in the extensive view, and although blade movement would be visible, it would not attract undue attention among the other varied features at this distance.*'

Nottinghamshire County Council would agree and add that as the site is now over 4 kilometres from the proposed development the effects of distance will reduce the prominence of the structure and it will also form a smaller proportion of the total field of view.

Effects on landscape character

The predicted effect is 'minor' and not significant. The wind turbine would form a minor new visual element in the view when viewed from the edge of the Wooded Farmlands RLCT.

Viewpoint 10. Trent Valley Way, south of Hoveringham

Effects on Visual amenity

The report says that there will be views of the site from this long distance footpath and provides a wire frame visualisation to illustrate this view at a distance of 6.72 kilometres. This could be summarised as locally significant to recreational receptors on a long distance footpath. Recreational receptors are sensitive (Reference Table 9.3) as this activity is focussed on the landscape.

The report states there is no visual impact on recreational users of the footpath, due to effect of screening tree cover from this view.

Effects on landscape character

There will be no effect on the landscape character as there is no view from this viewpoint.

Viewpoint 11. View south from main Road at Barnstone

Effects on Visual amenity

The report says that there will be views of the site from this road and from properties on the north west fringe of Barnstone and provides a wire frame visualisation to illustrate this view at a distance of 11.58 kilometres. This could be summarised as locally significant to vehicular receptors on local roads, vehicular receptors are less sensitive (Reference Table 9.3) than residential receptors.

The predicted impact on residents is moderate/minor and not significant, the predicted impact on vehicular users is minor and not significant.

The report states *'The rotating blades of the turbine would constitute a very minor feature, further filtered by hedges and tree cover.'*

Nottinghamshire County Council would agree and add that as the site is now over 11 kilometres from the proposed development the effects of distance will reduce the prominence of the structure and it will also form a smaller proportion of the total field of view.

Effects on landscape character

The predicted effect is 'minor' and not significant. The wind turbine would form a minor new visual element in the view when viewed from the Unwooded Vales RLCT.

Viewpoint 12. View west from bridleway at Beacon Hill, north of Bottesford

Effect on Visual amenity

The report says that there will be views of the site from this bridleway and provides a wire frame visualisation to illustrate this view at 17.02 kilometres. This could be summarised as locally significant to recreational receptors on a bridleway. Recreational receptors are sensitive (Reference Table 9.3) as this activity is focussed on the landscape.

The predicted impact on recreational users is moderate/minor and not significant.

The report states *'When visible the turbine would constitute a very minor, distant feature of the extensive view.'*

Nottinghamshire County Council would agree and add that as the site is now over 17 kilometres from the proposed development the effects of distance will reduce the prominence of the structure and it will also form a smaller proportion of the total field of view.

Effect on landscape character

The predicted effect is 'minor' and not significant when viewed from the Unwooded Vales RLCT.

The landscape team consider the above visual assessment accurate and thorough with clear visualisations (with the exception of Viewpoint 1 where we believe there is an error), nevertheless it demonstrates that there will be significant impacts on recreational users of the Trent Valley Way near to Stoke Bardolph village and on the edge of Radcliffe on Trent and west of Newton, also on some residents on Nottingham Road, some residents of Stoke Bardolph village, rail and road travellers on the A612 particularly crossing over the railway bridge, and users of a bridleway to the north on the ridgeline.

Paragraphs 9.12.6.1 – 9.12.6.4

Based on the viewpoint analysis (Appendix F4) and the preparation of the Visual Impact Schedule of dwellings within 2 km (Appendix F5), paragraphs 9.12.6.1. Residents-Settlements, 9.12.6.2, Motorists and other road users 9.12.6.3 Railway Lines and 9.12.6.4 Recreation; summarises the extent of views of the proposed development.

The most important visual impacts are drawn out in these descriptions and this is used to determine the viewpoints from which more detailed analysis has been carried out. It is accepted for residential properties that none of these views is 'overwhelming and unavoidable.'

Residential properties within 2km

Ferry Boat Inn public house, Stoke Bardolph
43-48 Stoke Lane plus detached dwelling
Lowes Farmhouse
Stoke Bardolph village

Outlying dwellings along Stoke Lane between Stoke Bardolph and junction with A612
Edge of Burton Joyce mainly at the point where Nottingham Road leaves the village
envelope beyond Millfield Close
From the edges of Shelford

Roads

A612 from junction of Millfield Close and Nottingham Road and Colwick Loop Road

Railway Lines

Nottingham – Newark – between A612 bridge until Burton Joyce station

Local Sporting venues

Poplars Sport Ground
Gedling Football Club
Carlton Tow Football Club

Recreational routes

Sections of the Trent Valley Way
Local PROW network between Radcliffe on Trent and Bulcote

9.13 Cumulative Landscape and Visual Assessment – Appendix F6

The report and its appendices consider cumulative assessment in terms of two situations:-

1. Where more than one turbine development will be seen at different points in the landscape from a fixed viewpoint. In order to analyse this 6 viewpoints have been considered which represent views from the Public Rights of Way network and local roads and railway lines.
2. Whether there is an increase in the incidence of sequential views as a result of the development on the Public Rights of Way network, and local road and rail routes. The report considers firstly operating and consented turbine sites, and then all proposed sites some which may not achieve planning consent.

1. Views of more than one turbine

Viewpoint 7. View east from the Trent Valley Way long distance footpath, west of Newton

The conclusion of this assessment is that there may be some moderate cumulative effects for some Stoke Bardolph residents as a result of the combined view of the Stoke Bardolph turbine and 3 separate single turbine developments between 6 and 11 km distance, 2 on the ridgeline at 6 - 7 km distance. There may also be some moderate cumulative effects for some recreational receptors as a result of the combined view of

the Stoke Bardolph turbine and the East Bridgford turbine and turbines on the skyline at Nottingham Trent University.

Viewpoint 8. View south from Bridleway at Lambley Airfield

The conclusion of this assessment is that there may be some moderate cumulative effects from Lambley airfield as a result of the combined view of the Stoke Bardolph turbine and other separate single turbine developments between 6 and 13 kms away. There may also be some moderate cumulative effects for some recreational receptors as a result of the combined view of the Stoke Bardolph turbine and the East Bridgford turbine.

Viewpoint 10. Trent Valley Way, south of Hoveringham

The conclusion of this assessment is that there will be no cumulative effects as the Stoke Bardolph turbine is not visible at this point so there can be no combined effects.

Viewpoint 11. View south from main Road at Barnstone

The conclusion of this assessment is that there will be no cumulative effects as a result of the combined view of the Stoke Bardolph turbine and other separate single turbine developments and there will be no cumulative effects as a result of the combined view of the Stoke Bardolph turbine and the East Bridgford turbine.

Viewpoint 12. View west from bridleway at Beacon Hill, north of Bottesford

The conclusion of this assessment is that there will be no cumulative effects as a result of the combined view of the Stoke Bardolph turbine and other separate single turbine developments and there will be no cumulative effect as a result of the combined view of the Stoke Bardolph turbine and the Hawton and East Bridgford turbine.

Viewpoint 13. View from East Bridgford Road, Newton

The conclusion of this assessment is that there will be no cumulative effects as a result of the combined view of the Stoke Bardolph turbine and other separate turbine developments and there will be no cumulative effect as a result of the combined view of the Stoke Bardolph turbine and the Grove Farm and East Bridgford turbine.

2. Possible sequential views of turbines

Landscape character

The report concludes that there will be some coalescence of landscape character sub types within the Trent Valley if all the turbine developments achieve planning approval and the Stoke Bardolph proposal will not make this situation worse. NCC would disagree with this as the Stoke Bardolph turbine will surely contribute to this coalescence.

MLA

The report concludes that there will be some significant cumulative effects on limited parts of the MLA between Burton Joyce and Arnold.

Residents

Burton Joyce – A limited number of properties on high ground will have views of the Stoke Bardolph and East Bridgford turbine from different parts of the same house and there would be a significant cumulative effect on their amenity.

Stoke Bardolph - A limited number of properties will have views of the Stoke Bardolph and East Bridgford turbine from different parts of the same house. A limited number of properties will have views of the Stoke Bardolph and Grove Farm turbine from different parts of the same house, and for both of these situations there would be a significant cumulative effect on their amenity.

Shelford – A limited number of properties will have views of the Stoke Bardolph and East Bridgford turbine from the same viewpoint in house or garden. A limited number of properties will have views of the Stoke Bardolph and Grove Farm turbines from same viewpoint in house or garden, and for both of these situations there would be a significant cumulative effect on their amenity.

Carlton – There will be potential views of Stoke Bardolph and East Bridgford turbine (7km north east) from same viewpoint in house or garden.

Roads

A46 – The report concludes that there would be some sequential effects above the baseline situation, the Stoke Bardolph turbine would reinforce these sequential effects but not add to the extent of them.

A52 – The report concludes that there would be some sequential effects above the baseline situation, the Stoke Bardolph turbine would reinforce these sequential effects but not add to the extent of them.

A612 – The report concludes that there will be an increase in sequential cumulative effects on users as a result of Stoke Bardolph turbine.

Minor roads – The report concludes that there would be significant sequential cumulative effects on users of the minor roads within 2 - 4 km of the Stoke Bardolph turbine.

Rail – The report concludes that there will be an increase in significant cumulative effects as a result of Stoke Bardolph turbine.

Recreational facilities – Holme Pierrepont Country Park -The report concludes that there will be an increase in significant cumulative effects as a result of Stoke Bardolph turbine on a very small are of the park.

Trent Valley Way – The report concludes that there will be an increase in significant sequential cumulative effects as a result of Stoke Bardolph turbine on parts of this route

Public Rights of Way network –The report concludes that there will be an increase in potential significant cumulative effects as a result of Stoke Bardolph turbine on this network.

The report concludes that significant cumulative landscape and visual impact would be localised in extent and limited given the size of the single turbine proposal, this is accepted but this impact could be up to 11 kilometres from the site (this is based on the furthest turbine with which there is likely to be inter-visibility – Proposed Nottingham Trent University being 11 kilometres from the site.)

Comment on Paragraph 9.1 Summary and Paragraph 9.14 Conclusions

The Nottinghamshire County Council comments on these sections of the document are summarised in the conclusions section below.

Planning Statement

No comments, all key issues contained in this document have been discussed with reference to the Landscape and Visual impact assessment above. The comments discussed (section 4.2.1.1 relating to Policy ENV5) were contained in the previous committee report and were written by Gedling Borough Council. The comments provided by Nottinghamshire County Council on Landscape and Visual Impact must be balanced against long term benefits in terms of production of renewable energy and reduction in greenhouse gas emissions.

Design and Access Statement

Section 5 of the document - Detailed Turbine Design – discusses how the approval of the Woodborough Park turbine 6-7 km to the north west of the Stoke Bardolph site at a height of 67 metres should be taken into consideration in informing this application. It is in the same national character area and is also in the Green belt. This application was determined at a district council level therefore it is not known what factors were taken into account in this decision and therefore it is not discussed here.

Conclusion

To summarise the conclusions of the report the turbine has a ‘significant visual impact’ within a localised area on a specified number of residential receptors, traveller receptors over a limited distance on an ‘A’ road, and recreational receptors on a long distance footpath and the immediate Public Rights of Way network. The effects on visual amenity are major to major/moderate for these receptors, and Nottinghamshire County Council would add “are major to major/moderate adverse”, which is the highest end of the scale of impact. Nottinghamshire County Council accept that these visual impacts are contained by the ridgelines that bound the Trent but nevertheless localised impact extends from this point up and down the valley for a distance of up to 3.5 kilometres.

The physical impact of the proposals is minimal and has been quantified by the applicant and is further reduced by the mitigation proposals described.

The impact on the character is as described in the LVIA document as adding 'a *new characteristic*' to the surrounding Policy Zone of the Trent Washlands Landscape Character Area (County Level) which Nottinghamshire County Council would agree with. At a wider scale of 1.5 – 2 kilometres, new landscape regional landscape sub-types will be developed – '*Floodplain Valleys with Wind Turbine*' and '*Wooded Village Farmlands with Wind Turbine*' This would have a significant effect on localised parts of the landscape character of these sub types, which we would also agree with.

There would be limited but significant effects on a small part of the Lambley and Burton Joyce MLA at its southern extension, to the area above and surrounding Gedling House.

There would be limited but significant effects on a small part of the Bulcote Conservation area both from important views out of the village and from residences on the fringe of the CA.

It is accepted by NCC that there are likely to be limited points on the ridgelines where the proposals can be viewed but these include those shown from Viewpoint for viewpoint 5.

The cumulative impacts have been described from both fixed points and where sequential visual impacts are possible. Cumulative impacts are possible from limited areas which include from the village of Stoke Bardolph for some residents (Viewpoint 7), and from the Trent Valley Way west of Newton (Viewpoint 7) and from a bridleway at Lambley airfield (Viewpoint 8). Sequential cumulative impacts are possible from limited properties in Burton Joyce, Stoke Bardolph and Shelford, as well as the local road network including the A612, the Newark – Nottingham railway line and the public rights of way network including the Trent Valley Way. This cumulative assessment assumes that all currently planned turbines will go ahead which is not necessarily the case.

Nottinghamshire County Council agrees that the visual impact of the proposals is 'significant' over a localised area, in our opinion from 7 of the 12 viewpoints within 3.5 kilometres of the site, as also stated in the LVIA report. Although the scale of turbine has been reduced and the number has reduced to a single structure we do not think that this is sufficient to reduce the visual impacts to an acceptable level and consider that this constitutes 'harm' to the visual amenity. On the grounds of impact on visual amenity Nottinghamshire County Council do not support this application. However this conclusion must be balanced against all other issues to be considered by Gedling Borough Council as part of the application including long term benefits in terms of production of renewable energy and reduction in greenhouse gas emissions.

Appendix 3 – Detailed Ecology Comments

Thank you for consulting the Nature Conservation Unit of the Conservation Team on the above matter. The planning application is supported by an Environmental Report (dated November 2012), which includes chapters on Ecology and Ornithology. Having reviewed these chapters, the following key issues are identified in relation to nature conservation:

1. Phase 1 Survey

An updated Phase 1 Habitat Survey of the site has been completed, which was undertaken in April 2012. However, it would appear that the area covered by this survey does not contain the location of the proposed turbine (which is to be located in the field to the west of the surveyed area), presumably because an alternative location was being pursued at the time that the survey was commissioned. This has a knock-on effect in some of the other surveys, where the survey area has been based on the Phase 1 survey area. On this basis, it is suggested that Gedling Borough Council seek further information from the applicant which updates the relevant surveys in light of the currently proposed location of the turbine.

2. Bats

A range of survey data was collected in relation to bats in 2009 to support the previous application for two wind turbines at this site. These surveys have been updated with transect surveys and remote monitoring carried out in 2012. It should be noted that the level of survey effort expended does not appear to match the Minimum Survey Standards as detailed in Table 2 of the 2nd edition of the Bat Conservation Trust's "Good Practice Guidelines – surveying for onshore wind farms". It is stated that at the time of the 2009 surveys, the site was considered to be of 'moderate' (i.e. medium) risk in relation to bats, yet the level of survey carried out in 2012 is equivalent to that required for a low risk site. It is assumed that following the results of the surveys from 2009 the risk category of the site was downgraded from medium to low, but this is not made clear. It is therefore suggested that Gedling Borough Council seek justification from the applicant on this matter.

In terms of assessing the impacts of the proposal on bats, one point requires clarifying: it is stated that there will be a low risk of harming or disturbing any bats foraging within or commuting through the site, and that based on the turbine specification and Natural England's current guidelines, a minimum stand-off distance of 70.4m is required to minimise the risk of bats being adversely affected by the operation of the turbine. It is then stated that as a stand-off of 80m has been implemented, the risk of bats being adversely affected either directly (collision) or indirectly (barotrauma or disturbance of habitats) is considered to be low. However, this 80m stand-off does not relate to the current location of the turbine (as identified in point 1 above). It is therefore essential that confirmation is sought that the current turbine location is at least 70.4m from the nearest boundary feature that could be used by foraging bats. In addition, any condition relating to micro-siting should ensure that this stand-off is maintained.

3. Birds

As with bats, a range of survey data was collected in relation to birds in 2009 to support the previous application for two wind turbines at this site. These surveys have been updated with a Breeding Bird Survey and vantage point surveys carried out in 2012. It should be noted that the level of survey effort expended does not appear to match the current guidelines as set out in Natural England's Technical Information Note TIN069 – "Assessing the effects of onshore wind farms on birds", which states that bird data should be collected for at least one year and that vantage point surveys should amount to 36 hours of survey per season. In this case, vantage point surveys were completed between April and September 2012 (i.e. across spring, summer and early autumn), and amounted to 45 hours in total. As with bats, it may be that the level of survey effort has been adjusted in light of the results of the 2009 surveys, but this is not made clear. However, given that sites along the Trent host wintering waterfowl species, it is concerning that this period was not covered in the 2012 vantage point surveys – especially as 'high' collision rates were recorded for golden plover (and wintering lapwing) based upon collision risk analysis of the 2009 data. It is therefore suggested that Gedling Borough Council seek justification from the applicant on this matter.

4. Mitigation

A range of mitigation measures are proposed in relation to habitats, bats, birds and other species present on the site or in the immediate area (otters, reptiles and badgers). These measures are outlined in section 5.10 of the Ecology chapter, section 6.7 of the Ornithology chapter, and section 5.6.10 of the confidential badger report.

The applicant proposes that an Environmental Management Plan will be produced prior to the commencement of the development, and that this will include ecological mitigation measures (as above) and post-construction monitoring. The production and implementation of such an Environmental Management Plan should be made a condition of any permission granted. In relation to the proposed areas of habitat creation, this should include details of species/seed mixes, establishment methods and maintenance regimes.

I trust you will find the above comments of use, but if you require any further information, please do not hesitate to contact me.

Nick Crouch
Senior Practitioner Nature Conservation

Appendix 4 – Detailed Archaeological Comments

The Stoke Bardolph Turbine proposal is relatively straightforward from an archaeological viewpoint. I have referred back to the archaeological report which was submitted by Oxford Archaeological Associates for the previous application for two turbines, as well as reading the material submitted by Woodhall Planning and Conservation. I have also visited the site with two colleagues from English Heritage, where we considered both the setting issues and the information submitted in respect of buried archaeological remains. I will restrict my comments to the buried archaeological potential.

In this location, close to the current course of the River Trent, I would automatically suspect that there could be significant buried archaeological remains at variable depths, and relating to earlier courses of the Trent and attendant human activity. Such archaeology can be both difficult to locate, and highly significant as organic remains, both of artefacts and environmental remains such as plant, pollen and faunal assemblages can survive in the waterlogged conditions associated with riverine environments.

However, we are fortunate to have the observations of the OAA watching brief report on the previous geotechnical works, which identified that such deposits are unlikely to survive to a depth of over 3m. The OAA report also points out the damage to higher archaeological remains which might have been expected to survive here from activities associated with the STW, such as slurry spreading. From my own experience of this area, in particular associated with the construction of the A612 Colwick Bypass, the survival of archaeological remains was patchy and unpredictable; some were protected by levels of alluviation and colluviation, in other places features were demonstrably truncated into non-existence.

I therefore concur with the view of OAA and Woodhall, that overall the archaeological potential is low, but that it is not completely negligible. I therefore recommend that if planning permission is granted, this should be conditional upon a programme of archaeological monitoring of all groundworks, with appropriate provisions to secure appropriate levels of investigation, recording and sampling and analysis of relevant features, finds and environmental deposits. A condition such as the following may be appropriate;

- *"No development shall take place within the application site until details of a scheme for archaeological mitigation has been submitted to and approved in writing by the LPA."*
- *"Thereafter the scheme shall be implemented in full accordance with the approved details."*

This scheme should be drawn up and implemented by a professional archaeologist or archaeological organisation. I will be happy to advise on the nature and extent of such a scheme, or to provide further advice or comment as required.

