



Campaign to Protect
Rural England

The Hertfordshire Society

To North Herts. District Council

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Application 08/00047/1 **Weston Hills Wind Turbines, off Hatch Lane, Weston**

Comments by CPRE – The Hertfordshire Society

1. We consider that this application should be refused for the following reasons.

Energy from Renewable Sources

2. The applicant sets great store by the need to increase the supply of energy from renewable resources to reduce greenhouse gas emissions and meet international and domestic targets. We do not dispute that this is desirable in order to combat global climate change and that more needs to be done. However, wind energy is only one source of renewable energy, and providing wind energy inland rather than in remote coastal areas or offshore is only a relatively small proportion of the UK wind energy generation potential.

National Planning Guidance on Renewable Energy

3. We acknowledge that Planning Policy Statement 22 *Renewable Energy* key principle (iv) states that the wider environmental and economic benefits of proposals for renewable energy projects, whatever their scale, are material considerations that should be given considerable weight in determining whether proposals should be granted planning permission. We do not have the technical expertise or the resources to assess these wider environmental and economic benefits. We are aware, however, that there is a considerable body of expert opinion that questions the efficiency and claimed capacity of wind turbines and their intermittent operation depending on prevailing wind conditions. It is for the Council, as local planning authority, to assess these claimed benefits and to determine how much weight should be accorded to them in considering this application.

4. PPS22 paragraphs 6 - 8 states that planning applications for renewable energy projects should be assessed against specific criteria set out in Regional Spatial Strategies (RSSs) and Local Development Documents (LDDs). Criteria-based policies should be used to identify broad areas at the regional/sub regional level where development of particular types of renewable energy may be considered appropriate. Other criteria-based policies to reflect local circumstances should be set out by local planning authorities in their LDDs. As we explain in paragraphs 12 and 21 - 22 below, work on this has not progressed very far as yet.

Green Belt issues

5. The application site is located in the designated Green Belt that surrounds Baldock and Letchworth and separates them from the larger built-up area of Stevenage to the south. The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns from merging into one another, and safeguarding the countryside from encroachment. Contrary to the applicant's assertion in section 5.2 of the Environmental Statement, the proposed development will have an impact on the Green Belt and will reduce its function.

6. PPS22 paragraph 13 states that, when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development, which may impact on the openness of the Green Belt; careful consideration will therefore need to be given to the visual impact of projects.

PPG2 paragraph 3.2 makes it clear that inappropriate development is, by definition, harmful to the Green Belt. This application comprises three 120 metre high wind turbines, a small substation and access tracks of between 3 and 5 metres width connecting each turbine with the access point on Hatch Lane. The proposed development will stretch across a large field located on the Weston Hills plateau, and will therefore have a detrimental effect on the openness of this part of the Green Belt.

7. In accordance with PPG2 paragraph 3.2, it is for the applicant to demonstrate that very special circumstances exist in this case to overcome the presumption against inappropriate development in the Green Belt. Substantial weight should be attached to the harm caused to the Green Belt when considering any application or appeal concerning inappropriate development.

8. Policy 2 of the North Hertfordshire District Local Plan (1996) sets out the Council's policy with regard to the Green Belt – that planning permission will only be granted for uses which are appropriate in the Green Belt, and which would not result in significant visual impact. The Environmental Statement (section 5.2) confuses this Green Belt policy with Landscape Conservation Area policy in Policy 12 of the Local Plan. Landscape Conservation policy is different from Green Belt policy, and the impact of the proposed development accompanying the application on the landscape should be considered separately from its impact on the openness of the Green Belt. We comment on landscape character and visual impact in paragraphs 24 - 45 below.

The Regional Spatial Strategy for the East of England

9. The East of England Plan was published in its final form by the Government in May 2008. The applicant's Planning Statement and Environmental Statement submitted with the application are out of date in that they rely on the Draft East of England Plan which has been substantially altered. In particular, draft Policy ENV8 and the supporting text have been replaced by a new Section 9 dealing with Carbon Dioxide Emissions and Renewable Energy.

10. Approved RSS Policy ENG2 states:

“The development of new facilities for renewable power generation should be supported, with the aim that by 2010 10% of the region's energy and by 2020 17% of the region's energy should come from renewable sources. These targets exclude energy from offshore wind, and are subject to meeting European and international obligations to protect wildlife, including migratory birds, and to revision and development through the review of this RSS.”

11. The supporting text explains that the above targets equate to installed capacity of at least 1192 Megawatts by 2010 (820 MW excluding offshore wind) and at least 4250 Megawatts by 2020 (1620 MW excluding offshore wind). However, paragraph 9.7 adds the proviso that renewable energy includes photovoltaic energy, solar-powered and geo-thermal water heating, wind, energy crops and biomass, and energy from agricultural, plant and animal, domestic and industrial waste. Onshore wind is therefore a limited source of energy to meet the regional target, and not the only source as the applicant seeks to imply.

12. RSS Section 9 goes on to state that fuller guidance for renewable energy, including sub-regional targets based on an assessment of potential, together with locational criteria, will be developed as part of the review of RSS. This Review of the East of England Plan has been announced as taking place during 2009-2010, to be completed by 2011. Until then, there is nothing in the RSS to support the location of large-scale wind turbines in north Hertfordshire generally or specifically in the Weston Hills area.

13. The applicant's Planning Statement refers to Regional Planning Guidance RPG6 (for East Anglia) and RPG9 (for the South East Region) in support of the application.

Since the commencement of the Planning and Compulsory Purchase Act 2004, these two documents have been superseded by the Regional Spatial Strategy. Similarly, the Planning Statement quotes Policy 54 of the Hertfordshire Structure Plan in support of the application. Again, the Structure Plan has been superseded by the RSS, and Policy 54 is not one of the ‘saved’ Structure Plan policies.

Ove Arup report: *Placing Renewables in the East of England*

14. The East of England Regional Assembly (EERA) commissioned a study by Ove Arup and Partners Ltd to inform the Review of the RSS with regard to renewable energy generation. The subsequent report was published in February 2008.

15. Chapter 5 of the Ove Arup report discusses the potential of onshore wind development for electricity generation in the Region. It identifies ‘strategic scale constraints’ which include:

- *wind speeds of less than 6.5 metres per second at 80m hub height*
- *settlements (a 500m buffer around properties listed on OS Address Point data used as a proxy to approximately model noise considerations around residential dwellings)*

16. We consider that the Council should assess the Weston Hills application with specific reference to these constraints. The applicant does not appear to have measured, or taken into account, potential wind speeds in the immediate area (or if he has, that information has not been made available to the public, so far as we can see).

17. Using these strategic scale constraints and other significant constraints, the Ove Arup report identifies areas of the Region that are ‘unconstrained’ and ‘variably constrained’ for the purposes of wind farm development. Table 5.1 of the report shows that out of 206 sq km across the Region assessed as ‘unconstrained’, only 7 sq km (3.4%) is in Hertfordshire. Figure 5.1 shows the unconstrained areas as white areas: those in Hertfordshire are clustered in the extreme north east of the county, and it is not clear at the scale used whether they include Weston Hills.

The Hertfordshire Renewable Energy Study (the Entec report)

18. The applicant draws attention to this study carried out by Entec UK Ltd for Hertfordshire County Council and published in July 2005. Section 4.5 sets out the technical and resource constraints on large-scale wind projects, including wind speed, terrain and topography, access for construction, ecology and ornithology, landscape and visual impact, noise and shadow flicker, etc. We consider that the applicant has not given sufficient consideration to some of these constraints, or has chosen to ignore them. We comment on some of these issues in more detail elsewhere in this statement.

19. Figure 5.1 of the Entec report identifies a broad ‘area potentially attractive for wind farm development’ and scattered ‘areas of limited attractiveness for wind farm development’ in Hertfordshire. The application site appears to be located on the very edge of the upland area of north east Hertfordshire that has been designated as being potentially attractive for wind farm development. This is a relative assessment, however, based on factors such as sparseness of population over a wide area, the highest area of land unconstrained by noise, and the possibility that the wind resource may be sufficient in places. It cannot be taken to endorse any particular wind energy proposal, which must be assessed objectively on its own merits and with regard to local conditions which are specific to the actual site.

20. The *Wind Farm Constraints Map* associated with the Entec report shows the site to be within 20 kilometres of Luton airport and 30 kilometres of Stansted Airport. The applicant states in paragraph 10(13) of the Planning Statement that neither the Civil Aviation Authority nor local commercial airports/fields (which we assume includes Luton and Stansted Airports) have raised any concerns

about the proposal following consultation. It is not clear whether this takes into account the recent proposals by NATS to change airspace usage in the Terminal Control North area. We expect the Council to secure confirmation of this from the appropriate authorities before determining this application.

North Hertfordshire District Local Development Framework

21. As referred to above, PPS22 states that planning applications for renewable energy should be assessed against specific criteria set out in Local Development Documents (collectively known as the Local Development Framework). So far as we are aware, the most recent relevant LDD produced by the Council is the Development Policies Preferred Options Paper issued for public consultation in September 2007. Development Policy 6 in that document deals with renewable energy development. The *preferred policy wording* put forward in that policy is quoted in the applicant's Planning Statement.

22. The most relevant point in the preferred policy wording is that renewable energy development proposals will be permitted where they have no unacceptable impacts. The impacts to be assessed include: the visual amenity of the local area, including landscape character; biodiversity, nature conservation and historical/archaeological interest; the openness and visual amenity of the Green Belt; highway, aviation and bird safety; and potential nuisance arising from noise, shadow flicker, electromagnetic interference or reflected light.

23. We submit that, as we explain elsewhere in this statement, this proposal will have unacceptable impacts on the visual amenity and landscape character of the local and wider area, potentially on local biodiversity and nature conservation (subject to the results of further surveys), and on the openness and visual amenity of the Green Belt, and should not therefore be permitted.

Landscape Character and Visual Impact (Chapter 10 of Environmental Statement)

24. Throughout this section the 'Notes on landscape information submitted with Planning Application 06/01843/1', prepared by Caroline Stanton, Horner + Maclellan Landscape Architects on the behalf of Hertfordshire County Council dated 21 November 2006, will be referred to as the Horner Maclellan Report. This report proposes a format and content for a full Landscape and Visual Impact Assessment (LVIA) required to support a planning application of this nature.

25. The Horner Maclellan Report recommends good practice for the LVIA as set out in the 'Guidelines for Landscape and Visual Impact Assessment' produced by the Landscape Institute and the Institute of Environmental Management and Assessment, 2nd Edition, 2002 (referred to below as The Guidelines) and in 'Visual Analysis of Windfarms Good Practice Guidance' Consultation Draft, Scottish Natural Heritage, 2005 (referred to below as Good Practice Guidance).

26. The Environmental Statement Section 10.2 Methodology states that the LVIA covers a radius of 30 km whereas the Horner Maclellan Report recommends adhering to the Good Practice Guidance distance of a radius of 35 km unless otherwise agreed with the determining authority. We agree with the statement in this section that the LVIA includes some of the 'viewpoints from which significant visual effects are most likely to occur' but conclude that a number of viewpoints from which significant visual effects are likely to occur have not been analysed.

27. Section 10.2.2 Zones of Theoretical Visibility (ZTVs) states that the radius covered was 30 km. We have already pointed out above that this distance should ideally have been 35 km.

28. We strongly dispute the conclusion to Section 10.3 Landscape Impact Assessment stated in the final sentence, that overall this wind turbine proposal is of minor significance in terms of landscape impact. This section starts by defining 'Landscape Impact' as set out in The Guidelines, which

includes the impact of change in the elements and qualities of a landscape as a result of development.

29. The Guidelines also define the ‘introduction of elements considered to be uncharacteristic when set within the attributes of the receiving landscape’ to constitute ‘high landscape impact’.

30. In our view the turbines, by virtue of their size and industrial appearance, and due to the movement of the blades, would introduce an unnatural and uncharacteristic element into the landscape.

31. As stated in Section 10.3.2, the proposal site lies in the Weston – Green End Plateau Area 222 as defined in the North Hertfordshire and Stevenage Landscape Character Assessment (2004), which lies within the North Hertfordshire Ridge landscape area as defined by Hertfordshire County Council. Section 10.3.5 quotes the following assessment of the North Hertfordshire Ridge:

“The lack of woody vegetation on the scarp slope makes the landform particularly important here, so that man-made artefacts and surface variations stand out dramatically.”

Significant features of the Ridge include “wide views, stretching off into the distance along the ridge line and away into the flat plains to the north.”

32. In relation to the Weston – Green End Plateau Area 222, the Landscape Character Area Evaluation, under Visual Impact, concludes that “limited development (is) well integrated into the landscape”. We suggest that major structures such as the proposed wind turbines would introduce a markedly different type of development into the landscape.

33. Section 10.3.7 Conclusion to Landscape Impacts and Table 1 Strategy and Guidelines for Managing Change concludes that in respect of all but two of the guidelines set out for the management of the Weston – Green End Plateau Area landscape in the Landscape Character Assessment, the proposed turbines will have ‘no impact’. We support this view but conclude that the guidelines would be insignificant in alleviating the impact on the landscape of the turbines as proposed.

34. In relation to two of the guidelines referred to in our preceding paragraph we strongly refute the suggested impacts. In respect of: *‘Protect and preserve the pattern of narrow winding lanes and associated hedge banks, sunken lanes, verges and hedges’* we dispute the conclusion “short term impact during 4 weeks of construction for access along roads but tracks and removal of hedges will be returned to current state immediately after construction”. In our view, to transport the components of the turbines onto the site will require the removal of roadside trees and hedges which cannot be returned to their current state immediately after the construction. Our views on this issue are set out in more detail in under the heading Access for Construction/Installation below. We also dispute the relevance of the guideline ‘Promote the diversity of hedgerow species and the planting of standard hedgerow trees’ in screening turbines which are 120 metres high.

35. The penultimate paragraph of this section concludes that wind turbines are not characteristic of this landscape but that existing man-made features present in the landscape already impact on the character of the area, and will help to diminish the magnitude of change. We suggest that elements 120 metres high are on a completely different scale to the existing features, such that their impact will be much more significant.

36. In Section 10.4 Visual Impact Assessment, Figure 1 Zone of Theoretical Visibility – Half Tower height (40m) shows the theoretical extent of visibility of a substantial portion of the turbines,

including the moving parts. While we appreciate that trees and man-made structures will reduce their visibility, the open nature of the landscape especially to the north will limit this screening potential. The abrupt cut-off at the 30 km circumference line shows how useful to this analysis the recommended 35 km radius of analysis would have been. We dispute the conclusion that distance will diminish the visibility of the turbines and also their impact beyond 10km, since there would be little point if this were the case in the Good Practice Guidance recommended study area radius of 35 km.

37. Section 10.4.6 Photomontages includes some statements about the potential visual impact of the proposed turbines which are not supported by evidence, such as “it is the case that in built-up environments the view of tall structures such as wind turbines is obscured by housing and trees” and “because the site is on an escarpment at the edge of Baldock, and set back from the edge, views from within the town will not be clear”. The ZTV map in Figure 43 indicates that from most of the built-up area of Baldock one, two or three turbines will theoretically be visible to at least half-tower height.

38. The Photomontage Viewpoint Positions shown in Figure 46 appear very selective and do not follow the recommendations in the Horner Maclennan Report, for example in respect of paragraph 3e of that report. In our opinion a number of viewpoints closer to the proposed turbine site would have indicated a greater impact on a significant number of receptors, for example from the western side of Clothall village, from the minor roads leading from Weston to Baldock and from Weston to Clothall, from closer on the Icknield Way than the viewpoint position chosen, from the Hertfordshire Way and from the public footpath which runs just to the north-east of the proposed site.

39. Paragraph 3e of the Horner Maclennan Report recommends a sequential assessment from key routes in the study area, to be made while travelling in both directions. This has not been done.

40. On a number of the photomontages the exact position of the viewpoint seems to have been selected to reduce the apparent impact of the proposed turbines. For example, in Viewpoint number 1 (Figure 47) the view has a line of pylons in the fore- and middle-distance which as expected appear much larger than the montage of the turbines, although in reality the pylons are estimated to be about one-third only of the proposed turbine height. Had the viewpoint been closer to the turbine site to exclude the pylons, this effect would have been lost. In Figure 2 Viewpoint 5 a similar effect is achieved with the roadside lampposts.

41. Judgements expressed in the assessments of the photomontages are obviously subjective. Nonetheless in four of the eleven viewpoints the significance of the visual impact is judged to be ‘moderate to major’. We take issue with some of the conclusions, in particular in respect of viewpoint 11. At 600 metres from the proposed site the considerable impact of the turbines from this position is apparent and we would have expected similar results or even more visual impact if viewpoints had been chosen from the Hertfordshire Way, from the footpath in close proximity to the site and from the minor road between Weston and Baldock. The significance of the visual impact from this viewpoint is judged to be ‘insignificant’, on the basis that the adjacent dwelling is well screened and the occupants are few. This suggestion that only residents of dwellings are receptors is clearly unfounded.

42. There is no reference in any of the assessments in Chapter 10 to the impact of the movement of the turbine blades. While we appreciate for example that it is impossible to replicate this movement in the photomontages, it should be noted that turbine blade movement draws the eye very strongly and adds a further unnatural and uncharacteristic element to the impact of the structures.

43. In respect of the recommendations in the Horner MacLennan Report, there is no attempt to comply with paragraph 3g (requiring a cumulative impact assessment in respect of the planning application submitted for three wind turbines at Benington approximately 11 km distant), or with paragraph 3h requiring details of the wind turbine layout and design exploration, in particular to assess the comparative impact of turbines of smaller height. Finally, there is no reference to paragraph 6f which requires an assessment of whether the proposed turbines would extend the urban/infrastructural character of Letchworth and Baldock and the nearby bypass further into the wider countryside.

44. In conclusion in respect of Chapter 10, we contend that as well as failing to carry out some of the recommendations of the Horner MacLennan Report and good practice generally in respect of impact assessments of this nature, those assessments carried out understate the potential impact of the proposal, especially in respect of the immediate area and in particular in respect of users of the public highways and other rights of way in the locality.

45. We contend that the proposed wind turbines would be uncharacteristic elements in the landscape and as such their impact would be high. The turbines would appear as very large-scale structures not integrated into the local landscape, unlike existing development and on a completely different scale to existing man-made features.

Ecology issues

46. Chapters 8 and 9 of the Environmental Statement present confusing information, as deficiencies in Chapter 8 have been partly rectified in the Chapter 9 surveys carried out at a later date. Full incorporation of the Chapter 9 material into Chapter 8 would have been more satisfactory.

47. Specific criticisms of the work presented in Chapter 8 are:

- the survey was carried out on one day (in May) noting species present and signs of species using the site such as footprints
- only the application site was surveyed and not nearby adjacent land
- habitat potential was assessed using information gathered from the one survey only and from existing Herts Biological Records Centre data

48. Standard ecological practice requires surveys to be carried out at all times of the year, especially where wintering or migrating populations may be affected by the proposals. All nearby land and not just the application site must be included in the survey, not just to identify mobile species but also to assess the likelihood of disturbance to species on neighbouring land. Reliance on existing records is not dependable unless it can be established that these represent the results of thorough and recent surveys of the affected area.

49. The results of surveys presented in Chapter 9 correct some of the deficiencies noted above. However, an invertebrate survey spread throughout the summer is still absent.

50. The Bird Survey only surveyed for breeding birds during the months of April to June. Surveys throughout the year would be needed to assess the use of the site by wintering or migratory species, for example of the amber list species lapwing which may use the grassland areas in the winter. In addition larger birds of prey such as buzzard and red kite are increasing in numbers in the county as a whole, so that the limited nature of the breeding bird survey may have substantially underestimated their numbers. Larger birds of prey are thought to be more prone than many groups of birds to direct collision with wind turbines.

51. The Bat Survey results included in Chapter 9 were from two surveys only carried out in April and May 2007. Surveys planned for later in the year are mentioned in this section but no results are given. The survey found only low numbers of bats in the vicinity of the proposed turbine sites. However, it is possible that later in the year bat numbers in the area may be higher. Recent research suggests that bat deaths in the vicinity of wind turbines are caused by internal damage due to fatal haemorrhaging, especially in the chest cavity, brought about by changes in air pressure in the vicinity of rotating turbine blades. Pressure around a rotating turbine blade is lower than in the surrounding air and it is believed that this causes a sudden expansion of the lungs of bats flying into this zone of lower pressure, in turn causing blood vessels to burst. This information was reported on the BBC News website on 26th August 2008 and suggests that bats may be killed by wind turbines even if they do not fly at the height of the turbine blades.

52. OPDM Circular 06/2005: Biodiversity and Geological Conservation –Statutory Obligations and Their Impact Within the Planning System states that local planning authorities must treat the potential impact of planning proposals on protected species as a material consideration. All wild birds and all bat species are protected species.

Access for Construction/Installation

53. In accordance with the Council's draft Development Policy 6 referred to in paragraphs 21 – 22 above, all major renewable energy applications must be accompanied by a statement detailing, *inter alia*, any unavoidable damage that would be caused during installation, operation or decommissioning, and how this will be minimised and mitigated, or compensated for. Chapter 16 of the Environmental Statement describes how it is proposed to transport the wind turbine components to the site, but it does not address the question of 'collateral damage'. Some reference to the environmental impact of the transport and construction phases appears in Chapter 10, and we comment on this in paragraph 34 above.

54. The Hertfordshire Renewable Energy Study (Entec report), under the heading of *Technological and resource constraints* draws attention to the physical problems of transporting and erecting large wind turbines and indicates that constraints on access to a wind turbine site might limit the size of turbines that can be accommodated.

55. Figure 63 of the Environmental Statement shows the proposed access route to the site from the A1(M) motorway via the A505/B197 and along the unclassified road Chalk Hills/Hatch Lane. This final part of the route is a very narrow lane which leaves the B197 with a sharp right-hand turn and climbs steeply to the site. There are several tight bends and a bridge taking the lane over the A505 Baldock bypass. Chalk Hills/Hatch Lane is bordered by trees and hedges for much of its length, especially at the bottom end.

56. There is considerable doubt as to whether some of the individual turbine components can be transported up this route in its present state. According to the Environmental Statement, the rotor blades are 40 metres long and the tower parts are 20-24 metres long and weigh 30-47 tonnes. The heaviest single component is the nacelle at 70 tonnes. We assume that the intention is to transport each of the tower parts to the site as a cylinder measuring 20-24 m long and up to 4 m wide, loaded on a lorry able to take a load of this size. We do not see how components of this size can be transported along Chalk Hills/Hatch Lane without significant modifications to the road being made and consequent damage to the trees and hedges (and subsequently the wildlife) being caused. We assume that the bridge over the bypass can take loads only up to a certain weight, but no reference is made to this in the Environmental Statement.

57. In our view, this application should not be determined until a detailed analysis is provided by the applicant to show how the components for the proposed installation are to be transported to site

without causing considerable damage to the trees and hedges bordering the lane and to the road surface, and if damage is unavoidable, which trees and hedges will have to be removed, what landscape and wildlife damage will occur, what mitigation will be required and how the road works will be paid for.

'Temporary' nature of the proposed development

58. The applicant argues, in both the Planning Statement and the Environmental Statement, that wind turbines have a life of about 25 years, and therefore this is essentially a 'temporary' application. We dispute this assertion. The likelihood is that if this application is allowed and the three wind turbines are built, when they reach the end of their operational life there will be a further application to renew or even to extend the development. This view is supported by paragraph 7.5 of the Ove Arup report referred to above, which states that existing wind farms may be 'repowered' (turbines replaced by larger or more efficient new models) and additional sites may be developed in the future. Even if the Council imposes a condition on any planning permission granted for the current proposal, requiring the turbines to be decommissioned and the site to be restored to its original condition, as suggested by the applicant, it will be very difficult to resist future applications to redevelop or extend the site once the principle of development in this location has been established.

Conclusions

59. As set out above, the application site is in the Green Belt and the proposed development constitutes inappropriate development in the Green Belt. It would have a detrimental impact on the openness and on the function of the Green Belt. Whether the net wider environmental and economic benefits of the project constitute the very special circumstances necessary to overcome the presumption against inappropriate development in the Green Belt is for the local planning authority to decide.

60. This notwithstanding, the proposed development would have a significant visual impact on the local landscape and on an area up to 35 km from the site. Precisely how significant that impact would be is difficult to assess because the applicant has not presented the appropriate evidence on which to base a firm conclusion. We consider that the likely visual impact is severe enough to constitute a reason for refusing the application.

61. The proposed development could have some impact on wildlife generally and on some protected species. Again, the applicant has not provided sufficient evidence on which to base a definite conclusion on this issue.

62. Finally, the proposed arrangements for transporting the necessary components and installing them on the site raise a considerable number of unanswered questions, and the applicant should be required to provide a more detailed technical assessment of the environmental impact of these arrangements before the application can be approved.

63. For the above reasons, we consider that this application should be refused.