Allerdale Borough Council

Planning Application
2/2014/0449

Proposed Development: Installation of a single small scale 11kW Gaia wind turbine mounted on an 18m lattice mast with a maximum tip height of 24.5m (resubmission of 2/2013/0754)

Location: West House Farm
Silloth
Wigton

Applicant: Mr Colin Winter

Recommendation Refused

Summary/Key Issues

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<td>Principle of Development</td>
<td>Paragraph 93 of the NPPF makes clear that the provision of renewable energy infrastructure is central to the economic, social and environmental dimensions of sustainable development.</td>
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<td>Landscape and Visual Impact</td>
<td>It is considered that the proposal has the potential for significantly harmful cumulative impacts on the character of the landscape and the visual amenities of the locality. The site is only 1.5km from the Solway Coast Area of Outstanding Natural Beauty (AONB). It is also 3km from the Upper Solway Flats and Marshes Site of Special Scientific Interest (SSSI).</td>
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<td>Residential Amenity</td>
<td>The proposed turbine is within 800m of residential properties. Although the applicants have sought to demonstrate that the proposal will not have a significant effect on residential amenity the proposal will nevertheless result in noticeable changes in views from a number of residential properties.</td>
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<td>Heritage</td>
<td>The site is within the buffer zone of the Hadrian's Wall World Heritage Site. Furthermore, it has the potential to impact on buried archaeological remains.</td>
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<td>Nature Conservation</td>
<td>The site is located within an area mapped in the RSPB document ‘Wind Turbines and Sensitive Bird Populations : A Spatial Planning Guide for on-shore wind farm developments in Cumbria’ as a sensitive area for wintering goose and swan</td>
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<td>Benefits</td>
<td>The proposal will make a contribution to renewable energy deployment nationally. It would also make a contribution to the running costs of the farm business by creating an alternative source of income, supporting rural enterprise and economic activity.</td>
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Proposal

The proposal is for the installation of a single 11Kw Gaia wind turbine mounted on an 18m lattice mast with a maximum tip height of 24.5m (resubmission of 2/2013/0754).

The application is an EIA development and has been accompanied by an Environmental Statement.

The proposed turbine is 2 bladed with a hub height of 18m, blade length of 6.5m and rotor diameter of 13m. The turbine rotor is proposed to be mounted on a tapered steel lattice tower, and the turbine will be supported on reinforced concrete foundations. Each foundation will be approximately 5.5m² with an overall depth of approximately 1m. The turbine would connect to a transformer within the existing farm buildings via an underground cable.

This is a resubmission of application 2/2013/0745, proposing a revised single turbine scheme, as opposed to a 2 turbine scheme as previously applied for. This application was withdrawn on 13th January 2014.

Site

The turbine is proposed to be located within an existing agricultural field that is currently used for grazing, to the south west of West House Farm. The site lies approximately 65m to the west of the B5301. The area is predominantly rural in character comprising a mixture of small to medium scale fields bounded by hedgerows, stone walls and fences. The landscape is undulating in character.

The site is 1.5m away from the AONB and within the world heritage buffer zone for the Hadrian’s Wall World Heritage Site. It is also approximately 3km from the Upper Solway Flats and Marshes Site of Special Scientific Interest (SSSI). This SSSI is part of the Upper Solway Flats and Marshes Special Area of Conservation (SAC). In addition, it is within an area mapped in the RSPB document ‘Wind Turbines and Sensitive Bird Populations: A Spatial Planning Guide for on-shore wind farm developments in Cumbria’ as a sensitive area for wintering goose and swan.

The site is located at a height of approximately 25m AOD.

Relevant Policies

National Planning Policy Framework

Meeting the challenge of climate change, flooding and coastal change
Conserving and enhancing the natural environment
Conserving and enhancing the historic environment
Supporting a prosperous rural economy

Planning Practice Guidance for Renewable and Low Carbon Energy July 2013
Allerdale Local Plan (Part 1) Adopted July 2014
Policy S1 – Presumption in favour of sustainable development, Allerdale Local Plan (Part 1)
Policy S14 – Rural economy, Allerdale Local Plan (Part 1)
Policy S19 – Renewable Energy and Low Carbon Technologies
Policy S27 – Heritage Assets
Policy S32 – Safeguarding amenity, Allerdale Local Plan (Part 1)
Policy S33 – Landscape
Policy S35 – Protecting and enhancing biodiversity and geodiversity, Allerdale Local Plan (Part 1).
Policy S36 – Air, water and soil quality, Allerdale Local Plan (Part 1)
Policy S4 – Design principles, Allerdale Local Plan (Part 1)

Relevant Planning History
A screening opinion has been issued by the Local Planning Authority which stated that the proposal Did constitute EIA development.

Scr/2012/0014 – Screening Opinion for 3 Turbines – Yes and EIA is required
Scr/2012/0037 – Screening opinion for 2 Turbines – Yes an EIA is required

Representations

NATS – No objection

Environment Agency – No comments to make.

Arqiva – No objection

Electricity North West – No objection

Stobart Air – No objection.

Ministry of Defence – No objection

United Utilities – No objection provided that conditions are met.

Public Right of Way – Comments on withdrawn application 2/2013/0745: Public Bridleway (no. 236004) crosses the field. The turbine is outside the fall zone of the Bridleway although equestrian users of the Bridleway could be affected by possible blade flicker and noise from the turbine.

Environmental Protection – The noise assessment for this turbine does provide predicted noise levels at the nearest residential properties within ETSU-R-97 levels. However, the landscape and visual impact assessment document provides some detailed information on the existing turbines within the area – And these turbines have not been considered in relation to their noise impact and the overall cumulative noise impact of these turbines and the proposed on nearby residential properties. Therefore a cumulative noise assessment should be undertaken. This should include existing and approved wind turbines within 1km of the application site.
Highways (Cumbria County Council) - No objections subject to the following conditions:

a) During the construction phase no vehicle shall leave the site in a condition that would give rise to the deposit of mud, dust or debris on the public highway; b) The applicant shall submit a Traffic Management Plan and Construction Method Statement for approval, all identified highway works shall be completed to the satisfaction of the Local Planning Authority in consultation with the highway authority prior to the works commencing on site.

English Heritage – The site is just within the buffer zone of the Hadrian’s Wall World Heritage Site. However, they do not consider that the proposed development would have a significant impact on the Outstanding Universal Value (OUV) of the World Heritage Site, or on the settings of listed buildings (the nearest of which is over 500m to the SW of the site) or scheduled ancient monuments. It does, however, have a limited potential to impact on buried archaeological remains. Subject to the views of the County Archaeologist, they consider that this potential impact would best be mitigated, should planning permission be granted, by a condition requiring any groundworks to take place in the presence of an archaeological watching brief.

Historic Environment Officer (Cumbria County Council) – Note that English Heritage have no objection to the proposal subject to the implementation of an archaeological watching in the event permission is granted. Such a programme of archaeological work can be secured through the inclusion of a condition in any planning consent.

Solway Coast AONB – Object.

Although not in the Solway Coast Area of Outstanding Natural Beauty (AONB) the site is only 1.5km outside it, and is inside the World Heritage Area.

This area is within the Solway Coast AONB Landscape and Seascape Character Assessment (2010) as ‘Lowland Landscape Character Type F: Drumlinned Lowland Farmland’. This is the most extensive character type in the study area and large areas lie predominantly beyond the AONB boundary to the south and southeast and play an important role as the setting of character areas within the AONB. The smooth skylines of the rolling landform and low elongated drumlins are characteristic of views looking inland from many parts of the AONB, with the upland Lakeland Fells forming a distinctive backdrop.

It is a rural agricultural landscape of gently rolling pastures and arable fields with scattered linear settlements. Any turbine situated in this landscape would impinge on the views into and from the AONB towards the Solway Firth and affect undeveloped horizons which form distant backdrops.

In addition, there will be the cumulative effect of the three large turbines at Warwick Hall, 2 Gaia turbines at Low Tarns and 1 turbine at Pelutho. Also the backdrop of the Hellrigg turbines near Silloth increases the magnitude of the cumulative impact both towards and from the AONB. This area is also within the RSPB bird sensitivity area for Pink Foot Geese and Whooper swans.

Natural England - Make the following comments:
1) **Designated Landscapes**
The proposal is located approximately 2km from the Solway Coast Area of Outstanding Natural Beauty (AONB). Therefore comments should be received from the AONB Partnership / AONB Conservation Board.

2) **Designated Sites**
The application site is located approximately 3km from the Upper Solway Flats and Marshes Site of Special Scientific Interest (SSSI). This SSSI is part of the Upper Solway Flats and Marshes Special Protection Area (SPA) and Ramsar and the Solway Firth Special Area of Conservation (SAC).

In addition, the development site is located within an area mapped in the RSPB document ‘Wind Turbines and Sensitive Bird Populations: A Spatial Planning Guide for on-shore wind farm developments in Cumbria’. as a sensitive area for wintering goose and swan.

3) **Natura 2000 site**
The proposal is unlikely to have a significant effect on the interest features for which the Upper Solway Flats and Marshes SPA and Ramsar and the Solway Firth SAC have been designated.

The potential impacts of the development on the designated site, i.e. bird displacement, disturbance and/or collision risk, are unlikely to have a significant effect for the following reasons:

- The development site is of limited value to SPA birds for feeding/roosting due to the topography and land use of the site along with the close proximity to existing roads and power lines.
- The Cumbria Biodiversity Data Centre (CBDC) record search that has been carried out has identified that the closest record of SPA species is 0.8km from the turbine location, which is sufficient distance to avoid bird disturbance.
- The small scale of the proposed turbine and distance from areas known to be used by SPA bird means that the risk collision would be minimal.

4) **SSSI**
Natural England is satisfied that the proposed development will not damage or destroy the interest features for which the Upper Solway Flats and Marshes SSSI has been notified. Therefore the SSSI does not represent a constraint in determining the application.

5) **Protected Species**
Natural England has publishes standing advice on protected species.

‘FORCE’ (Friends of Rural Cumbria Environment) – Object, and make the following comments:

- The wind turbine is in excess of ‘small scale’ as defined by the Governments Department of Energy and Climate Change.
- The ecology report concludes that the proposed development poses no threat to protected species despite the fact that the site is within the RSPB mapped area of
- Whooper swans and pink-footed geese both have amber priority status because at least 50% of each species population can be found in no more than ten sites in the UK.
- The ecology report makes the assertion that geese and swans are more at risk of collision with the power line carried across the field on timber telegraph poles. However, this is stationary infrastructure which is at a considerably lower height than the bladetips of the proposed turbine.
- The risk to protected bird species is one of the reasons clearly given in two separate screening directions published in 2012 by the National Planning Casework Unit. Both of these screening directions related to wind energy developments proposed at West House Far, Pelutho, and both of them upheld the Councils decision that an EIA would be necessary. The reasons for the decision are the fact that the turbines would be located within the RSPB mapped area of bird sensitivity, and also within 64m of the frontiers of Hadrian’s Wall World Heritage Site. SCR/2012/0014 and SCR/2012/0037.
- The NPPF looks favourably in principle upon renewable energy developments. But, it also places great emphasis upon the intrinsic beauty of the countryside as well as upon local opinion.
- The agent denies that the development would have any impact on tourism. However, there is much evidence to the contrary. A survey produced by the British Wind Energy Association itself (now Renewable UK) states on page 21 that up to 22% of visitors to Cumbria could be deterred. And a more recent survey carried out by Visit Scotland suggests that 20% of visitors might stay away.
- Policy S19 of the Allerdale Local Plan regarding the setback distance between wind turbines and residential properties does not apply in this case. However, Policy S19 places a responsibility on the developer to demonstrate that plans are, or can be made acceptable. Force do not believe that this has been achieved due to the location of West House Farm within the RSPB mapped area of bird sensitivity and also within the frontiers of the Hadrian’s Wall World Heritage Site.
- The agent ignores the fact that the Borough of Allerdale already accommodates an exceptionally large number of onshore wind turbines. Yet, it is because of this that the cumulative impact is of particular relevance.
- The agent makes reference to similarly sized local turbines at Tarns. But these cannot be used as a justification to add more turbines just because they are already present.
- Furthermore, by suggesting that these turbines are more acceptable and suited to the landscape than the larger machines at Hellrigg, Westnewton, Wharrells Hill and Tallentire (many of which are also visible from the application site), the agent avoids carrying out a through assessment of the overall situation.
- Many local wind energy developments which have recently received planning consent do not appear to have been taken into consideration. They include two 67m wind turbines at Goose Green and High Scales, a 47m turbine at Firs Farm, and a 35m turbine at Leesrigg. But this is far from an exhaustive list.
- Many local residents at Pelutho and surrounding scattered dwellings will have views of the turbine from their homes, and as much of the natural vegetation is deciduous this will only offer temporary mitigation.
Holme Low Parish Council - Recommend refusal on the following grounds:

1) There are already too many turbines in the surrounding area. As such there would be a detrimental cumulative impact on the visual amenity of the surrounding countryside which is contrary to Policy EN19 and EN25 of the Allerdale Local Plan and Policy R44 of the Cumbria and Lake District Joint Structure Plan.

2) The site is in close proximity to the Solway Coast AONB and would have an adverse impact on the landscape and also tourism in the area.

The application has been advertised by site notice and neighbour notification letters. It has also been advertised in the press as an application accompanied by an Environmental Statement.

Three letters of objection, one letter of support, and one letter of ‘no objection’ have submitted.

The letters of objection are on the following grounds:
- Cumulative impact
- Allerdale hosts more than 70% of the wind turbines in Cumbria, and there is scarcely any view in the borough which does not include at least one of these machines.
- Negative impact on tourism
- Damage to the landscape
- Close proximity to the Solway AONB
- Loss of visual amenity
- Unacceptable risk to protected species within the RSPB mapped area of sensitivity

The letter of support comments that electricity costs have rapidly increased over the last 6 / 7 years for dairy farming and milk production. The proposed turbine will help the viability of the business which supports two families and deals with numerous local businesses. The location and type of the turbine has been deliberately chosen to limit visual and environmental impact. Such impact will be negligible and will be comfortably outweighed by the benefits.

Main Issues:

National Planning Policy and the Allerdale Local Plan (Part 1) are broadly supportive of proposals for renewable energy development. The need to meet national targets for the generation of electricity and heat from renewable and low carbon sources is recognised as are the wider environmental, community and economic benefits of such development.

To ensure that the impacts of development (either in isolation or cumulatively) are, or can be made acceptable, Policy S19 of the Allerdale Local Plan sets out clear criteria for the consideration of proposals for renewable energy development, including wind turbines. The criteria most relevant of this application are considered below.

Amenity of local residents
Policy S19 seeks to protect local residents from unacceptable harm. The supporting text comments that in order to address community concerns and in the interests of residential amenity and safety in relation to turbine development a separation distance of 800m to residential properties will be expected in cases where the turbines are over 25m in height to blade tip.

This 800m distance has been established as being generally sufficient to avoid unacceptable impact on residential amenity. The Local Plan does recognise the need for flexibility and that “in some cases due to site-specific factors such as orientation of views, land cover, other buildings and topography, it may be appropriate to vary this threshold, where it can be demonstrated through evidence that there is no unacceptable impact on residential amenity’.

In this case the turbine is proposed to be 24.5m to blade tip, 500mm short of 25m. Therefore, the 800m guideline is not strictly applicable.

However, there are a number of residential dwellings that are within close proximity of the site. The nearest residential properties are as follows:

West House Farm (The application dwelling) is located approximately 340m to the north of the proposed turbine.

Pelutho Bungalow – This property is located on the western edge of Pelutho approximately 510m to the north east of the proposed turbine.

Prospect House – This property is also located on the western edge of Pelutho approximately 510m to the north east of the proposed turbine.

Lowsay Farm – This property is located approximately 590m to the west of the proposed wind turbine, and it is Grade II Listed.

The applicant’s Landscape and Visual Impact Assessment acknowledges that some properties will be subject to visual impact from the proposed turbine. However, it comments that nearby dwellings are surrounded by maturing trees and hedgerows which shall help screen the proposed turbine from view. It also considers that the impact shall be further limited by the undulating topography and hedgerow that flanks the B5301. Furthermore, the Grade II Listed property at Lowsay Farm will be screened from the proposal by a number of large agricultural buildings.

However, it is Officers opinion that the nearby properties will have some direct views of the turbine and consequently the development is likely to have an adverse impact on the amenity of these residents. Residents within 1km of the site will see the turbine when travelling to and from their properties, and it is Officers opinion that the size and scale of the turbine would be overbearing and oppressive from the nearest dwellings.

In relation to the potential impact of noise the Environmental Health team have advised that in addition to the noise assessment that has been carried out for the turbine a cumulative noise assessment should also be undertaken. This should include existing and approved wind turbines within 1km of the application site to establish the overall cumulative noise impact of these turbines, and the proposal, on nearby residential
properties. The applicant has been advised that this additional information should be submitted, however, they have questioned the need for this supporting assessment on the grounds that it was not requested at the time of the previous application (which was subsequently withdrawn) because Environmental Health had considered that issues regarding noise could be covered by conditions being applied to any planning approval.

With regards to shadow flicker, it is generally acknowledged that the potential impact is only likely to be an issue within 10 x rotor diameters of the turbine. In this case this is 130m and there are no residential properties within the zone likely to be affected by shadow flicker.

**Landscape and Visual Impact**

The Cumbria Landscape Character Guidance and Toolkit (LCG) supports appropriately located schemes for wind energy in line with the provisions of the Cumbria Joint Wind Energy Supplementary Document (SPD) which was adopted by the Council in 2007. The site falls within Cumbria’s landscape classification 2c Coastal Plain. The coastal plain is characterised by largely flat open landscapes with big skies, long views and large rectangular fields where vertical features stand out. The 2c landscape within the coastal plain can be more undulating, more enclosed and intimate with smaller irregular fields.

The Cumbria Landscape Character Assessment also states that within the coastal plain ‘In close range large turbines may appear incongruous against small scale landforms’

The planning application has been accompanied by a Landscape and Visual Impact Assessment (LVIA); Environmental Statement; Photomontages; and Zone of Theoretical Visibility Map.

The applicants LVIA states that the turbine is proposed to provide green electricity for West House Farm and as such is required to be located in close proximity to the property. The turbine has the potential to generate electricity to cover more than 90% of the property and businesses energy demands and will contribute directly to regional and national targets for energy produced from renewable sources.

The 11kw Gaia-Wind turbine on a lattice tower was selected as the applicant considered that the permeability of the mast design minimises the overall impact of the development. The tower design (which is permeable in nature), and the colour to blend in with the sky and surrounding landscape is proposed to reduce visibility over both mid and long range distances. The LVIA also states that the 24.5m mast height is considered the optimum height for energy generation whilst ensuring the low visual impact. It is considered that a change in the design to a smaller mast may slightly reduce visual impact but at the expense of the viability of the project through a much depreciated generation of energy.

It is not proposed to incorporate any landscaping within the scheme. The LVIA comments that this is because the proposal will not harm existing landscaping, and the turbine is far enough away from residential properties to require mitigation in the form of screen planting. Furthermore, it adds that turbines need clear turbulent free air to function correctly.

Computer generated Zone of Theoretical Visibility (ZTV) Maps have been prepared to assist in viewpoint selection and to indicate the potential influence of the development in
the wider landscape. They have been prepared to indicate the extent of potential visibility on the basis of ‘bare ground’ only, not taking the screening effects of the built form of settlements and main areas of woodland into account. In addition, photomontages from 12 viewpoints have been submitted. These are within a 10km radius of the site. Following discussions with Officers, three additional photomontages have been submitted. These are taken from 3 points along the B5301 between the proposed turbine location and West House Farm.

The LVIA includes an assessment of the proposal from the various photomontage viewpoints and comments that while there will be some impact on the local landscape there would be no significant adverse effects on mid-range and longer view points. Furthermore, it states that even from more close range views where the turbine would be clearly visible it would not dominate the landscape due to its relatively modest size and scale. The LVIA considers that the 2-bladed model will appear calmer in the landscape than 3-bladed turbines of an equivalent size as the blade passage frequency will be two thirds of that of a 3-bladed turbine.

The applicant's assessment also makes reference to the turbines close proximity to the Solway Coast Area of Outstanding Natural Beauty (AONB). It comments that views of scattered farms and tree planting contribute to the landscapes tolerance to change, and the turbine would be screened by trees in the intervening landscape. It also comments that the lattice mast would break down the mass of the overall development, and the colour of the blades (pale grey / off white) will blend with the colour of the typical British sky.

The assessment acknowledges that there are a number of viewpoints where the proposed turbine would be viewed in conjunction with existing turbines, but again concludes that this would not result in a significant adverse effect on the landscape character of the area.

It is considered that the applicants Landscape and Visual Appraisal underestimates the visual impact of the proposed turbine within both the immediate locality and the wider area which includes the Solway Coast AONB.

A number of objectors, including FORCE and Solway Coast AONB, have highlighted concerns that the proposal will increase cumulative impact of turbines in the area.

There are 3 existing turbines located immediately to the south of the site at Low Tarns (2 turbines) and Tarns Farm (1 turbine). In addition, there are turbines at Hellrigg, Lanrigg and Westnewton. The scheme of 4 turbines at Langrigg are clearly visible within the locality of the site, as are the large turbine developments at Hellrigg, Westnewton and Wharrells Hill.

The proposed turbine would be located on rising land that is set at a higher level than the adjacent B5301 and it is considered that it would be visually incoherent in the immediate landscape and in the surrounding area.

**Impact on nature conservation interests**
The site is located approximately 3km from the Upper Solway Flats and Marshes Site of Special Scientific Interest (SSSI). This SSSI is part of the Upper Solway Flats and Marshes Special Protection Area (SPA) AND Ramsar and Solway Firth Special Area of Conservation (SAC).

In addition, the development site is located within an area mapped in the RSPB document ‘Wind Turbines and Sensitive Bird Populations: A Spatial Planning Guide for on-shore wind farm developments in Cumbria’ as a sensitive area for wintering goose and swan.

Natural England have confirmed that the proposal is unlikely to have a significant effect on the interest features for which the Upper Solway Flats and Marshes SPA and Ramsar and the Solway Firth SAC have been designated. They also comment that the potential impacts of the development on the designated site through bird displacement, disturbance and/or collision risk are unlikely to have a significant effect.

However, the turbine falls within an area described as important for several important bird species that are vulnerable to the effects of renewable developments, specifically onshore wind developments, as set out in a the document produced by the RAPB.

Impact on heritage assets and their settings

The site is situated just within the buffer zone of the Hadrians Wall World Heritage Site. It is also located within 500m of a Listed Building at Low Tarns. However, English Heritage do not consider that the proposed turbine would have a significant impact on the Outstanding Universal Value (OUV) of the World Heritage Site, or on the settings of listed buildings.

English Heritage do consider, however, that the proposal has potential to impact on buried archaeological remains.

Operational requirements, including the suitability of the road network

The main impacts of the proposed development on the road network would be associated with construction traffic. The highway authority has no objections to the proposal subject to conditions and commitments from the developer in relation to the repair of any damage to the road network resulting from construction traffic.

Potential benefits to the local economy and local community

It is acknowledged that the proposed turbine will have local economic benefits in terms of the contribution it would make to the sustainability of the agricultural operation at the host Farm.

Local Financial Considerations:

Having regard to S70 (2) of the Town and Country Planning Act there are no local finance considerations that are relevant to the consideration of the application.
Conclusion

Whilst recognising the potential benefits of the proposed wind turbine and the contribution it would make to meeting renewable energy and low carbon targets this must be balanced against the likely adverse impacts on the residential amenity of the occupier of dwellings in the vicinity of the site and the impact the increased proliferation of turbines would have on the landscape character of the area. It is for these reasons that it is recommended that planning permission be refused.

Annex 1

Reason for Refusal

The proposed turbine, by virtue of its siting, scale and proximity to other turbine development would increase the proliferation of turbines in the area resulting in a significantly harmful impact on the landscape and visual amenity of the area including the setting of the Solway Coast AONB, and would have a significantly harmful effect on the amenity of the occupiers of residential properties in the area. The proposal is therefore considered contrary to policies S19, S32 and S33 of the Allerdale Local Plan (Part 1) adopted July 2014 and the advice contained within the National Planning Policy Framework and Planning Practice Guidance for Renewable and Low Carbon Energy.

Notes to Applicant: