Allerdale Borough Council

Planning Application

Reference No: 2/2011/0973
Received: 09 December 2011

Proposed Development:
Installation of a single 500kw wind turbine together with associated control equipment resubmission of planning application 2/2010/0370

Location: Brayton Park
Brayton
Aspatria
Wigton

Applicant: Mr Malcolm Ashworth
Distributed Generation Ltd

Drawing Numbers: SL1 - Site Location Plan
DGblockplan04Dec2011B - Location and Access Plan, Turbine Elevations

Constraints: British Coal Area

Policies:

Allerdale Local Plan, Adopted 1999 (Saved)

Policy EN5 - Pollution Control
Policy EN6 - Location of potentially polluting development
Policy EN10 - Restoration, after uses cease
Policy EN19 - Landscape Protection
Policy EN25 - Protecting the open countryside
Policy EN32 - Protecting wildlife protected by law

Cumbria and Lake District Joint Structure Plan 2001-2016 (Saved)

Policy R44 - Renewable energy outside the Lake District National Park and AONBs
Policy E35 - Areas and features of nature conservation interests other than those of national and international conservation importance
Policy E37 - Landscape character

North West Regional Spatial Strategy to 2021
Policy DP1 - Spatial principles
Policy DP9 - Reduce emissions and adapt to climate change
Policy EM17 - Renewable Energy

National Planning Policy Framework
Cumbria Wind Energy Supplementary Planning Document
July 2007

Relevant Planning History:

2/2010/0370 – Wind Turbine 62m to tip - Approved

Representations:

Aspatria Town Council – Recommend that the application is refused as per the grounds of the original objection which outlined the following concerns:

- Visual impact
- Cumulative effect
- Degradation of the whole beauty of the county of Cumbria which is regarded as a special area for its landscape and views
- The turbines would affect the application for holiday chalets which they support and would conflict with tourism
- The computer simulations do not give the full impact of the proposal
- Potential to set a precedent.

Allhallows Parish Council – No response to date

Cumbria Highways – No objections.

United Utilities – No objections.

CAA – No objections

RSPB – No objections

NATS – No safeguarding objection.

County Archaeologist – No objections.

Fire Officer – No objections.

Ministry of Defence – No objections subject to aviation lighting being fitted to the equipment.

Environmental Health – No objections subject to an appropriate condition to control noise.

Natural England – The proposal does not appear to affect any statutorily protected sites or landscapes, or have significant impacts on the conservation of soils, nor is the proposal EIA development. The LPA should assess the application against the standing advice related to protected species.

In terms of the standing advice for protected species, Natural
England has assessed the submitted report against the advice for bats and they concluded that the findings of the report should be accepted.

The application has been advertised on site and adjoining owners have been notified.

There have been 9 letters of objection 5 being from the operators of the adjoining leisure facility which relate to:

- Unsuitability of the site
- Potential to affect other peoples property if the turbine fell over
- The wind speed data is from the 1970’s 80’s and does not take into account of the topography of the site
- Proximity to the wood would act as a windbreak, decrease wind speed and cause turbulence
- The age of the turbine and affects of the turbulence could affect the stability of the turbine
- Increase in size of turbine
- No connection to the national grid planning permission should not be granted without the relevant permission to connect to the grid
- The applicants would not be affected as they do not live within the borough
- Larger capacity of turbine
- Diesel generators would be used when wind turbines are not in use
- Visual impacts even greater than the turbine allowed at appeal
- The only similarity with the turbines is the height of 62m
- The blades would be larger in diameter
- Extra blade to that approved
- The turbine would be larger in girth
- The turbine would be dominant when viewed from Aspatria
- Potential to affect bats/birds
- The tranquillity of the area would be affected
- Potential affects on the new golf course
- Potential affects on Lakeside Inn
- May make the proposed golf course unviable
- Potential to affect horses
- Affect on holiday let business
- Withdrawal of funding for holiday park development
- Screening of the development would incur costs
- No indication of route to connect to the national grid
- Hoseasons indicate that a wind turbine may affect the holiday let and potentially reduce the income from the property
- The development is for financial gain of the developer and
power company

- Proliferation of turbines
- Similar in scale to commercial turbines
- Sets a precedent for further wind turbines
- Cumulative impacts
- A letter and an email from Cumbria Tourism (CT) has provided generalised comments relating to wind development and comments relating to large wind farms. The CT response comments that Mr Ward has had concerns with on the holiday let advertised with Hoseasons and the potential reduction in income and level of interest in the holiday let. Mr Ward has also outlined his concerns to CT relating to the future holiday park/golf course and on this basis CT would have concerns relating to a wind turbine in this location and would advise caution and suggest that the application should be resisted until the applicant is able to demonstrate clearly that there will be no harmful affects on the visitor economy.

Report

Introduction

Members may recollect this application was deferred to enable the applicant to provide further details in relation to the tourism and health and safety concerns. The health and safety concerns relate to topple and structural information which may result from the affects of turbulence created by the woodland. The applicant has provided a supporting statement addressing these issues which is appended to this report.

The application is a resubmission to a previously approved wind turbine. This proposal seeks permission for the erection of a single wind turbine of a different design to that approved on land adjacent to Jim Peet feed mill at Brayton Park, Aspatria.

Site History

Planning application 2/2010/0370 for a single two bladed wind turbine was presented before members of the development panel on 9 November 2012; members were minded to refuse the application contrary to officer’s recommendation. Members recommended that the application was refused due to the potential affects of the development in terms of its siting, scale, noise and flicker, being harmful to the existing and approved tourist development at Brayton Park, Aspatria. An appeal was submitted by the applicant, which allowed the development subject to conditions.

Policy Considerations

Planning Policy
Renewable energy developments are supported by the National Planning Policy Framework (NPPF) which outlines that there should be a presumption in favour of sustainable development under paragraph 14. Under Chapter 10 of the NPPF it outlines there is a presumption to approve applications for renewable energy proposals unless material considerations indicate otherwise (paragraph 98).

The NPPF states that the delivery of low carbon energy and associated infrastructure is central to the economic social and environmental dimensions of sustainable development. In determining planning applications, LPA’s should:

- not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- approve the application if its impacts are (or can be made) acceptable

The NPPF is considered to support policy R44 of the Cumbria and Lake District Joint Structure Plan. Saved Policy R44 of the Joint Structure Plan states that outside the Lake District and AONB, proposals for renewable energy, including any ancillary infrastructure or buildings, will be favourably considered subject to a number of criteria relating to landscape character, biodiversity and natural and built heritage, local amenity, local economy, highways or telecommunications.

As the property is not located within any special landscape designations (including local) the proposal would be in compliance with Policy EN25 of the Local Plan when read in conjunction with the NPPF chapters 109, 110 and 115. The Cumbria and Lake District Joint Structure Plan, under Policy E37, stipulates that development should be compatible with the distinctive characteristics and features of the landscape, requiring future proposals to be assessed in terms of relevance, visual intrusion, scale in relation to the landscape and remoteness and tranquillity.

The objectives of Policy EN6 of the Allerdale Local Plan seek to safeguard sensitive development from pollution generating proposals which would concur with the objectives of the NPPF.

The proposal as a whole is considered to be in line with the NPPF.

Overall (as reflected in the policies) the merits of the proposed development relate to balancing whether the economic, social and environmental benefits of the proposed renewable energy
development outweigh any environmental impact of the proposed turbines.

Financial Implications

There would be no financial implications associated with this development.

Need for and Environmental Impact Assessment

A screening opinion was undertaken 20 January 2012 and identified that an Environmental Impact Assessment is not required. The screening opinion indicated that reference should be made to 'Cumbria Wind Energy: Supplementary Planning Document' which details the issues to be addressed. The application is accompanied by various supporting documentation.

Needs/Benefits

The needs and benefits of the proposal are important elements in the overall planning balance. The NPPF continues to give support to all forms of renewable energy development.

The increased development of renewable energy resources is vital to facilitating the delivery of the Government’s commitments on both climate change and renewable energy. Positive planning which facilitates renewable energy developments can contribute to the Government’s overall strategy on sustainability and renewable energy development, as emphasized in the Energy White Paper (2007), The UK Renewable Energy Strategy (2009) the UK Energy Road Map (2011) and a significant number of other policies and commitments. The NPPF continues to give support to all forms of renewable energy development.

In order to mitigate the effects of climate change, the North West Regional Spatial Strategy (NWRSS) policy EM17 encourages the use of renewable energy development in order to achieve 15% of the electricity supplied within the Region from renewable energy sources by 2015, rising to 20% by 2020. The RSS includes indicative generation targets and for Cumbria, these are:

2010 – 237.3MW
2015 – 284.8MW
2020 – 292.4 MW

The Courts have determined that the government’s intention to abolish Regional Spatial Strategies is a material consideration. However, in the context of renewable energy development, this intention is not considered to carry significant weight, given the binding legal targets relating to carbon and greenhouse gas
emissions within the Climate Change Act.

The Cumbria Renewable Energy and Deployment Study (August 2011) confirmed that the capacity of operational or consented renewable energy schemes within Cumbria totalled 285.36MW. This figure is not directly comparable to the RSS targets because the RSS specified electricity generation only; whilst the Cumbria Renewable Energy and Deployment Study considered renewable energy schemes for both power and heat. The UK Renewable Energy Strategy recognises the importance of both electricity and heat from renewable sources and seeks around 35% of electricity and heat to come from renewable and low carbon (non nuclear) sources by 2020. Of the overall figure deployed or consented within Cumbria, 70% is located within the district of Allerdale.

As such, the consented/installed capacity for power and heat from renewable energy development is considered to be substantial and to make a positive contribution to addressing climate change.

Regardless of these figures, the imperative for further renewable energy within national policy and strategy is clear. Therefore, the weight to be attached to the deployment of renewable energy is not considered to have diminished.

Whilst this scheme would make only a small contribution towards regional and national targets for the production of energy from renewable sources, it remains valuable, thus contributing to meeting the objectives of the Climate Change Act. Whilst the local economic benefits cannot be precisely quantified there would be some in terms of the economic benefits to this local business. Achieving the binding national targets for the proportion of energy from renewable sources and the reductions sought in greenhouse gases can only be done by an accumulation of local projects of varying scale. Thus, based solely on national performance, a need for developments of this type exists. These are material considerations that weigh significantly in the planning balance.

**Site and Surroundings**

The site is within an area of little use and currently characterised by rough scrub. A bund runs to the west of the site which is lightly vegetated and to the east of the site is a concrete hard standing and the associated feed mill.

**The Proposal**

The site is located within an area of open countryside with the nearest settlements being Aspatria 1.87km from the proposal, Baggrow 1.05km and Blennerhasset being 1.5km from the proposal. The proposal is located approximately 7km from the
boundary of the National Park and 8km from the Area of Outstanding Natural Beauty (AONB).

The turbine is considered to be a medium sized wind turbine in terms of modern wind turbine design. The turbine would be a three bladed with a hub height of 40m with a 40m rotor diameter giving a total height to blade tip of 60m. The previous approval was for a two bladed turbine 50m in height to the hub; the diameter of the blade was 24m giving a total height to blade tip of 62m. There would not be any increase in height above the previously approved application.

Officers consider that the amended design, increase in rotor diameter and additional blade would not lead to significant harm to the landscape or have any significant impacts to the site and surroundings above that already approved.

The blades would be constructed of glass reinforced polyester composite which is commonplace in turbine blade construction. The colour of the turbine would be either grey or white which can be controlled by condition in order to achieve a satisfactory finish to minimise the visual appearance of the development.

The design of the turbine does not require any form of construction compound, special access, sub station or any temporary structures. The turbine would connect into the national grid by way of a new connection with low level poles. This is the responsibility of the applicant and would be done in connection with United Utilities. Once connected to the national grid there will no longer be a requirement for diesel generators.

Officers are of the opinion that there is sufficient information within the supporting design and access statement to assess the proposal; photomontages have been provided which show the impacts from various vantage points in the immediate area.

The turbine design has been selected to meet the power needs of the operational feed mill which is currently operating off grid with power supplied by a 500kw diesel generator. A wind assessment has identified that there are winds of a sufficient speed to achieve a satisfactory power output for the needs of the mill. This proposal seeks to significantly reduce the CO2 emissions associated with the use of the site by producing green energy.

**Access and Highways Considerations**

The application site is located off an unclassified road approximately linking the A596 and the B5299. The proposal would be located approximately 120m from the adjoining highway, which is an unclassified road and 750m from the A596 which is the
main highway between Aspatria and Wigton.

The access into the site would be by way of the existing access into the Jim Peet site which already can accommodate large heavy goods vehicles. The turbine would not need any oversized vehicles or special cranes/equipment to install the turbine therefore the existing access onto the highway is acceptable.

The proposal is considered not to affect users of the highway and no objections have been received from the Highways Authority.

There are no public rights of way crossing the site, the nearest public right of way is in excess of 1km from the site.

Noise

It is considered that the proposal is sufficiently away from dwellings to avoid any disturbance from noise. The nearest residential property that is not associated with the proposal is approximately 550m (The Old Smithy) from the proposed site and would not be significantly affected by the proposal.

An assessment of the potential noise impacts accompanies the application. In terms of noise from the operational wind turbine it is concluded that the noise level would be lower than the recommended noise levels that would cause disturbance to residential properties and the new turbine design has lower noise levels than that previously approved. The Council’s Environmental Health department has recommended a condition is attached to any approval to control noise levels from the development.

Shadow Flicker

In terms of shadow flicker, the standard assessment would be that properties within 10 rotor diameters of the turbine could potentially be affected by shadow flicker. In this case the rotor diameter is 40m therefore as there are no residential properties within 400m the affects of shadow flicker would not cause harm to surrounding properties.

Wildlife

The previous application was not refused on wildlife issues; however the applicant has provided further evidence that the development is unlikely to have significant affects on the development. An appropriately qualified ecologist has undertaken a desk based assessment in relation to the proposed development. The report indicates that the site is of relatively poor ecological value and a full bird survey would not be required; however, would recommend that a bat survey is undertaken.
The report highlights that certain birds may be affected by wind turbines; it indicates that buzzards can have their activity influenced by wind turbines; however, a single turbine of this scale on a site of modest ecological value may not have any significant influence. Although buzzards are known to be found within the area the scale of the development is not considered to be of a significant enough risk to warrant refusal of the application.

The application is supported by a report undertaken by an appropriately qualified person and relates to bats and barn owls. There have been some observations of bats foraging within the area; however it is regarded as being low. Small numbers of common and soprano pipistrelles have been identified commuting over the bund, foraging at canopy height (10m) and along the lane to the mill exit.

The bat survey recorded the foraging activities at approximately 3 to 6m and as the lowest blade height would be 20m also the foraging activities on the lane are sufficiently away from the development not to be affected and outside the guidance provided by Natural England. The survey has not detected any Noctule bats at the site which account for the highest number of bat fatalities from wind farms.

A barn owl was observed flying at 1-2m above the ground level. The report concludes that it is not anticipated that a single turbine would pose a significant risk to barn owls. The barn owl trust indicates that there is currently no evidence that wind turbines in the UK are having an affect on barn owls. The Trust also outline that barn owls are unlikely to be affected by wind turbines due to the way they forage at comparatively low altitudes and most wind turbines would have ground clearance in excess of this. In this case it is considered that there is sufficient ground clearance from the blade sweep not to affect foraging barn owls.

As no consultees have raised any particular issues with regards to protected species, the proposal is considered to be acceptable with regards to Policy EN32 of the Local Plan and the relevant parts of the Habitats Directive. Officers consider that the development would not have a significant adverse affect on any of the above species.

**Effects on TV receptors**

The BBC windfarm tool is applicable to windfarms not single wind turbines also the tool is applicable to turbines of a greater height and electricity output (generally sites of 3MW compared to this turbine of 300kw). The applicant contests that the online tool would not provide an accurate reflection of the potential interference with
television reception. Officers cannot place great emphasis on the BBC online tool due to the significant differences in the size and capacity of this development. It is considered that safeguarding television reception can be controlled by condition to ensure appropriate mitigation of any interference caused by the development.

Tourism

The site is located approximately 550m from an approved application for a golf course and holiday chalet development at Home Farm, Brayton Park, Aspatria. It is considered that the wind turbine is of a sufficient distance from the chalets not to affect the amenities of potential occupiers. In terms of effects on the proposed new golf course the wind turbine is of a sufficient distance from the proposal not to cause shadow flicker on the course, noise disturbance or have significant visual implications.

The issue of impact on local economy and tourism potential was raised in the objections and indeed constituted a ground of refusal on the turbine application at Parkhead, Silloth. However, the Inspector’s appeal decision highlighted that the Council had little empirical evidence, and whether research was submitted indicating any impact on tourism and the local economy would be insignificant. However, crucial to the impact on tourism issues relates to whether it has any harmful landscape or visual impact, i.e. only if this environmental harm occurred would it deter visitors.

Although Hoseasons have commented on the individual holiday let they do not comment on the lodge/golf development. In the response submitted by Cumbria Tourism no evidence has been submitted for individual turbines and the evidence gathered in research on wind turbines undertaken in 2005 was based on the proposed Whinash windfarm (adjacent to the Lake District National Park) which consisted of 27 turbines 115m in height rather than a medium scaled individual turbine. Of that survey 74% indicated that the proposed windfarm would not make a difference to them visiting the Lake District or Cumbria. The inspector of the Whinash public inquiry concluded “On balance, I see no justification to contemplate adverse effects on tourism and the rural economy.”

The inspector for the previous appeal on the site commented on tourism related issues within his report and stated,

“On a more general analysis, the Council says that the proposed turbine would jeopardise the success of the Brayton Park tourism site, which is expected to become a major source of employment in the area and which would make a significant contribution to the local economy. They say that the proposed turbine would adversely affect
patrons’ enjoyment of the facilities, so they would choose to go elsewhere. There is no evidence to suggest that the presence of even large wind turbine developments has had an adverse impact on tourism. The Guide even lists tourism potential as being one of the economic advantages of renewable energy projects and refers to a visitor centre at a wind farm at Swaffham in Norfolk as an example. The proposed single turbine is most unlikely to be a visitor attraction in its own right, but I see no reason to suppose that it would put people off visiting the area.”

The inspector also commented on the appeal that the proposal would not be detrimental to horses as the track is not part of a national trail or Ride UK route and The British Horse Society’s advice is that a minimum separation distance of 200m from the turbine to the route would be required, this scheme is more than 200m from the tracks.

Bearing in mind that a wind turbine of a similar height has approval on the site and the inspector’s comments relating to tourism, officers consider that the impact of this development on tourism is not sufficient to warrant refusal of the application.

**Landscape and Visual Impact**

An independent landscape assessment has been undertaken on the original proposal that identified there would be localised landscape impacts in particular within 1km from the proposal. The findings of the original landscape assessment are considered to be still relevant to this proposal.

The report also indicated that the impact on the landscape character would have an adverse impact of low to medium significance. The significance is based on minor/moderate impact on the landscape character and a medium impact on the immediate landscape character within the site context up to 1km from the proposal.

The applicant has provided photomontage evidence that the wind turbine would be seen from certain vantage points but it is considered that the proposal would not have a wider significant impact on the landscape. There is screening to the highway to the front of the site and some screening provided by an area of woodland to the west of the proposal. The mature hedges and trees would provide some screening of the proposal from surrounding highways and residential properties.

In terms of visual impact, the baseline for the survey has been up to a 5km radius from the site. The original assessment identified that the magnitude of the impact would be moderate as would the
visual receptor sensitivities and the inclusion of the wind turbine into the landscape would have an adverse visual impact of low to medium significance.

The cumulative impact was also been independently assessed and the impact was considered to be low; this is based on the fact that the nearest windfarm development is at Wharrels Hill some 5.5km from the site.

In terms of cumulative impact, officers are of the opinion that this scheme for a single wind turbine and would not add significantly in terms of cumulative impact. The scheme for Westnewton is for a windfarm of three turbines of three blades measuring 107m in height which is greater in height by 45m than this proposal and covering a larger spatial area. The Westnewton turbine is approx. 3.8km from the site. For similar reasons to Wharrels Hill, the differences in number, height and design would distinguish the two developments and provide a contrast, reducing the linkage and therefore the cumulative impact.

The overall conclusion based on the information provided within the application and the independent findings of the cumulative, landscape and visual assessments is the introduction of one wind turbine at Brayton Park would not have a significant adverse impact. There may be some long distance views gained from the surrounding area as well as the localised views, however, due to the size of the turbine and distance from the boundaries, the turbine would not cause significant visual harm to the wider landscape, or the National Park or AONB designations.

It is considered that the landscape and visual impact of the proposal would not be significant enough to warrant refusal of the application.

**Structural stability concerns**

The site is located a satisfactory topple distance from public highways (Hence no objections from the highway authority.)

Although the turbine is within topple distance of the shed this is a health and safety matter for the applicant. Indeed the Voridian turbine allowed on appeal within the confines of the chemical works at Siddick is within toppling distance of both an office block and industrial plant.

The applicants supporting evidence indicates that this structural stability issue is inherent in the design of the turbine itself which will be regularly monitored. The applicant advises that the turbine concerned has an excellent track record in terms of reliability.
Other Issues

The Ministry of Defence has no objections to the proposal and state that the turbine will not adversely affect defence interests.

The boundaries to the property are mature hedgerows and open countryside with some areas of trees and deciduous woodland. There are no national or local landscape designations affecting the site.

In relation to the comments regarding setting a precedent and being part of a larger scheme for the area, each application site would be looked at on its own merits.

The planning inspector concluded on the previous approval,

“the proposed wind turbine would not have any unacceptable effects of sufficient weight to warrant refusal of planning permission. The benefits it would have for the feed mill business would make a positive contribution to the local economy by safeguarding jobs there. The wider social, economic and environmental benefits of renewable energy projects generally, outweigh the harm to the local landscape attributable to the low to moderate visual impact of the turbine. It is therefore acceptable.”

Conclusion

Bearing in mind the current extant approval for a wind turbine on this site and the fact that the turbine would be no greater in height than that approved, the alteration in design is not considered sufficient to warrant refusal of the application.

It is considered the need for the development outweighs any landscape implications also, bearing in mind national planning policy approval is recommended.

Recommendation: Approved

Conditions/Reasons:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
   Reason: In order to comply with Section 51 of the Planning & Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following plans:
   SL1 - Site Location Plan
   DGblockplan04Dec2011B - Turbine Elevations, Location
and Access Plan
Reason: In order to ensure a satisfactory standard of development.

3. This permission shall remain valid for a period of 25 years from the date that electricity from the development is first generated. Within 12 months of the cessation of electricity generation at the site or the expiration of this permission whichever is the sooner, all development shall be removed and the land restored in accordance with a scheme submitted to and approved by the Local Planning Authority prior to any development commencing.
Reason: In order that the impact of the development is removed at the end of the development's operational life.

4. If any turbine ceases to be operational for a continuous period of 6 months unless an extension of time is agreed in writing with the Local Planning Authority it shall be dismantled and removed from the site and that part of the site shall be restored in accordance with details approved pursuant to Condition 3 above.
Reason: In order that the impact of the development is removed if electricity ceases to be produced.

5. Before erection of any of the wind turbine, details of the colour and finish shall be submitted and approved by the Local Planning Authority and the development shall be carried out in accordance with those details.
Reason: In order to minimise visual impact.

6. No development shall commence until a written scheme has been submitted to and approved by the Local Planning Authority setting out a protocol for the assessment of electro-magnetic interference in the event of any complaint, including remedial measures. Operation of the turbines shall take place in accordance with the agreed protocol unless the Local Planning Authority gives its prior written consent to any variation.
Reason: In order to minimise the risk of nuisance.

7. No development shall take place until a scheme of aviation obstruction lighting has been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved scheme.
Reason: In the interests of air safety.

8. The LA90 (10 minutes) specific noise levels due to the
operation of the turbine, shall not exceed 35dB(A) up to wind speeds of 10m/s at 10 metre height. This will be assessed and measured 3.5 metres from the facade of the nearest noise sensitive use, namely The Old Smithy, Home Farm, Brayton, Aspatria, CA7 3SX
Reason: To safeguard local residents from noise and disturbance.

9. The date of the first production of electricity shall be notified in writing to the Local Planning Authority within 28 days of the event occurring.
Reason: To ensure that this site within open countryside is restored to an appropriate standard, in accordance with Policies EN25 and EN10 of the Allerdale Local Plan, Adopted 1999 (Saved).

Notes to Applicant:

Comments provided by Distgen on Members reason for deferral

Tourism:

DistGen acknowledges the opportunity to respond to the CTB's E-Mail & Letter (dated 7th&10th Sep12).
In the above communications, the CTB refer to 'large turbine development', and they also state that they are 'not against the principle of wind turbine development', but are concerned about the possible affect on the nearby holiday lodges proposal and potential jobs associated with it.

In the Planning Inspector's specific review of tourism here (within the application 2/2010/0370 which was approved for a turbine of a similar scale and at this site), he determined that no evidence exists to support a claim that a single wind turbine is an adverse impact on tourism:

Planning Inspector's comment: "On a more general analysis, the Council says that the proposed turbine would jeopardise the success of the Brayton Park tourism site, which is expected to become a major source of employment in the area and which would make a significant contribution to the local economy. They say that the proposed turbine would adversely affect patrons’ enjoyment of the facilities, so they would choose to go elsewhere. There is no evidence to suggest that the presence of even large wind turbine developments has had an adverse impact on tourism. The Guide (PPS22) even lists tourism potential as being one of the economic advantages of renewable energy projects and refers to a visitor centre at a wind farm at Swaffham in Norfolk as an example. The proposed single turbine is most unlikely to be a visitor attraction in its own right, but I see no reason to suppose that it would put people off visiting the area."
For the current application (2/2011/0973), where the turbine is no higher (62m), the Allerdale Planning Officer’s Report to Development Committee on the 11th Sept 12 made the following comment:

'Bearing in mind that a wind turbine of a similar height has approval on the site and the inspector’s comments (above) relating to tourism, officers consider that the impact of this development on tourism is not sufficient to warrant refusal of the application.'

In making these determinations, and from within the same Officers Report (11/09/12), it was also reported that:

- It is considered that the wind turbine is of a sufficient distance from the chalets not to affect the amenities of potential occupiers.
- In terms of effects on the proposed new golf course the wind turbine is of a sufficient distance from the proposal not to cause shadow flicker on the course, noise disturbance or have significant visual implications.
- The issue of impact on local economy and tourism potential was raised in the objections and indeed constituted a ground of refusal on the turbine application at Parkhead, Silloth. However, the Inspector’s appeal decision highlighted that the Council had little empirical evidence, and whether research was submitted indicating any impact on tourism and the local economy would be insignificant. However, crucial to the impact on tourism issues relates to whether it has any harmful landscape or visual impact, i.e. only if this environmental harm occurred would it deter visitors.
- In the response submitted by Cumbria Tourism no evidence has been submitted for individual turbines and the evidence gathered in research on wind turbines undertaken in 2005 was based on the proposed Whinash windfarm (adjacent to the Lake District National Park) which consisted of 27 turbines 115m in height rather than a medium scaled individual turbine. Of that survey 74% indicated that the proposed windfarm would not make a difference to them visiting the Lake District or Cumbria. The inspector of the Whinash public inquiry concluded “On balance, I see no justification to contemplate adverse effects on tourism and the rural economy.”

Conclusions from Officer’s Report (2/2011/0973 - 11/09/12):

- The planning inspector concluded on the previous approval, “the proposed wind turbine would not have any unacceptable effects of sufficient weight to warrant refusal of planning permission. The benefits it would have for the feed mill business would make a positive contribution to the local economy by safeguarding jobs there. The wider social, economic and environmental benefits of renewable energy projects generally, outweigh the harm to the local landscape attributable to the low to moderate visual impact of the turbine. It is therefore acceptable.”
- Bearing in mind the current extant approval for a wind turbine on this site and the fact that the turbine would be no greater in height than that approved, the alteration in design is not considered sufficient to warrant refusal of the application. It is considered the need for the development outweighs any landscape implications also, bearing in mind national planning policy approval is recommended.
Discussion: Would the CTB support a tourism venture which incorporates ECO-friendly initiatives?

DistGen believes that the CTB would support a development of this kind which conversely, does not need to be viewed and portrayed in the negative way that has occurred with regard to Brayton Park/Mill and in such circumstances, we believe, the CTB would not be adverse to a wind turbine? In this, we respectfully offer the following speculative scenario:

DistGen has already offered to work with the adjacent holiday/golfing enterprise and still holds the view that the holiday lodge proposal would not be adversely affected and could in fact benefit directly from a turbine installation where:

- an ethical ECO-friendly approach could be embraced by the Holiday Village which would be enhanced by association with the turbine as part of a green technology theme to attract visitors - we could work together to provide visitor information ie. including an educational programme on renewables.
- if an ECO theme were to be adopted, the Park scheme may then be more viable in terms of seeking funding (where banks (since 2008) have been reluctant to lend to businesses, particularly those often regarded as high risk perhaps including those from within the tourist industry?) – in this there might be improved opportunities with progressive 'green' banks (such as Triodos?) if a greener approach were to be adopted here?
- the Holiday Parks own renewable obligation (?) (10% of its energy to be sourced from renewables) could potentially be met in part by WT energy generation. Collaboration with us could mean that there is no need for a turbine to be built on the Park, and this might also mean that no additional investment costs would be incurred by the Park venture.
- the Park's overheads could reduce if cheaper electricity where to be derived from a turbine proposal of this kind, where export rates generally/nationally are circa 6p/kwh and well below supply company tariffs.

We would also refer to our earlier response to the CTB as relevant, dated 2nd Feb 12 and attached for inclusion within this submission, (ie. in response to Mr Greenwood of CTB's letter dated 24/1/12).

DistGen concur's with the above views and comments regarding Tourism made by both Planning Inspector and by Allerdale's Planning Officer and additionally offers the following views/extracts which remain pertinent to the App:

- is for a single medium-scale turbine – and so is not a Large Scale development.
- is recognised (within NPPF) that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions (substantiating that Brayton Mill is a small scheme).
- is in an industrial setting and is not within an AONB or National Park nor is it within a Local Special Landscape designation - impact here is deemed to be low in context.
- aligns with Local, Regional and National (NPPF) guidelines – ie. Compliance, where, in NPPF there is a mandate of presumption to approve applications for renewable energy proposals...
- is the same height (tip ht=62m) as the already approved turbine ie. planning ref: 2/2010/0370.
will enable the off-grid diesel generator electricity supply to be replaced and thus reduce the carbon emissions emanating from this site as a direct consequence.

supports an existing and established (15yrs) local business which serves both local farmers and beyond – which in itself deserves the support of its local authority and as per local policy.

helps to safeguard existing jobs (6 F/time & 6 P/time*) associated with the Mill operations which are at risk from a total dependency on fossil fuel (diesel generators) for electricity, where a turbine will assist in expansion possibilities for the Mill which in turn would increase the potential number of job opportunities there (possibly 4+ over next 5yrs*) *JPA.

Officers consider that the amended design, increase in rotor diameter and additional blade would not lead to significant harm to the landscape or have any significant impacts to the site and surroundings above that already approved.

Officers are of the opinion that there is sufficient information within the supporting design and access statement to assess the proposal.

Wildlife. Officers, following consultations in line with Policy EN32, consider that the development would not have a significant adverse affect on the protected species (specifically bats, barn owls & buzzards) identified hereabouts.

**DistGen - WT Stability:**

With any turbine, it's in-service performance will be the result of a combination of factors from its inherent design to the environment in which it is located. Design criteria including localised effects of height, wind shear, wind speed, topography (inc. turbulence) have a net consequence upon its reliability and ultimately, upon its life span.

A practical approach must therefore be adopted in terms of safeguarding the turbine within its surroundings, where a careful monitoring regime within a regular maintenance programme includes for regular inspection of structural elements to protect against failure.

In this way, individual components are monitored, where some are routinely replaced to maintain the integrity of the turbine throughout its working life. From the geographic data, the Brayton Mill site does not pose particularly challenging conditions for the operational intent, where the 2nd user V39 turbine selected has an excellent track record in terms of reliability, and in our opinion, is well suited to this location.