BARNSLEY PARTNERSHIP FOR LEARNING

CARLTON ALC: WIND TURBINE DEVELOPMENT

PLANNING STATEMENT

JUNE 2010

TURLEY ASSOCIATES

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1. Introduction and Background

1.1 This Planning Statement is submitted in support of a Full Planning Application by Barnsley Partnership for Learning for two 15kW wind turbines development at Carlton Advanced Learning Centre (ALC). This proposal is a resubmission following withdrawal of planning application 2009/1591.

1.2 This proposal should be considered within the context of the Outline Planning Permission (reference 2009/0027) and Reserved Matters Approval (reference 2008/1821) currently being implemented on the site for the construction of a new ALC. The proposals that this statement considers are a component part of the wider ALC construction programme.

1.3 The application is supported by the following documents:

- Design and Access Statement;
- Landscape and Visual Impact Assessment;
- Noise Impact Assessment; and
- Bat Survey.

1.4 *The remainder of this document is structured as follows:*

- Chapter 2 sets out the background to the development;
- Chapter 3 describes the application site and surrounding context;
- Chapter 4 outlines the proposals;
- Chapter 5 sets out the pre-application discussions that have been held with Barnsley Council;
- Chapter 6 sets out the relevant planning policies as they apply to the proposed wind turbines;
- Chapter 7 presents the relevant planning history;
- Chapter 8 sets the context for the material considerations;
- Chapter 9 provides an assessment of Green Belt impacts;
- Chapter 10 analyses the other material considerations and technical matters; and

- Chapter 11 provides the summary and conclusions.

2. Wind Turbines and BSF in Barnsley

Barnsley BSF

2.1 In response to the continued economic decline of Barnsley Borough since the 1980's, ambitious plans were drawn up for the regeneration of the Borough which is known as Remaking Barnsley. In association with this, there is Education Vision which underpins the regeneration of the Borough. This has become known as Remaking Learning. Remaking Learning is a radical programme of transformation that will provide the highest quality learning opportunities for every child, young person and adult. A key tool in the delivery of this agenda is the Building Schools for the Future (BSF) programme, within which Barnsley is a wave 3 Authority.

2.2 The Council's broad for delivering the BSF programme rests on improving the quality of teaching, support to teaching and the experience the school can offer. The design, environment, equipment and servicing of school buildings are central to these strategies and this has clear linkages with providing appropriate facilities that are fit for purpose. The current building stock has suffered through lack of investment and this has had a detrimental effect on attainment levels in Barnsley. There are serious suitability, condition and sufficiency issues to be addressed.

2.3 To address these issues and to achieve the educational vision highlighted above, the complete reorganisation of the secondary school stock resulting in the creation of a smaller number of new Advanced Learning Centres (ALCs) is the most appropriate solution and this is to be delivered through the BSF programme. A part of the new development programme is the delivery of cutting edge sustainability features and this includes the generation of a proportion of the energy consumed from renewable sources on site.

2.4 Upon completion, the BSF programme will deliver state of the art facilities providing access to high quality learning environments for all learners aged 11+ fit for the 21st Century.

2.5 The wider policy context for these applications sets a requirement for any new development to generate 10% of its energy from on site renewable sources (RSS Policy ENV5, B.3). The emerging Barnsley Core Strategy also sets a requirement for decentralised, renewable or low carbon energy sources to be installed at new major development sites, to reduce carbon dioxide emissions by at least 15% (draft policy CSP5). There is therefore a clear policy steer to provide renewable energy generation on site. On behalf of the Council, as a leading public sector body, the BSF team have adopted this requirement on each of the ALC sites.

2.6 This helps to lead the way in terms of policy compliance for other major developments in the Borough, and also provides a strong fit with the environmental objectives of the Council. The turbines also provides a new educational opportunity for children using the ALC, with the energy generation agenda presenting a number of opportunities for learning, which would otherwise not be present, including potential subject matter relevant to geography, physics, environmental and other technology considerations.

2.7 10% of the energy requirement at the ALC is already met through the provision of biomass heating / hot water as an integral part of the development. The Council, *through the brief and specification prepared by the Education Department, requires* a further 10% on site generation to be provided. This requires the presence of at least 1 turbine at each site, but allows the additional 10% to be provided across the *phase 1 sites as a whole. This allows for individual site circumstances to be taken* into account.

Overall Approach to Delivery

2.8 The on site renewable energy generation targets effectively amounts to 20% of that required across the Phase 1 BSF portfolio. A strategic decision has been made to focus on biomass heating systems and wind power generation, as these technologies are the most proven and cost effective means of meeting the requirement.

2.9 Other technologies are either not feasible, not cost effective or a combination of both of these factors. Technologies such as micro-hydro and photovoltaics have been discounted on this basis, as they do not represent best value for public expenditure.

2.10 *At the time of applying, the following baseline position applies:*

School	**10% Requirement**	**Additional 10% Requirement**
Darton	To be met by Biomass Heating Plant	Application for 1 x 15kW turbine withdrawn
Dearne	To be met by Biomass Heating Plant	Permission granted for 2 x 15kW Turbines

School	*10% Requirement*	*Additional 10% Requirement*
Penistone	To be met by Biomass Heating Plant	Application for 5 x 15kW turbines withdrawn
Carlton	To be met by Biomass Heating Plant	Application for 2 x 15kW turbines withdrawn
Kirk Balk	To be met by Biomass Heating Plant	Application for 1 x 1.5kW building mounted turbine pending consideration.

2.11 The actual position therefore shows that 10% on site generation requirements for the majority of the ALC sites will be met by biomass heating plant. However the additional contribution over and above the contribution made by biomass not been met. Therefore to meet the requirement specified by the Council further sources of renewable energy are required.

2.12 Overall the previous applications included a total of 11 wind turbines distributed across all of the Phase 1 schools. At the present time two turbines have been approved at Dearne, whilst at Kirk Balk an application is in the late stages of negotiation. Following revisions to the schemes, across all 5 ALC's it is expected that there would be fewer turbines, generating equivalent levels of electricity from renewable sources.

2.13 In this context, the overall approach to turbine distribution will be based upon selective use of more efficient turbines in the areas of greater operational efficiency. The objective is to meet the overall generation requirements set by both policy and the Education Departments Development Brief (amounting to 20% on site generation overall), but to achieve this in a more efficient manner. A result of this approach will be fewer effects on the openness of the Green Belt, within which the turbines are to be located.

2.14 The relative operational efficiency of each site is ranked overleaf:

School	Relative Power Generating Efficiency	Rank
Penistone	100%	1
Darton	64%	2
Dearne	59%	3
Carlton	35%	4
Kirk Balk	-	5

2.15 The distribution strategy is expected to ensure that the Phase 1 BSF can meet the additional energy generation requirements required by the Council Education Department across the portfolio of sites.

2.16 It also shows that this can be achieved with a lower number of turbines than originally proposed by the original applications on these sites. This has obvious benefits in terms of visual influence and Green Belt openness concerns. However, it does mean that the generating capacity on each of the sites is not equalised across all sites. The reasons for this are considered further below on a site by site basis.

Carlton

2.17 The Carlton site has available open space, but technical work undertaken shows that it has relatively unfavourable wind speeds, with only 35% efficiency predicted. Potential turbines sited in this location would operate at a lower efficiency than the other ALC sites. It is anticipated that attempting to meet the 20% requirement on this site alone would not represent the best use of resources, and would result in under exploitation of available resources elsewhere.

Kirk Balk

2.18 The Kirk Balk site has favourable wind potential, but is too densely populated to allow wind turbines of higher generating capacity to be placed on the site. The siting of turbines in this location is not possible due to the proximity of sensitive

receptors and associated impacts in terms of noise and general amenity. Therefore a smaller roof mounted turbine has been proposed, and under consideration via planning application 2010/0185 at the time of writing. This is to meet the requirements of the Education Department that each site has at least 1 turbine. Whilst the 20% requirement could be easily met on this site, other planning factors mean that this would not be appropriate.

Dearne

2.19 Dearne has reasonably good power generating efficiency, and already benefits from planning permission for two 15m high turbines. It is proposed to keep the generation largely the same, although the wider mix of turbines across the sites, and greater efficiency achievable at Penistone and Darton, means that there is an opportunity to better exploit the available resource by ensuring that energy generation efficiency is maximised within this location.

Penistone

2.20 Penistone, by virtue of its location, aspect and wind conditions offers the most efficient source of renewable energy generation by wind. Therefore, to achieve the overall energy generation target, it is expected that two turbines will be proposed and will operate at a significantly higher level of efficiency. This approach offers a reduced overall effect compared to 5 smaller turbines previously applied for. However, known sensitivities and possible prominence of turbines have been recognised and it is considered that his is the most appropriate balance between the number of turbines and efficiency of renewable energy generation.

Darton

2.21 Darton offers the second highest level of power generation capability. However this is lower than the potential shown at Penistone. Whilst the location offers a good level of operational efficiency a single turbine remains proposed as, when compared to Penistone the site is relatively inefficient. Nonetheless to maximise the operational efficiency, whilst minimising the number of turbines proposed a single turbine with a hub height of up to 34 metres is proposed in this location.

Summary

2.22 It is concluded that the revised strategy offers a more efficient means of meeting the same energy generation requirement, both in terms of cost effectiveness and

the extent of development proposed. Overall, this strategy will continue to deliver wider environmental benefits through renewable energy generation in the most efficient locations and in a form which, we consider, reduces landscape, visual and Green Belt concerns.

3. Site Description and Context

3.1 The application site boundary for the proposals is shown outlined in red on plan reference BP4L_CAR_AWP_DR_94_BW_LL_12. However it should be noted that this is a component part of a wider site where construction for a new ALC is currently ongoing. However the area where construction of the wind turbines is to take place makes up part of the agreed new landscaping provision[1]. Primarily the following planning policy designations apply to the site.

- The site is in Green Belt (defined by saved UDP Policy BA9).
- The site is identified as within the site for the construction of a new Advanced Learning Centres under the adopted Barnsley Education sites Development Plan Document

3.2 In terms of immediate surroundings the site is located within the development site for the construction of a new ALC at Carlton. Surrounding land uses are as follows:

- To the north west lies the new ALC building which is currently under construction;
- To the east and west are grounds and sports facilities provision which are associated with the ALC; and
- To the south are grounds associated with the ALC with recreational open space (defined by saved UDP Policy BA17) which is not associated with the ALC beyond.

[1] A revised landscaping plan will be submitted via the appropriate process.

4. The Proposals

4.1 The proposal seeks to construct two 15kW capacity wind turbines at a hub height of 15 metres at the indicative location identified on plan reference BP4L_CAR_AWP_DR_94_BW_LL_12.

4.2 As set out at section 2 above, the purpose of the wind turbine is to ensure that a proportion of the ALC's energy requirement is provided from renewable sources of energy. The proposed turbine model is the Proven 15 with a power output of 15 kW.

4.3 A similar proposal was the subject of a previous application (ref 2009/1591) for two turbines of an similar specification, which was subsequently withdrawn, primarily due to issues over siting.

Turbine Siting

4.4 In arriving at the proposed siting of the turbine now under consideration, a number of factors have to be taken into account. For example, in this respect the turbine needs to:

- Be sited in proximity to the school building for technical issues relating to power drop and efficiency of operation;
- Take account of the potential impact upon protected species (e.g bats);
- Ensure that the turbine is located so that issues of noise and shadow flicker on sensitive receptors are adequately addressed and mitigated.

4.5 This application represents a revised location for the wind turbines, which have been determined following further discussions with the local planning authority and statutory consultees, as well as the acoustic impacts on the surrounding residential properties and consideration as to where the wind resource is greatest and most reliable. Having completed the review of turbine siting, the location proposed is the most appropriate taking account of the above factors and the other considerations set out later in this statement.

4.6 The previous application submission (app ref 2009/1591) was screened on the need for an Environment Impact Assessment (EIA) in line with the requirements of Circular 2/99; was concluded that an Environmental Impact Assessment (EIA) was not required. The letter attached at Appendix 1 is confirmation from Barnsley Metropolitan District Council that an EIA was not required for those proposals.

Whilst siting is different, this planning application is a deemed request for a further screening opinion. This is addressed in the covering letter. Nonetheless the differences are minimal and therefore it is our view that this proposal is not sensitive enough to require EIA.

5. Pre-application Discussion

5.1 In drawing up the proposals under consideration, there has been extensive dialogue and discussion with the Council, the school and other consultees. This is outlined below.

Barnsley Metropolitan Borough Council (BMBC)

5.2 Pre application discussions have been held with officers at BMBC regarding the proposed development. Initial discussions were held in February 2009 where the key issues were identified. In this respect the Council requested that due consideration be given to noise, landscape and visual impact and other matters such as shadow flicker and highways impact.

5.3 Further dialogue was held with the Council where proposed locations of the turbine were considered. Indicative location plans were submitted as part of a Screening request submitted under the Environmental Impact Assessment (EIA) regulations.

5.4 The original proposals were screened on the need for EIA where it was concluded that this was not necessary.

5.5 Prior to the resubmission of proposals, further discussions were held with Officers of the Council in February 2010. During the meeting further discussion was held in respect of turbine siting and overall approach to delivering 10% on site renewable energy generation over and above that provided via the biomass heating.

5.6 The previous planning application for a wind turbine at Carlton ALC (reference 2009/1591) was withdrawn in January 2010 to allow further consideration of the impact of the turbine on bats. In response to this, a bat survey has been undertaken and the proposed wind turbines have been re-sited to ensure minimal impact on these protected species.

Engagement with the Schools

5.7 As part of the ongoing BSF programme, extensive engagement was held with the schools during the design process where the location of the proposed turbines was discussed and agreed. This engagement is ongoing.

Engagement with Statutory Consultees

5.8 In preparing the proposals, discussions were held with the following statutory consultees:

- Sport England; and
- Natural England

Sport England

5.9 Pre-application discussions were held with officers of Sport England where the siting of the turbines was discussed. As a result of the discussions, the siting of turbines was considered and in principle agreement was reached, subject to the application of conditions to a planning permission.

Natural England

5.10 Officers of Natural England provided comments on the proposed sitings of the turbines. Natural England indicated that, subject to confirmation that the turbines are to be in excess of 50 metres from an existing vegetation features a known issue in respect of risk to bat activity could be overcome.

Other consultees

5.11 As part of the wider approach to pre-application engagement, the following consultees were also consulted on the original proposals:

- Civil Aviation Authority
- Ministry of Defence Estates;
- National Air Traffic Service (NATS).

5.12 At the time of writing no adverse comment has been received from any of the above consultees.

6. Relevant Planning Policy

Statutory Context

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.

6.2 The Development Plan of consideration for the application proposal comprises the adopted Regional Spatial Strategy (RSS) for Yorkshire and Humber (2008) and the Barnsley Metropolitan Council Unitary Development Plan (UDP) (2000).

6.3 Other documents which should be afforded appropriate material weight in the determination of the planning application include the following:

- Planning Policy Statement 1: Delivering Sustainable Development (2005);
- Planning and Climate Change: Supplement to Planning Policy Statement 1 (2007);
- Planning Policy Guidance 2: Green Belts (1995, amended in 2001);
- Planning Policy Statement 9: Biodiversity and Geological Conservation (2005);
- Planning Policy Statement 22: Renewable Energy (2004);
- .Barnsley Metropolitan Borough Council Local Development Framework (LDF).

National Planning Policy

PPS1: Creating Sustainable Communities (2005)

6.4 PPS1 outlines the Government's vision for the planning system and the key policy principles which should underpin it. Principles include taking a spatial planning approach, promoting good design and actively seeking to support sustainable development through the development plan system.

6.5 A key principle of PPS1 is the requirement for development plans and decisions to contribute towards global sustainability by addressing the causes and potential impacts of climate change. This should be secured through policies which reduce

energy use, reduce emissions, promote the development of renewable energy resources and take climate change impacts into account in the location and design of new development.

6.6 The prudent use of natural resources is a key aim of PPS1 (Paragraph 4) and a key principle of the Statement is the promotion of the development of renewable energy resources (Paragraph 5). Development plan policies and decisions should seek to minimise the need to consume new resources over the lifetime of the development by seeking to promote the use of renewable resources to encourage energy efficient developments.

6.7 Paragraph 13 promotes the development of renewable energy and paragraph 22 encourages the use of renewable energy schemes in developments.

Planning and Climate Change: Supplement to Planning Policy Statement 1 (2007)

6.8 The Supplement to PPS1 sets out how planning should contribute towards reducing emissions, stabilising climate change and securing the highest viable resource and energy efficiency by securing sustainable patterns of development.

6.9 Consideration of the environmental performance of a proposed development, particularly the climate that the development is expected to experience of its projected lifetime, is encouraged as a key part of the planning process.

6.10 The Supplement requires that opportunities for renewable and low carbon sources of energy supply and supporting infrastructure are maximised through regional and local plans. Regional targets for renewable energy generation should be set in line with PPS22 and should require that a proportion of the energy supply of new development is secured from decentralised and renewable or low-carbon energy sources.

6.11 In particular, paragraph 20 of the Supplement states that planning authorities should not require applicants for energy development to:

> *'...demonstrate either the overall need for renewable energy and its distribution, nor question the energy justification for why a proposal for such development must be sited in a particular location'.*

6.12 The effects of the proposal on existing and proposed development in close proximity should also be taken into consideration.

PPG2: Green Belts (1995; Amended 2001)

6.13 PPG2 outlines the fundamental aims of the Government's Green Belt policy as the prevention of urban sprawl and safeguarding greenfield land. Green Belts shape the pattern of urban growth, ensuring that development occurs in locations allocated in development plan.

6.14 The five purposes of including land within Green Belts are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve setting and special character of historic towns;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.15 The positive role of Green Belts is outlined in terms of fulfilling objectives which provide opportunities for access to the open countryside and outdoor sport and recreation, retain and enhance attractive landscapes, improve damaged and derelict land, secure nature conservation and retain land in agricultural, forestry and related uses.

6.16 PPG2 sets guidelines and provides advice on the types of development which are appropriate within Green Belts. These are as follows:

- Agriculture and forestry;
- Essential facilities for outdoor sport and outdoor recreation, for cemeteries and other uses of land which preserve the openness of the Green Belt;
- Limited extension, alteration or replacement of existing dwellings;
- Limited infilling in existing villages and limited affordable housing for community needs under development plan policies according to PPG3; and
- Limited infilling or redevelopment of major existing developed sites.

6.17 There is a general policy presumption against inappropriate development unless very special circumstances can be demonstrated. The key guidance statement at Paragraph 3.2 states:

> *'Inappropriate development is by definition harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'*

6.18 The visual amenity of the Green Belt is identified at Paragraph 3.15 of PPG2 as a specific consideration. Proposals for development should not harm the visual amenity of the Green Belt by reason of their siting, materials or design.

PPS9: Biodiversity and Geological Conservation (2005)

6.19 PPS9 sets out planning policies on the protection of biodiversity and geological conservation through the planning system.

6.20 Paragraph 1 sets out the key principles to ensure that the potential impacts of planning decisions on biodiversity and geological conservation are fully considered and states that:

> *'The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. Where planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm.'*

PPS22: Renewable Energy (2004)

6.21 PPS22 sets out the Government's planning policy on renewable energy. The key objectives are the promotion and development of renewable energy and improvements to energy efficiency in order to mitigate climate change.

6.22 The document states that the wider environmental and economic benefits of all proposals for renewable energy projects, irrespective of scale, should be treated as a material consideration that will be given significant weight in determining whether proposals should be granted planning permission.

6.23 Paragraph 8 requires the on-site generation of renewable energy to only be applied to developments where the installation of renewable energy generation equipment is feasible given the type of development proposed, its location, and design and the policy should not be framed in such a way as to place an undue burden on developers, such as specifying that all energy to be used in a development should come from on site renewable generation.

6.24 Paragraph 13 relates to the development of renewable energy sources in the Green Belt. It is recognised that where renewable energy projects are located in the Green Belt, these constitute inappropriate development, and may impact on the visual amenity and openness of the Green Belt. Careful consideration is therefore required to the visual impact of projects; developers should demonstrate very special circumstances that clearly outweigh any harm, to justify proposals for renewable energy sources.

6.25 Developers will also need to demonstrate very special circumstances for wind turbine development in the Green Belt. PPS22 suggests that:

> *'such very special circumstances may include the wider environmental benefits associated with the increased production of energy from renewable sources'*

6.26 Paragraph 18 requires that local planning authorities and developers consider the opportunity for incorporating renewable energy projects in all new developments. Small scale renewable energy schemes, such as wind turbines, can be incorporated into new developments and some existing buildings. PPS22 requires that local planning authorities should encourage such schemes through positively expressed policies in local development documents.

6.27 Paragraphs 19 and 20 relate to the impacts of renewable energy schemes on the landscape and visual amenity, and ambient noise levels. Appropriate siting, design and landscaping schemes are emphasised as a means of minimising the impacts of the proposed renewable energy development.

Companion Guide to PPS22 (2004)

6.28 The Companion Guide to PPS22 sets out practical advice as to how the renewable energy policies set out in PPS22 can be implemented in practice.

6.29 The Companion Guide requires that where a renewable energy proposal is promoted, it should be demonstrated that the proposals:

- Meets the requirements of applicable development plan policies;
- Does not compromise the reasons behind any relevant area designation, or if it does, the proposal provides sufficient justification of the environmental, economic and social benefits which outweigh any harm; and
- *Addresses the issues of visual impact, and cumulative visual impact,* where appropriate.

6.30 Technical Annex 8 of the Companion Guide provides detailed information relating to development proposals for wind turbines. Key issues associated with such development may include impacts upon ambient noise levels, landscape and visual amenity, listed buildings and conservation areas and ecology.

The Development Plan

Regional Spatial Strategy for Yorkshire and the Humber (2008)

6.31 *The Regional Spatial Strategy (RSS) for Yorkshire and the Humber was published* in May 2008 and sets out the development strategy for the Region. Notwithstanding the proposals of Government to abolish planning at Regional level, the RSS remains, for now form part of the development plan for the area.

6.32 Policy ENV5 specifies that local authorities and developers should seek to increase renewable energy capacity and energy efficiency in prospective and existing developments. In specific reference to new non-residential developments over 1000m^2, Policy ENV5B states that 10% of energy should be from decentralised and renewable or low carbon sources, unless due to the type or design of the development this is not feasible or viable.

6.33 Policy YH9 states that the Green Belts in North, South and West Yorkshire have a valuable role in supporting urban renaissance, as well as conserving countryside. Policy YH9 requires that the general extent of the Green Belt should not be changed, but recognises that there may be a *'localised need'* to reconsider its extent and use in certain locations.

Barnsley Unitary Development Plan (2000)

6.34 The Barnsley Metropolitan Borough Council Unitary Development Plan (UDP) (2000) and is the Council's statutory development plan whilst the Local Development Framework (LDF) is under preparation. Only the Local Plan policies

which were 'saved' by the Secretary of State in September 2007 have been considered as part of this appraisal.

6.35 The site lies wholly within the Green Belt as defined by saved Policy BA9.

6.36 A 'Recreational Routeway' runs along the northern boundary of the site and is defined by Policy BA15/8/ Policy BA15 seeks to protect and develop these routes

6.37 Policy GS7 seeks to safeguard against inappropriate development in this locality and specifies that development will not be permitted within the Green Belt unless it maintains openness and does not conflict with the purposes of including land within the Green Belt.

6.38 Policy GS8 is aligned with PPG2, stating that the construction of new buildings in the Green Belt will not be permitted except in very special circumstances, unless it is for the following purposes:

- Agriculture or forestry;
- Essential facilities for outdoor sport or outdoor recreation, for cemeteries, or for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it;
- The replacement of existing dwellings in compliance with policy GS8e.

6.39 Policy GS9 requires that development within the Green Belt should not by reason of its siting, materials or design result in significant harm to the visual amenity of the Green Belt.

6.40 Policy ES12 sets out the Council's requirements for proposals that seek to develop wind energy generation. Such proposals will be assessed with regard to the following factors:

- Effect both individually and cumulatively upon landscape and the visual amenity of the area;
- The impact on residential amenity with reference to noise, visual outlook, shadow flicker and flashing from the turbine blades;
- Provision of satisfactory access to the highway network having regard to visual amenity, highway capacity and safety;
- Effect on wildlife, ecology and archaeology;
- Effect on agricultural land uses;

- Electro-magnetic effects;
- The provision for connection to the electricity transmission and supply system;
- The effect of shadow flicker or flashing from turbine blades.

6.41 Policy ES12A outlines the importance of using appropriate technology and design for all wind generator proposals. Policy ES1C states that the Council will control development in the vicinity of existing wind generation installations so as to safeguard these from a reduction in local wind speeds.

6.42 Policy BE6 sets out design standards for all development. Proposals will be assessed in terms of:

- The quality of layout and the suitability of the scale of the development;
- The use, quality, design and landscape treatment of open land within the site and the area around buildings;
- The standard of detailed design and facing materials of proposed buildings;
- The suitability of the whole development for its proposed context and its relationship with adjoining land uses.

Barnsley Local Development Framework

6.43 In accordance with the requirements of the Planning and Compulsory Purchase Act (2004), the Council is currently preparing its Local Development Framework (LDF).

Core Strategy

6.44 The Core Strategy remains in draft but will constitute part of the Development Plan upon its expected adoption in February 2011. The Core Strategy will set out the proposed policies, spatial options and strategic objectives for the future development of the Barnsley Borough to 2026.

6.45 The Core Strategy Revised Preferred Options was published in June 2009. This was updated by the Core Strategy "Publication Version", which went out to consultation in March and April 2010.

6.46 The Publication Version sets out strategic policies; site specific allocations will be issued following the publication of the Core Strategy. Strategic Objective 6 requires that all new development is suitably designed and built to the highest standards, by embracing the principles of sustainable design, whilst Strategic Objective 8 seeks to minimise energy consumption and to support renewable energy facilities in the Borough.

6.47 Draft Policy CSP1 supports Strategic Objectives 6 and 8 by requiring that development reduces and mitigates the impact of growth on the environment and ensures that existing and new communities are resilient to climate change, through the efficient use of resources and renewable energy.

6.48 Draft Policy CSP5 outlines the Council's requirements for incorporating renewable energy in developments; all new development exceeding 1,000sq m of non-residential floorspace will be expected to incorporate decentralised, renewable or low carbon energy sources, in order to reduce the carbon emissions associated with the development. This should be by at least 15% for applications submitted to 2015 and 20% for applications submitted thereafter.

6.49 Draft Policy CSP6 outlines the Council's support for development that produces renewable energy, as long as there is no significantly harmful effect upon:

- The character of the landscape and appearance of the area;
- Living conditions;
- Biodiversity, geodiversity and water quality;
- Historical and cultural features and areas;
- Highway safety; and
- Infrastructure including radar.

6.50 Draft Policy CSP6 requires that all proposals are accompanied by information that shows how the local environment will be protected and that the site will be restored when production ends.

6.51 Draft Policy CSP29 seeks to secure high quality design in all new developments. The policy requires that all development must adhere to design principles which include:

- Contribution to place making and high quality design;
- Regeneration;

- Improved access and safety for all;
- Meet the CABE Building or Life Silver Standard.

6.52 In terms of Green Belt policy, Draft Policy CSP34 requires that the extent of the Green Belt is retained and safeguarded, in order to protect the countryside and open land around built up areas. Development in the Green Belt must meet the requirements of PPG2.

6.53 Draft Policy CSP36 requires that new development conserves and enhances biodiversity and geodiversity in the Borough. This should include protecting and improving habitats, species, sites of ecological value and sites of geological value and maximising biodiversity and geodiversity opportunities in and around new developments. Development which may harm a biodiversity or geological feature will not be permitted unless effective mitigation and/or compensatory measures can be ensured.

6.54 Draft Policy CSP37 requires that development retains and enhances the character and distinctiveness of the Landscape Character Area in which it is situated.

6.55 Draft Policy CSP43 lends support for the provision of schools and education facilities in the Borough.

6.56 Draft Policy CSP48 requires all development of more than 1,00 0sq m of non-residential floorspace to provide a minimum of 10% of predicted energy needs from decentralised, renewable or low carbon energy sources.

Barnsley Education Sites DPD (2009)

6.57 The Council adopted the Education Sites DPD in January 2009. The DPD sets out the planned sites for secondary schools across the borough in accordance with the Government's Building Schools for the Future development programme.

6.58 The DPD sets out the Council's intention to create nine advanced learning centres in the borough, to replace the thirteen existing secondary schools, three of which are on new sites located within the Green Belt. This site is one of those three sites identified in the DPD.

6.59 The Council has partly reviewed the boundary of the Green Belt in preparing the local development framework. The DPD states that there are *'very special circumstances'* which justify using Green Belt land to provide the education centres (Paragraph 4.10) and to allow the Building Schools for the Future programme to go ahead.

7. Relevant Planning History

7.1 Table 7.1 outlines the planning history of relevance to the site and the application proposal:

Application Number	Proposal	Decision	Decision Date
2006/1133	Erection of advanced learning centre, car parking and new access road (outline)	Approved	16/12/2006
2008/1821	Erection of advanced learning centre, car parking and new access road, formation of sports pitches and other ancillary facilities (Reserved matters)	Approved	16/02/2009
2009/0027	Variation of Condition 29 relating to submission of community use agreement on previous planning permission 2006/1133, dated 12 December 2006 for erection of Advanced Learning Centre, car parking and new access road.	Approved	11/03/2009
2009/1591	Erection of 2 wind turbines	Withdrawn	January 2010

8. Material Considerations

8.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) refers to the Development Plan as a whole and states that:

> *'if regard is to be had to the Development Plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise'*

8.2 The key material planning considerations raised by the proposed wind turbine at Penistone ALC and to be taken into account in the decision making process are therefore:

- Impact on the Green Belt;
- Impact on the landscape and visual amenity of the area;
- Impact on noise levels;
- The impact of shadow flicker;
- Impact on ecology, including bats / ornithology;
- Impact of the wind turbines surrounding footpaths / highways;
- Impact of construction on the highway;
- Television / telecommunications interference; and
- Impact on Air Safety.

8.3 These are discussed in more detail in the following two sections.

9. Green Belt Assessment

9.1 It is accepted that the wind turbine development constitutes inappropriate development in the Green Belt. Paragraph 3.1 of PPG2 makes it clear that there is a general presumption against inappropriate development in the Green Belt and that such development should not be approved except in very special circumstances. Paragraph 3.2 also makes clear that inappropriate development is, by definition, harmful to the Green Belt. The presumption against development in the Green Belt is also reflected in the saved policies of the Barnsley UDP (2006).

9.2 The central issue, therefore, is whether very special circumstances exist which outweigh the harm to the Green Belt resulting from the inappropriateness of the proposed development. In considering the issue, it is necessary to assess:

- The impact on the openness of the Green Belt;
- The impact on the visual amenities of the Green Belt;
- The impact on the purposes of including land within the Green Belt; and
- The impact on the use of land within the Green Belt.

Very Special Circumstances

9.3 Paragraph 13 of PPS22 states that the development of renewable energy is inappropriate development in the Green Belt in the context of PPG2, therefore very special circumstances will need to be demonstrated.

9.4 PPS22 also states that:

> *'Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.'*

9.5 It is therefore considered that the very special circumstances in this case are the wider environmental benefits of the proposals. However, it is also worth noting that the Education Sites DPD acknowledges that there are very special circumstances for allowing the ALC's to be developed within the Green Belt. Whilst this DPD has not removed the ALC sites from the Green Belt, the currently proposed turbine, is part and parcel of delivering that approved development and therefore securing its wider environmental obligations. This suggests some level of wider development plan support and differentiates this turbine from an equivalent turbine in the open Green Belt, where the context lacks any urbanisation.

9.6 National policy and the statutory development plan seek to reduce climate change and increase the use of renewable sources of energy. The proposals will secure a renewable source of energy generation in line with the overriding national and regional planning policy objectives. It is considered that this constitutes very special circumstances for this development in the Green Belt.

9.7 The development of wind turbines within the grounds of the new school is a key component to the wider school redevelopment proposals, as this will secure a proportion of energy derived from on site renewable sources in accordance with the national planning policy objectives, the statutory development plan and the Design and Development Brief for the BSF Programme.

9.8 The erection of the turbines will secure a source of renewable energy generation that will play its part in the wider objective of reducing greenhouse gas emissions, a principal cause of global climate change. The need to secure and deliver sources of renewable energy generation in order to reduce CO2 emissions is a key national planning policy objective.

9.9 The provision of wind turbines at Carlton ALC will meet this overriding objective and consequently this represents the very special circumstances that justifies the proposals within the Green Belt. The development will therefore meet wider planning policy objectives, most notably RSS policy ENV5 which seeks to increase renewable energy capacity within the Region. It is therefore considered that the need for the development outweighs the harm to the Green Belt and that this constitutes very special circumstances.

Impact upon the Openness of the Green Belt

9.10 *It is now necessary to consider whether the proposed development would have an* impact upon the openness of the Green Belt (i.e. freedom from development): it's most important attribute. The impact on openness is assessed on the basis of the presence and extent of buildings and other urbanising features, with proposed development being compared with existing as a means of demonstrating the balance of change. Impact can be assessed in terms of change in developed footprint and site coverage, and in terms of changes in building scale and mass.

9.11 Whilst it is acknowledged that the proposed wind turbine will constitute an increase in 'built form' in the Green Belt, this is limited by the small footprint and tower like form of the development. Whilst there will clearly be an impact on openness, as a form of development turbines lack major volume and mass and must therefore have a commensurately low impact on openness.

9.12 The proposed turbines lie wholly within operational land associated with Carlton ALC, which is itself an urbanised area of the Green Belt. The presence of buildings, hardstanding, car parking and indeed maintained playing fields and associated infrastructure, all have an urbanising effect on this area of the Green Belt, which reduces the concern of this proportionally small addition of development.

9.13 Whilst the turbine does have an effect on openness, we consider that this is limited and is outweighed by the contribution the turbine can make to reducing carbon emissions and delivering on renewable energy generation targets.

Impact on the Purposes of Including Land within the Green Belt

9.14 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It establishes five purposes of including land within the Green Belt. Considering the effect of the proposed wind turbine upon each of the five purposes, it is concluded that:

i) To check the unrestricted sprawl of large built up areas

The Green Belt in this location will continue to fulfil this function. It is not considered that the proposed wind turbines will prevent the fulfilment of this function as the proposed development lies wholly within ground associated with Carlton ALC, has a small footprint and will not result in pressure to physically develop other areas of land either within or around the site.

ii) To prevent neighbouring towns from merging into one another

The Green Belt in this location will continue to perform this function as it will not materially reduce separation distances between Carlton and surrounding urban areas.

iii) To assist in safeguarding the countryside from encroachment

The Green Belt will continue to fulfil this function in this location and will not be adversely affected by the proposals as the proposed wind turbines lie wholly within the curtilage of Carlton ALC.

iv) To preserve the setting and special character of historic towns

The Green Belt in this location does not undertake this function and does not need to be considered in this instance.

v) **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

The re-use or recycling of urban land would not be prevented by this development proposal. The use of this site as suitable for an ALC has been identified in the adopted Education Sites DPD and this decision has been made in the light of other brownfield alternatives. The turbine is one element of delivering a sustainable educational development.

9.15 Paragraph 1.6 of PPG2 advises that once Green Belts have been defined, the use of land has a positive role to play in fulfilling five objectives as set out in this statement and above. As demonstrated above, it is considered that the proposed development would not undermine any of those objectives. It can therefore be concluded that the proposed wind turbine will not undermine the functioning of the Green Belt in this location.

9.16 Finally, it has been demonstrated that the requirement for the development constitutes very special circumstances, which far outweighs the very limited impact on the openness of the Green Belt and modest impact on the visual amenities and character of the Green Belt.

9.17 In light of the foregoing, it is considered that the proposed development is acceptable and is not in conflict with the provisions of PPG2 or saved UDP policies in respect of the Green Belt.

10. Other Material Considerations and Technical Matters

10.1 This application is supported by a number of accompanying reports which set out specific details relating to landscape and visual impact and noise. The impact of the proposed wind turbines on TV / telecommunications will also be considered in this chapter. All of these matters should be considered as material to the determination of the application.

Principle of Development

10.2 National, regional and local planning policy supports the development of renewable *sources of energy to support sustainable development objectives.*

10.3 The proposals are for the generation of energy from renewable sources of energy. This is supported by adopted and emerging national, regional and local planning policy, namely:

- PPS1 and its supplement;
- PPS22 and the Companion Guide to PPS22;
- RSS Policy ENV5; and
- Draft Core Strategy Policy CSP48.

10.4 The objective of PPS1 is the promotion of sustainable development and identifies the prudent use of natural resources as one of the key principles. Similarly, the key objective of PPS22 is the promotion and development of renewable energy in order to mitigate against climate change.

10.5 Policy ENV5 of the RSS provides development plan support for proposals of this type, and this is also reflected in emerging planning policy.

10.6 In summary, the wind turbine is ancillary to the wider Carlton ALC and is the most appropriate source of renewable energy in this location. The development will ensure the ALC will make a positive contribution to the aims, objectives and requirements of the development plan and national planning policy.

10.7 The principle of the development of wind turbines in this location is therefore acceptable.

Green Belt

10.8 Notwithstanding the above, it is acknowledged that the proposed development constitutes inappropriate development in the Green Belt. However, very special circumstances for the development are considered to exist and the benefit of the proposals in terms of the wider environmental benefits associated with the increased production of energy from renewable sources. This is reviewed at chapter 9 of this statement.

10.9 The proposed wind turbine seeks to provide a proportion of the ALC's energy requirements, therefore they will need to be located in close proximity to the school. Therefore, as the ALC is located wholly within the Green Belt, the wind turbine will also need to be located here. The location of the wind turbine within the ALC site has been carefully considered to ensure that the surrounding residential properties experience minimal disturbance in terms of noise and visual impact. Supporting documents demonstrate that the application site is the most appropriate location for the wind turbine.

Ecology

10.10 The application site does not contain designated sites of acknowledged ecological importance.

10.11 The site is however, situated approximately 400 metres from a Local Nature Reserve which extends between Shaw Lane and Bleach Croft Farm. The local nature reserve comprises a variety of habitats including woodlands, dry and marshland and open water. The site is allocated under Policy BA12/4, which is aligned with Policy GS15, to safeguard important habitats and specifies activities which would cause disturbance, pollution or other damage to the reserve. This is supported by Policy GS16 which states that development likely to have an adverse effect upon the conservation value of a nature reserve will only be permitted where it can be demonstrated that other material considerations outweigh the special interest of the site.

10.12 The proposed development is for a wind turbine, which in itself does not directly create pollution and are unlikely to cause disturbance or be detrimental to the intrinsic interest of the nature designation which is primarily water based in this area. The proposed development is therefore acceptable in regards to the requirements of Policies BA12/4, GS15 and GS16.

10.13 In terms of potential impact on protected species, due regard has been had to technical advice produced by Natural England. In this regard, the wind turbine is

located in excess of 50 metres from existing vegetation in accordance with the interim advice. As this is the case the potential impact upon bats is thereby mitigated.

10.14 The planning application submission package includes a bat survey of the site. It is considered that parts of the wider site are used by a small number of foraging and commuting common pipstrelle bats and found that one of the mature trees within the wider site is used as a roost site by individual common pipstrelle. As a result of this, the proposed wind turbines have been sited well away from areas of known bat activity to ensure that the impact on bats is minimal.

Landscape and Visual Impact

10.15 A landscape and visual impact assessment of the proposed wind turbine accompanies the planning application. In the case of the application site, the landscape is typified by a diverse range of land uses, including agriculture, recreation, residential, industrial, commercial development and nature conservation.

10.16 As highlighted at section 5 of this statement, the revised siting of the turbines were agreed following pre application discussions with both the planning authority and statutory consultees. Of key significance here is that the siting options for the turbine are limited, and in order to meet the development brief of on site provision of a turbine to make a positive renewable energy contribution wind turbines have been found to be the most efficient source of renewable energy for the school site.

10.17 The photomontages submitted with the application show that in terms of impact upon the landscape and visual amenity, views of the turbine will be limited, when looked at from the agreed viewpoints: from the north, south west and south east.

10.18 From both receptors, it is evident that the existing vegetation effectively filters complete views of the wind turbines during construction and completion phases resulting in impacts of only minor significance. It is important to note that the wind turbines will seen in the context of the school buildings which are currently under construction and will not be seen in isolation.

10.19 Once the proposed woodland planting around the perimeter of the site becomes fully established this will fully screen any views of the turbines.

Noise

10.20 The detailed noise report has been prepared by SRL and has been submitted as part of this application package. The noise assessment concludes that the measured data indicate that ETSU criteria for the acceptability of wind turbine noise are likely to be met at all wind speeds during both the daytime and the night time. In terms of noise impact, the proposed wind turbines are therefore considered to be acceptable.

10.21 The location of the wind turbines within the ALC site has been carefully considered to ensure that the surrounding residential properties experience minimal acoustic disturbance.

Impact on Playing Pitch Users

10.22 Pre-application discussions with Sport England have confirmed that the proposed siting of the turbine is acceptable in principle. This is by virtue of the fact that the proposed turbine is located on land previously approved as new landscaping and not on existing playing or land capable of being used as a playing field.

10.23 The approved Landscape Masterplan under Reserved Matters Approval 2008/1821 clearly shows the application site as comprising new structural landscaping that never formed part of the approved playing field provision. As this is the case ,we consider that the proposal complies with Exception Criteria E3 of Sport England's Playing Fields Planning Policy Statement, which specifies that planning permission for development which may affect the use of a planning field is acceptable where:

> *'The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing areas of any playing pitch or the loss of any other sporting/ancillary facilities on the site'.*

Shadow Flicker

10.24 The Companion Guide to PPS22 Planning for Renewable Energy, Technical Annex: Wind states:

> *'Under certain combinations of geographical position and time of day, the sun may pass behind the rotor of a wind turbine and cast a shadow over neighbouring properties. When the blades rotate, the*

shadow flicks on and off; the effect is known as 'shadow flicker'. It only occurs inside buildings where the flicker appears through a narrow window opening.'

10.25 Shadow flicker is not a common occurrence and has been proven to occur only within ten rotor diameters of properties within 130 degrees either side of north. In terms of assessing the potential effect of Shadow Flicker the first assessment that should be made is the proximity of sensitive receptors that lie within 10 rotor blade diameters of the proposed turbine. In this case given the type of turbine proposed (a Proven 15 with a rotor diameter of 9 metres) the potential effect may only be assessed within 90 metres (the equivalent of 10 rotor diameters) of the proposed turbines.

10.26 In terms of assessment it should be noted that when determining the location of the proposed turbines at Carlton that are now being applied for, the turbines are located at least 160 metres from residential properties where shadow flicker might be experienced. With regard to the turbine proposed and associated rotor diameter of 9 metres, this is clearly in excess of 90 metres where the effect of shadow flicker is proven to potentially occur.

10.27 As this is the case, shadow flicker in residential properties is not an issue that is likely to be experienced as a result of the development.

Surrounding footpaths/highways

10.28 No public rights of way or adopted highways lie within the "fall over" distance of the proposed turbines. The siting of the turbines is therefore considered to be suitable in this regard.

10.29 The proposed turbines will be situated will be situated over 200 metres from the new public bridleway which is situated to the north of the site. Paragraph 56 of the Companion Guide to PPS22 outlines the British Horse Society's recommendation for a 200m exclusion zone around bridleways to minimise the noise impact of turbines upon horse users. However the Companion Guide also notes that this is not a statutory requirement.

Ice Throw

10.30 The potential for ice throw from the turbine has been assessed but is not considered to be a significant issue for the determination of the application. As

outlined by the PPS22 Companion Guide, the weather conditions required for the build-up of ice are unlikely to occur more than once a year in England.

10.31 The turbine is designed so and blades are shaped to reduce noise and also ice build-up. The turbines do have mechanical brakes which can be engaged in conditions when ice build-up occurs, but this is not likely to be a frequent occurrence.

Construction effects on highways

10.32 In terms of the effects of construction on surrounding highways, it should be noted that at Carlton ALC, construction is ongoing and there is in place existing infrastructure to enable access to the site.

10.33 This has been agreed by the Council as part of the discharge of conditions attached to planning permission 2009/0027. The construction effects report submitted with the application sets out that in terms of additional vehicle movements as a result of proposals these are minimal. Given that there is already a construction access on site, along with associated traffic generation and management measures, the impact of the additional vehicle movements is considered minimal. As this is the case the construction effects on highways are minimal. A construction impacts assessment for all sites is attached at Appendix 3.

TV/Telecommunications interference

10.34 As part of preparing the proposals an assessment of the potential for interference to television and radio signals was undertaken using a web based tool provided by the BBC. A copy of the response is attached at Appendix 2. The outcome of this assessment is there is a potential for 1,326 receptors to be affected where there is no alternative off air service and potential for a further 15,667 homes where an alternative off-air service may be available.

10.35 It should be noted that the web based tool does not consider the precise location, number or height of proposed turbines. Therefore as part of the assessment as the extent of impact (if any) will only be known once the turbines are constructed and operational. Nonetheless, it should be noted that the hub height of the turbines are comparable in terms of scale with the main ALC building this being up to approximately 16 metres from floor to roof level. It should also be noted that when compared to commercial wind farms, and for which the tool is designed the proposal is very modest in scale, and as a consequence is very unlikely to result in any appreciable disruption to TV or radio reception.

Air Safety

10.36 As part of pre-application consultation on the previous proposals a number of bodies with responsibilities for air safety were consulted setting out details and locations of the proposed turbines. It should be noted that the turbines are modest in scale and are unlikely to affect air safety when compared to larger scale alternatives. These points have been confirmed by the relevant consultee of which responses are attached at appendix 4.

11. Summary and Conclusions

11.1 This Planning Statement has been prepared to support the Planning Application for one wind turbine at Carlton ALC to provide a proportion of the school's energy requirements.

11.2 There is an overriding need to provide additional facilities for the generation of renewable energy sources and this is supported by national, regional and local planning policy.

11.3 The turbine is located in the Green Belt and constitutes inappropriate development. However there are very special circumstances that override Green Belt considerations in this case. Moreover, it is considered that the development would not harm the functions of the Green Belt in this location. Also, there are no technical constraints on the proposed development in this location. As this is the case we respectfully request that the application be granted planning permission.

Appendix 1 – Screening Opinion Response from Council

BARNSLEY
Metropolitan Borough Council
Planning and Transportation Service
Assistant Director: Stephen Moralee BA (Hons) MBA
Development Control Section
PO Box 604, Barnsley, S70 9EF
Tel: (01226) 770770 Fax: (01226) 772591 E-mail: developmentcontrol@barnsley.gov.uk
The website address for all Council services is www.barnsley.gov.uk

RECEIVED
12 OCT 2009

My ref – MW/ALC/CARLT Your ref – LAIY2022

Date: 06/10/09 Enquiries to: Matthew Woodward Dial Direct 01226 772587

Dear Sir,

I write to provide both a response to a formal screening request (regulation 5 (1)) and guidance on the proposal outlined in your letter dated 16th September 2009.

The proposal involves two wind turbines with a tower (hub) height of 15m and a blade diameter of 9m (total height of approximately 19.5m from base to blade tip). The turbines would be located to the north east of the proposed ALC in an area which is intended to be landscaped/playing fields. Currently the land comprises agricultural land located in the Green Belt.

The proposal falls outside Schedule 2 of the Environmental Impact Assessment (EIA) 1999 regulations (as amended) as the applicable thresholds in respect of wind turbine proposals are as follows:

- *Development involving the installation of more than 2 turbines;*

- *The hub height of any turbine or structure exceeds 15 metres.*

Furthermore, the indicative thresholds and criteria also highlight the following:

"The likelihood of significant environmental effects will depend on the scale of the development, and its visual impact, as well as noise impacts. EIA is more likely to be required for commercial developments of 5 or more turbines, or more than 5 MW of new generating capacity".

As well as falling outside the applicable and indicative thresholds, the small scale nature of the proposal and the likelihood of significant environmental effects arising from the proposal are considered to be minimal. Furthermore, the proposal does not fall within an environmentally sensitive area. It is therefore not considered that the proposal requires an EIA.

FAO Matthew Collins
Turley Associates
33 Park Place
Leeds
LS1 2RY

There are, however, a number of issues which need addressing in detail as part of a planning application. Firstly, it is considered the proposal amounts to an inappropriate development in the Green Belt. Planning Policy Statement 22 (Renewable Energy) advises as follows:

"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, and developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of inappropriateness and any other harm if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable source"

You need to clearly demonstrate that there are very special circumstances which clearly outweigh harm to the Green Belt, and any other harm, in order to satisfy this policy. Furthermore, you need to comprehensively address the following issues in any subsequent planning application:

- Landscape and Visual Impact (including cumulative effects)
- Noise/Shadow Flicker
- Ecology/Ornithology
- Proximity of highway/footpaths
- Highways Impacts
- Interference to TV/telecommunications
- Impact on air safety

I trust this clarifies the Council's opinion and provides you with the necessary information to be considered in any subsequent planning application. I look forward to hearing from you in due course.

Yours sincerely

For and on behalf of Martin Winnard,
Development Control Manager

Awarded for excellence

Appendix 2 – TV and Radio Interference Assessment Result

TURLEY ASSOCIATES

appendix 2 - 100607 windfarms BBC Windfarms Tool results.

From: Windfarms [Windfarm.Tool@bbc.co.uk]
Sent: 07 June 2010 14:15
To: Matthew Collins
Subject: [The BBC Windfarms Tool] Your query results.

If you were to place turbines in the following locations:

SE368103

You would be likely to affect 1326 homes for whom there is no alternative off-air service.

In addition, you may affect up to 15667 homes for whom there may be an alternative off-air service.

The transmitters likely to be affected are:

EMLEY MOOR CH5
BELMONT
EMLEY MOOR

This information is provided for the guidance of Wind Farm developers.
The results of this query are a rough estimate of populations that may suffer interference from wind farms built at the locations specified.
The information is not intended to be a substitute for an on-site survey where the potential for disruption to television services may more accurately be assessed.

The BBC does not accept liability for the consequence of any use of the information provided by this web site. All television reception difficulties caused by the erection of wind turbines are the responsibility of the wind farm developer.

This email was automatically generated in response to a query at the BBC Windfarms Tool website. Please do not reply to this address.

If you wish to contact the BBC, please visit:
http://www.bbc.co.uk/feedback/

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The BBC accepts no responsibility for this email. This email is generated by a request on the BBC webserver. If you were not expecting this email, please contact webweaver@bbc.co.uk including all headers from the email.

Appendix 3 – Construction Impacts Assessment Methodology

Matthew Collins

From: Mills, Peter [pmills@laingorourke.com]
Sent: 02 December 2009 08:50
To: Matthew Collins
Cc: Mills, Peter
Subject: method statement for installation of wind turbines
Follow Up Flag: Follow up
Due By: 03 December 2009 01:00
Flag Status: Red

Scope of works.

To install two wind turbines at each school to achieve 10 % of the schools renewable energy target.
The location of the wind turbines have been determined by acoustic consideration to the surrounding neighbours which generally requires the location to be atleast 175m from residential properties.

Method statement.
Foundations
The bearing pad size for a 15kw Proven wind turbine is 4m x 4m x 2m deep*
Excavate an area on plan of 5m x 5m with battered sides at 45 degree slopes. Use JCB 3B Backacter excavator to excavate.
Soil removed from the excavation to be redistributed on site via a small dump truck.
Blind the formation with 50mm 15N/mm2 concrete
Install timber formwork to form the sides of the bearing pad
Install reinforcement bars
Set free issue holding down bolts in the centre of the form work
Place 35 N/mm2 concrete into form work by pouring directly from the back of the concrete wagon into form work.
There will be 6 deliveries of concrete to complete the 32m3 pour.
Trowel the concrete surface and allow to set.

Erection of mast and turbine
Locate 20 tonne crane adjacent to the foundation
Manouver the trailer carrying the 25m high mast adjacent to the crane and using a quick release web sling attach the crane to the mast.
Lift and slew the mast into place securing the bolts to the base plate
Release the slings

Lift the turbine section into position, carefully locate the turbine onto the mast fixing bolts. This is done by locating a mobile work platform (Genie 3TS or similar) and manouvering the working platform adjacent to the turbine motor.

Once the turbine is fixed then each of the 3 blades are lifted and securely bolted into place.
Remove the craned and mobile work platform from site.

Vehicle movements

1. delivery of JCB
2. delivery of mobile platform
3. delivery of crane
4. delivery of wind turbine on low loader articulated vehicle.
5. Delivery of 6 concrete wagons

Programme
Forming foundation = 1 week
Installation of wind turbine = 2 days.

* subject to bearing pressure testing of the excavated ground.

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Appendix 4 – Responses from Consultees Regarding Air Safety

From: Pope DelphaL [DelphaL.Pope@caa.co.uk]
Sent: 16 November 2009 15:55
To: Matthew Collins
Subject: Carlton WindFarm

Our Ref: DAP/Wind/Carlton\1482
Your Ref: LAIY2022

Dear Mr Collins
Wind Farm Proposal – Carlton

Thank you for notification of the title proposal. In line with the guidance provided within the Department for Trade and Industry document Wind Energy and Aviation interests, which does not differentiate, in consultations terms between very small turbines such as that associated with the application in question, and larger proposed developments. This Directorate has no further observations.

There may however be issues related to en route navigational facilities. Accordingly details of your proposal have been copied to National Air Traffic Services for any comment. If you do not hear from NATS or wish to contact them, they can be contacted at:

National Air Traffic Services Ltd
Navigation Spectrum & Surveillance
Corporate and Technical Centre
4000 Parkway, Whiteley
Fareham
Hampshire
PO15 7FL
Email: nerlsafeguarding@nats.co.uk
For completeness it would also be sensible to establish the related viewpoint of local emergency services air support units. This is because of the unique nature of their operations in respect of operating altitudes and potentially unusual landing sites.

In respect of any aviation need to increase the conspicuity of the turbines, developers should be aware that there may be a need to install aviation obstruction lighting to some or all of the associated wind turbines should this development be progressed. This comment is made specifically if there were concerns expressed by other elements of the aviation industry; ie the operators. For example, if the Ministry of Defence or a local aerodrome had suggested such a need, we the Civil Aviation Authority (sponsor of policy for aviation obstruction lighting) would wish, in generic terms, to support such a claim. We would do so if it could *reasonably be argued that the structure(s), by virtue of their location and nature, could be considered a* significant navigational hazard. That said, if the claim was clearly outside credible limits (ie the proposed turbine(s) was/were many miles away from an any aerodrome or it/they were of a height that was unlikely to effect even military low flying) the Authority would play an 'honest-broker' role.

All parties should be aware that international aviation regulatory documentation requires that the rotor blades, nacelle and upper 2/3 of the supporting mast of wind turbines that are deemed to be an aviation obstruction should be painted white, unless otherwise indicated by an aeronautical study. It follows that the CAA advice on the colour of wind turbines would align with these international criteria.

The number of pre-planning enquiries associated with windfarm developments has been significant. It is possible that the proliferation of wind turbines in any particular area might potentially result in difficulties for aviation that a single development would not have generated. It is, therefore, not necessarily the case that, because a generic area was not objected to by the aviation industry, future, similarly located potential developments would receive the same positive response.

Developers are advised that there is a civil aviation requirement in the UK for all structures over 300 feet high to be charted on civil aviation maps (I understand that the ministry of defence utilises a lower threshold height). Should this proposed wind turbine development progress and the 300 feet height be breached, to achieve this civil aviation charting requirement, developers will need to provide details of the development to:

Defence Geographic Centre

AIS Information Centre
Jervis Building
Elmwood Avenue
Feltham
Middlesex
TW13 7AH
Telephone: 020 8818 2708 (This number is for Defence Geographic, not the CAA)

An amendable version of the proforma is available electronically at http://www.bwea.com/docs/developers_proforma.doc and can be E-mailed to windfarms@caa.co.uk when submitting preplanning information.

Please be aware that due to the rationalisation of CAA Email addresses the windfarms Email address is now windfarms@caa.co.uk, the previous address windfarms@dap.caa.co.uk will no longer work.

Regards

Delpha

Mrs Delpha L Pope
S&SM Administration Officer
Civil Aviation Authority
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