PLANNING JUSTIFICATION STATEMENT

Dated 21st February 2012

Applicant:	Mr M Lonsdale & Mrs K Lonsdale
Proposed Development:	Installation of a single small scale Evance R9000 5Kw wind turbine on a 12m monopole mast
Site Address:	Land at Hey Slack Farm, Hey Slack Lane, Cumberworth, Huddersfield HD8 8YD

Introduction

1.1 Planning Policy Statement 22 – Renewable Energy states that "Renewable energy development projects should be capable of being accommodated throughout England in locations where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily." It asks local planning authorities when assessing planning applications to "recognise that the impact of turbines on the landscape will vary according to the size and number of turbines and the type of landscape involved." It also asks Local Planning Authorities to consider that "the wider environmental an economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission."

1.2 The proposal at Hey Slack Farm will be sited in a location with an excellent wind resource (a minimum of 7.2 m/s) where energy output and performance will be high.

1.3 The design, scale and appearance of the development has been considered and both technical and environmental factors have been examined to determine, on balance, the most appropriate site and type of wind development that optimises energy production and satisfactorily addresses environmental, economic and social impacts. This process is outlined in detail in our accompanying Design & Access Statement.

1.4 The proposed turbine:

- Is small scale and will be seen as a new marginal feature of slender form in the landscape; it
- will be located in an area that has been identified as a landscape type suitable for accommodating wind turbine developments; it
- will be located in a landscape where other vertical features are present – pylons, telegraph poles, telecommunications masts and wind turbines; it

- will be sited relatively close to the existing group of buildings at Hey Slack Farm and will be viewed in context with these buildings and other scattered developments in the surrounding landscape. It will also be sited on a downward slope helping to reduce its presence and help mitigate visual impact; and because of its siting
- visual impact will be limited to near views; it
- will be sited in a landscape that has no special designation and is of moderate environmental sensitivity, and whose character and appearance can accommodate a development of this scale and nature; it
- will not impact on local wildlife or protected species; it
- will not affect the recreational use of local footpaths; it
- will not create a noise disturbance; it
- will not affect the historic setting of listed buildings or other heritage assets.

1.5 The main issues are:

(a) whether the proposal constitutes inappropriate development in the Green Belt and its potential effect on the openness of the Green Belt;
(b) whether the proposal will cause harm to the character and appearance of the area and effect visual amenity
(c) whether any harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations, so as to amount to very special circumstance to justify the development.

Inappropriate Development

2.1 It is accepted that the development of a wind turbine in Green Belt is deemed to be inappropriate development. PPG2 states that "inappropriate development is, by definition, harmful to the Green Belt" and it states that it is for the applicant to show why permission should be granted. In "very special circumstances to justify inappropriate development it will not exist until the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." In accordance with PPS22 very special circumstances may include the wider environmental benefits associated with the increased renewable energy production.

2.2 The proposed development comprises a small single turbine, modest in scale. It will be seen as a new vertical structure in the landscape, but its slender form will help moderate the loss of openness and it will be sited in an area where similar structures, including nearby telecommunications and pylons have already been constructed. Although there will be some effect on openness this harm will be significantly outweighed by substantial benefits which clearly demonstrate special circumstances.

Landscape & Visual Impact

3.1 Thoughtful design and careful site selection has resulted in a development proposal that on balance, optimises energy production and minimises overall environmental impact. However, the construction of a new vertical structure in Green Belt will be visible in certain views, but given its very modest scale it will not block the expansive view. It will be sited in an area of pleasant countryside that does not have a national designation and is not

protected as a special or high value landscape. The area has been identified in the recent South Pennines Landscape Capacity Study for Wind Energy Developments (2011) as an area suitable for further wind turbine development – and capable of accommodating turbines of a more significant scale, if correctly designed and sited. The proposed turbine at Hey Slack Farm is very small and has been sited close to the farm buildings. It will only be seen at near distant view because of the small visual envelope around the site which is dictated by the local terrain. It's slender frame and modest height (12m to hub) mean it will be seen in context with the farm and other scattered developments, it will be partially screened by buildings and trees; and when seen in full it will be viewed against a busy landscape containing pylons, telegraph poles, posts, buildings, masts and a mosaic of dry stone walls all helping to assimilate it into the background. Even at very close view, and seen in context with the adjacent turbine it will not dominate the landscape or block the expansive view. Furthermore, although there are other turbines in the locality and potentially two at this site, this development will not constitute cumulative impact. Given its very modest scale it cannot be judged to be 'combined visibility' (i.e. overdevelopment of several turbines on the same site); or a 'sequential effect' (i.e. one turbine after another viewed on the same route)as there is sufficient distance between neighbouring turbines and the terrain helps screen others from view. In summary, visual impact has been mitigated by careful siting and choice of turbine (see our Design and Access Statement) and in our view landscape and visual impact has been satisfactorily addressed.

Benefits

4.1 PPS22 asks Local Planning Authorities to consider that "the wider environmental an economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission."

4.2 These wider environmental and economic benefits (which include the increased production of energy from renewable sources) can also be used to demonstrate very special circumstances to clearly outweigh any harm by reason of inappropriate development which may impact on the openness of the Green Belt or have an adverse effect on a nationally designated areas such as a National Park, Area of Outstanding Beauty, Sites of Special Scientific Interest, National Nature Reserves, Heritage Coasts, Scheduled Monuments, Listed Buildings, Registered Historic Battlefields and Registered Parks and Gardens.

4.3 The wind turbine proposed for Hey Slack Farm will generate significant economic and environmental benefits and these weigh heavily in favour of our proposal. These benefits s are detailed in the attached Appendix and summarised as follows below.

4.4 Summary of Benefits

The proposed development will: -

- generate an estimated **18,000kW annually** - enough electricity to power the equivalent **of 4 average family homes**;
- provide a secure electricity supply for Hey Slack Barn and Hey Slack and reduce overall energy costs;
- help reduce carbon emissions saving **8 tonnes** of carbon every year and help the farm to become carbon neutral;
- help meet the Government's Renewable Energy Target for 2021;

- support the rural economy – a key priority of the Yorkshire and Humber Regional Economic Strategy;
- create **2.75** new jobs;
- generate income to re-invest in Hey Slack Farm: helping to manage and maintain a small farmstead, and helping to fund further improvements to the farmhouse and cottages;
- enable Hey Slack Farm to continue to maintain and manage the rural landscape, thus helping to protect the unique character and appearance of the area and encourage biodiversity.

Recent Case Law

5.1 There have been several appeals recently for small to medium turbine developments in Green Belt. I refer you to the following cases in the north of England: -

- Proposed 2 no. 11kw Gaia wind turbines (each 25m to blade tip) at Upper Prospect Farm, Nettleton Hill, Golcar, Huddersfield (Ref: APP/Z4718/A10/2138246)
- Proposed 1 no. 11kw Gaia wind turbine at Crosper Farm, Spofforth, Harrogate (APP/E2734/A/10/2131110)
- Proposed 1 no. 11kw Gaia wind turbine at Heath Lea Farm, Halifax, (APP/A4710/A/10/2127607)
- Proposed 1 no. 10Kw Evoco wind turbine at Brockland Farm, Otley, West Yorkshire (APP/E2734/A/11/2146247)
- Proposed 1 no. 10Kw Evoco wind turbine at Ings Farm, Castley, West Yorkshire (APP/E2734/A/11/2144654)

5.2 All of the Appeals noted above were upheld and in each case the Planning Inspector concluded that the environmental and economic benefits of each scheme significantly outweighed any harm to openness of the Green Belt or harm to landscape character and visual amenity.

5.3 In the case of Upper Prospect Farm where the renewable energy generated is greater than the energy needs of the farm and where the surplus is being fed into the National Grid (as in the case of our proposal for Hey Slack Farm) the Inspector agreed with the applicant that although “the proposal would be an inappropriate form of development in the Green Belt, it would not cause significant or serious harm to the surrounding countryside.” He also acknowledged that “the proposal would secure very significant benefits through the generation of electricity from a renewable resource”. He concluded that “these benefits to be a consideration that clearly outweighs any harm by reason of inappropriateness, and other harm identified.” The Inspector also stressed that electricity exported to the grid, in addition to that generated to support the farm, served to ‘magnify’ benefits and not diminish it.

5.4 At Hey Slack Farm the proposed Evance R9000 turbine will generate similar amounts of electricity to those schemes outline above**. The principle of development in this location has been established under a previous planning consent. It is clear and beyond doubt that on balance, the substantial benefits of the development proposed demonstrate special circumstances that significantly outweigh any harm, or any other harm by reason of inappropriate development. Therefore, this application should be approved.**

APPENDIX 1
ECONOMIC AND ENVIRONMENTAL BENEFITS

Renewable Energy

A1 Wind energy is an abundant natural resource. It is non-polluting, clean and sustainable. The UK has one of Europe's windiest climates and therefore wind energy is an important element in achieving the Government's international commitment to reduce greenhouse gas emissions. The UK has a commitment underpinned by the Climate Change Act 2008 to reduce carbon dioxide levels by 42% less than 1990 levels by 2020 and by 80% by 2050.

A2 The UK Government also made a commitment under The Energy White Paper (2007) that 10% of UK electricity should come from renewable energy by 2010 and 20% by 2020.

A3 PPS22 states that "increased development of renewable energy resources is vital to facilitating the delivery of the Government's commitments on both climate change and renewable energy." Furthermore it advocates that "positive planning that facilitates renewable energy developments can contribute to all four elements of the Government's sustainable development strategy:

- Social progress which recognises the needs of everyone - by contributing to the nation's energy needs, ensuring all homes are adequately and affordably heated; and providing new sources of energy in remote areas;

- Effective protection of the environment – by reductions in emissions of greenhouse gases and thereby reducing the potential for the environment to be affected by climate change;

- Prudent use of natural resources – by reducing the nation's reliance on ever diminishing supplies of fossil fuels; and,

A4 The proposed turbine at Hey Slack Farm will deliver significant benefits towards all four elements of the sustainable development strategy and as such adds significant weight to our planning application. It will contribute towards the reduction of greenhouse gases by saving approximately **8 tonnes of carbon dioxide per year** (at least 160 tonnes over twenty years) and generate an average of **18,000kWh of electricity per annum** from renewable sources reducing our reliance on fossil fuels. This is equivalent to the electricity usage of **4 family homes.** 10% net of the energy generated will be fed back to the national grid. It will contribute to the Government's renewable energy targets and help meet the regional and local targets identified in the Yorkshire and Humber Regional Spatial Strategy.

A5 In April 2011 the Renewable Energy Foundation published a report entitled Renewable Output in 2010. The report uses data provided by the Department of Energy and Climate Change and data made available as part of Ofgem's reporting of subsidy claims under the Renewable Obligation. It concludes that the UK failed to reach its 10% renewable electricity target for 2010 producing only 6.5% of electricity from renewable sources – a major shortfall of 35% and putting extreme pressure on the delivery of targets for 2021.

A6 In addition, a recent report entitled "Renewable and Low Carbon Energy Study "was commissioned by neighbouring Pennine authorities in September 2010. This report examines the capacity for renewable and low carbon energy in Burnley Borough Council, Pendle Borough Council, Rossendale Borough Council, Calderdale Metropolitan Council and Kirklees Metropolitan Council. The report concludes "that the potential for commercial wind energy development is significantly larger than any other local resource and will have to be further utilised to varying degrees if the local notional targets are to be met." It states that "two important actions arising from the study are the need to promote greater acceptance, public and political, of the need for locally generated renewable energy and the continued expansion of long term Government financial support."

A7 The study found that all five districts are well short of the notional 30% Renewable and Low Carbon targets for 2020. Taking the five districts as a whole the current generation from renewable sources is 43.73MW and needs to rise to 145.2MW to meet the 2020 target. This requires an increase of over 330%. It is anticipated that Barnsley will face a similar challenges.

A8 It is clear that fundamental change is required to bring about greater public awareness of the benefits of wind energy, political support locally for wind energy schemes and greater support and understanding from local planning authorities particularly for small scale wind developments located in areas which have low-medium sensitivity to wind developments, where the wind resource is good and where on balance potential environmental impacts can be satisfactorily addressed.

Environmental Management

A9 Farming has shaped the landscape for thousands of years and farmers and landowners provide an important stewardship role helping to protect and manage the environment. This may be at risk if farms, farmsteads, country estates and small holdings are not allowed to adapt and diversify and this includes investment in new technology, new plant and processes and new business opportunities. Investment in cheaper, cleaner energy is an important part of this process. The development of a wind turbine at Hey Slack Farm will generate new income to help maintain the fabric of the farmstead.

A10 Hey Slack Farm is a small rural landholding. The land needs to be managed, dry stone walls repaired and the farmhouse maintained. The income generated by the wind turbine will enable Mr & Mrs Lonsdale to maintain its estate and by doing so preserve and protect the unique character of the area.

A11 If agricultural and rural businesses are not able to diversify (particularly in the more marginal Pennine fringe), and allowed to fail then their management role will cease and the character and appearance of the countryside as we know it will change irrevocably forever. Viable farms and smallholdings are essential if the rural landscape is to continue to be managed; thereby protecting its distinctive character, and maintaining its condition and environmental quality.

Supporting Business and Economic Growth

A12 A Ministerial Statement entitled 'Planning for Growth' was issued by the Rt Hon Greg Clark MP on 23rd March 2011. The statement outlines the Government's proposal to reform the

planning system to promote sustainable economic growth and jobs. It introduces a strong presumption in favour of sustainable development and requires local planning authorities to plan positively for new development and to deal promptly and favourably with planning applications that comply with up to date national planning policy. When determining applications local planning authorities are obliged to have regard to all relevant considerations to support economic recovery including energy, environmental, transport and heritage consents. They should support enterprise and give appropriate weight to economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust economies (which may, where relevant, include matters such as job creation and business productivity. This statement is highly relevant to renewable energy developments.

A13 In addition the Regional Economic Strategy for Yorkshire and the Humber aims to secure a strong and diverse rural economy by promoting sustainable economic development in rural areas and drive change to support farming, rural enterprises and land based industries.

A14 The proposed development, although modest in scale, will stimulate economic growth and create jobs. A wind turbine is an essential part of Hey Slack Farm's plan to modernise and diversify the smallholding and introduce other energy efficiency measures to achieve carbon neutrality.

Job Creation

A15 The design, construction and project management of the proposed wind development will create an equivalent of **2 full time** jobs (measured as 1 job equal to 50 person weeks and calculated using the Regional Development Agency's job creation methodology). It will also help test the development of new technologies assisting the future process of research and development in the growth industry of wind turbine manufacture. A further **0.75 full time jobs** will be created over the expected 20 year lifetime of the turbine through regular maintenance and servicing contracts.