

BARNSLEY PARTNERSHIP FOR LEARNING

WIND TURBINE DEVELOPMENT AT SHAFTON

ADVANCED LEARNING CENTRE

PLANNING STATEMENT

JANUARY 2010

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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 wind turbine development at Shafton Advanced Learning Centre (ALC).
- 1.2 The proposals that this statement considers are a component part of the wider ALC construction programme. The applications should therefore be viewed in the context of the Outline Planning Permission (reference 2007/0822) and Reserved Matters Approval (reference 2009/1361).
- 1.3 This Planning Statement sets out the relevant planning policy and material considerations associated with the type of development proposed. The statement then continues to set out why the proposals are acceptable and planning permission should be granted.

The Submission

- 1.4 This application is also supported by the following technical documents:
 - Landscape and Visual Impact Assessment prepared by Anthony Walker and Partners Landscape Architects;
 - Design and Access Statement prepared by Turley Associates; and
 - Noise Assessment prepared by SRL.
- 1.5 In addition, this statement also includes the following:
 - An assessment on the potential for interference to TV and radio reception;
 - Construction impacts on the surrounding highways network.

This Document

- 1.6 In terms of the structure of this document, this statement:
 - Section 2 sets the context for the proposals;
 - Section 3 describes the application site and surrounding context;
 - Section 4 describes the proposals;

- Section 5 sets out the relevant planning policy;
- Section 6 sets out the relevant planning history;
- Section 7 introduces the material considerations;
- Section 8 assesses the proposals against the purposes of the Green Belt;
- Section 9 analyses the other material considerations and technical matters; and
- Section 10 provides a summary and conclusions.

2. Wind Turbines and BSF in Barnsley

- 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 strategy 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 (together with condition and suitability issues), the complete reorganisation of the secondary school stock resulting in the creation of a smaller number of new ALC's is the most appropriate solution and this is to be delivered through the BSF programme. As 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.

3. Site Description and Context

- 3.1 The application site boundary for the proposals is shown outlined in red on plan reference BP4L_SHA_AWP_DR_94_BW_LL_14 PL01. However it should be noted that this is a component part of a wider site where construction for a new ALC has been approved. However the area where construction of the wind turbines is to take place makes up part of the approved playing field provision.
- 3.2 The site is designated as being within the Green Belt under saved UDP Policy PE5.
- 3.3 In addition, the Education Sites DPD identifies new sites for schools, including the site at Shafton. In accordance with the Outline and Reserved Matters Approval, the school buildings should be located towards the north of the site with playing fields and open space being situated in the southern portion of the site. The proposed wind turbines will sit at the southern end of the site, within the area identified for playing fields and open space.

Shafton ALC Site

- 3.4 The site lies to the south of the main urban area of Shafton and is wholly within the Green Belt, as defined by saved UDP Policy PE5.
- 3.5 The site is currently farmland but has Outline Planning (reference 2007/0822) and Reserved Matters Approval (reference 2009/1361) for a new Advanced Learning Centre however development has not yet commenced on site.
- 3.6 The school site extends to 11.17 hectares, 2.5 hectares of which is for the buildings and access, and the remaining 8.67 is for playing fields and open space.

Wind Turbine Location

- 3.7 The proposed wind turbines lie wholly within the curtilage of Shafton ALC.
- 3.8 The turbines will be located on the southern boundary of the ALC site, beyond the playing pitches. The school buildings lie approximately 300 metres to the north of the proposed turbines.
- 3.9 The nearest residential property is Hazeldene Farm which lies approximately 220 metres to the north of the turbines.

Surroundings

- 3.10 The wider site is bound by Engine Lane and Hazeldene Farm to the east, Collier Road to the north and further green fields to the south and west.
- 3.11 Collier Road, which lies to the north of the site, is the main A628 which links the site with the urban areas of Shafon to the north and Cudworth to the west, whilst Engine Lane links the site to Grimethorpe which lies to the south east.
- 3.12 The eastern boundary of the wider site wraps around Hazeldene Farm which comprises a farmhouse and some outbuildings.

4. The Proposals

- 4.1 The proposals are to construct 3 wind turbines at a hub height of 25 metres at locations identified on plan reference BP4L_SHA_AWP_DR_94_BW_LL_14 PL01. Associated with this is a GRP structure as an ancillary adjunct to the turbines.
- 4.2 The purpose of the wind turbines is to help secure a source of energy supply to meet a proportion of the energy usage for the ALC from renewable sources of energy. The proposed turbine model is the Proven 15 with a power output of 15Kw each.
- 4.3 Part of the brief for the 3 schools brought forward under phase 2 of the BSF programme is to make provision for a proportion of the energy consumed by the schemes to come from on site renewable sources. The site circumstances surrounding the other 2 schools at Springwell and Greenacre means that it was not possible to site turbines of a sufficient power output to meet 10% of their energy usage. Primarily this is due to the proximity of residential properties and potential amenity impacts. Therefore wind turbines of a lower power output were selected for those sites, with compensatory provision being made to make up the deficit at Shafton, through the provision of 3 turbines at this location.
- 4.4 The location of the wind turbines have been determined following consideration of the acoustic impacts on the surrounding residential properties.
- 4.5 Wind turbines were considered to be the most appropriate source of renewable energy as it is the most financially viable source which takes advantage of the local climate and will therefore be the most effective source of renewable energy.
- 4.6 In line with the requirements of Circular 2/99, a screening letter on the need for an Environmental Impact Assessment (EIA) of the proposals, is included as part of this planning application package. We consider that whilst the proposals are Schedule 2 development, it is not EIA development.

5. Relevant Planning Policy

Statutory Context

- 5.1 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.
- 5.2 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).
- 5.3 Other documents which should be afforded appropriate material weight in the determination of the planning application include:
- Planning Policy Statement 1: Delivering Sustainable Development (2005);
 - Supplement to Planning Policy Statement 1: Planning and Climate Change (2007);
 - Planning Policy Guidance 2: Green Belts (1995/2001);
 - Planning Policy Statement 22: Renewable Energy (PPS22);
 - Barnsley Metropolitan Borough Council Local Development Framework (LDF).

National Planning Policy

PPS1: Creating Sustainable Communities (2005)

- 5.4 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.
- 5.5 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.

- 5.6 A second key feature of PPS1 is the promotion of good design in new development. It affirms that good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development.
- 5.7 Key policies contained in the Guidance include support for sustainable economic growth, creating linkages between places, greater accessibility to local facilities and services and the re-use of previously developed land.
- 5.8 The prudent use of resources is another key principle of PPS1. This requires using resources efficiently, in a form that respects the needs of future generations. 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.

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

- 5.9 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.
- 5.10 Consideration of the environmental performance of a proposed development, particularly the climate that the development is expected to experience over its projected lifetime, is encouraged as a key part of the planning process.
- 5.11 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.
- 5.12 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'.*
- 5.13 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)

5.14 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 plans.

5.15 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.

5.16 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.

5.17 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.

- 5.18 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.'

- 5.19 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.

PPS22: Renewable Energy (2004)

- 5.20 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.
- 5.21 The guidance states that regional and local planning bodies should contain policies designed to promote and encourage the development of renewable energy sources. 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.
- 5.22 Paragraph 8 allows local planning authorities to include policies in their plans which require a percentage of the energy to be used in new residential, commercial or industrial developments to be derived from on-site renewable energy sources. To ensure viability, such policies should ensure that the requirement to generate on-site renewable energy is only 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.
- 5.23 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 may comprise inappropriate development, which 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. PPS22 recognises however that justification is possible by virtue of reference to the wider environmental benefits associated with the increased production of energy from renewable sources.

- 5.24 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.
- 5.25 Paragraphs 19 and 20 relate to the impacts upon landscape and visual amenity and ambient noise levels derived from renewable energy developments. 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)

- 5.26 The Companion Guide to PPS22 sets out practical advice as to how the renewable energy policies set out in PPS22 can be implemented in practise.
- 5.27 The Companion Guide requires that where a renewable energy proposal is promoted, it should be demonstrated that the project:
- 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;
 - Addresses the issue of visual impact, and cumulative visual impact, where appropriate.
- 5.28 Technical Annex 8 of the Companion Guide provides specific 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

- 5.29 The RSS for Yorkshire and the Humber was published in May 2008 and replaces the 'Regional Spatial Strategy for Yorkshire & Humber to 2016' which was issued in December 2004.
- 5.30 The Plan sets out the broad development strategy for the Region and covers topics including housing, economic development, transport, the environment and regeneration.
- 5.31 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 1000m², 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.
- 5.32 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 UDP

- 5.33 The Barnsley Metropolitan Borough Council Unitary Development Plan (UDP) (2000) constitutes 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.
- 5.34 The site is allocated under Policy PE5 as Green Belt land and under Policy PE20 as an existing community facility.
- 5.35 Policy PE5 defines the extent of the Green Belt around the settlement of Penistone. 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*.

- 5.36 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.
- 5.37 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.
- 5.38 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.
- 5.39 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

- 5.40 In accordance with the requirements of the Planning and Compulsory Purchase Act (2004), the Council is currently preparing its Local Development Framework (LDF).
- 5.41 The Core Strategy will constitute the key Development Plan Document, which will sets out the proposed policies, spatial options and strategic objectives for the future development of the Barnsley Borough to 2026.
- 5.42 The Core Strategy Preferred Options document was published in October 2005. This was updated by the Core Strategy Revised Preferred Options, published in June 2009.
- 5.43 The Revised Preferred Options document sets out strategic options; 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, whilst Strategic Objective 8 seeks to minimise energy consumption and to support renewable energy facilities in the Borough.
- 5.44 Draft Policies CSP38 and CSP45 supports Strategic Objectives 6 and 8 by promoting efficient and prudent use of resources in new developments, including reduced energy consumption and promotion of sources that utilise renewable energy.
- 5.45 Draft Policy CSP48 further promotes the use of renewable sources of energy, stating that:

'All development (either new build or extension) of 10 or more dwellings or exceeding 1000 sq m of non-residential floorspace must provide a minimum of 10% of predicted energy needs from decentralised, renewable and low carbon energy sources'.

The Policy states further, that where it is not appropriate to incorporate such provisions within a development, an off-site contribution may be required.

- 5.46 Draft Policy CSP49 specifies however that proposals for renewable energy will only be permitted where there is no detrimental impact upon the character of the landscape and appearance of the area, residential amenity, biodiversity and any historical and cultural features.

- 5.47 In terms of Green Belt policy, Draft Policy CSP41 requires that the extent of the Green Belt is retained. New development should not conflict with the purposes of the Green Belt or have a negative effect upon its openness or appearance. Acceptable uses for development in the Green Belt are aligned with PPG2 and UDP Policy GS8. However, one such acceptable use is specified as: *'Renewable energy schemes including wind farms'*.

Barnsley Education Sites DPD

- 5.48 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.
- 5.49 The DPD sets out the Council's intention to create nine advanced learning centres in the borough, to replace the thirteen existing secondary schools.
- 5.50 The DPD outlines that for each advanced-learning centre which requires a new site a number of options for new sites were identified and consulted upon throughout the Barnsley Education Sites Issues and Options document. The sites were then selected following the preferred options consultation.
- 5.51 Policy EDS1 relates to the Council's intention to build three of the replacement schools on new sites. This includes reference to *'11.17 hectares of land west of Engine Lane in Shafton'*.
- 5.52 Key issues associated with the development of the Shafton education site as identified by the Education Sites DPD, include reducing the effect of development upon the Green Belt and residential amenity.
- 5.53 The DPD refers to the development of new education centres in the green belt. The Council has partly reviewed the boundary of the green belt in preparing the local development framework. Paragraph 4.10 states that there are *'very special circumstances'* which justify using green belt land to provide the education centres and to allow the Building Schools for the Future programme to go ahead.
- 5.54 The DPD identifies new sites for schools, including the site at Shafton. In accordance with the Outline and Reserved Matters Approval, the school buildings should be located towards the north of the site with playing fields and open space being situated in the southern portion of the site. The proposed wind turbines will sit at the southern end of the site, within the area identified for playing fields and open space.

6. Relevant Planning History

6.1 Table 5.1 outlines the planning history of relevance to the site and the application proposal.

Application Number	Proposal	Decision	Decision Date
2009/1260	Variation of condition 12 of previously approved planning application 2007/0822	Approved	16/12/2009
2009/1361	Erection of an advanced learning centre, car parking, new access, formation of sports pitches and other ancillary facilities (Reserved Matters)	Approved	12/01/2010
2007/0822	Development of Advanced Learning Centre (Outline).	Approved	28/08/2007

Table 5.1: Planning History

6.2 Correspondence with Barnsley Council planning officer Matthew Woodward in December 2009, confirmed that no applications for wind turbines have historically been submitted on the site.

7. Material Considerations

- 7.1 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'

- 7.2 The key material planning considerations raised by the proposed wind turbines at Shafton ALC 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 / ornithology;
- Impact of the wind turbines surrounding footpaths / highways;
- Impact of construction on the highway;
- Television / telecommunications interference; and
- Impact on Air Safety.

- 7.3 These are discussed in more detail in the following two sections.

8. Green Belt Assessment

- 8.1 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).
- 8.2 The centre 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

- 8.3 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.
- 8.4 PPS22 also suggests that:
- 'Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.'*
- 8.5 It is therefore considered that the very special circumstances in this case are the wider environmental benefits of the proposals.
- 8.6 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.

- 8.7 The development of 3 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 is 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.
- 8.8 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 objective.
- 8.9 The provision of 3 turbines at Shafton ALC will meet this overriding objective and consequently this represents the very special circumstances that justify the proposals within the Green Belt. The development will therefore meet wider planning policy objectives, most notably RSS policy ENV5. 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

- 8.10 *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.*
- 8.11 Whilst it is acknowledged that the proposed wind turbines will constitute an increase in 'built form' in the Green Belt, the proposed development does lie wholly within the land associated with the grounds of the Shafton ALC.

Impact on the Purposes of Including Land within the Green Belt

- 8.12 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 fulfils 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 the curtilage of Shafton ALC.

ii) To prevent neighbouring towns from merging into one another

The Green Belt in this location performs this function in relation to preventing coalescence between Shafton and surrounding urban areas. As the proposed wind turbines will be wholly within the curtilage of the ALC, there will be no adverse impact on this function of the Green Belt in this location.

iii) To assist in safeguarding the countryside from encroachment

The Green Belt fulfils 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 Shafton 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.

8.13 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 chapter 6 of this statement and above. As demonstrated above, it is not considered that the proposed development would not undermine any of those objectives. It can therefore be concluded that the proposed wind turbines will not prevent the functions of the Green Belt being fulfilled in this location.

9. Other Material Considerations and Technical Matters

- 9.1 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

- 9.2 National, regional and local planning policy supports the development of renewable sources of energy to support sustainable development objectives.
- 9.3 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.
- 9.4 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.
- 9.5 Policy ENV5 of the RSS requires developers to increase renewable energy capacity and energy efficiency in all developments and states that 10% of energy should be from decentralised and renewable or low carbon sources.
- 9.6 This is also reflected in emerging policy. Strategic Objective 8 of the Core Strategy Preferred Options seeks to minimise energy consumption and supports the development of renewable energy sources. Draft Core Strategy Policy CSP48 seeks the provision of a minimum of 10% of the energy requirements of all new developments to be provided from decentralised, renewable or low carbon sources.

- 9.7 Wind turbines were considered to be the most appropriate source of renewable energy in this location as they will take advantage of the local climatic conditions and will be the most financially viable source.
- 9.8 The development of wind turbines in this location is therefore considered to be acceptable.
- 9.9 In summary, the wind turbines are considered to be ancillary to Shafton ALC and are the most appropriate source of renewable energy in this location. The development will ensure the ALC will adhere to the requirements of the statutory development plan and national planning policy. The principle of the development of wind turbines in this location is therefore considered to be acceptable.

Landscape and Visual Impact

- 9.10 In terms of landscape and visual impact, the photomontages submitted with the application show that *in terms of impact views of the turbines from the north, south and east will be limited, when looked at from the agreed viewpoints (please refer to accompanying photomontages).*
- 9.11 As previously mentioned, the location of the wind turbines has been chosen to as to provide sufficient distance from residential properties whilst maintaining operational efficiencies. Therefore, the proposed location is considered to be the most appropriate.
- 9.12 The accompanying Landscape and Visual Impact Assessment provides more detail on this. *However it is considered that the proposal is acceptable.*
- 9.13 In summary, the Landscape and Visual Impact Assessment concludes that:
- The turbines will be visible from the public footpath to the west of the site and Engine Lane to the east of the site;
 - The wind turbines will not be seen in isolation but in the same context as the ALC;
 - From the majority of the surrounding properties and other locations, the turbines will be obscured by vegetation and buildings; and
 - Few properties will have direct views of the turbines.

Noise

- 9.14 The detailed noise report has been prepared by SRL and has been submitted as part of this application package.
- 9.15 The 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.
- 9.16 The location of the wind turbines within the ALC site has been carefully considered to ensure that the surrounding residential properties experience minimal disturbance.

Shadow flicker

- 9.17 *The Companion Guide to PPS 22 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."

- 9.18 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.
- 9.19 In terms of assessment it should be noted that when determining the location of the proposed turbines at Shafton that are now being applied for, the turbines are located at least 200 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.

- 9.20 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.

Ecology/Ornithology

- 9.21 The application site does not contain designated sites of ecological importance nor are they located within 3 kilometres of such a site. There is, therefore, no impact on issues of acknowledged ecological importance.
- 9.22 The proposals are a necessary adjunct to the wider construction of the ALC and construction impacts upon ecology are considered below. Nonetheless these matters will have been considered when planning permission was granted and will not differ as a result of construction of the turbines.

Surrounding footpaths/highways

- 9.23 In terms of surrounding public rights of way and highways, the nearest footpath/bridleway is some 150 metres from the closest turbine to the west whilst the nearest highway is some 90 metres to the east. In terms of potential effects on safety for users of the surrounding the distance of the turbine exceeds the fall over distance of the turbine. Therefore in the event of a catastrophic failure/collapse of the turbine.

Construction effects on highways

- 9.24 In terms of the effects of construction on surrounding highways, it should be noted that at Shafton ALC, construction of the ALC and wind turbines will be undertaken in the same build cycle. As this is the case, there will be in place infrastructure to enable access to the site as part of the wider construction programme.
- 9.25 This is to be agreed by the Council as part of the discharge of conditions attached to planning permission 2007/0822. In this regard. 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 1.

TV/Telecommunications interference

- 9.26 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 up to 652 receptors to be affected where there is no alternative off air service and a further 10846 homes where an alternative off-air service may be available.
- 9.27 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.
- 9.28 When compared to commercial wind farms, the proposals are modest in scale and operation and the issue in hand clearly relates to establishing mechanisms for mitigating impact should it be proven to occur as a result of construction of the turbines. As this is the case, and accepting the potential for an impact, we are prepared to accept a planning condition to a planning permission in this regard.

Air Safety

- 9.29 These proposals are for a small scale wind farm which does not lie in close proximity to any airfield. It is therefore considered that the proposals are unlikely to interfere with aviation radar.

10. Conclusions

- 10.1 This Planning Statement has been prepared to support the Planning Application for 3 wind turbines at Shafon ALC to provide a proportion of the schools energy requirements.
- 10.2 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. Therefore, the proposed wind turbines will satisfy some of this need.
- 10.3 The application proposal is to provide 3 wind turbines at Shafon ALC. This planning statement has demonstrated that the redevelopment proposals will:
- 10.4 Therefore, although constituting inappropriate development in Green Belt policy terms, the proposals are justified and acceptable having regard to the very special circumstances which exist in this case. Moreover, it is considered that the development would not harm the functions of the Green Belt in this location.
- 10.5 Also, there are no technical constraints on the proposed development in this location.
- 10.6 It is therefore considered that the proposal is fully compliant with national guidance and all of the relevant planning policy objectives of the development plan and local guidance, and that planning consent should be granted for this important and extremely beneficial development. Therefore, we respectfully request that the application be permitted.

Appendix 1 – Construction Impacts Methodology

From: Mills, Peter <pmills@laingorourke.com>
To: Matthew Collins
Cc: Mills, Peter <pmills@laingorourke.com>
Sent: Wed Dec 02 08:49:39 2009
Subject: method statement for installation of wind turbines

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 2 – TV / Radio Interference Search

The BBC Windfarms Tool Your query results.
From: Windfarms [Windfarm.Tool@bbc.co.uk]
Sent: 20 January 2010 17:47
To: Matthew Collins
Subject: [The BBC Windfarms Tool] Your query results.

If you were to place turbines in the following locations:

SE397098

You would be likely to affect 652 homes for whom there is no alternative off-air service.

In addition, you may affect up to 10846 homes for whom there may be an alternative off-air service.

The transmitters likely to be affected are:

EMLEY MOOR CH5
SHEFFIELD CH5
BELMONT
BILSDALE
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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