

Park Spring Wind Farm

Planning Statement

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Planning Statement

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1 INTRODUCTION

1.1.1 This Planning Statement has been prepared to accompany the planning application made for the proposed Park Spring Wind Farm, Little Houghton, Barnsley.

1.1.2 The Planning Statement is submitted in support of the planning application to Barnsley Metropolitan Borough Council (BMBC) made under the Town and Country Planning Act 1990, as amended. The application is accompanied by an Environmental Statement submitted in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The Environmental Statement has been prepared following the issue of a Scoping Opinion by BMBC on the 14th September 2011 which confirmed the impacts to be addressed in the Environmental Statement (ES).

1.1.3 The proposal is for a wind farm to the east of Park Spring Road (A6195), Little Houghton, Barnsley to be known as Park Spring Wind Farm. The proposed development comprises three turbines and associated infrastructure, each turbine with an anticipated rated installed generating capacity of 2 MW each and a total height to tip of up to 126.5 m.

1.1.4 This statement, along with other supporting documents, presents an assessment which considers the acceptability of the proposed Park Spring Wind Farm development in light of relevant national, regional and local policies and other material planning considerations. It is intended to assist BMBC in its consideration of the merits of the application and also assist those persons interested in the application in understanding the planning context and the reasons why the proposals has been designed to fit that context.

1.1.5 When making a determination under the Planning Acts decision making authorities must have regard to Section 38 (6) of the Planning and Compulsory Purchase Act 2004 which states: *If regard is to be had to the plan for the purpose 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.*"

1.1.6 The Planning Statement sets out the relevant planning policies under which the application is to be determined and outlines the reasons why the proposals are in accordance with the statutory development plan context.

1.2 The Applicant

1.2.1 EDF Energy Renewables (EDF ER) is a renewable development company, jointly owned by EDF Energy plc (EDF Energy) and EDF Energies Nouvelles SA (EDF EN). EDF ER is the main vehicle for developing and operating wind farm projects within the UK on behalf of EDF EN and EDF Energy, and has a combined UK renewable portfolio of over 600 MW comprising projects that are either operational, in construction or consented plus a large portfolio of projects in development. Currently, EDF ER has over 300 MW of operational wind farm assets in the UK, comprising 21 wind farms.

1.2.2 EDF Energy is a leading vertically integrated energy company in the UK supplying energy to 5.5 million customer accounts, generating approximately 25% of national electricity consumption.

- 1.2.3 EDF EN is a global player in the renewable industry having interests across Europe and North America. Worldwide, EDF EN had 3,251 MW of installed wind capacity as at June 2012, with approximately 1,678 MW of capacity in operation in Europe alone. In all technologies, current gross installed capacity worldwide is 4,125 MW with 1,782 MW capacity under construction.

1.3 The Proposal

- 1.3.1 The proposed development site lies approximately 750 m west of the settlement of Great Houghton, 1 km south of Grimethorpe, 1 km north of Little Houghton and 1.5 km north east of Darfield. Further afield, the town of Barnsley is located approximately 6.5 km to the west.

- 1.3.2 The site is located to the east of Park Spring Road (A6195) and comprises undulating, mixed-use agricultural land, small areas of woodland and includes areas of restored open cast workings. The planning application site boundary is shown on Figures 1.1 and 1.2 in the associated Planning Forms Volume of the accompanying ES.

- 1.3.3 The Park Spring Wind Farm will comprise three turbines and associated infrastructure, each turbine with an anticipated rated installed generating capacity of 2 MW and a total height to tip of up to 126.5 m. The Development therefore includes the installation of three wind turbines of approximately 6 MW installed generating capacity in total, together with associated infrastructure.

- 1.3.4 Full details of the proposal are provided in Chapter 3 of the accompanying Environmental Statement.

1.4 Statutory Requirements

Determining Planning Applications

- 1.4.2 The proposed Park Spring Wind Farm has an expected installed generating capacity of 6 MW and therefore stands to be determined under section 70(2) of the Town and Country Planning Act 1990. The determining authority in this case is BMBC, as the local planning authority (LPA).

Environmental Impact Assessment

- 1.4.3 Given the size of the proposed wind farm at Park Spring, the applicant has recognised that an EIA would be needed. It was also recognised that a structured EIA can play an important role in informing the wind farm design, helping to minimise any adverse environmental impacts and capitalise on positive environmental effects of the development. An EIA has therefore been undertaken in accordance with the Town and County Planning (Environmental Impact Assessment) Regulations 2011 ("the EIA Regulations") to identify and assess the proposed development's likely significant environmental effects and appraise inherent and proposed mitigation measures. The ES that accompanies the planning application contains the findings of this assessment and should be read in conjunction with this Planning Statement and other application documents as appropriate.

2 DEVELOPMENT JUSTIFICATION

2.1 Introduction

2.1.1 In 2007 the most recent conclusions of the Intergovernmental Panel on Climate Change (IPCC) were published. The IPCC concluded that there is now no longer any doubt that climate change is real, serious and is being caused to a significant degree by human activities, particularly the burning of fossil fuels. Even if the causes of climate change are successfully stabilised, global warming and sea level rises as a result of human activity would continue for centuries into the future. Carbon dioxide is identified as being the most important of the greenhouse gases which are being produced by human activity and contributing to climate change. According to the IPCC, stabilising carbon dioxide concentrations of 450 parts per million (PPM) (that is 85 ppm above 2007 levels and 170 ppm above pre-industrial levels) in the long term would require the reduction of emissions worldwide to below 1990 levels within a few decades.

2.1.2 Renewable resources are defined as those which are not based on finite reserves stored within the earth. Renewable energy resources occur naturally and repeatedly in the environment and include sunlight, wind, hydro, geothermal, waves and tides. One of the main advantages of renewable energy supplies over conventional fossil fuels is that during the generation of energy from them virtually no carbon dioxide or other air pollutants are created and as such, do not contribute to either global climate change or local air pollution.

2.1.3 The energy of the wind has been harnessed for centuries. Since the energy crises of the mid-1970s the use of wind turbines to generate electricity has expanded rapidly and it is currently the fastest growing renewable energy resource. Wind power produces minimal waste or emissions to air and does not contribute to global climate change in its operation.

2.1.4 The impacts of climate change with the international and national energy policy response is a key material consideration. Energy policy has shifted considerably since the 1990s primarily in recognition of the strategic issues of climate change and security of supply. This section outlines the extant climate change and energy policy for the EU and UK and the contribution to renewable energy generation that the proposed Park Spring Wind Farm will make.

2.2 Climate Change and Energy Policy Context

European Policy and Legislative Context

2.2.2 The direction of UK policy on renewable energy is guided by its commitments to International and European climate change instruments. The UK Government is a signatory to the convention of the Intergovernmental Negotiating Committee on Climate Change that was signed at the UN Conference on Environmental Development, The Earth Summit in Rio de Janeiro in June 1992. This commits developed countries to formulating policies and measures *“with the aim of returning individually or jointly to their 1990 levels of anthropogenic emissions of carbon dioxide and other greenhouse gases not controlled by the Montreal Protocol”*.

2.2.3 Commitments at the Earth Summit were not legally binding on the signatories. However, at the Third Conference of the Parties to the Convention on Climate Change in Kyoto in December 1997 a protocol was adopted which set binding targets on industrial nations to reduce their emissions of six greenhouse gases to 5.2% below

1990 levels over the period 2008-2012. The Member States of the EU jointly agreed to exceed this commitment by requiring a reduction in greenhouse gas levels of 8% over 1990 levels by this period. The contribution to this target differs for each Member State.

2.2.4 The UK accepted a legally binding target of 12.5% reduction in these greenhouse gases over 1990 levels within the time period. Following these binding agreements, the EU Environmental Council agreed a list of priority measures to help Member States achieve their individual contributions to the overall target. Promotion of renewable energy was highlighted as one of the principal means to achieve these targets.

2.2.5 The Kyoto Protocol's first commitment period ended in 2012. In Doha, 2012, the Doha Amendment to the Kyoto Protocol was adopted. The amendment extends the Kyoto Protocol for a second commitment period (2012-2020). During the second commitment period, Parties committed to reduce green house gas emissions by at least 18 % below 1990 levels in the eight-year period from 2013 to 2020.

2.2.6 In spring 2007 the EU heads of Government agreed to a binding target of 20% of the EU's energy consumption to come from renewable sources by 2020. Each Member State has therefore agreed to a binding target ranging from 10% to 49%. The UK has agreed to a target of 15% of the country's energy consumption to come from renewable sources by 2020. The UK's target represents one of the biggest step changes for any Member States (From 2005 levels) as the UK has relatively low levels of renewable energy generation.

2.3 National Policy and Legislative

2.3.1 The UK Government is committed to tackling climate change. This commitment has been formalised through various pieces of legislation and policy documents (summarised below); all of which promote the generation of electricity from renewable sources with the overall objective being to tackle climate change by reducing carbon dioxide emissions.

2.3.2 Increased renewable energy production is driven by legally-binding targets and in order to meet these targets, it is necessary to permit the development of the infrastructure required to generate renewable energy. The need for wind farm developments such as the proposed Park Spring Wind Farm is therefore established within national legislation and policy on tackling climate change.

Climate Change Act 2008

2.3.3 The Climate Change Act 2008 was passed in November 2008. It places a legal duty upon the UK Government to ensure that the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline, with an interim target of 26% by 2020. This will be achieved through a series of five yearly carbon budgets.

UK Low Carbon Transition Plan (2009)

2.3.4 The UK Low Carbon Transition Plan 2009 sets out a number of key steps which need to be taken in order to reach the UK's low carbon objectives. These include an intention to produce 30% of the UK's electricity by renewable means by 2020. The Plan recognises that the action which the UK Government is taking to cut emissions is also good for the nation's security of supply.

- 2.3.5 Electricity generation from renewable sources increased by around one fifth between 2011 and 2012 to reach 41.2 TWh, representing a contribution to total UK electricity generation of 11.3%. Capacity grew by a similar proportion (to 12.3 GW) over the same period. However, when using normalised load factors to take account of fluctuations in wind and hydro, the contribution of renewables to gross electricity consumption increased from 8.7% to 10.7% only¹.

UK Renewable Energy Strategy (2009)

- 2.3.6 Published in parallel with the Low Carbon Transition Plan, this strategy sets out the path to be taken in order for the UK to meet its legally binding EU target of 15% renewable energy generation by 2020, recognising that it would involve an almost five-fold increase in the share of renewables in just over a decade.

- 2.3.7 The strategy estimates that a total of 14 GW of installed onshore wind generation will be needed by 2020. However, by the end of 2012, only 5.89 GW was installed¹. At that time a 238% increase in onshore wind capacity over the next 8 years would therefore be required to meet the Strategy targets from 2011.

UK National Renewable Energy Action Plan (2010)

- 2.3.8 The Coalition Government published its submission to the European Commission setting out how the UK plans to meet its legally binding 15% renewable energy target as required by the EU Renewable Energy Directive. The UK Action Plan retains much existing policy, but suggests policy changes informed by an in-depth analysis of the 2009 UK Renewable Energy Strategy.

Planning Our Electric Future: A White Paper for Secure, Affordable and Low Carbon Electricity (2011)

- 2.3.9 The White Paper recognises the challenges facing a nation's electricity markets which are security of supply and decarbonisation matched against the decommissioning of existing plant and anticipated rise in electricity prices. In his forward, the Secretary of States speaks of the need for a huge investment in renewables, together with nuclear and in time gas and coal with carbon capture, restating the Coalition Government's aim to meet the 15% renewables target by 2020.

UK Renewable Energy Road Map (2011)

- 2.3.10 In tandem with the White Paper, the UK Government published the Renewable Energy Road Map in July 2011. Paragraph 3.21 recognised that communities may be concerned about the possible impacts of wind farms on landscape and local amenity. It states that this has led to a situation where many developments are approved on appeal and recognises that these concerns are increasing cost delay or risk revenue, and could deter developers from making applications in the first place or lead them to drop applications if initially rejected. It states that such concerns are risking both the onshore wind projects currently awaiting determination in the UK as well as those projects which have not yet come forward.

¹ Department of Energy and Climate Change (2013) Digest of UK Energy Statistics, available from <https://www.gov.uk/government/organisations/department-of-energy-climate-change/series/renewables-statistics> (Accessed July 2013).

Energy Act 2011

- 2.3.11 The Energy Act 2011 provides for some of the key elements of the Government's energy programme and including a step change in the provision of energy efficiency measures to homes and businesses. It also makes improvements to the framework for enabling and securing low carbon energy supplies and fair competition in the energy markets.

The Carbon Plan: Delivering Our Low Carbon Future (2011)

- 2.3.12 The Carbon Plan sets out how the UK will achieve decarbonisation within the framework of energy policy: to make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households.
- 2.3.13 It reaffirms the commitment to dramatically increase the amount of renewable electricity generation in the UK and states that the Government's immediate focus for renewables is on delivery, tackling the common barriers to deployment across all low carbon technologies. Looking to the fourth carbon budget period and beyond, the Plan sets out that renewable electricity (particularly onshore and offshore wind) has the potential to provide over 40% of power generation by 2030.

Energy Bill (2012)

- 2.3.14 In November 2012, the Secretary of State for Energy and Climate Change confirmed the introduction of the Energy Bill to the House of Commons. The Bill includes provision on, amongst other elements, electricity market reform designed to attract the £110 billion investment which is needed to replace current generating capacity and upgrade the grid by 2020, and to cope with a rising demand for electricity. The intent is to encourage low carbon electricity generation and ensuring security of supply.

The UK Renewable Energy Road Map Update 2012

- 2.3.15 This document was published in December 2012, it states:
- 'Whilst this Renewable Energy Roadmap focuses on reaching our 2020 targets, it is clear that renewables will have a pivotal role to play in the UK energy mix in the decades beyond.'* (para 1.3)
- 2.3.16 In respect of development of renewable energy to 2020 para 2.5 states:-
- 'It remains true, as stated in the Overarching National Policy Statement for Energy, that there is an urgent need for new large-scale renewable energy projects to ensure that we meet the 2020 target and wider decarbonisation ambitions.'*
- 2.3.17 Para 2.10 states:-
- 'Last year's Roadmap suggested that we could see up to around 13GW of onshore wind capacity by 2020. Since last year we have had an increase of 1.3GW in operational capacity (between January 2011 and end of June 2012) and the onshore wind pipeline holds an additional 6.1GW of projects awaiting or under construction as well as 7GW awaiting planning approval. The current pipeline is likely to have the potential to provide the appropriate quantity of deployment to fulfil our ambition outlined last year. However, we cannot be certain how much of the capacity in the*

pipeline projects will go forward as not everything in the pipeline will be consented and not everything consented will be built.'

- 2.3.18 The Update refers to "onshore wind" at page 36. The following is considered of relevance to the determination of the Park Spring Wind Farm application:

'The UK has some of the best wind resources in Europe, and onshore wind is one of the most cost-effective large-scale renewable energy technologies. The Government is committed to onshore wind as part of a diverse energy mix contributing to our security of supply and carbon reduction targets. Between July 2011 and end of June 2012, onshore wind deployment has increased by over 1GW to a total installed capacity over 5.3GW.

Onshore wind provides substantial economic benefits. In 2011 onshore wind supported more than 8,600 jobs contributing over £500 million to the UK economy. By 2020 there could be around 11,600 direct and supply chain jobs rising to around 15,500 total jobs if wider quantifiable impacts are taken into account.

The Government is seeking to remove barriers to the development of appropriately-sited projects, while giving local communities more influence.

Results of the DECC Public Attitudes Tracking Survey show that the majority of the public support the growth of onshore wind in the UK. With this in mind, the Government is sympathetic to the concerns of communities about developments in their areas'.

2.4 The Contribution of Park Spring Wind Farm to Renewable Energy Generation

- 2.4.1 The proposed Park Spring Wind Farm will have an anticipated installed generating capacity of 6 MW, based on the candidate turbine for the site.

Energy Generation

- 2.4.2 In order to quantify the amount of renewable energy generation, and the associated offset of emissions, that would be produced by the Park Spring Wind Farm, it is necessary to calculate the amount of the electricity the wind farm is expected to produce in a typical year. For the purpose of this assessment, the calculations have been based upon a 2 MW candidate turbine.

- 2.4.3 The annual electricity production of Park Spring Wind Farm is estimated from:

= Project rated capacity (kW) x Number of Hours in Year x Capacity Factor

- 2.4.4 A capacity factor (the equivalent percentage time each year that the wind turbine would operate at full load) of 25.9 % has been used to estimate the annual electricity production (based on an average 2008 - 2012 load factor for onshore wind in the UK, DUKES 2013²).

- 2.4.5 Annual electricity production at Park Spring Wind Farm is expected to be approximately equal to:

- 2.4.6 6000 (rated capacity) x 8760 (number of hours in a year) x 0.259 (capacity factor)

² Department of Energy and Climate Change (2013) Digest of UK Energy Statistics, available from <https://www.gov.uk/government/organisations/department-of-energy-climate-change/series/renewables-statistics> (Accessed July 2013).

- 2.4.7 Therefore, for the Park Spring Wind Farm, which is expected to have an output of 6 MW, the total annual electricity production would be approximately 13,613,040 kWh (or 13,613 MWh)
- 2.4.8 Based on DECC's 2005 - 2011 average annual domestic consumption of 4266 kWh³, it can be calculated that the wind farm will provide approximately 3191 households with renewable energy annually.
- 2.4.9 The population of the towns and villages within 2 km of the site boundary are summarised below:
- Great Houghton (~1,130 homes).
 - Little Houghton (~50 homes).
 - Billingley (~85 homes).
 - Darfield (~ 4,100 homes).
 - Grimethorpe (~2,100 homes).
 - Other isolated residential properties in the surrounding 2 km area (~50 homes).
- 2.4.10 The output of the wind farm is anticipated to meet the approximate equivalent needs of the total domestic energy consumption of residential properties in Great Houghton and Grimethorpe. Alternatively, the output of the wind farm provide the equivalent of approximately 42 per cent of the total domestic energy needs of the town, villages and isolated residential properties within 2 km of the site (amounting to ~7,500 homes).

Carbon Savings

- 2.4.11 Nationally and globally, a significant benefit of the use of wind power rather than fossil fuels is the reduction of emissions of environmentally harmful gases. These benefits are associated with the prevention of emissions of:
- Carbon dioxide, the main greenhouse gas.
 - The acid gases.
 - Local air quality pollutants.
 - Sulphur dioxide.
 - Oxides of nitrogen.
 - Particulate matter.
 - Volatile Organic Compounds (VOCs).
- 2.4.12 The quantity of carbon dioxide emissions that the Park Spring Wind Farm would prevent being emitted from non-renewable sources has been calculated using the RenewableUK methodology⁴, which uses the DECC carbon saving figure of 430 g/kWh.

³ <https://www.gov.uk/government/statistical-data-sets/sub-national-energy-consumption-statistics>

⁴ <http://www.renewableuk.com/en/renewable-energy/wind-energy/uk-wind-energy-database/figures-explained.cfm>

- 2.4.13 Using the RenewableUK methodology it can be estimated that the Park Spring Wind Farm could offset the emission of 5853 tonnes of carbon dioxide per year.

Conclusions

- 2.4.14 The UK Government is committed to binding obligations to tackle the adverse effects of climate change made at an international, european and national level. In addition at a national level there is a further fundamental issue to ensure security of energy supply.
- 2.4.15 The Renewable Energy Roadmap 2012 emphasises that the goal to ensure that 15% of the UK energy demand is met from renewable sources by 2020 is not an 'end date'. The ambition to increase the reliance upon renewable energy sources extends well beyond 2020. As stated in the Overarching National Policy Statement for Energy – and repeated in the UK Renewable Energy Road Map 2012, *"there is an urgent need for new large-scale renewable energy projects to ensure that we meet the 2020 target and wider decarbonisation ambitions."* While the Park Spring Wind Farm project is not 'large scale' (i.e. less than 50 MW) the principle of the urgency of need also applies to smaller schemes.
- 2.4.16 The policies set out within the various documents referred to above are positively encouraging towards renewable energy development in order to fulfil the Governments' legally binding commitments to reduce greenhouse gas emissions, and to safeguard the security of our nation's energy system. The White Paper and other energy policy documents referenced, emphasise the importance for an accelerated provision of renewable energy development in an endeavour to meet the UK's obligations on renewable energy targets.
- 2.4.17 A review of current UK renewable energy and electricity generation shows the contribution of renewables to gross electricity consumption stands at only 10.7%, against a 2020 target of 30%. In consequence, there is a recognised need to dramatically increase renewable electricity generation.
- 2.4.18 Onshore wind has been identified by the UK Government as playing a key role in this respect; however, a significant increase in wind capacity will be required if targets are to be met. In this context, the proposed Park Spring Wind Farm will provide a contribution to the achievement of national targets and this constitutes a key material consideration in the determination of the application.

3 PLANNING POLICY

3.1 Introduction

- 3.1.1 This section sets out the key planning policies relevant to the consideration of the proposed Park Spring Wind Farm and assesses the performance of the scheme against them. It begins with an assessment of the national planning policy and other material considerations, before outlining the relevant sections of the statutory Development Plan which are of relevance to the proposed development.

3.2 National Planning Policy

- 3.2.1 National planning policy on renewable energy developments is principally set out in National Policy Statements (NPSs) and the National Planning Policy Framework (NPPF). This section considers each in turn in the context of the proposed Park Spring Wind Farm.

National Policy Statements

- 3.2.2 The Planning Act (2008) made provision for the production of National Policy Statements (NPS) which detail national infrastructure priorities for the country in several policy areas. A total of six NPSs covering energy were designated in July 2011 and are used in the determination of nationally significant infrastructure projects by the National Infrastructure Directorate (NID) of the Planning Inspectorate. The NPSs are also a material consideration for local planning authorities when determining planning applications for development under the Town and County Planning Act 1990 and in this respect the NPPF (Section 10, paragraph 97) sets out, in determining applications for wind energy development, planning authorities should follow the approach set out in the NPS for Renewable Energy Infrastructure alongside the Overarching NPS for Energy Infrastructure. These NPSs are discussed below.

Overarching National Policy Statement for Energy (EN-1)

- 3.2.3 This statement sets out how the suite of energy NPSs will work and also establishes energy infrastructure requirements by looking at the need for a new energy supply and diverse mix of energy generation, and the need for specific types of energy infrastructure.
- 3.2.4 NPS EN-1 outlines the importance of secure and reliable supplies of electricity in supporting the transition to a low carbon economy. In order to achieve this, a greater proportion of low carbon generation and a diverse mix of technologies and fuels are required alongside reliable supplies of gas and oil during the transition process. In this context, the statement suggests that approximately 33 GW of new electricity capacity will need to be derived from renewable sources by 2025 (much of which has yet to be consented) and identifies onshore wind as the most well-established and currently the most economically viable source of renewable electricity available for future large-scale development in the UK. The NPS stresses that, in order to meet UK commitments, it is necessary to bring forward new renewable electricity generating projects as soon as possible and that the need for new renewable electricity generation projects is therefore urgent.
- 3.2.5 NPS-EN1 outlines a range of generic impacts arising from energy infrastructure of all types with associated policy. The issues covered include (but are not limited to): biodiversity and geological conservation; civil and military aviation and defence

interests; flood risk; the historic environment; landscape and visual; land use; noise and vibration; socio-economic; traffic and transport; and water quality and resources.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.2.6 NPS EN-3 relates specifically to renewable energy infrastructure. Section 2.7 of the NPS covers on-shore wind and provides guidance in relation to site selection and impact assessment principles covering biodiversity and geological conservation, historic environment, landscape and visual, noise, shadow flicker and traffic and transport.

3.2.7 Alongside this guidance relating to the potential impacts of schemes, the NPS also identifies several technical issues that need to be considered when determining onshore wind applications. These technical considerations include: access requirements; project lifetimes; flexibility in the details of projects; and arrangements for micro-siting.

National Planning Policy Framework (NPPF)

3.2.8 The NPPF (2012) sets out the Government's planning policies and is a material consideration in determining planning applications. Paragraph 14 sets out that a presumption in favour of sustainable development is key to decision taking, which should be taken to mean:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or*
 - *specific policies in the Framework indicate development should be restricted (and in the context of this the footnote indicates that such policies may include those relating to a range of designations including landscape, green belt, nature conservation and heritage assets).*

3.2.9 The most relevant policy areas of the NPPF, in relation to the Park Spring proposal, relate to the protection of the greenbelt, meeting the challenge of climate change, and the conservation of the natural environment.

Greenbelt (NPPF)

3.2.10 The proposed Park Spring Wind Farm site is located within the Green Belt. Section 9 of the NPPF (paragraphs 79-92) relates to the protection of the Green Belt land.

3.2.11 Paragraph 79 notes that: *'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'*

3.2.12 Paragraph 80 notes that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;

- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.2.13 Paragraph 87 notes that: *'As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'*

3.2.14 Paragraph 88 notes that: *'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.'*

3.2.15 Paragraph 91 notes that: *'When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.'*

3.2.16 It is submitted therefore that Paragraphs 88 and 91 are the key paragraphs of the NPPF to be considered in determining the Park Spring Wind farm application in relation to the Green Belt.

Conservation of the Natural Environment (NPPF)

3.2.17 In relation to the conservation of the natural environment, paragraph 109 sets out that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Climate Change (NPPF)

3.2.18 Section 10 (paragraphs 93-108) of the NPPF addresses climate change and with respect to renewable and low carbon energy development states:

“Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions.... and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.”

- 3.2.19 The NPPF encourages LPAs to adopt a positive approach to renewable energy development and states at paragraph 97:

“To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:

- have a positive strategy to promote energy from renewable and low carbon sources;*
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;*
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;*
- support community-led initiatives for renewable and low carbon energy, including developments outside such area being taken forward through neighbouring planning; and*
- identify opportunities where developments can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”*

- 3.2.20 In this context, the NPPF stipulates that, when determining applications for renewable and low carbon energy development, local planning authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and approve the application if impacts are (or can be made) acceptable. The NPPF also includes, inter alia, policies for economic growth (including within rural areas), transport and conserving and enhancing natural and historic environments. These policies are also relevant to the proposed wind farm.

Proactive Engagement

- 3.2.21 Paragraph 187 of the NPPF states *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”*

Development Plan Policy – Compliance with the NPPF

- 3.2.22 The NPPF includes guidance on the status of existing local plans and the impact of the introduction of the NPPF on them. Specifically it makes reference through paragraphs 215 – 216:

215 - In other cases and following this 12 month period, due weight should be given to the relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework the greater the weight that may be given)

216 - From the day of publication, decision makers may also give weight to relevant policies in emerging plans according to:

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that can be given)*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to policies in this framework the greater the weight that may be given).*

Planning Practice Guidance for Renewable and Low Carbon Energy (July 2013)

- 3.2.23 The Department for Communities and Local Government (DCLG) has issued new planning guidance for renewable and low-carbon energy projects. The accompanying press release stated that the guidance would 'make clear the importance of environmental protections in deciding applications'.
- 3.2.24 The 'Planning practice guidance for renewable and low carbon energy' replaces the previous 'Planning for renewable energy: a companion guide to PPS22', which has now been cancelled. It is to be used by local authorities alongside the National Planning Policy Framework to help deliver new renewable and low-carbon energy infrastructure, without 'overriding environmental protections and the planning concerns of local communities'.
- 3.2.25 It reads: 'There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.'
- 3.2.26 Technologies covered by the document include biomass, hydropower, active solar technology (photovoltaics and solar water heating), solar farms, and wind turbines.
- Key considerations*
- 3.2.27 Examples of the considerations for particular renewable energy technologies that can affect their siting include proximity of grid connection infrastructure and site size.
- 3.2.28 General criteria for consideration in planning applications include:
- ensuring the need for renewable or low-carbon energy does not 'automatically override' environmental protections;
 - considering 'cumulative impacts' of the project, such as the number of wind turbines, which could affect local landscape and amenities;
 - identifying any potential 'damaging effects' on landscape;
 - ensuring heritage assets 'are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting'; and
 - considering proximity of a project to any National Parks or Areas of Outstanding Natural Beauty.
- 3.2.29 Specifically, the document outlines that:

- wind turbine applications should include consideration of noise pollution, air safeguarding, electromagnetic interference and air traffic impacts.

'Local people must be listened to when making planning decisions'

3.2.30 Speaking of the guidance, Local Government Secretary Eric Pickles said: *"The views of local people must be listened to when making planning decisions. Meeting Britain's energy needs should not be used to justify the wrong development in the wrong location."*

3.2.31 *"This new guidance is an important step in ensuring that communities can continue to shape their local surroundings and that landscape and heritage are properly considered and protected."*

3.2.32 *Planning always works best when local communities themselves have the opportunity to influence the decisions that affect their lives. That is why it is so important every area has a local plan in place as soon as possible."*

3.3 The Development Plan

3.3.1 At a local level, the 2004 Planning Act introduced the Local Development Framework (LDF), aimed at offering a more flexible and easily adaptable system that allowed local authorities to tailor their development policies for the benefit of communities in line with their corresponding Regional Spatial Strategy (RSS), national PPGs and PPS'.

3.3.2 RSS' have since been revoked and the NPPF and recently published guidance replaced the PPG and PPS Guidance to become the primary source of policy guidance for local authorities and developers alike. Although PPGs and PPS' are no longer relevant, the evidence base for the RSS remains a material consideration in the development of the LDF and the consideration of planning applications.

3.3.3 The site lies within the Green Belt on the adopted Unitary Development Plan. Planning decisions should be made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan for Barnsley consists of the remaining saved policies of the Unitary Development Plan (UDP), and the LDF documents (including the adopted Core Strategy).

3.3.4 In assessing the weight to be attributed to particular development plan policies, paragraph 215 and 216 of the NPPF require decision makers to consider whether or not the relevant development plan policies comply with national guidance. Furthermore, paragraph 14 of the NPPF states that where the development plan is absent, silent or relevant policies are out of date, that decision makers should grant planning permission any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

3.3.5 The Council has also produced a Consultation Draft of the Development Sites & Places Development Plan Document, which shows possible allocations up to 2026 and associated policies. The document is a material consideration but the weight afforded to it is limited by the fact that it is at an early stage in its preparation. The proposed site for the Park Spring Wind Farm is allocated as Green Belt within this document.

Barnsley Local Development Framework

- 3.3.6 The Barnsley LDF comprises a number of different documents that provide the main planning policies and proposals previously contained in the UDP. The documents are at varying stages in their production.
- 3.3.7 A Supplementary Planning Document providing guidance for renewable energy developments was not available at the time of writing this Statement.

Barnsley LDF Core Strategy (adopted September 2011)

- 3.3.8 In accordance with paragraphs 215 and 216 of the NPPF, consideration has been given to the conformity of the relevant development plan policies with national guidance, and therefore the weight to be attributed to each policy in the determination of this planning application.
- 3.3.9 The following policies of the Barnsley Core Strategy are considered to broadly accord with the relevant national guidance, and are therefore considered to be relevant to the determination of the Park Spring Wind Farm proposals: CSP 6, CSP 21, CSP 29, CSP 30, CSP 34, CSP 36, CSP 37, and CSP 40.
- 3.3.10 Policy CSP6 of the Core Strategy allows for development that produces renewable energy as long as there is no significantly harmful effect on:
- the character of the landscape and appearance of the area
 - living conditions
 - biodiversity, geodiversity and water quality
 - heritage assets, their settings and cultural features and areas
 - highway safety, and
 - infrastructure including radar
- 3.3.11 The policy requires proposals to be accompanied by information that shows how the local environment will be protected, and that the site will be restored when production ends.
- 3.3.12 The Core Strategy recognises that some proposals for renewable energy will have significant effects on the local area – such as prominence in the landscape. In such cases, the Council will ‘carefully weigh up the environmental, social and economic benefits of the proposals against effects on the local area including any effects on the National Park, the Green Belt and European and Natura 2000 designations’.
- 3.3.13 The Core Strategy (9.41) commits the Council to preparing a Supplementary Planning Document on Renewable Energy - looking at landscape capacity across the Council area. This is currently at the early stages of preparation, and a draft is not expected until summer 2013.
- 3.3.14 Policy CSP21 – Rural Economy – aims at encouraging a viable rural economy by allowing development in rural areas if it supports the sustainable diversification and development of the rural economy or results in the growth of existing businesses or is related to tourism/recreation or improves the range and quality of rural services. However, development in rural areas will be expected to:

- Be of a scale proportionate to the size and role of the settlement;
- Be directly related, where appropriate, to the needs of the settlement;
- Not have a harmful impact on the countryside, biodiversity, Green Belt, landscape or local character of the area; and
- Protect the best quality of agricultural land.

3.3.15 Policy CSP29 - Design - states that high quality development will be expected, that respects, takes advantage of and enhances the distinctive features of Barnsley, including (amongst other things):

- Topography, important habitats, woodlands and other natural features;
- Views and vistas to key buildings, landmarks, skylines and gateways; and
- Heritage, townscape and landscape character including the scale, layout, building styles and materials of the built form particularly in and around (amongst other areas), Penistone and the rural villages in the west of the Borough.

The policy is aimed at ensuring that development is appropriate to its context.

3.3.16 Policy CSP30 – The Historic Environment – states that development will be expected to protect the character and/or appearance of listed buildings and Scheduled Ancient Monuments.

3.3.17 Policy CSP34 – Protection of Green Belt – the character and openness of the Green Belt is to be safeguarded.

3.3.18 Policy CSP36 – Biodiversity and Geodiversity – development will be expected to conserve and enhance the biodiversity and geological features of the borough. Development which may harm such features will not be permitted unless effective mitigation and/or compensatory measures can be ensured.

3.3.19 Policy CSP37 - Landscape Character - development will be expected to retain and enhance the character and distinctiveness of the individual Landscape Character Assessment in which it is located.

3.3.20 Policy CSP40 – Pollution Control and Protection – development will be expected to demonstrate that it is not likely to result in an increase in air, surface water and groundwater, noise, smell, dust, vibration, light or other pollution which would unacceptably affect or cause a nuisance to the natural and built environment or to people.

3.3.21 As noted previously, the Council has also produced a Consultation Draft of the Development Sites & Places Development Plan Document Relevant policies in the Development Sites and Places DPD.

3.3.22 Policy SD1 – Presumption in Favour of Sustainable Development – refers to taking a positive approach reflecting the presumption in favour of development contained in the NPPF. However, proposals for development will only be approved if (amongst other matters):

- They advance the economic ambitions contained in the Economic Strategy;

- There will be no significant adverse effect on the living conditions and residential amenity of existing and future residents;
- They are compatible with neighbouring land and will not significantly prejudice the future use of the neighbouring land; and
- They include appropriate landscaping to provide a high quality setting for buildings, incorporating existing landscape features and ensuring that plant species and the way they are planted, hard surfaces, boundary treatments and other features appropriately reflect, protect and improve the character of the local landscape.

4 PLANNING POLICY REVIEW

4.1 Introduction

4.1.1 This section of the statement sets out those issues considered to be the main material planning considerations in respect of the proposed wind farm at Park Spring and considers and applies the relevant planning policy to those considerations.

4.1.2 The proposed development has been examined with respect to the extant and emerging planning policy at the national, regional and local level and it is considered the principal planning issues assessed by the proposed development are:

- Green Belt;
- Landscape and Visual;
- Archaeology and Cultural Heritage;
- Biodiversity, Ecology, Nature Conservation & Ornithology
- Hydrology, Geology and Hydrogeology;
- Noise;
- Shadow flicker;
- Aviation and Radar;
- Electromagnetic Interference and TV Reception;
- Traffic and Transport;
- Socio-economic impacts; and
- Community Engagement and potential for community benefits.

4.1.3 In the following section of this statement, each of the above issues are examined with reference to the conclusions of the relevant sections of the submitted ES. For a detailed examination of those issues, the reader is referred to the ES main report (Volume 1) and the supporting documents.

4.2 Green Belt

4.2.1 The application site lies within land designated as Greenbelt. It is considered that the sites designation is a key consideration in determining the application. In relation to planning policy, there is an immediate tension between the encouragement of renewable energy development and the protection of Green Belt because both are supported in the Core Planning Principles of the NPPF and the relevant development plan policies.

4.2.2 In accordance with the relevant national planning policy due to its location within the Greenbelt it is considered that the proposed development would affect openness and that the scheme constitutes inappropriate development. As previously stated in the Planning Policy section of this statement, inappropriate development is, by definition, harmful to the Green Belt and such development should not be approved, except in very special circumstances. Such very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

- 4.2.3 Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable resources whatever their scale, and this should be given significant weight in determining proposals.
- 4.2.4 The NPPF also reiterates the importance of Green Belts and in particular, their openness and permanence and advises local planning authorities to plan to retain and enhance landscapes, visual amenity and biodiversity. Substantial weight is given to any harm to the Green Belt.
- 4.2.5 In assessing proposals for the development of wind farms within areas designated as Greenbelts, it is also important to consider recent planning appeal decisions.
- 4.2.6 Although it predates the NPPF, the decision in Hook Moor (Appeal Ref APP/N4720/A/10/2121279) is an example of a decision in which an Inspector concluded that a proposed wind farm (5x 125m turbines) near Leeds, whilst inappropriate development, should be granted planning permission because of the very special circumstances associated with the renewable energy benefits arising from the development. In that case he considered each of the purposes of the Green Belt and determined the extent to which each would be affected by the proposed wind farm. He helpfully condensed the balancing exercise into a list of matters that weighed against and for the development, as follows:

“61. Turning to the planning balance I set out below a synopsis of those matters which must be taken into account, followed by my assessment of where the correct balance lies.

The matters which weigh against the proposal (the harm):

- *The development constitutes inappropriate development in the Green Belt. This attracts substantial weight in its own right;*
- *There would be some harm to the openness and purposes of the Green Belt, which is of moderate weight;*
- *There would be a degree of harm to the character and appearance of the landscape, but this is of moderate weight overall;*
- *There would be minor harm to the setting of Lotherton Hall gardens, but this could be mitigated and is of limited weight.*

The matters which weigh in favour of the proposal:

- *The strong national support for renewable energy in order to tackle the effects of climate change is a significant factor in favour of the proposal, and carries substantial weight;*
- *The locally emerging targets for renewable energy, together with the anticipated provision of 20MW of wind generated energy, are considerations of significant weight;*
- *The provision of employment is a matter of some weight.”*

- 4.2.7 Also predating the NPPF is the appeal decision in Aston Grange Farm (Appeal ref APP/L0635/A/07/2047477) in which planning permission was refused for a wind farm (4x 125 turbines) on Green Belt grounds. In that case the Inspector found that the development would be inappropriate development but recognised the balancing exercise that need to be undertaken:

“For the very special circumstances described in PPG2 the balance of advantage must be obviously and plainly evident. In this case the inappropriateness of the scheme would be substantially aggravated by the injury to visual amenity – principally

as a result of the height of the proposed turbines in their particular landscape setting. Although the benefits of the proposal are real and substantial, I have concluded in this case that they are insufficient to outweigh the harm with the necessary clarity. The very special circumstances referred to in PPG2 do not therefore exist."

- 4.2.8 In relation to the proposed Park Spring Wind Farm, the proposed development makes a significant contribution (6 MW) of renewable energy generating capacity (equal to approximately 20% of the existing installed capacity in Barnsley - 26.9 MW). As such this is put forward as a case for special circumstances which would need to be sufficient to outweigh the harm to the local landscape from the turbine and associated structures, for planning permission to be approved.
- 4.2.9 In considering the impact of development on the green belt, a decision maker is likely to also consider the five purposes of the Greenbelt identified previously, and the degree to which the development would compromise the ability of Green Belt to serve these purposes.
- 4.2.10 The NPPF also states that local planning authorities should follow the approach set out in the National Policy Statement for Renewable Energy Infrastructure (EN3) (read with the relevant sections of the Overarching National Policy Statement for Energy Infrastructure (EN1)).
- 4.2.11 Whilst the policy in EN3 replicates what is said in the NPPF, paragraph 5.10.12 and 5.10.17 of EN1 state that
- "It may also be possible for an applicant to show that the physical characteristics of a proposed overhead line development or wind farm are such that it has no adverse effects which conflict with the fundamental purposes of Green Belt designation..."*
- When located in the Green Belt, energy infrastructure projects are likely to comprise 'inappropriate development'. Inappropriate development is by definition harmful to the Green Belt and the general planning policy presumption against it applies with equal force in relation to major energy infrastructure projects. The IPC will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is outweighed by other considerations. In view of the presumption against inappropriate development, the IPC will attach substantial weight to the harm to the Green Belt when considering any application for such development while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation."*
- 4.2.12 Therefore in determining this application it is important to consider whether the proposal has any adverse effect which conflict with the purposes of Greenbelt designation.
- 4.2.13 The Landscape and Visual Impact Chapter (6) of the submitted ES has concluded that the development of the nature and scale proposed would retain the openness of the Green Belt and allow visual permeability between the Green Belt and surrounding areas. Viewpoints VP1 to VP7 as contained in the ES section 6 (Figures 6.7 to 6.13 respectively) illustrate views of the proposed development within the Green Belt.
- 4.2.14 The primary objective of Core Strategy Policy CSP 34 is to protect the Green Belt, it states,

“the main purpose of which is to prevent the built up areas merging with the surrounding settlements of Cudworth, Royston, Darfield, Wombwell, Dodworth and Higham in order to maintain the separate identity and character of these settlements in relation to surrounding countryside and landscape features”.

- 4.2.15 The Core Strategy, at paragraph 9.240, notes that Green Belt helps to conserve the natural environment by restraining development and assisting in the process of urban renaissance.
- 4.2.16 The large scale simplicity of the restored landscape within the application site, which lies in Green Belt land, lends itself to the introduction of large scale features more easily than other areas of more complex landscape nearby. It is inevitable that wind turbines will be visible over a relatively large area, and their scale and man-made appearance mean they will not naturally ‘fit in’ with a rural landscape.
- 4.2.17 However, in this instance the turbines would be viewed in the context of the nearby Dearne Valley Parkway main distributor road, extensive industrial development at the Park Spring Grimethorpe and Park Spring Houghton employment land, and the adjacent ASOS distribution centre. The Greenbelt in the vicinity of Park Spring has been tightly drawn around these industrial urban areas, and the settlements at Grimethorpe, Middlecliffe, Great Houghton and Darfield. Although the turbines would be prominent, they would not appear out of place close to nearby large scale industrial buildings.
- 4.2.18 The proposed development would result in the loss of 0.98 ha from Green Belt, which would be a long term (25 years), but reversible. The wider application site is to remain in agricultural use.
- 4.2.19 The layout of the Park Spring turbines has been designed to provide a simple, clearly structured, balanced composition that relates to the scale of the landform, as well as the grain of the site contours. The scale and number of turbines proposed are considered appropriate to this landscape. Aspects of the turbine design, including a recessive matt pale grey colour and low turbine rotation speed, would help mitigate visual effects. The control building, ancillary structures and access roads would be sited to take advantage of screening provided by the existing landform and/or trees and hedgerows. Through consideration of these factors the proposed development has been designed to protect the visual amenity of the surrounding landscape and Green Belt.
- 4.2.20 Development of this nature and scale with a small area of development footprint would retain the openness of the Green Belt, whilst allowing visual permeability between the Green Belt and surrounding areas. Openness is not a measure of landscape quality but a requirement to keep land permanently open within Green Belt and viewpoints VP1 to VP7 illustrate how the turbines would not obstruct views across the landscape to any great degree.
- 4.2.21 It is acknowledged that the proposed development would add large scale man-made elements to the Green Belt establishing a new landmark feature and a point of reference in views from the wider landscape. However, they would not be incongruous with nearby large scale industrial development adjoining this narrow area of Green Belt land. The turbines would be designed and sited to relate to the landscape whilst retaining views within and through the Green Belt. Overall, it is considered that the visual effects of the proposed turbines would not conflict with the objective of Core Strategy Policy CSP 34 to protect the Green Belt.

- 4.2.22 It is therefore submitted that the significant contribution the proposal would make to renewable energy generation represents very special circumstances that would outweigh any harm to the reasons for the designation of the site as Greenbelt. The proposed wind turbines at Park Spring are on balance in accordance with the objectives of the adopted NPPF and are not incompatible with objectives of Green Belt policy either at national or local level. It is therefore, respectfully, submitted that the proposals comply with the aims and policies of the development plan and the NPPF.

4.3 Landscape and Visual Impact

- 4.3.1 It is acknowledged that the proposed turbines would be large man made structures that would be visible from the surrounding area and would change the character of the site itself to a significant degree. The NPPF acknowledges that, of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects, and that these large structures will inevitably have an impact on the landscape and visual environment.
- 4.3.2 A full assessment of the potential landscape and visual impacts of the proposed wind farm is detailed in Chapter 6 of Volume 1 of the submitted ES. The ES includes a detailed assessment of the proposal in terms of both cumulative impact and landscape and visual impact of the proposals. This has looked at the location of the site in relation to other existing wind farms, consented schemes not yet implemented and other proposals within the planning process. A selection of viewpoints has been used to provide a range of views, photographs, wireframes and photomontages to provide an accurate understanding of the visual effects of the proposals.
- 4.3.3 The results of the LVIA are included in the Environmental Statement. The assessment has concluded that significant direct effects on the landscape fabric of the site during construction and operation would be limited in extent, would be fully reversible when the turbines and ancillary structures were decommissioned, and are considered to be acceptable in landscape terms.
- 4.3.4 The landscape is classified as being of low quality with low sensitivity to wind energy development. The proposed development conforms to the appropriate small scale wind energy development that could be accommodated within the Nottinghamshire, Derbyshire and Yorkshire Coalfield national character area, as described in Planning for Renewable Energy Targets in Yorkshire and Humber. The potential for significant effects on landscape character within the 20 km study area would be substantially limited by the undulating topography, extensive areas of woodland and built development.
- 4.3.5 The proposed Park Spring Wind Farm would not affect important views from the Peak District National Park. None of the key or distinctive characteristics of the National Park's 'natural beauty, wildlife or cultural heritage' would be lost or changed because of its construction.
- 4.3.6 The proposed development would be sited in an area of Green Belt. The proposed development would result in the loss of 0.98 ha from Green Belt, which would be long term (25 years), but reversible. Development of the nature and scale proposed would retain the openness of the Green Belt and allow visual permeability between the Green Belt and surrounding areas. Overall, it is considered that the visual effects of the proposed turbines would not conflict with the objective of Core Strategy Policy CSP 34 to protect the Green Belt.

- 4.3.7 Significant visual effects would be limited to views from settlements up to 2.5 km radius of the proposed development. These comprise localised parts of Great Houghton, Little Houghton, Grimethorpe and Edderthorpe where residents would experience clear visibility of the proposed turbines within principal views. The residential visual amenity assessment did not identify any properties where it was considered likely that the visual effect of the scheme could render occupation unacceptable by converting the property into one which would come to be widely regarded as an 'unattractive and thus unsatisfactory (but not necessarily uninhabitable) place to live.'
- 4.3.8 No significant cumulative landscape and visual effects are likely to arise from the proposed Park Spring turbines in addition to other existing and proposed wind farms in designated landscapes. Successive cumulative visual effects would be most notable in conjunction with wind farms at Hampole (under construction) and Marr (operational), where views would be over long distances and would not be considered Significant in landscape terms.
- 4.3.9 It should be noted that all on-shore wind farm developments lead to significant landscape and visual effects, and that significant effects are not necessarily unacceptable. The changes arising from the proposed development may engender positive or negative responses depending on individual perceptions regarding wind energy development. The significant effects identified in this assessment are long term and reversible. If the decision is taken to decommission the Park Spring Wind Farm at the end of its 25 year operational life, the turbines would be dismantled and removed, and the site fully restored.
- 4.3.10 The effects of the proposals have been examined in terms of the immediate area of the wind farm, the local area, and also wider impacts on the Peak District National Park. Whilst there would be some effects of significance, these are not considered to be sufficient in the case of a wind farm to conclude that there is a breach of the national, regional and local policies in this regard. Relevant national policy accepts that there wind farm development will always impact on landscapes, at paragraph 2.7.48 of NPS EN-3 it is noted that *"Modern onshore wind turbines that are used in commercial wind farms are large structures and there will always be significant landscape and visual effects from their construction and operation for a number of kilometres around a site."*
- 4.3.11 Policy at all levels details that renewable energy developments should be encouraged but that this should be subject to impacts on landscape and visual amenity being addressed satisfactorily. It is considered that the LVIA provides convincing evidence that policies CSP6 and CSP37 of the Barnsley Core Strategy would be met.

4.4 Archaeology and Cultural Heritage

- 4.4.1 The Environmental Statement (Chapter 7 ES Volume 1) has examined potential impacts on the historic environment.
- 4.4.2 Core Strategy Policy CSP 6 Development that Produces Renewable Energy provides support to renewable energy development, provided that there is no significantly harmful effect on "heritage assets, their settings and cultural features and areas". This policy requires proposals to show how the "local environment will be protected, and that the site will be restored when production ends". This policy accords with Policy CSP 30 of the Core Strategy, which states that development will be expected to protect the character and/or appearance of listed buildings and Scheduled Ancient Monuments.

- 4.4.3 In relation to Archaeological remains, The ES concludes that during construction, the proposed development has the potential to have an effect on any undiscovered archaeology that may be present within the site area. It is considered that there is a moderate chance of undiscovered remains being present. There are two known archaeological assets within the application site, one of which will be disturbed by development related ground works. The ES outlines suitable mitigation, such as micro-siting and/or a watching brief to mitigate any impact on the assets.
- 4.4.4 In relation to both designated and undesignated Heritage Assets such as Listed Buildings, the construction of the proposed development has the potential to have an indirect adverse effect upon on the setting of four Scheduled Monuments, one Grade I, two Grade II* and a number of Grade II Listed Buildings, which are located within 5 km of the application site. Additionally, seventeen non-designated assets will also be subject to a visual impact on their setting. Any impacts on the assets would be due to the proposed wind farm being visible from, or being visible in views of a particular asset. The impact of the Wind Farm on each of the assets is assessed in the ES, which concludes that there would be no impact on the significance of each of the assets as a result of the wind farm development.
- 4.4.5 It is submitted that the proposal complies with Chapter 12 of the NPPF 'Conserving and enhancing the historic environment', NPS EN-3, relevant guidance contained within the Planning Practise Guidance in relation to Renewable Energy, and with relevant local policies CSP 6, and CSP 30 as set out above.
- 4.5 Biodiversity, Ecology, Nature Conservation & Ornithology**
- 4.5.1 The Environmental Statement (Chapters 9 and 10 - ES Volume 1) sets out the methods used to establish the features of ecological interest within the survey area. It then sets out the potential impacts on receptors during construction, operation and decommissioning and assesses the potential effects on populations at an appropriate geographic scale. Avoidance and measures to mitigate any significant effects are proposed and a summary of any residual effects is provided. The conclusions of the assessment have been informed through a series of desk and field based surveys to inform the baseline conditions of the survey area. The Valued Ecological Receptors (VER) have been identified and provided a geographic value in consideration of their abundance and location.
- 4.5.2 The proposed access track will require the removal of up to 400 m of species rich hedgerows to allow the installation of wider access tracks within the Development site. New hedgerows and gapping up existing hedgerows are planned within the site boundary.
- 4.5.3 The site has been surveyed for use by Badgers; the results show that badgers cross and potentially forage within the site, however, no active badger setts were found within the survey area. Badgers are protected for welfare rather than conservation reasons, and are considered to be a common species. Mitigation measures are suggested within the ES to ensure that they are protected.
- 4.5.4 No signs of otter were recorded during the field surveys. The otter survey concluded that although dispersing otters may pass through the site, they are unlikely to use features in the area or site on a permanent basis.
- 4.5.5 During the field surveys signs of water vole were recorded in a ditch on site, potential areas suitable to support water vole were found. It was considered that the site supported low numbers of water vole or was part of a territory of water voles within

the local area. There will be no loss of water vole habitat, there are therefore no significant effects are predicted on water voles.

- 4.5.6 The level of bat activity across the site is considered to be low to moderate and the species recorded are relatively common locally and nationally. Each of the wind turbines are located in excess of 50 m from blade tips to habitat features, which is in line with Natural England guidance. The overall impact on bats species is considered to be low and the proposed hedgerow planting works will benefit bat use of the site away from the wind turbines.
- 4.5.7 The survey area contains habitat suitable to support common reptile species and great crested newt species. However, given the small area due to be affected and the distance from the nearest pond, it is considered extremely unlikely that the construction of the proposed wind farm will cause any problems to great crested newts. The construction of the proposed wind farm will require vegetation clearance and ground works, which will be undertaken in a manner to minimise risks to reptile species. Subject to the implementation of the mitigation proposed in the ES it is considered that potential impacts on reptile species and great crested newts due to the Development will not be significant.
- 4.5.8 In relation to Ornithology, generally the breeding bird numbers within both the construction and operational disturbance zones were low, with no species present in more than locally important numbers. No high sensitivity species were found breeding within 500 m of the proposed wind turbine locations.
- 4.5.9 The wintering bird numbers recorded within a worst-case scenario potential disturbance zone of 600 m from the wind turbine (for both construction and operation) revealed only one species in nationally important numbers; the golden plover. Eight other species were also present in this zone in regionally important numbers; white-fronted goose, wigeon, gadwall, teal, mallard, shoveler, avocet and lapwing.
- 4.5.10 There are no Special Protection Areas (SPA) within 20 km of the proposed wind farm. The only Site of Special Scientific Interest (SSSI) within 5 km of the site is Carlton Main Brickworks SSSI, a site of geological interest with no notified ornithological features.
- 4.5.11 Edderthorpe Flash lies 300 m SW from the nearest proposed wind turbine and is part of the Dearne Valley RSPB reserve, which RSPB consider to be of national importance for birds and wildlife. Most of the Flash's bird populations which are of conservation interest were found outside the potential impact zone of the wind farm, therefore the Development is not likely to have significant effect on this area's bird populations.
- 4.5.12 The ornithological effects that are likely to occur during decommissioning will be similar to those during construction, though given the reduced time required, and the presence of existing infrastructure, they will be of a lower magnitude. Significant effects are not likely but precautionary mitigation measures will be implemented to ensure that any impacts are minimised.
- 4.5.13 Though no significant effects are likely on the breeding or wintering bird community, given the range of species present, and the fact that the site lies within the Dearne Valley Nature Improvement Area (NIA), a habitat enhancement programme will be implemented to ensure that the project delivers a net local conservation gain. It is proposed that a suitably worded planning condition is attached to any grant of

planning permission to require the submission and agreement of a Habitat Enhancement Management plan.

4.5.14 Following mitigation, the residual effects of the development will be a loss of a small amount of agricultural habitat to turbine bases and tracks, and a non-significant risk of disturbance and collision. Using evidence from existing wind farms it is considered unlikely that this will have any long term impact on the integrity of the study area's ornithological or ecological features or the conservation status of the species found here. The implementation of the proposed wildlife enhancement measures would deliver a gain to the areas ornithological and ecological interests.

4.5.15 It should be noted that that ecological and ornithological surveys have been undertaken on the site and the surrounding area, as per the scope and methodology agreed with Barnsley Council and Natural England. The results of these surveys have informed the final design of the proposed wind farm submitted for planning permission. The proposed wind farm has been designed to avoid impacts upon ecology and ornithology.

4.5.16 The proposal therefore accords with: Core Strategy Policy CSP 6, CSP 36, national policy contained within the NPPF and NPS EN-3, and guidance within the Planning Practise Guidance for Renewable Energy.

Geology, Hydrogeology and Hydrology

4.5.17 The Environmental Statement (Section 8 ES Volume 1) has examined potential impacts on land drainage, possible pollution of watercourses during construction and the underlying groundwater system.

4.5.18 Core Strategy Policy CSP 6 Development that Produces Renewable Energy provides support to renewable energy development, provided that there is no significantly harmful effect on "biodiversity, geodiversity and water quality". This policy requires proposals to show how the "local environment will be protected, and that the site will be restored when production ends".

4.5.19 The potential for the proposed development to affect geological, hydrogeological and hydrological features is mitigated; both through design and through the adoption of management plans and best practice as detailed in the ES. These mitigation measures concentrate on controlling surface water runoff and preventing/managing the mobilisation of contamination/pollution. Following the implementation of these mitigation measures, there are not anticipated to be any residual impacts relating to geology, hydrology, hydrogeology, or the health of future site users from the proposed development.

4.5.20 Therefore the proposed development is considered to accord with Policy CSP6 of the Core Strategy and relevant national policy contained within chapters 10 and 11 of the NPPF.

4.6 Noise

4.6.1 An assessment of the likely noise impact due to the construction and decommissioning phase of the proposed Park Spring Wind Farm has been undertaken. No significant noise levels are predicted at the nearest receptors from construction and decommissioning activities due to the distances involved between the wind turbine locations and the receptors.

- 4.6.2 Background noise data at the nearest receptors has been collected and analysed in accordance with current accepted practice, and ETSU-R-97 noise limits have been derived. The background noise data has been corrected for the influence of periods of precipitation and other extraneous noise events.
- 4.6.3 One proposed wind farm development has been defined within 2km of the Park Spring site and has been considered in the cumulative assessment of wind turbine noise.
- 4.6.4 The operation of the proposed Park Spring Wind Farm, both in isolation and cumulatively, would be compliant with the ETSU-R-97 methodology, and that it can meet the relevant ETSU-R-97 noise limits. This can be achieved and controlled by the council through a suitable planning condition based on the ETSU-R-97 limits described.
- 4.6.5 It is submitted therefore that the proposal accord with the NPPF, NPS EN-3, guidance contained within the Planning Practice Guidance for Renewable Energy, and development plan policies CSP 6 and CSP 40.

4.7 Shadow Flicker

- 4.7.1 A full assessment of the potential for shadow flicker at the site is detailed in Chapter 12 of Volume 1 of the ES. Shadow flicker is an issue particular to wind turbine developments. It occurs when, under certain environmental conditions, the sun passes behind the blades of the turbine and casts an intermittent shadow over nearby buildings, which flickers as the turbine blades rotate. As the blades rotate and the shadow created passes a window, the impression is one of light flickering proportional to the rotational speed of the turbine. The effect is limited to those rooms which have windows facing the turbine and is more pronounced in smaller rooms with smaller or narrower window openings.
- 4.7.2 Potential shadow flicker effects have been assessed at nearby residential receptors using industry standard techniques and best practice. In some properties, the duration of show flicker predicted exceeds threshold levels where mitigation may be required. The degree to which shadow flicker can raise issues is dependent on a number of site specific factors including the presence of intervening screening and whether windows are present in the affected elevation of the dwelling/building. However, once climatic conditions are taken into account the actual likelihood of the nearby residential properties experiencing shadow flicker effects above recognised best practice limits is considered to be very low.
- 4.7.3 It is submitted therefore that that, subject to the mitigation as detailed in the ES, that the proposal accords with the NPPF, NPS EN-3, guidance contained within the Planning Practice Guidance for Renewable Energy, and development plan policies CSP 6 and CSP 40.

4.8 Aviation and Radar

- 4.8.1 The ES assesses the impact of the development in terms of both aviation safety and radar interference, and other technical issues. This assessment is set out in Section 14 of Volume 1 of the ES.
- 4.8.2 Wind turbines have the potential to act as a physical obstruction to aviation because of their height and can also be detected by radar, through generation of unwanted radar returns partially due to height and particularly due to the rotating blades.

Informal, pre-planning consultations have been held with the Civil Aviation Authority (CAA), Ministry of Defence (MOD), Robin Hood Airport Doncaster Sheffield (RHADS) and The National Air Traffic Service (NATS), and no objections have been raised.

- 4.8.3 It is submitted therefore that that, subject to the mitigation as detailed in the ES, that the proposal accords with the NPPF, NPS EN-3, guidance contained within the Planning Practice Guidance for Renewable Energy, and development plan policy CSP 6.

4.9 Electromagnetic Interference and TV Reception

- 4.9.1 The impact of the development on telecommunications is set out in Section 14.2, and on TV Reception in 14.3 of the ES. Operational wind turbines can cause interference with electromagnetic signals and therefore with TV and radio reception, landline and mobile telephone networks and civilian and military radar.

- 4.9.2 The appropriate consultations have been made with radio communications operators as part of the ES. The Joint Radio Company (JRC) analyses proposals for wind energy developments and the potential of such developments to interfere with radio systems operated by Energy Industry companies in support of their regulatory operational requirements. The JRC confirmed that parts of the Park Spring Wind Farm site are located within 1km of link sites and therefore objected to the scheme.

- 4.9.3 The EM field along the path of a link can be considered to consist of a number of 3 dimensional concentric zones, known as Fresnel zones, each shaped like an elongated rugby ball. The radius of a Fresnel zone at any point along the path of a link is related to the link's overall length and operating frequency. Guidance published by Ofcom in 2002 recommends that due to the varying geometry of a wind turbine a conservative approach to avoiding interference should be taken. The guidance advises keeping the second Fresnel zone clear of obstructions to minimise the risk of interference. The closest JRC link (JEYIS1 – JEYI01) is 553m away from turbine T3, this is outside of the 2nd Fresnel zone, and there is therefore no direct impact predicted. Due to the distances involved, no reflection impacts are anticipated.

- 4.9.4 The assessment of the potential impact of the proposed wind development on television reception has considered both analogue and digital broadcasting services.

- 4.9.5 The detailed television assessment found that television services in the vicinity of the Development are likely to be provided by Emley Moor Transmitter, which provides television services for most of Yorkshire. The television assessment determined that detrimental impacts to television reception in homes are unlikely to occur. If effects attributable to the Development were to occur, suitable mitigation measures such as the upgrading of the receiving equipment or installation of satellite TV as outlined in the ES, would be investigated and implemented.

- 4.9.6 It is submitted therefore that that, subject to the mitigation as detailed in the ES, that the proposal accords with the thrust of the NPPF, NPS EN-3, guidance contained within the Planning Practice Guidance for Renewable Energy, and development plan policy CSP 6.

4.10 Traffic and Transport Infrastructure

- 4.10.1 Chapter 13 of the ES presents an assessment of the potential impacts of the proposed Development on the local transport network. A description and assessment

of the proposed access route to site for normal project traffic and abnormal load deliveries (i.e. turbine components) is included.

- 4.10.2 This assessment describes both the volume and composition of the traffic that will be generated by the development during construction, operation and decommissioning of the three wind turbines and associated site facilities, and compares this to the existing use of the local transport network.
- 4.10.3 The traffic generation during the construction, operation and decommissioning phases will not cause any significant impacts on the highway network. Notwithstanding this, a Transport Management Plan will be agreed with the highways authority to actively manage all the potential issues resulting from the increased demand on the local transport infrastructure to ensure that any impacts are minimised or eliminated, and this will be kept under review during the construction phase.
- 4.10.4 In light of the above conclusions it is considered that this development complies with all relevant development plan policies, and national planning policy and guidance.

4.11 Socio-economics

- 4.11.1 A range of socio-economic effects may result from the proposed development, these include: direct effects on employment; indirect effects on economic activity, e.g. construction workers using local facilities such as bed and breakfast accommodation; and indirect effects on tourism and recreation, principally due to perception of visitors to the area. The consideration of socio-economic impacts as a result of the proposed development is outlined in detail in Section 11 of Volume 1 of the ES.
- 4.11.2 The assessment concluded that construction of the proposed Park Spring Wind Farm will result in small direct positive economic benefits for local service companies (i.e. cafes, hotels, shops, security) as well as local contractors. Construction will employ of the order of 30 construction workers and will last approximately 6 to 9 months. During operation, the positive impacts attributed to the proposed development would be less noticeable as the wind farm will be unmanned. Its performance will be automatically monitored from a centralised off-site control room. Staff of two maintenance engineers is envisaged, depending on the manufacturer selected during the tendering process. These staff would be part-time at the development as it is expected they would also operate and maintain a number of other wind projects in the area.
- 4.11.3 However, there would also be wider economic benefits associated with the scheme. Estimates by the European Wind Energy Association (EWEA) value the European wind energy market at £50 billion by 2020. The Department of Energy and Climate Change (DECC) estimate that there are currently 2,500 jobs sustained by the wind industry in the UK, which could rise to as high as 35,000 jobs across all UK renewables by 2020.
- 4.11.4 Between 1 April 2011 and 31 March 2012, there was over £1.6 billion of private sector investment in onshore wind, supporting around 1,800 jobs, and contributing to the Coalition Government's objective to rebalance the economy and support economic growth. (DCLG Press notice: 13/057)
- 4.11.5 The positive impacts of the wind farm on the economy as already mentioned above are consistent with the NPPF which states that there is an economic role which needs to be filled in order to achieve sustainable development.

4.12 Community Engagement and Potential for Community Benefits

- 4.12.1 The application has been discussed with the communities closest to the site and feedback to the proposal assessed.
- 4.12.2 Residents living in proximity to other built wind farm sites have, over the last few years, participated in several independent surveys with regards to their attitudes to wind energy. These surveys have consistently shown that a clear majority of between 70 and 80 per cent of the general public are in favour of wind energy. This positive feeling is reflected by those living near a wind farm, and similar numbers do not believe that it spoils the scenery or causes noise nuisance.
- 4.12.3 Potential community benefits have been raised during those discussions. The EDF ER position on this aspect is that it is best dealt with following the determination of the application and not be seen as part of the application process. However, it is the case that EDF ER has taken a positive approach to the establishment of community funds as part of proposals for other wind farms, and there is no objection in principle to such a fund being established in connection with this proposal.
- 4.12.4 Where EDF ER has participated in the establishment of community funds, an annual contribution based on at least £1,000 per MW of installed capacity has been used. However, recent government announcements have suggested that the wind industry increase the level of funding for community funds, from £1,000 to £5,000 per MW of installed capacity. EDF ER is committed to comply with standard levels of community funding if the increase is adopted by the wind industry. The proposed Park Spring Wind Farm would provide as a minimum £6,000 per annum over the life of the development.

5 CONCLUSION

- 5.1.1 The Park Spring Wind Farm proposal would comply with national and local planning policy, in particular the requirements of the NPPF in relation to Renewable Energy and the Greenbelt; and, policies CSP 6 (Renewable Energy) and CSP 34 (Greenbelt) Barnsley LDF Core Strategy.
- 5.1.2 Policy CSP 6 of the Barnsley Local Development Framework Core Strategy and the associated discussion regarding this policy states that the Council will support proposals for renewable energy unless there are significant harmful effects which cannot be prevented or mitigated against. Where large scale renewable energy developments are proposed which are dominant in the landscape (like the proposed Park Spring Wind Farm), the Council will weigh up the environmental, social and economic benefits of the proposals against effects on the local area, including any effects on the National Park, the Green Belt and European and Natural 2000 designations.
- 5.1.3 The proposed wind farm has been designed to ensure that there are no significantly harmful effects on: the character of the landscape and appearance of the area; living conditions; biodiversity, geodiversity and water quality; heritage assets, their settings and cultural features and areas; highway safety; and infrastructure including radar.
- 5.1.4 The proposal would significantly contribute to the local renewable energy target. The proposed turbines would generate an output of up to 6 MW, and approximately 13,613 MWh of electricity per year, this is clearly a significant benefit to the Barnsley Metropolitan Borough Council area. Although now revoked the Regional Spatial Strategy set local targets for installed grid-connected renewable energy. The figures for Barnsley were 15 MW by 2010 and 34 MW by 2021, at present there is 26.9 MW of operational and consented renewable generating capacity in Barnsley. Although the RSS no longer forms part of the development plan, the evidence used to inform the strategy, and therefore to set the renewable energy generating capacity targets is considered to be a material consideration in the determination of the Park Spring Wind Farm application.
- 5.1.5 Furthermore, the key Green Belt objectives of restricting the sprawl of large built-up areas; preventing neighbouring towns from merging into one another; safeguarding the countryside from encroachment; preserving the setting and special character of historic towns; and assisting the recycling of derelict and other urban land are not considered to be breached by this proposal due to the characteristics of the development proposed.
- 5.1.6 As such this proposal is considered to represent the very special circumstances that can justify development within a Green Belt. The significant contribution to meeting the targets for renewable energy generation at the national and local level, and the consequential effect in tackling climate change represents a compelling argument in favour of the proposed wind turbines at Park Spring.
- 5.1.7 Substantial weight has been given to any harm that might result from the development. However, given the characteristics of the development proposed and its negligible impact on the openness of the Greenbelt, together with the wider benefits of the scheme through renewable energy generation, it is suggested that the benefits of the scheme clearly outweigh the harm by virtue of inappropriate development, the very limited harm to the openness, and any other harm so as to justify approving planning permission for the proposed scheme on the basis of very special circumstances.

- 5.1.8 Accordingly, it is submitted that the proposed wind turbines at Park Spring are on balance in accordance with the objectives of the adopted NPPF. It is therefore, respectfully, submitted that the proposals therefore comply with the aims and policies of the development plan for Barnsley and the NPPF and planning permission should be granted