



Installation of 45m turbine & associated works  
West Thornber, Wigglesworth

September 5th 2014

Object

Dear Ms Muscroft

CPRE Craven has examined the file, met with local residents and viewed the site from a variety of locations including from the Yorkshire Dales National Park. The fact that there is already a wind turbine on site makes comment much easier and residents comments to CPRE are based upon fact not fear of what might be.

Our countryside is incredibly beautiful, dangerously finite and infinitely precious. That countryside will continue to change as it always has. But the speed and scale of the change we are now seeing as a result of the proliferation of wind turbines is immense and threatens to damage the character of many landscapes for at least one generation. The Campaign to Protect Rural England is increasingly concerned that the wave of planning applications for wind turbines across the countryside risks unacceptable harm to the landscape, to localism and people's confidence in the planning system and ultimately to the battle against climate change which rests on public consent and participation. In 2011, Secretary of State for Energy and Climate Change Chris Huhne reassured CPRE that efforts to tackle climate change did not mean the Government would '*wantonly plant wind farms across the country*' or '*let market forces loose on the countryside*'

CPRE has always recognised that the countryside and its landscapes will change over time in response to human needs. The countryside as a source of energy is one such example. In principle, CPRE will accept wind turbine proposals where they are appropriately located, but will oppose proposals where the balance between energy output and landscape and amenity harm is judged to be unfavourable.

Decisions made today will have a lasting effect on the countryside. In pursuing our national carbon reduction and renewable energy targets, we must not ignore other important and established environmental objectives, particularly the protection of valued landscapes from damaging development. In the case of the application at West Thornber for a second 45 metre turbine, CPRE feels that the balance between energy output and landscape and amenity harm is unfavourable. The cumulative and sequential impact of yet another wind turbine in this area is the first major concern to CPRE. We therefore respectfully request that the application be refused. Our rationale is attached.

Yours Sincerely

The Chairman and Committee of CPRE Craven

## **Recommendation for the refusal of West Thornber, second 45m wind turbine on a 52 square metre concrete base.**

### **1 Industrialisation of the open countryside**

The proposal would create the effect of an industrial character in a non urban, countryside area within close proximity to the Forest of Bowland AONB and in full view of the Yorkshire Dales National Parks national trails and public footpaths. The concrete base required for a turbine of this height would measure 52 square metres

### **2 Adverse impact on the tranquillity of the local area.**

Our landscape in this part of Craven falls into the Most tranquil category in CPRE's Tranquillity Map

Tranquillity is a highly valued characteristic of the English countryside and a key indicator of its quality

The NPPF has a emphasis on planning taking into account 'the different roles and character of different areas' and 'recognising the intrinsic character and beauty of the countryside' as a core principle. (NPPF para 17)

Tranquillity is part of this intrinsic character.

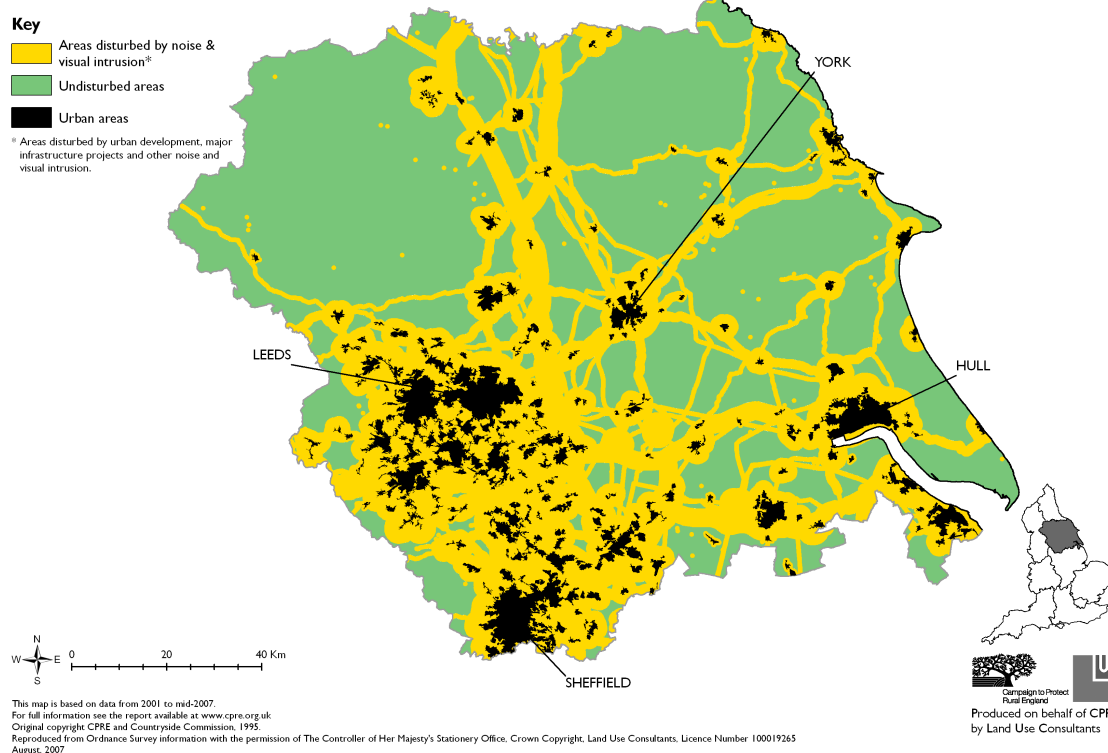
CPRE worked closely on researching tranquillity with Natural England and the Universities of Northumbria and Newcastle during 2005-2006. This work identified up to 44 'mappable' factors that affect people's experience of tranquillity and used 42 such factors to quantify and map England in 500m by 500m squares on a spectrum of tranquillity from least to most tranquil. CPRE published this new tranquillity map of England in 2006. CPRE published a revised version and new county maps in 2007. The research produced a model of tranquillity which includes negative and positive factors that can be seen and/or heard: for example hearing traffic, seeing urban development, hearing birdsong or seeing trees in the landscape. On this basis CPRE went on to define tranquillity as the quality of calm experienced in places with mainly natural features, free from disturbance from man-made ones.

Core planning principles refer to 'recognising the intrinsic character and beauty of the countryside' (NPPF, para. 17). This suggests that other rural areas outside any recognised 'areas of tranquillity' that emerge may also deserve some protection for their tranquillity, irrespective of whether the area is 'prized'. This position is supported by the Rural White Paper Our Countryside: the Future – a fair deal for rural England (2000) which recognised tranquillity and associated aspects as an intrinsic part of the character of the countryside: 'It is not just its physical features

which gives the countryside its unique character; there are also less tangible features such as tranquillity and lack of noise and visual intrusion, dark skies and remoteness from the visible impact of civilisation.'

**We submit that whilst there is a wind turbine of 45 metres on site at this time, this is no justification to further destroy or adversely impact upon the tranquillity of the open countryside around Wigglesworth, it would be visually intrusive and would add to the detrimental impact caused by the first approved turbine at this location and this turbine application should be refused.**

### **Intrusion Map: Yorkshire and Humber, 2007**



### 3 Design & Access EIA screening opinion

We note the decision of the planning authority that in view of the size of the development constitute EIA development.

However, it is of great concern to CPRE that the agent for the application in point 1.4 of the D&A statement, states the following:

*'In addition, the same turbine as that permitted under Craven District Council reference 36/2011/12044 is now proposed so that it would assimilate within the **surrounding context**'.*

The planning portal offers the following information relation to plans and planning applications

[www.planningportal.gov.uk/uploads/1app/maps\\_plans\\_and\\_planning\\_apps.pdf](http://www.planningportal.gov.uk/uploads/1app/maps_plans_and_planning_apps.pdf)

*"Most planning applications require a location plan and a site plan (also known as a block plan), to be submitted as supporting documents.*

*A location plan shows the proposal in its **surrounding context** and a site plan shows the development in more detail.*

*This guidance is based on the criteria set out in the Government guidance document (Guidance on information requirements and validation."*

Therefore the surrounding context refers to the area within the location plan. The major part of the location plan is field with associated walls, hedgerows and trees and agricultural buildings. One turbine does not a context make.

In the D&A the agents go on to state in section 2 Assessment

#### *2.1 Physical Context*

*2.2 The application site is located on agricultural land associated with West Thornber Farm. The land is currently used for grazing land.*

This again suggests that the surrounding context is grazing land or fields.

To suggest that a one turbine justifies the successful assimilation of another industrial structure in the countryside is flawed.

Whilst the officers could not justify EIA for this application, it is important to remember that environmental impact EU laws and agreements apply to this country and it should be noted that general principles are important in interpreting and applying European Union environmental law.

### Article 3 (3) Treaty on European Union (TEU)

Member states shall.....*"work for the sustainable development of Europe...based on ..aiming at ..a high level of protection and **improvement** of the quality of the environment."*

Supporting our argument that the existence of one turbine which already degrades the surrounding countryside cannot be used to permit the approval of another.

We suggest that in the case of this application EIA should have been carried out to assist the LPA and Local People and the Developer to assess the impact on the surrounding area of such a large turbine.

In view of the rationale used by the agent to justify approval of one turbine based on the prior approval on another, this would indicate to us a pattern that should alert authorities to an increased need for Environmental Impact Assessment.

Section 2.6 of Design and Access statement is also most interesting in attempting to justify the suitability of the site for a large turbine.

*2.6 The application site falls outside development limits for development control purposes and is within Flood Zone 1. The land immediately surrounding the application site is dominated by farming with farmsteads scattered in the area alongside small clusters of residential properties, caravan parks and holiday let cottages and the above mentioned settlement. There are also small clusters of woodland surrounding the application site particularly to the northwest, north and northeast.*

Twin Ghyll Caravan Site 2.6km from site on lower ground.

Gallaber Caravan site 4.4km from site (the larger part of which was created without EIA which should have been carried out according to CDC)

Crowtrees Park 3.6 km from the site and on the other side of the hill.

If the application site is indeed surrounded by caravan sites and holiday let cottages then this illustrates the importance of the area to tourism in addition to farming and any degradation of the quality of the countryside would present a harmful impact on tourism and the tourist based economy.

However we illustrate our description of the area using google earth maps showing the last image (2009) of the surrounding context which clearly shows a rolling, rural landscape.

Perhaps if using the arguments made by the developer and the location of nearby caravan sites as rational to approve the turbine we should focus on the proximity of the Yorkshire Dales National Park (4.23km) and the Forest of Bowland AONB 1.5km

from the application site. The Long Preston Conservation area some 3.0 km from the application site or the Long Preston Deepes SSSI again, approximately 3.0 km from the application site or Pan Beck Fen SSSI approx 3.5 km from the site or the White Moss SSSI 1.5km to the west of the application site to name but a few key sites within the same distance as the mentioned caravan sites

The area contained within this map measures 3.9 km by 4.54 km



The maps confirms that:

The landscape character of this site is classified as "Pasture with wooded gills and woodland in the 2002 Craven District Council Landscape Appraisal. That landscape character appraisal must be respected and noted. It should also be noted that this landscape character description does not include wind turbines. The site falls

within the National Character Area 33 Bowland Fringe and Pendle Hill (Natural England Character Map of England).

#### 4 Energy value

In the argument (see para 9.3 officer report 36/2011/12044) to support the previous application para 17 of the NPPF was used to justify this argument and the following quoted:

planning should “support the transition to a low carbon further in changing climate and encourage the use of renewable resources” (**for example** the by the development of renewable energy)

Wind energy is used as an **example** only.

In the Government’s policy ‘Increasing the use of low-carbon technologies’  
[www.gov.uk/government/policies/increasing-the-use-of-low-carbon-technologies](http://www.gov.uk/government/policies/increasing-the-use-of-low-carbon-technologies)

The issue is clearly identified:

*Increasing the amount of energy the UK gets from low-carbon technologies such as renewables and nuclear and reducing emissions through carbon capture and storage will help us to*

- *make sure the UK has a secure supply of energy*
- *reduce greenhouse gas emissions to slow down climate change*

Agriculture can contribute positively to carbon reduction through the use of carbon capture or sequestration. All homes with a desire to reduce the impact on climate change through the use of renewable energy would surely demonstrate other practices in existence such as solar energy, bio mass heating, ground source heating, insulation, low impact lighting.

We can find no evidence of such in relation to the farm at West Thornber illustrating to CPRE Craven that this is a commercially based application and not one of concern regarding the need to reduce carbon emission through careful management of energy

This application is for a second 45m turbine on this site. In the argument for the first turbine (application 36/2011/12044. The applicant stated in this instance that the turbine was needed ‘to meet the requirements of the farming operation on this site and would enable the farm to operate more efficiently and would contribute to the economic viability of the rural economy.’ There can be no justification in using this argument to promote the second turbine based on the size and scale of the proposal versus the size and needs of the farm operation. This proposal now illustrates a commercial enterprise based purely upon turbines and subsequent payments

## 5 Size and scale of the development

From the officer report relating to 36/2011/12044

*9.6 At the local level, Saved Policy ENV1 is permissive of small scale development appropriate to the countryside where it clearly benefits the RURAL economy*

Thus identifying the argument in support of small scale development in the open countryside however point 9.9 goes on to state clearly

*9.9 It is acknowledged that the proposal is **not small scale** development and therefore there would be some impact on the landscape, however as stated in para 98 of the NPPF, that applications for renewable energy generation should be approved in the impacts are (or can be made) acceptable and that these projects provide a valuable contribution to cutting greenhouse gas emissions.*

It is therefore established without doubt that the officer (and CPRE agree) felt that the application for one 45m turbine was not small scale development and therefore logical and reasonable to assume that a further application for a similar turbine again is not small scale development indeed we would go as far as to argue that it becomes large scale industrial development of the open countryside.

We submit that the size of scale of this turbine when viewed singularly would have an adverse impact on the landscape however when viewed with the existing approved turbine, that impact significantly and adversely increases.

This turbine would present an industrial structure within the open countryside that would stand 45 metres high from base of the turbine (not including the concrete base) to tip. 45 metres equates to 147.63 feet or more than twice the height of the Angel of the North, Britain's largest sculpture. 45metres equates to the eight of more than eight double decker buses or between 14 and 18 stories dependent upon building spec. In short it would be visually obtrusive structure in the open countryside.

In the arguments to approve the first 45 metre turbine on this site, constant reference was made to the 46m high telecommunications mast close to Dunhazles farm as supporting rationale to approve the application.

We suggest that the existence of an existing structure (as in the case of the existing approved turbine) and the telecommunications mast cannot be used as rationale to further degrade the character and appearance of the surrounding countryside.



## **6 Impact on the Yorkshire Dales National Park**

The proposed turbine will add to the adverse impact of the first approved turbine on this site when looking at views from the Yorkshire Dales National Park.

When walking the trails in the National Park above Long Preston, it is quickly apparent that the views from the National Park are changing with a surprising number of highly visible turbines. There can be no argument to further degrade the area.

## **7 ENV 1, 2**

Saved policy ENV2 states that development acceptable in principle under policy ENV1 should only be permitted where it is compatible with the character of the surrounding area and does not have an unacceptable impact on the surrounding area. We have already argued that this application will create an unacceptable impact on the surrounding countryside. Therefore we submit that this application should be refused using ENV1 & 2

## **8 Sustainability**

This proposal fails to meet all three requirements to be considered sustainable. *There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: an economic role ... a social role ... and an environmental role.....These roles should not be undertaken in isolation, because they are mutually dependent....*

*Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.*

This harm to the environment outweighs the benefits and therefore this development fails.

Economically, the harm to tourism, a key contributor to the local economy outweighs the benefits.

## Conclusion

- This application should be refused because the balance between energy output and landscape and amenity harm is unfavourable.
- This application is contra to NPPF para 17 setting out as one of the 12 core planning principles that planning should:
  - take into account the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside.
- This wind turbine would loom high in the open and unspoilt countryside representing an incongruous structure that would considerably detract from the natural scenic quality of the surrounding area.
- The National Planning Policy Framework states: 'the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscape' It is our suggestion that this turbine would damage and degrade the local landscape.
- Mrs. Justice Laing ruled in 2011 that:
  - 'It is not correct to assert that the national policy of promoting the use of renewable resources ..negates the local landscape policies or must be given primacy over them'
  - The Government's targets on climate change cannot and should not take precedence over natural beauty.
- It would create an industrial setting in the midst of open countryside in close proximity to an AONB and in view of a national park.
- It would impact adversely on tranquillity in this rural area

**Therefore, CPRE Craven suggests that whilst the proposed development is supported in principal by the policy of the NPPF, the harm which would be caused to the character and appearance of the surrounding rural area outweighs that support and the benefits flowing from this renewable energy application. The NPPF also seeks to ensure that the intrinsic character and beauty of the countryside is recognised and saved Local Plan Policy ENV2 is in general accordance with criterion 4. Criterion 4 requires that services and infrastructure are provided WITHOUT causing a serious harmful change to the rural character and appearance of the locality. We request the officers of CDC refuse this application**

Interesting wind information:

In 2013

- Some 763 turbines are due to be built onshore in 2013, up 60 per cent from last year.
- Already there are 4,366 turbines in operation in the UK providing 8.2GW of power, enough to power 4.5 million homes for a year.
- There are a further 7,843 turbines that have been approved but are yet to be built, bringing the total due to go up in the UK to more than 10,000.
- In the last year the industry has hit new heights, providing 10 per cent of the UK's electricity needs – when the wind is blowing.
- The increase in wind turbines has been attributed to an apparent relaxing of the planning rules.
- Last year the approval rate for wind farms went up by 50 per cent, according to industry group Renewable UK.
- Despite fears for the countryside, the number of wind farms approved by councils at a local level went up for the first time in five years.
- These smaller wind farms or single turbines are often just as controversial as larger developments. And despite the Government's apparent cooling on the industry, the number of wind farms approved at a national level went up by a fifth.
- Dr John Constable, director of Renewable Energy Foundation, a UK charity publishing data on the energy sector, said there is a "dash for wind" while the Government continues to pay a subsidy. "The UK's wind power deployment on and offshore is way ahead of the learning curve, and needs to slow down to a rational pace to avoid insupportable burdens on the consumer and the risk of major malinvestment the unwinding of which will be painful and embarrassing."
- John Hayes, a former Energy Minister, has said that the number of wind farms does not need to go beyond those planned.
- The Government has committed to 13GW onshore by 2020, meaning the amount of onshore wind constructed or in planning is nearing the target