

08/01365/FUL: ERECTION OF TWO WIND TURBINES WITH CONTROL BUILDING AND
 ANCILLARY WORKS AT FRENCH FARM THORNEY PETERBOROUGH
 VALID: 22 DECEMBER 2008
 APPLICANT: CORNWALL LIGHT AND POWER LTD
 REFERRED BY: HEAD OF PLANNING SERVICES
 REASON: TO KEEP MEMBERS INFORMED IN VIEW OF PREVIOUS INTEREST
 DEPARTURE: NO
 CASE OFFICER: DALE BARKER
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1 SUMMARY/OUTLINE OF THE MAIN ISSUES

The main considerations are:

- i) Planning policy
- ii) The impact of the development on the character and appearance of the rural area
- iii) The cumulative impact of the proposed turbines with existing and potential turbines in the vicinity
- iv) Impact on Residential Amenity - Visual
- v) Impact on Residential Amenity - Noise
- vi) Aviation issues
- vii) Wildlife Implications
- viii) Highway Safety
- ix) Impact on National Gas Grid
- x) Trees
- xi) Other Issues - The Impact of the proposal on Agriculture, Property Values, Health, Shadow Flicker, Section 106 Obligation Implications

The Head of Planning Services recommends that the application is Refused.

2 PLANNING POLICY

City Centre Framework Implications: NONE

Village Design Statement Implications: NONE

Central Government Advice

- **White Paper on Energy - May 2007 - Meeting the Energy Challenge**

In summary the White Paper is seeking to tackle climate change by reducing carbon dioxide emissions both within the UK to ensure a secure, clean and affordable energy provision as the country becomes increasingly dependent upon imported fuel.

The White Paper expands on the need for the country to save energy whilst at the same time focusing upon Renewables as the key to the Government's strategy to tackle climate change and deploy cleaner sources of energy.

The Governments target is to have renewable energy production to grow as a percentage of the country's electricity supply to 10% by 2010 with an aspiration for this level to double by 2020. The Renewables obligation is the main mechanism for promoting this growth. (The Government requires energy suppliers to provide a percentage of the energy they generate from renewable sources).

- **White Paper - Planning for a Sustainable Future - 2007**

The White Paper emphasises the need for an efficient and effective planning system. It emphasises the need for Local Authorities to make timely decisions whilst taking full account of representations from the public and those bodies consulted on an application. It sees that climate change is a key challenge facing this generation and that the targets that have been set by way of increasing percentages of renewable energy production are to be met. Applicants proposing renewable energy developments no longer have to justify a need for the proposal.

It makes reference to an emerging Planning Policy Statement on Climate Change where it will make it clear that the government will expect Local Authorities to look favourably upon proposals for renewable energy projects.

The Department of Trade and Industry published, in 1997, the Assessment and Rating of Noise from Wind Farms. To provide a framework for the measurement of turbine noise. It gives indicative noise levels thought to offer a reasonable degree of protection to wind farm neighbours. The report recommends:-

- The control of wind farm noise by the application of external noise limits at the nearest noise sensitive premises
- Setting limits relative to background noise
- Setting separate daytime and night-time limits
- Limits should be 5dB (a) above background
- A noise rating and monitoring scheme for developer/Local Authority adoption

- **Planning Policy Statement 22 (PPS22) - Planning for Renewable Energy**

PPS22 and its companion guide outline 8 key principles in the Government's approach to renewable energy. These are as follows:-

- (i) Renewable energy developments should be capable of being accommodated throughout England in locations where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily.
- (ii) Regional spatial strategies and local development documents should contain policies designed to promote and encourage, rather than restrict, the development of renewable energy resources. Regional planning bodies and local planning authorities should recognise the full range of renewable energy sources, their differing characteristics, locational requirements and the potential for exploiting them subject to appropriate environmental safeguards.
- (iii) At the local level, planning authorities should set out the criteria that will be applied in assessing applications for planning permission for renewable energy projects. Planning policies that rule out or place constraints on the development of all, or specific types of, renewable energy technologies should not be included in regional spatial strategies or local development documents without sufficient reasoned justification. The Government may intervene in the plan making process where it considers that the constraints being proposed by local authorities are too great or have been poorly justified.
- (iv) The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission. This directs Planning Authorities to give a greater emphasis to the overall benefits of renewable energy than was previously given in PPS22.
- (v) Regional planning bodies and local planning authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects (e.g. identifying generalised locations for development based on mean wind speeds).

Technological change can mean that sites currently excluded as locations for particular types of renewable energy development may in future be suitable.

- (vi) Small-scale projects can provide a limited but valuable contribution to overall outputs of renewable energy and to meeting energy needs both locally and nationally. Planning authorities should not therefore reject planning applications simply because the level of output is small.
- (vii) Local planning authorities, regional stakeholders and Local Strategic Partnerships should foster community involvement in renewable energy projects and seek to promote knowledge of and greater acceptance by the public of prospective renewable energy developments that are appropriately located. Developers of renewable energy projects should engage in active consultation and discussion with local communities at an early stage in the planning process, and before any planning application is formally submitted.
- (viii) Development proposals should demonstrate any environmental, economic and social benefits as well as how any environmental and social impacts have been minimised through careful consideration of location, scale, design and other measures.

Regional renewable energy targets should be expressed as a minimum amount of installed capacity. The fact that a target has been reached should not be used in itself as a reason for refusing planning permission for further renewable energy projects. Nor should it be argued that the potential to generate substantial amounts of energy from offshore projects is reason to justify lower targets for onshore projects. The PPS also states that fixed targets for renewable development proposal should not be used.

Of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects. However, in assessing planning applications, local authorities should recognise that the impact of turbines on the landscape will vary according to the size and number of turbines and the type of landscape involved, and that these impacts may be temporary if conditions are attached to planning permissions which require the future decommissioning of turbines.

Renewable technologies may generate small increases in noise levels (whether from machinery such as aerodynamic noise from wind turbines, or from associated sources - for example, traffic). Local planning authorities should ensure that renewable energy developments have been located and designed in such a way to minimise increases in ambient noise levels. Plans may include criteria that set out the minimum separation distances between different types of renewable energy projects and existing developments. The 1997 report by ETSU for the Department of Trade and Industry should be used to assess and rate noise from wind energy development.

The original PPG22 outlined noise levels from selected every day activities to compare with the noise levels generated by a wind farm development. A selection of these are:-

Source/Activity	Indicative Noise Level at dB(A)
Threshold of Pain	140
Pneumatic Drill at 7m	95
Car at 40mph at 350m	55
Wind farm at 350M	35-45
Quiet bedroom	20
Rural night-time background	20-40

- **Planning Policy Statement 7 - The Countryside, Environmental Quality and Economic and Social Development** seeks to integrate development necessary to sustain economic and social activity in rural communities whilst protecting the character of the countryside. It indicates that new development should be sensitively related to existing settlement patterns and to historic, wildlife and landscape resources.

- **Planning Policy Guidance Note 8 - Telecommunications** - This guidance indicates that the possibility of interference can be a material consideration. There are two types of interference. Electromagnetic by a radio transmitter or by unwanted signals emitted by other electrical equipment. If such potential for this kind of interference could be remedied then there would be no justification for taking it into account. Secondly there is the potential for a physical interference. The guidance specifically mentions that wind turbines fall into this category and that a Local Planning Authority must be satisfied that this potential has been fully considered.
- **Planning Policy Guidance Note 24 - Planning and Noise** - This gives guidance on the use of planning powers to minimise the adverse impact of noise and that noise can be a material consideration in considering the acceptability of development proposals. New development involving noisy activities should, if possible, be distant from noise sensitive land uses. Where it is not possible to achieve such a separation of land uses it should be considered whether it is practical to control or reduce noise levels, or to mitigate the impact of noise through the use of conditions or planning obligations.

Regional Planning Policy

The East of England Plan - The Revision to the Regional Spatial Strategy for the East of England - May 2008

Represents a 15-20 year vision to tackle climate change, address housing shortages and strengthen the region's economy.

The Plan sets out Renewable Energy Targets for the region and states that 'the development of new facilities for renewable power generation will be supported with the aim of meeting the following regional targets:-

By 2010 there is to be at least 1192 Megawatts of installed capacity for renewable energy and by 2020 there is to be at least 4250 Megawatts of installed capacity. These targets are equivalent to 14% of total electricity consumption in the East of England (or 10% excluding off shore wind) by 2010 and 44% (17% excluding off shore wind) by 2020. It goes on to advise that these targets are subject to meeting European and international obligations to protect wildlife, including migratory birds and to revision and development through the review of the Regional Spatial Strategy.

Development Plan Policy

Cambridgeshire and Peterborough Structure Plan

Keynote sustainable development policies in the Structure Plan set the framework for the County Council's vision for the future of the County.

Policy P7/7 of the Structure Plan relates specifically to renewable sources of energy advising that wind, biomass and solar systems will be considered favourably. It further advises specifically that Local Planning Authorities will consider areas of search for generating energy from wind where areas attain sufficient wind speed, do not adversely impact upon the residents of an area or the local environment and can be connected to new or existing energy demands.

Peterborough Local Plan (First Replacement)

- T1 - The Transport Implications of New Development
- DA2 - The effect of Development upon the Amenities and Character of an Area
- CBE2- Other Areas of Archaeological Potential or Importance
- CBE3 - Development affecting Conservation Areas
- CBE7 - Development affecting the Setting of a Listed Building
- LNE1 - Development in the Countryside
- LNE3 - Loss of Agricultural Land
- LNE9 - Landscaping Implications of Development Proposals
- LNE17 - Other sites of Nature Conservation Importance
- LNE19 - Protection of Species
- U5 - Floodland and Washland
- U12 - Protection of Utility Mains and Plant
- U14 - Energy from Renewable Sources

DETR Circular 1/97 "Planning Obligations". Amongst other factors, the Secretary of State's policy requires planning obligations to be sought only where they meet the following tests:

- i) necessary;
- ii) relevant to planning;
- iii) directly related to the proposed development; (in the Tesco/Witney case the House of Lords held that the planning obligation must at least have minimal connection with the development)
- iv) fairly and reasonably related in scale and kind to the proposed development;
- v) reasonable in all other respects.

In addition Circular 05/2005 states the following principles:

The use of planning obligations must be governed by the fundamental principle that **planning permission may not be bought or sold**. It is therefore not legitimate for unacceptable development to be permitted because of benefits or inducements offered by a developer which are not necessary to make the development acceptable in planning terms. Similarly, planning obligations should never be used purely as a means of securing for the local community a share in the profits of development.

3 DESCRIPTION OF PROPOSAL

The proposal is for the erection of 2 identical wind turbines to measure 60m to hub (nacelle) height and 100m to the blade tip. The blades will have a length of 40m each. Each of the turbines would have a rated output of 2-2.5MW. The turbines will be approximately 360 m apart.

The blades of each of the turbines are to rotate in the same direction and the hub (nacelle) of the turbines turn to ensure that the blades would always face into the wind.

They would begin to generate power at wind speeds of around 6.75mph (3.5m/s) and would shut down if the wind speed were to reach around 56mph(25m/s).

The applicant has confirmed that the arrangement of the turbines has been dictated by the need to provide a good separation distance from existing residential properties.

The construction of the turbines would require the upgrading of an existing farm track through the fields and the formation of a temporary access from French Drove. The access track will have a width of a minimum width of 4.5. The track would be retained for the operational life time of the development to service/maintain the turbines.

Each turbine will have reinforced concrete foundations approximately 20 m square and 2.5 to 3.5 m deep depending on ground conditions.

For construction, a crane hardstanding will also be needed for each turbine. These measure approx 20m x 40m.

All electrical cables within the site will be underground, off site cabling will be the subject of a separate application.

A control building measuring approx 8m x 10m is proposed to the rear of the existing farmyard area. During construction a compound measuring approx 30m x 40m will be used and removed after completion

Vehicles delivering the component parts of the turbines will approach from the west via the A16, A1073, the B1166 and French Drove. Some enabling works will be necessary along the route of the delivery and construction vehicles to include the corner leading to South Eau Bridge, which may need to be temporarily widened and the bridge strengthened. The construction vehicle length has to accommodate 40m long blades.

4 DESCRIPTION OF SITE AND SURROUNDINGS

The character of the area is Peaty Fen where the landscape is dominated by arable farming, isolated farmsteads, long straight roads, rivers and drains which is known for its 'big sky'. The site is located approximately 4km north of Thorney and 4km to the east of Crowland.

Entrance is off French Drove using a custom built temporary access in order to avoid conflict with trees within an existing farmyard.

The access to the site follows the western edge of a straight dyke that runs approximately

north/south. The turbines are proposed immediately to the west of the access road.

Approximately 700m to the north of the site are a group of dwellings on Dowsdale. These dwellings are partially screened from the application site by a mature tree belt and an earth bund.

5 PLANNING HISTORY

There have been a number of other wind turbine proposals in the vicinity which are set out below.

98/00904/FUL - Erection of 2 x 60m wind turbines Approved (Renewal of 93/P0457). This permission has been commenced and can be completed at any time.

03/01869/FUL - Erection of 12 wind turbines on land at Wrydecroft -Withdrawn.

03/01247/FUL - 8 X 100m wind turbines on land at Morris Fen, to the north of English Drove and to the south of Green Drove Thorney. This application was refused in 2004 on the grounds that the wind turbines would have an adverse impact upon visual amenity, the character of the Fen landscape and the amenities of the nearby residents.

07/01756/FUL - the erection of 2 x 100m tall wind turbines on the application site. This scheme has been withdrawn. There remains an extant planning permission for the erection of 2 x 67m high wind turbines at this site. The permission dates back to 1994.

04/00902/FUL - Erection of 7 x 100m tall wind turbines on land at Wrydecroft, Thorney. Members resolved to approve this application subject to the satisfactory completion of a section 106 agreement. However this proposal has never been pursued by the applicant due to a late objection from TRANSCO on safety grounds. One of the turbines was in close proximity to a main gas pipeline crossing through the site such that were it to topple over the gas pipeline would potentially be in danger of being pierced.

06/01051/FUL - Erection of 7 x 102m tall turbines on land at Nuts Grove Farm, Thorney. This application is currently the subject of an appeal. Members resolved at the 21st October 2008 meeting of the Planning and Environmental Protection Committee that they would have refused the application for the following reasons: Ministry of Defence advice that the proposed turbines would interfere with the proper operation of its RAF radar systems; the applicant had failed to demonstrate that the proposal would not adversely affect such aviation interests and on the grounds that the cumulative impact of wind turbines would have an adverse impact on the character of the Fen landscape and failure to make S106 contributions.

07/01411/FUL - Erection of 6 x 102m tall turbines on land at Wrydecroft, Thorney. Refused. This application was refused at the 21st October 2008 meeting of the Planning and Environmental Protection Committee following an objection from the Ministry of Defence who advised that the proposed turbines would interfere with the proper operation of its RAF radar systems; the applicant had failed to demonstrate that the proposal would not adversely affect such aviation interests and on the grounds that the cumulative impact of wind turbines would have an adverse impact on the character of the Fen landscape and failure to make S106 contributions. This application is currently the subject of an appeal.

07/01813/FUL - The erection of 4 x 125m tall turbines on land adjacent to the Flag Fen Sewage Treatment Works, Third Drove, Peterborough. The application was refused under delegated authority on the grounds that the proposed turbines would have a detrimental impact upon the heavily protected Nene Washes Site of Special Scientific Interest, Special Protection Area and its RAMSAR designation an area that has been given European Protection because of its importance for wildfowl and waders. The proposal was also refused following an objection from the Ministry of Defence who advised that the proposed turbines would interfere with the proper operation of its RAF radar systems. The applicant had failed to demonstrate that the proposal would not adversely affect such aviation interests.

There have been a number of planning permissions for wind farm developments in neighbouring authorities. These include:-

Fenland District Council

- 8 x 100m high wind turbines at Glassmoor Bank, approximately 5 km south of the centre of Whittlesey (i.e. 15km from the site). Approved in June 2003 - Implemented.
- 8 x 100m high 1.75MW wind turbines at Coldham Farm approximately 5 km north east of the centre of March. Approved September 2003 – Implemented
- 9 x 100m high 1.75MW wind turbines at Franks farm which is approximately 4.5km north east from the centre of March. Approved and Implemented
- 1 x 107m high on land off Longhill Road, March Approved and Implemented.
- 5 x 100m high turbines on land at Ransom Moor Farm approximately 7km from the centre of March. Approved and Implemented.
- 4 x 125m high wind turbines have been erected on land near to the McCains Factory/Abbey Produce to the west side of Whittlesey. Approved and Implemented.

South Holland District Council

- 8x100m high wind turbines to North West of the village of Deeping St Nicholas. These were approved at appeal by the Secretary of State in May 2003 and implemented. They are visible from the application site.

6 CONSULTATIONS/REPRESENTATIONS

INTERNAL

Head of Transport and Engineering Services – No objection subject to conditions.

Landscape Architect - In principle I do not have any objection to this application.

Consent has already been granted for two 60m turbines (98/00904/FUL and 93/P0457). Although those now proposed are physically much larger, perceptually this will only be really noticeable close too, say within 1km or so. Bearing in mind the small number of properties concerned, the change in overall visual impact will therefore be relatively limited. At the same time it is important to realise that within 5km moderate adverse impact is likely. At the level of overall landscape character the change would be insignificant.

To their credit the applicants have not relied upon the existing commitment to justify their revised proposal. They have prepared a very thorough and up to date landscape and visual impact assessment with which I have very little argument. Significantly it applies to the latest advice on photomontages. Here it is critical to appreciate that these show the effect of the development on a photo of the view. To properly appreciate their significance the reader should view relevant photographs at each location to ensure they take account the limitations of photographic representation.

One of the main considerations concerning wind turbine development in the larger area is cumulative impact.

In terms of pure numbers I have no difficulties with the two proposed. When considered with the potential numbers at Wryde Croft/Nutsgrove the physical separation of 4 km will mean that from most directions the development will be seen as separate and as part of a larger landscape. It will be only from limited directions that the two will merge and here into a largely unstructured view.

Cumulative impact also needs to be concerned in terms of **design**. Wind farms which contrast in size, turbine height, or layout can give rise to a visual conflict and on this argument there are benefits of having turbines of the same size as on adjoining proposed sites.

Significantly the Environmental Report includes a cumulative landscape and visual impact assessment which looks at the whole of the surrounding area in relation to existing and proposed wind energy developments; the issue here being one of not exceeding the threshold or capacity of the local landscape to accept change without unacceptable change to the area as a whole. To do this there needs to be clarity about the landscape objectives in the area.

Whether:

- to maintain the integrity and quality of the immediate landscape (as may be appropriate within a designated landscape or
- to maintain the landscape character; or
- to accept landscape change

Here I suggest that objective to maintain overall landscape character, whilst tolerating local landscape change is reasonable.

The cumulative assessment has looked at views from various locations and considers the question of change of landscape character as a result of the development. However it does do this from a relatively narrow point of view. The difficulty here being that wind turbines are starting to become a significant occasional feature in the surrounding Fen landscape and landscape character is subtly changing. Significantly it is doing so as a result of development in neighbouring local authorities, none of which is under the control of this LPA. This issue cannot be ignored

In terms of the cumulative effect of Wryde Croft, Nuts Grove and French Drove there is no doubt that the three proposed developments will lead to a major change in the structure of the local landscape and also local landscape character. However it continues to be my opinion that whilst the wider overall Fen landscape character will not be damaged by this level of development, the total number of turbines should be viewed broadly as the maximum for this locality. This would be broadly in line with the most recent advice on cumulative effect of wind farms (Scottish Natural Heritage 2005) where it is made clear that such judgements do have to be based upon a full local consideration of local landscape issues.

Head of Environmental Health Services - Has no objection subject to appropriate conditions.

The Archaeological Team – A formal programme of archaeological work is not justified in this case.

EXTERNAL REPRESENTATIONS

Natural England – Has no objection subject to conditions.

Comments that it is unlikely to have a significant impact on the Nene Washes SPA/Ramsar/SSSI; conditions sought relating to removal of vegetation, surveys and monitoring for non-SPA birds, bats, water voles and great crested newts and habitat enhancement works.

The Royal Society for the Protection of Birds –

On the basis of the information provided in the Environmental Report (ER), concerning the findings of the ornithological surveys conducted, proposed mitigation measures and post construction monitoring, the RSPB is satisfied that this proposal is not likely to have a significant impact on bird populations or designated sites of nature conservation interest in the vicinity of the development.

We would recommend that the Council ensure the proposed mitigation measures and post-construction monitoring are implemented by requiring these through Planning Conditions. It is the opinion of the RSPB that the proposal should have been subject to an EIA as both turbines exceed 15 metres hub height. However, the RSPB is satisfied that, for the ornithological interest only, the information provided in the ER is that which we would have

required in an EIA and therefore we can determine that any impacts of the proposal on ornithological interest will be of low significance, and can be adequately mitigated for.

English Heritage –

The turbines are located in a flat landscape, and there are no contours on the land between the site and the historic assets that lie within 5km of the site. In Thorney these included the Grade I listed Thorney Abbey, Abbey House and Church of St Mary and St Botolph, while in Crowland they include the Grade I listed Crowland Abbey, Holy Trinity Bridge and Grade 11* listed Manor House. There are also a number of Schedule Ancient Monuments within this 5km radius.

The applicant should be asked to undertake a thorough assessment of the impact on the historic environment, and specifically those assets located within 5km of the site. Once this information is available, English Heritage would wish to be re-consulted on the application. In the event that the applicant is unwilling to undertake this work, English Heritage would wish to see the application refused on the grounds that insufficient information has been provided to allow a full assessment of the impact on the historic environment (as required by PPG 15).

Middle Level Commissioners – No comment.

The North Level Internal Drainage Board - The Boards drain runs through the application site. Its byelaws prevent any construction within 9 metres of the edge of the watercourse.

GO-East - No comments but request that it is informed of the decision.

National Grid -

Using the micro siting allowance will allow the turbines to be located a minimum of 90m from the high pressure pipeline. As long as this is adhered to No Objection.

The Wildlife Trust- Has not replied.

The Health and Safety Executive - Has no objection

The Highways Agency - No objections to the application as it would not adversely affect the A47 Trunk road.

Countryside Agency - Has not replied

The Environment Agency - No objections.

Fenland District Council - Has not replied

South Holland District Council - Object on the grounds of noise impact on residents; impact on the landscape when viewed individually and cumulatively. The Council's landscape assessment has shown the vicinity to be unsuitable for wind turbine development.

Crowland Parish Council – Express serious concern on three issues:

- 1) Noise & Vibration - There are a number of residents who we feel may be close enough to experience noise & vibration - in particular Dowsdale, French Drove & Nene Terrace and it was felt that you need to further understand the amount of dwellings in these areas as the location map seems to show far fewer dwellings than are actually in there.
- 2) Safety - The documentation received does not appear to include any assessment of the low flying military aircraft which is the corridor between RAF Wittering and Crowland Gliding Club restricted air space. These military aircraft are often flying at 250 feet.
- 3) Visual Impact - We feel that the visual impact may be somewhat more than

the "Slight to Moderate" assessment suggested in the application.

Wisbech St Mary Parish Council - Has not replied

Thorney Parish Council - Has not replied

Parson Drove Parish Council - The turbines are too close to residential properties in Dowsdale Bank, the development would affect the health of the their occupiers by way of headaches, interruption of sleeping patterns, anxiety, nausea and depression dizziness, palpitations and tinnitus; and they would have an unacceptable visual impact on the open flat countryside.

Gedney Hill Parish Council - Has not replied.

Eye Parish Council - No objections

National Power - Has not replied

Ministry of Defence – The Ministry of Defence (MOD) objects to the granting of permission for the said proposed development (“the Proposal”) which includes two wind turbines which will be 100 metres to the tip of the blade at the highest point.

Air Traffic Control (ATC) radar

The turbines will be located approximately 38 km from the Air Traffic Control (ATC) Watchman radar at RAF Cottesmore. Based on their location, both of the turbines will be within line-of-sight of that radar. No doubt Cornwall Light and Power (CLP) have carried out their own line-of-sight analysis for each of the turbines to the radar and you should refer to these line-of-sight analyses to help you make a properly informed decision.

Scientific trials carried out have demonstrated that wind turbines within line-of-sight to a primary radar (such as that at RAF Cottesmore) adversely affect the probability of detection of aircraft flying over or in the vicinity of those turbines. The reduced probability of detection extends over an area that is greater than that of the turbines themselves. This reduced probability of detection will materially impair the ability of RAF Cottesmore to provide a safe and expeditious Air Traffic Radar Service in the volume of airspace above and around the proposed wind turbines. Although the likelihood of this reduced probability of detection causing or contributing to an air accident on any particular day is very small, the turbines will be a permanent feature and the consequences of this risk becoming reality are potentially catastrophic. For this reason alone, the MOD objects to the Proposal.

Precision Approach Radar

The turbines will be located approximately 26 km from the Precision Approach Radar (RPAR) at RAF Wittering. Based on their location, both of the turbines will be within line-of-sight of that radar. No doubt CLP have carried out their own line-of-sight analysis for each of the turbines to the radar and you should refer to these line-of-sight analyses to help you make a properly informed decision.

The MOD has evidence that wind turbines within line-of-sight to an RPAR (such as that at RAF Wittering) affect the performance of that radar. The turbines will be detected by, and displayed on, the RPAR and additional plots/tracks caused by the turbines could cause the RPAR to overload and reject actual aircraft. This would have a significant adverse effect on operations at RAF Wittering and implications for air safety generally.

Again, I feel sure that CLP will have carried out their own line-of-sight analysis for each of the turbines to the RPAR at RAF Wittering and, as with the ATC radar issue, you should refer to those line-of-sight analyses to help you make a properly informed decision.

It is the MOD's position that any degradation in the operability of the RPAR at RAF Wittering resulting from the Proposal provides a free-standing basis for rejecting the Proposal.

Civil Aviation Authority (CAA) -

The French Farm development (like any wind turbine development) has the potential to impact upon aviation operations and activities in a number of ways. During 2007 we advised both the Council and Cornwall Light and Power that we had no site-specific observation. In essence that remains the case. However, it is possible that the proliferation of wind turbines in any particular area might potentially result in difficulties for aviation that a single development would not have generated. It is, therefore, not necessarily the case that, because a generic area was not objected to by the aviation industry, future, similarly located potential developments would receive the same positive response.

As the Council will be aware there have been a number of wind turbine developments that have been proposed, consented or are currently operational in the wider Fenland area. Such proliferation is of real concern to the aviation community; whilst such developments might be outside agreed or officially established aerodrome safeguarding areas, the introduction of many structures of a height of 300 feet or more will combine to impact upon local aviation activity. Whilst such an impact is difficult to quantify, the generic effect upon local light aviation activity, away from the immediate vicinity of an aerodrome needs to be considered. With that in mind, I believe it would be a sensible way forward to invite comment from local aerodromes, even though it is unlikely that there would be a specific aerodrome safeguarding issue. Accordingly, I recommend that the Council provides the aerodrome licensees / operators of Fenland and Crowland the opportunity to comment upon the French Farm ER and planning application as a whole.

Moreover, from a more generic perspective, all parties should be aware that:

- There might be a need to install aviation obstruction lighting to some or all of the associated wind turbines should this wind farm development be progressed.

This comment was made specifically if there were concerns expressed by other elements of the aviation industry, i.e. the operators. For example, if the Ministry of Defence (MoD) or a local aerodrome had suggested such a need, the CAA (sponsor of policy for aviation obstruction lighting) would wish, in generic terms, to support such a claim. We would do so if it could reasonably be argued that the structure(s), by virtue of their location and nature, could be considered a significant navigational hazard.

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

The number of pre-planning enquiries associated with wind farm developments has been significant. It is possible that the proliferation of wind turbines in any particular area might potentially result in difficulties for aviation that a single development would not have generated. It is, therefore, not necessarily the case that, because a generic area was not objected to by the aviation industry, future, similarly located potential developments would receive the same positive response².

There is a requirement in the UK for all structures over 300 feet high to be charted on civil aviation maps. Should this proposed wind turbine development progress, to achieve any charting requirement, developers will need to provide details of the development to the Defence Geographic Centre.

Due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, it would also be sensible to establish the related viewpoint of local emergency services air support units.

Peterborough Ramblers – No objection. It would give people the opportunity to view turbines quite closely

Fenland Aero Club – Has not replied

Peterborough and Spalding Gliding Club – Has not replied

East Anglian Air Ambulance – Has not replied

British Trust for Ornithology – The British Trust for Ornithology is an independent research organisation and, as such, is not able to get involved with these kinds of consultation exercises.

National Air Traffic Services - This body is responsible for the safe and expeditious movement in the en-route phase of the flight of aircraft operating in controlled airspace in the UK. The proposed development does not conflict with our safeguarding criteria.

Jubilee Farm Aerodrome - Has not replied.

Lincolnshire Bat Group - Has not replied.

Cambridgeshire Bat Group - Has not replied

Campaign to Protect Rural England - Has not replied

The Fenland Against Rural Turbines Action Group (FART) – Has not replied

Public Representations

43 letters of objection have been received on the following grounds:-

- A change in Government policy acknowledges that there is public opposition to on shore turbines – they should be sited off shore to avoid ruining quality of life
- Noise – low background noise and helicopter thump
- Health problems including migraine, headaches, depression and epilepsy potentially caused by infrasound or flicker. Health effects of living close to high voltage electricity
- Large number of private houses will be affected/devaluation of housing
- The site will be lost to agriculture at a time when there is increasing demand to grow crops
- Effect on hydrology/all foundations must be removed at the end of life
- Impact on wild bird and bat populations
- Wind farms damage the atmosphere, increase temperatures and dry out surrounding land
- Impact on views – visual impact – loss of open horizons – out of proportion – industrialisation of the landscape – cumulative impact with other proposed turbines
- Acknowledge the need for farms to diversify
- Does not produce cheap electricity
- Danger to MOD aircraft
- Blade flicker affects dog within 3 miles of existing turbines
- Will distract/cause danger to horses and road users
- Turbines are unreliable and inefficient
- There are more suitable technologies available
- Loss of tranquility
- Threat of turbine development has existed for 15 years
- Funds should be reserved for decommissioning at the end of life
- No local jobs will be created
- Proximity to existing dwellings and settlements
- Danger/disruption from construction traffic
- Devaluation/reduced saleability of houses
- Potential damage to buildings from vibration
- Local residents should be provided with individual turbines as an alternative
- Solar energy is more appropriate
- The wind blows unreliably and insufficient to generate useful electricity or to offset the permanent impact on the countryside
- Ice throw

One letter of support has been received making the following comments:

- The turbines are located well away from roads and centres of population
- They will add interest to a bleak landscape
- They will not be overwhelming
- Will enhance Peterborough's position as a 'Green City'

COUNCILLORS

No representations have been received from Members of the Council.

7 REASONING

Introduction

Planning permission was granted in 1993 for the erection of two wind turbines on the same sites as the proposed turbines under ref: 93/P0457. The permission was renewed in 1999 under ref 98/00904/FUL. This permission was commenced on site and that commencement was confirmed by officers. It is therefore possible for the applicants to proceed to construct two 400kW turbines at any time. The proposed turbines are 100m to the tip of the blades, which is smaller than the group north of Whittlesey at McCains and comparable to those south of Whittlesey at Glassmoor Bank.

This application falls within schedule 2 of the EIA Regulations which means that an Environmental Impact Assessment is optional. In view of the level of information provided by the applicant it is considered that no purpose would be served by an EIA in this case and a screening opinion to that effect has been produced.

i) Planning Policy

The Government White Paper - Planning for a Sustainable Future 2007 no longer requires the need for renewable energy developments to be justified, whilst PPS 22 advises 'the wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission.'

This affirms the Government's stance that there will always be a need for renewable energy provision by reasons of climate change and to reduce the country's reliance upon fossil fuels.

Members should therefore expect to approve applications for renewable energy proposals unless convinced by overwhelming arguments against the specific proposal.

ii) The impact of the development upon the character and appearance of the rural area

In assessing the impact of these proposed turbines on the character and appearance of the area Members should take into account the existing permission to erect two 400kW turbines on the same sites. These would stand just over half as high as the proposed 2-2.5MW (100m) turbines.

Although located in a rural area, where any form of development is tightly controlled, there are certain exceptions to this policy of constraint. One of the few exceptions to the strict control of development in the open countryside relates to public utilities. Wind must be farmed where it is found and on shore this is predominantly within rural areas.

The site is not within any designated protected area, it is arable farmland and in all directions the landscape is dominated by peaty fen landscape. In assessing the impact of the turbines on the character of the Fen countryside it is the capacity of a landscape to accommodate change without significant effects on its character.

Clearly the turbines would be noticeable from many vantage points both close to the site and further a field. The zone of influence of the turbines (i.e. at various distances from which they could be seen) could be up to 12km upon a clear day without physical or natural obstruction. Nevertheless whether it is two 60 m turbines (approved) or two 100 m turbines (proposed) the impact on the immediate countryside will be material, but in view of the distances to other approved turbine groups is not considered unacceptable when weighed against the national need to find sites for renewable energy generation.

In the past 4 years a number of wind turbine developments have been implemented, principally in Fenland but also in South Holland District.

At distances of greater than approx 3-4 km the potential for wind turbines to dominate a locality diminishes and the open spaces either side of the turbines assume a greater visual importance, restoring the 'big sky'. Within the 3-4 km zone, the turbines will dominate, but this is mitigated by other landscape features, such as clusters of trees, earth banks, and the light appearance of this small cluster of two turbines.

The Planning Inspector in approving the (much larger) wind turbine development at Deeping St Nicholas concluded that - *'the scale of the turbines and their horizontal spread would have a significant impact upon the landscape character although with increasing distance, they would occupy smaller and smaller proportions of the horizon and would be absorbed by the huge skies'*.

The Inspector further stated, in his decision report ..." *that just because an impact may be significant it would not necessarily make it unacceptable'*.

Many of the representations objecting to the proposal have cited the adverse impact of the turbines upon the Fen landscape. Objectors have been critical of certain aspects of the value and accuracy of the landscape/turbine evidence put forward by the applicant and are not satisfied with the information of the photo-montages with particular concerns of the accuracy of the heights of the superimposed turbines.

The photomontages are created with sophisticated computer programmes and are as accurate as possible. Nevertheless, they can only give an indication of the expected impact and as such they offer a good tool to assess the anticipated landscape impacts of the turbines. The Planning Inspector for the Deeping St Nicholas appeal agreed. The existing operational wind turbine developments close to Peterborough Officers have also been used to assess the expected impact of the turbines on the Fen landscape.

Overall there is no doubt that wind turbines have a significant impact in the open countryside and would normally be unacceptable in any rural location. However, Government advice in PPS 22 et al makes it clear that normal policies of restraint in the Countryside have to be weighed against the national and international imperative to reduce carbon emissions and as such only where there are particular local circumstances will turbines be unacceptable. The landscape is therefore considered to have the capacity to accommodate two 100m wind turbines in this location.

iii) The cumulative impact of the proposed turbines with existing and potential turbines in the vicinity

The largest uncertainty in this respect is the outcome of the Nuts Grove and Wryde Croft Inquiry; no date has yet been set. In evaluating this application it is reasonable to disregard those proposals although permission on this site would be a material consideration in deciding the appeals.

There are 7 operational wind turbine developments within a radius of about 16km from the application site. This equates to a total of 39 wind turbines.

The key consideration in this regard is to determine whether the local fen landscape would change in character dominated by its wide open uninterrupted sky's and open arable landscape to one that would become a landscape where wind turbines would dominate.

The cumulative impacts of wind turbine developments upon the character and appearance of a landscape is determined depending upon the number of wind turbines, siting, separation distances, whether or not it is possible to see a number of wind farms in a single view and the distance of the turbines from a viewpoint. There are a number of turbine developments visible from the application site, all are distant views and the cumulative impact of two turbines of the same scale as those existing groups does not appear to lead to turbine dominance. The expanse of open Fen countryside between the turbine groups is such that the overall character

of the landscape still dominates.

The role that existing vegetation plays in mitigating the impact of the established wind turbine developments both on an individual wind turbine development and cumulatively with the fen landscape is an important consideration. As the area is predominantly flat when either walking or driving within this landscape the tree presence, predominantly along the field boundaries or in occasional clumps of small woodland, is such that views of the turbines will be restricted and broken as you pass through the landscape.

Wider impacts on the landscape character are harder to quantify. This landscape is unique in that it is the result of the drainage of this part of the Fens by the Earl of Bedford, who ultimately was responsible for the drainage of the whole Fen basin. The landscape is thus divided into plots that derive their existence from the way in which the land was managed following drainage. The importance of this area to the history of the Fens is thus significant. These two turbines will be located close to the boundary of one such parcel and will have little additional impact over the already consented turbines.

iv) Impact on Residential Amenity - Visual

Nearby residents are concerned that the turbines would be too close to their properties. The nearest dwelling to the turbines is at French Farm, approx 400m to the south, with an intervening tree presence and farm yard. Thus the visual impact is considered to be slight. To the north, dwellings on Dowsdale (closest dwelling 700m) will have restricted views of the turbines thanks to the relative positions of a bund and tree belt, thus the impact on the visual amenity of local residents will be very limited. No close dwellings will have unobstructed views directly from living room windows and thus the overall impact is considered to be slight, even when considered cumulatively with the existing turbines.

The following extract is from a report by the Planning Inspectorate in determining an appeal for the erection of 20 wind turbines on land to the west of Skegness where the landscape is, in many ways, comparable to that around French Farm. The heights of the turbines were similar as now proposed. In that case there were also two dwellings within 920m from the nearest turbine with the remainder at least 1km away.

'Whilst the circumstances of each property were different it seems to me that in the light of the separation between the turbines and other factors such as orientation of buildings and windows, position of gardens, boundary treatment and the like that even though the outlook would change the degree of change would not be so severe as to result in material harm to the visual amenity of the residents when on their property. In forming this view I have been mindful that because of the positioning of the turbines from some properties they would occupy a substantial part of the outlook from certain directions'

In view of this Inspectors comments it is not considered that the impact on residential amenity would result in material harm and the proposal is therefore acceptable.

v) Impact on residential amenity - Noise

The potential for the noise generated from a wind turbine development to cause nuisance and general disturbance to residential amenity has been the subject of much media exposure following the plight of a resident living just under a kilometre from the wind turbine development at Deeping St Nicholas. The outcome has seen the residents move from their dwelling due to intolerable levels of noise they were experiencing. The situation has been confirmed by South Holland District Council. DEFRA commissioned a report by Salford University to assess whether tonal noise from a wind turbine development could result in harm to residential amenity. The report did not specifically look into the problems of the nearby residents but it covered similar effects.

The report has been published. However, it did not conclude that tonal noise from wind turbines would as a matter of course be expected to result in disturbance to residential amenity and it did not conclude that such tonal noise would be the cause of such disturbances if they occurred. The findings were therefore inconclusive and it remains uncertain what the root causes of the problems have been.

The advice in Planning Policy Statement 22 (PPS22) does not advise on acceptable distances of wind turbine developments to residential properties. PPS22 acknowledges that noise would be generated from the aerodynamic motion generated by the blades of the wind turbine for example. It requires that all renewable energy developments should be located in such a way to minimise increases in the ambient noise levels. PPS22 advises that Local Planning Authorities should use the 1997 report by ETSU for the Department of Trade and Industry to assess and rate the noise from wind energy.

The applicant has submitted an acoustic assessment of the background noise levels of the locality and makes the following comments:

'Wind turbines have been cited as significant producers of infra-sound. This has, however, been due to the high levels of such noise, as well as audible low frequency thumping noise, occurring on older 'downwind' turbines of which many were installed in the USA prior to the large scale take up of wind power production in the UK. Downwind turbines are configured with the blades downwind of the tower such that the blades pass through the wake left in the wind stream by the tower resulting in a regular audible thump, with infra-sonic components, each time a blade passes the tower. Virtually all modern turbines, including those proposed here, are of the upwind design; that is with the blades up wind of the tower, such that this effect is eliminated.' They go on to say 'The DTI Low Frequency Noise Study referred to in Paragraph 3.12 concluded that "Infrasound noise emissions from wind turbines are significantly below the recognised threshold of perception for acoustic energy within this frequency range. Even assuming that the most sensitive members of the population have a hearing threshold which is 12 dB lower than the median hearing threshold, measured infrasound levels are well below this criterion". It goes on to state that, based on information from the World Health Organisation, that "there is no reliable evidence that infrasound below the hearing threshold produce physiological or psychological effects" it may be concluded that "infrasound associated with modern wind turbines is not a source which may be injurious to the health of a wind farm neighbour".

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Thus Members should not anticipate any infrasound or low frequency noise issues as a result of this proposal.

The noise data submitted as a part of the application has been scrutinised by the Community Protection Team and it is not anticipated that there will be any noise issues. It is generally accepted that since noise levels vary with wind speeds at the properties nearest to the wind turbines for most wind speeds the noise caused by the turbines would be much lower than the noise of the wind passing through trees, hedges and fences for example.

vi) Aviation Issues

The Ministry of Defence (MOD) have advised that the proposed wind turbine development would unacceptably affect MOD radar systems and recommend refusal. PPS 22 advises 'It is the responsibility of developers to address any potential impacts, taking account of Civil Aviation Authority, Ministry of Defence and Department for Transport guidance in relation to radar and aviation, and the legislative requirements on separation distances, before planning applications are submitted. Local Planning Authorities should satisfy themselves that such issues have been addressed before considering planning applications.' In view of the comments from the MOD, the applicant has failed to follow the advice in PPS 22 and thus the application should be refused for the reasons given by the MOD. The National Air Traffic Service who are responsible for the safe and expeditious movement in the en-route

phase of the flight of aircraft operating in controlled airspace in the UK and the Civil Aviation Authority have not raised objections to the relation of the siting of the turbines to the presence of the local aerodromes.

vii) Wildlife Implications

There is no reason to believe that there will be any adverse impact on wildlife, however wind turbines are still a relatively unusual form of development and the impact on wildlife cannot always be predicted. The applicant has carried out wildlife survey work and specifies that more detailed survey work would be carried out if permission were granted.

Some of the work cannot be carried out until immediately before development begins because badgers, for example, move their setts on a regular basis. The micro-siting allowance can be used to enable the applicants to take this into account.

A series of surveys and studies would be required by condition/S106 obligation in order to monitor and mitigate any adverse effects of the development on specified wildlife.

Wildlife potentially affected includes Barn owls, bats, water voles, badgers and great crested newts.

viii) Highway safety

Construction traffic

A temporary construction access is proposed. Both the Highways Agency and the Head of Transport and Engineering Services are satisfied that the constituent parts of the wind turbines, would be able to be delivered to the application site without disruption to traffic flows.

Distraction to motorists

There is no doubt that wind turbines can be an attraction or an intrigue to the passing motorist due to the novelty factor and scale in particular. In this landscape the turbines would generally appear steadily in ones view and would not tend to suddenly appear as a surprise either to drivers, or to horses. This would allow motorists to gradually become aware of their presence such that any distraction would be expected to be minimal. Neither the Highways Agency or the Head of Transport and Engineering Services have raised objections.

ix) Impact on National Gas Grid

The National Grid has confirmed that provided a safeguarding distance of 90 m is maintained, the relationship to their high pressure gas main is acceptable. This is confirmed by the HSE comment.

x) Trees

At the entrance to the farm there is a small copse of trees, grouped either side of the entrance. Due to the length of individual components, the large construction vehicles require a very wide sweep and thus the entrance to the site would need to be altered involving works to the trees. In order to avoid the loss of or damage to any trees, a separate temporary access is proposed immediately to the East of this group of trees. This will both avoid damage to the trees and minimise its impact on the countryside.

xi) Other issues

Planning History:- The existing permission for two turbines on this site is a material consideration. Members should consider only changes in legislation, or the application in reaching their decision.

Impact upon agriculture - There may be some impact upon the movement of farm vehicles during the construction of the wind farm but this would be short lived. The take up of land for the 2 turbines and the various access tracks to the turbines would be insignificant. There has been concern raised about the practice of leaving the foundations in situ once the turbines have been decommissioned and removed from the site. The proposal involves removing all material to a depth of 300mm and covering with earth, thus the site will be capable of agriculture and there will be no permanent loss of agricultural land, although the 20 m square will probably be less versatile than currently. There is no reason to assume that the concrete remaining on the land will have any other effect on agricultural quality.

Impact on Rights of Way - The nearest footpath is nearly 500m from the nearest turbine and although clearly visible, the impact will be insignificant.

Property Values - This has been a concern to many of the surrounding residents. To clarify the planning status of this aspect it is worth advising of the comments of the Planning Inspector in the recent assessment of a wind farm proposal near to Skegness. 'Planning Policy Guidance Note 1 makes it clear that when looking at developments the basic question is not whether owners and occupiers of neighbouring properties would experience financial or other loss, but whether a proposal would unacceptably affect amenities and the use of land which ought to be protected in the public interest. It is not the number of properties which would be affected but the degree of harm that occupiers would experience which is the determining factor. Concern about the devaluation of property is not a planning matter; it can be affected by any number of factors including planning permissions for various uses'. Further the Committee is advised that a recent Court of Appeal judgement stated that a loss of value of ones property due to a neighbouring development does not mean a loss of amenity under the Human Rights legislation. Hence, loss of property value should not be a planning consideration.

Television reception - There is always a possibility that television reception may be affected for those dwellings closest to the turbines. In view of this risk the developer has undertaken to remedy any interference to domestic television reception or radio reception should it occur as a result of the development. This can be secured by condition.

Small output – The output of wind turbines is smaller than conventional power stations, nevertheless the contribution made does reduce dependence on fossil fuels. Arguments to the contrary are incorrect. As an environment city, Peterborough should welcome any proposal to generate electricity sustainably. The advice in PPS 22 makes it clear that Planning authorities should not reject planning applications (for renewable energy projects) simply because the level of output is small. The output is therefore irrelevant to the evaluation of the application.

Shadow Flicker - Shadow flicker can occur both within buildings where there is a narrow opening (at certain times of the day and the year when the weather conditions are wrong). The properties that may be affected has been modelled and no properties will be subject to shadow flicker. This was the approach taken with the turbine at Longhill (Whitemoor Prison) in March. The potential for shadow flicker problems were anticipated for the prison at some parts of some days in spring and autumn. When the turbine was built, the problem occurred and the turbine is now stopped automatically when the problem is likely to occur. This completely solves the problem.

Health – Although there are concerns by local residents that there will be health problems resulting from turbines, there is no evidence to sustain these concerns. Epilepsy is triggered by much faster strobing; stress, migraine, headaches and depression may result from many sources, but there is no reason to believe that the presence of turbines will trigger any of these conditions.

Ice Throw – This potentially occurs on all turbines, but is not usually a problem. There has been a recent problem with a turbine at King's Dyke Whittlesey, where motorists and the public were in danger from ice throw. This has been resolved by stopping the turbine when the problem could occur (low temperature). In the case of the proposed turbines, no danger will occur to people or vehicles due to the distance from dwellings and roads.

Section 106 implications:- The Council has a program of sustainable education that is rolling out across the schools of Peterborough. This contribution will help to demonstrate to the children of Peterborough that the harm caused to the open countryside by wind turbines was balanced against the benefits of renewable energy production in reaching this planning decision. It is proposed to secure funding for this programme. In addition a contribution to fund the monitoring of wildlife effects caused by the turbines is sought. The applicant's response to these requests is awaited.

Such funding of these projects would satisfy the 5 tests as set out in the planning policy section of this report.

8 CONCLUSIONS

The proposed turbines are somewhat taller than the turbines which could be built on site and will thus have a greater impact on the character of the area. In all other respects, there are unlikely to be any consequences of the proposed change of design. The impact on the character of the area, local agriculture, amenity of local residents, trees, wildlife traffic and highway safety are all considered to be acceptable.

Nevertheless, the potential harm to MOD radar function is inescapable. For this reason it is considered that the proposal is unacceptable in its current form.

9 RECOMMENDATION

The Head of Planning Services recommends that this application is **Refused** for the following reason:

- 1 The proposed wind turbine development would unacceptably affect Ministry of Defence radar systems to the degree that it would not, if the turbines were constructed, be possible to provide a safe and expeditious air traffic service to military and non-military aircraft in the area. The Ministry of Defence has advised that the applicant has failed to prove that the proposal would have no adverse impact on aviation interests as required in accordance with paragraph 25 of Planning Policy Statement 22 (PPS 22) – Renewable Energy which states;

'It is the responsibility of developers to address any potential impacts, taking account of Civil Aviation Authority, Ministry of Defence and Department for Transport guidance in relation to radar and aviation, and the legislative requirements on separation distances, before planning applications are submitted. Local Planning Authorities should satisfy themselves that such issues have been addressed before considering planning applications'

and paragraph 96 of the Companion Guide to PPS 22 which states:

Because topography, intervening buildings and even tree cover can mitigate the effect of wind turbines on radar, it does not necessarily follow that the presence of a wind turbine in a safeguarding zone will have a negative effect. However, if an objection is raised by either a civil aviation or Defence Estates consultee, the onus is on the applicant to prove that the proposal will have no adverse impact on aviation interests.

Thus the proposal is contrary to the provisions of Planning Policy Statement 22.

Copy to Councillors Dobbs and Sanders

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