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For assistance in understanding or reading this document or specific information about this Agenda or on the "Public Participation" initiative please call Democratic Services on 01629 761133 or e-mail [committee@derbyshiredales.gov.uk](mailto:committee@derbyshiredales.gov.uk)

17 February 2015

To: All Councillors

As a Member or Substitute of the **Southern Area Planning Committee**, please treat this as your summons to attend a **Special Meeting** on **Wednesday 25 February 2015 at 6.00 pm in the Council Chamber, Town Hall, Matlock – PLEASE NOTE CHANGE OF VENUE.**

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sandra Lamb', with a stylized flourish at the end.

Sandra Lamb  
Head of Corporate Services

## AGENDA

**SITE VISITS** The Committee is advised a coach will leave the **TOWN HALL, MATLOCK** at **3.00pm PROMPT**. A schedule detailing the sites to be visited is attached to the agenda. **(MEMBERS ARE ADVISED TO WEAR STOUT FOOTWEAR)**

### 1. APOLOGIES/SUBSTITUTES

Please advise the Committee Team on 01629 761133 or e-mail [committee@derbyshiredales.gov.uk](mailto:committee@derbyshiredales.gov.uk) of any apologies for absence and substitute arrangements.

### 2. APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING

10 February 2015.

### 3. INTERESTS

Members are required to declare the existence and nature of any interests they may have in subsequent agenda items in accordance with the District Council's Code of Conduct. Those Interests are matters that relate to money or that which can be valued in money, affecting the Member her/his partner, extended family and close friends. Interests that become apparent at a later stage in the proceedings may be declared at that time.

## 4. APPLICATIONS FOR DETERMINATION

Please note that for the following items, references to financial, legal and environmental considerations and equal opportunities and disability issues will be embodied within the text of the report, where applicable.

### PUBLIC PARTICIPATION

To provide members of the public **WHO HAVE GIVEN PRIOR NOTICE** (by no later than 12 noon on the working day prior to the meeting) with the opportunity to express their views, ask questions or submit petitions relating to planning applications under consideration. Representations will be invited immediately before the relevant item of business/planning application is discussed.

**Page No.**

#### 4.1 APPLICATION NO. 14/00224/FUL (Site Visit)

**4 - 71**

Erection of 5 wind turbines with height to blade tip of up to 100m (hub height 59m) and associated substation building, new and upgraded access tracks from Manystones Lane and B5056, hardstanding, temporary compounds and associated works at Land at Manystones Lane, Brassington

### NOTE

For further information about this Agenda or on the Public Participation initiative contact the Committee Team on 01629 761133 or e-mail [committee@derbyshiredales.gov.uk](mailto:committee@derbyshiredales.gov.uk).

Members of the Committee: Councillors Richard Bright, Ken Bull, Steve Bull, Albert Catt, Tom Donnelly (Vice Chairman), David Fearn, Richard FitzHerbert, Steve Flitter, David Frederickson, Cate Hunt, Angus Jenkins, Tony Millward, BEM (Chairman), Garry Purdy, Lewis Rose, OBE, Andrew Shirley, Peter Slack, Geoff Stevens, MBE.

Substitutes: Councillors Jacque Bevan, Sue Burfoot, David Burton, Bob Cartwright, Ann Elliott, Chris Furness, Neil Horton, Jean Monks, Andrew Lewer, Andrew Statham, Jacque Stevens, Barry Tipping, Philippa Tilbrook, Judith Twigg, Carol Walker, Jo Wild.

## SITE VISITS

Members will leave the **TOWN HALL, MATLOCK** at **3.00pm prompt** for the following site visit. **MEMBERS ARE ADVISED TO WEAR STOUT FOOTWEAR.**

#### 3.20pm Application No. 14/00224/FUL

**4 – 71**

##### **Land at Manystones Lane, Brassington**

Site meeting to be held at access drive to Griffe Walk Farm. Following a visit to the application site the turbines will be viewed from various locations in the surrounding landscape. It is anticipated that the site visit bus will arrive in Ible at approximately 4.00pm to view the impact on properties in this settlement.

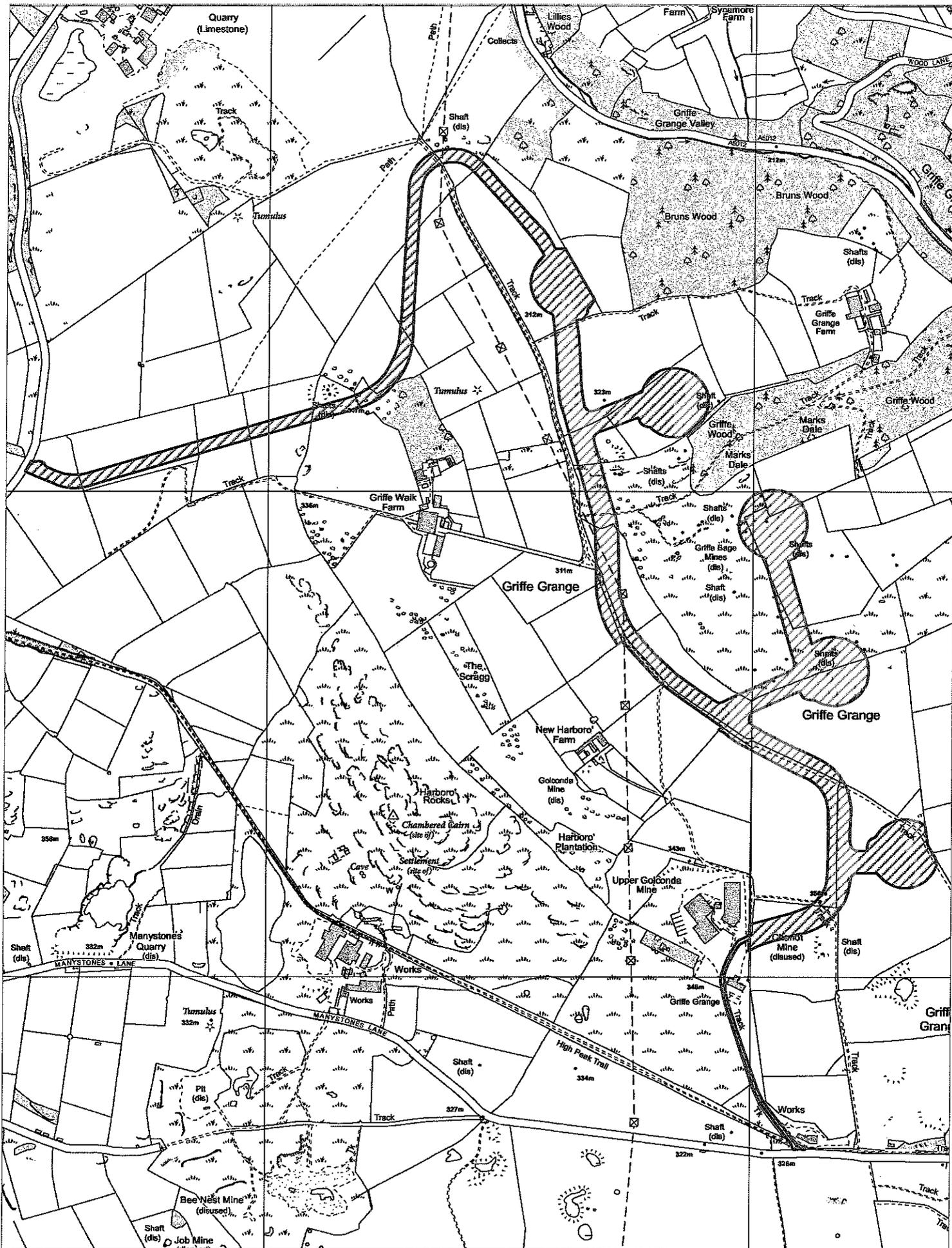
Requested by Case Officer.

#### 5.00pm Return to Town Hall

## **COMMITTEE SITE MEETING PROCEDURE**

You have been invited to attend a site meeting of the Council's Planning Committee/Advisory Committee. The purpose of the meeting is to enable the Committee Members to appraise the application site. The site visit is not a public meeting. No new drawings, letters of representation or other documents may be introduced at the site meeting. The procedure will be as follows:

1. A coach carrying Members of the Committee and a Planning Officer will arrive at the site as close as possible to the given time and Members will alight (weather permitting)
2. A representative of the Town/Parish Council and the applicant (or representative can attend.
3. The Chairman will ascertain who is present and address them to explain the purpose of the meeting and sequence of events.
4. The Planning Officer will give the reason for the site visit and point out site features.
5. Those present will be allowed to point out site features.
6. Those present will be allowed to give factual responses to questions from Members on site features.
7. The site meeting will be made with all those attending remaining together as a single group at all times.
8. The Chairman will terminate the meeting and Members will depart.
9. All persons attending are requested to refrain from smoking during site visits.



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Scale 1: 10,000  
 16/02/2015

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**14/00224/FUL      ERECTION OF 5 WIND TURBINES WITH HEIGHT TO BLADE TIP OF UP TO 100M (HUB HEIGHT 59M) AND ASSOCIATED SUBSTATION BUILDING, NEW AND UPGRADED ACCESS TRACKS FROM MANYSTONES LANE AND B5056, HARDSTANDING, TEMPORARY COMPOUNDS AND ASSOCIATED WORKS AT LAND AT MANYSTONES LANE, BRASSINGTON FOR GRIFFE GRANGE WIND FARM LIMITED**

Parish Councils: Brassington and Carsington & Hopton  
Application type: Full

Date of receipt: 09.04.2014  
Case Officer: Mr. J. Bradbury

**THE SITE AND SURROUNDINGS:**

The proposed wind farm would be located along the eastern flank of the broad limestone dale Griffé Grange which includes the historic 'Portway' route between Bakewell and Wirksworth and which is located between high ground at Harboro Rocks to the south and Griffé Grange Valley to the north, along which the A5012 Via Gellia road runs. The Sibelco (formerly Viaton) works lie to the south west on the brow of the hill and Harboro Rocks, with its scheduled ancient monument is located to the west of this and forms the local high point in the landscape at 379m.

The land slopes down generally from this high point to the north, but Griffé Grange itself forms a shallow bowl of a dale with higher ground to the east and west in which New Harboro Farm and Griffé Walk Farm are located. The landscape is fairly typical of the limestone plateau with farmland being utilised predominantly for grazing. The landscape has an open character with only isolated pockets of woodland on the higher ground. The steep sided Griffé Grange Valley to the north and north east is wooded.

The locality has a history of lead mining and old mine workings associated with Griffé Bage Mines occupy part of the eastern flank of the dale. In addition to this the wider locality has industrial premises at Hoben Minerals to the south of Harboro Rocks and Sibelco to the south and quarries exist at Ryder Point to the south east and Longcliffe north west of the site.

The boundary of the Peak District National Park is the valley bottom of Griffé Grange Valley and at its closest point is approximately 350m from the northernmost turbine. The land to the north of Griffé Grange Valley rises steeply and the settlement of Ible lies above the wooded valley on the lower slopes of Bonsall Moor within the National Park with open views to the south.

Griffé Grange Valley immediately to the north of the site is a site of Special Scientific Interest and in addition to Harboro Rocks the heritage assets in the immediate locality comprise of the Grade II Listed Griffé Walk Farm and the scheduled monument of Moot Low immediately to the north west. The wider landscape is rich in both mining history and hilltop prehistoric monuments such as Minninglow Hill and Stanton Moor which are visible over long distances.

The locality has important footpath and bridleway routes with the Limestone Way crossing the site to the west of the proposed turbines before climbing across Bonsall Moor to the north and the High Peak Trail / Midshires Way running east / west to the south of Harboro Rocks.

To the south of the High Peak Trail and Manystones Lane is an operational wind farm of four 100m turbines on Carsington Pastures. In addition to these a further 100m turbine has been granted permission to the south east of the Sibelco works and two further 100m turbines also have permission on land to the south east between the Sibelco works and Ryder Point Quarry. The application site is crossed by a line of pylons running north / south. The application incorporates land stretching to the west to incorporate a vehicular access to the B5056 Longcliffe to Via Gellia Road and also includes the access route running south from the Sibelco works to Manystones Lane.

Although the application lies within Brassington and Carsington and Hopton parishes, these villages lie tucked under the limestone escarpment to the south and it is the settlement of Ible to the north, Bonsall to the north east and Aldwark to the north west who will experience the clearest views of the turbines.

### **THE APPLICATION:**

Planning permission is sought for the erection of 5 wind turbines with height to blade tip of up to 100m (hub height 59m) and associated substation building, new and upgraded access track from Manystones Lane and B5056, hard standings, temporary compounds and associated works.

The 5 wind turbines would be erected in a line running south south east to north north west along the eastern flank of Griffie Grange. The southernmost of the turbines (T5) would be located approximately 350m to the north east of the Sibelco works and approximately 350m above sea level, 40m to the west of an existing access track and footpath.

Moving north turbine T4 would be approximately 400m away from T5 and at an altitude of 340m.

Turbine T3 is the next to the north and is shown approximately 325m to the north of T4 and approximately 300m above sea level.

Turbine T2 is shown to be 325m north north west of T3 and is located just to the north of woodland which extends up to Marks Dale and at an altitude of 315m.

Finally, turbine T1 lies 325m to the north north west of T2 at an elevation of approximately 305m above sea level.

Overall, from T1 to T5 the line of 5 turbines covers a distance of approximately 1.4km.

The turbines would be served by newly created access tracks. A new access track would be created running north east from the existing track serving Sibelco which would then run north along the line of a footpath to meet the existing footpath and access track which runs centrally north west to south east through Griffie Grange. A spur access road would cut across open land to the location of turbine 5 and its associated hard standing.

Turbines T4 and T3 would be serviced from a common new access track which would run north east from the existing track to T4 before turning north to service T3 where it terminates. Some cut and fill will be necessary to create the access tracks and hard standing proposed alongside the turbines.

Just to the south of the existing access which serves Griffie Walk Farm a new access route is to be created running north parallel with the existing track before spurring off to the east

to service T2 and continuing north to run immediately alongside T1. This track then continues north west to cross the existing track 50m to the south of the Limestone Way route. The track then heads due south before turning west to the south of Griffe Walk Farm and crossing open farmland to meet the B5056 opposite Curzon Lodge. This western section of the roadway is shown to involve significant localised excavation but is indicated to be a temporary means of access in order to deliver the main turbine components to site. It is suggested that the land will be reinstated to its existing profile once this is completed.

To the north of the route of this temporary access a new substation is to be constructed. A site compound for the project is positioned immediately to the east of the Sibelco Works.

The turbine detail submitted indicates a turbine with an overall height marginally under 100m with 3 blades rotating from a hub height of 59m. The turbine blades are 41m in length from the centre of the hub giving an overall blade diameter of 82m.

The nacelle at hub height is approximately 6.5m deep. The base of the turbine tower will be 4m wide and taper to 3m where it meets the nacelle. The blades have a maximum width of 3m where they meet the nacelle. The blades have a maximum width of 3m and taper at the ends. Each turbine would be erected by crane sitting alongside on a hard standing area of approximately 50m x 25m dimensions. The application includes an indicative drawing of the proposed substation building. This would have a main footprint of 5m x 4.95m x 5.85m and be 3.4m to eaves with a ridged roof at 5.2m. It would have an additional monopitch element of lesser height at 3.26m with a footprint of 1.65m x 1.65m. A radio antenna with a height of 6m would be attached to its side wall.

The applicants suggest that the overall energy output will be up to 12.5MW but the actual choice of turbine has not been finalised. They consider this to be enough to supply the average electricity needs of circa 7,000 homes each year. The turbines would have a variable speed of between 3.5 and 25 revolutions per minute dependant on wind speed.

The applicants have submitted an Environmental Impact Assessment and submitted extensive supporting information which has been made available for public inspection and comment. The initial documents submitted comprised of the Environmental Statement with chapters on landscape and visual impacts, socio-economic impacts, ecology, the historic environment, soils and water, noise and vibration, existing infrastructure and aviation, traffic and transportation and shadow flicker. This was supported with a volume of technical appendices and a volume of wire frames and photomontages and figures to support the landscape and visual impact assessment. In addition to this the applicants submitted a Design and Access Statement, a Transport Assessment, a Statement of Community Involvement and a Supporting Planning Statement.

Before moving on to the subsequent submissions made by the applicants it is pertinent to summarise the conclusions they reached in the Supporting Planning Statement as follows:-

- Whilst a government report in 2011 suggested it is on target to meet its 2020 target for renewable energy 14,000MW will be needed from on shore wind by then. This is 4 times what had been created to date and there is, therefore, a pressing need to generate electricity from renewable sources.

- The National Planning Policy Framework strikes a balance and suggests that planning permission should be granted for renewable energy projects unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- Impacts are limited to landscape setting and visual effects in relative close proximity to the site. The scheme could generate 12.5MW (89% of current capacity in Derbyshire Dales) of renewable energy development to the District. 28,000 tonnes of CO<sub>2</sub> emissions would be displaced per annum. Up to £4.85 million will be spent in the regional economy during construction and £430,000 of spend annually.
- The benefits of the scheme significantly outweigh all potential impacts and it, therefore, accords with national policy.
- The site lies adjacent to existing turbines at Carsington Pastures and extant permissions for Viaton and Ryder Point. It will appear as an extension of a wind farm rather than a new one and this reduces its impact in an industrial working landscape.
- The working landscape in which development is to be located, adjacent to operational quarries and industrial sites, indicate its fragmented nature and explains why it was excluded from the National Park when it was set up.
- Within this worked landscape setting to the Park the extension of existing wind turbine development is considered to have an acceptable impact on the Park as a whole. Whilst there will be a significant impact its impact is confined to circa 1.5% of the Park and this is not considered significant as a whole.
- The development is considered to meet the requirements of Section 62 of the Environment Act 1995 as the development conserves the natural beauty, wildlife and cultural heritage of the Park.
- In accordance with government guidance in EN-1 the landscape impacts are not so significant as to outweigh the benefits.
- The LVIA concludes that whilst there are some significant visual effects these have been minimised due to design and location. All wind farms generate significant landscape and visual effects but the low number here makes this an acceptable project.
- The impacts are reversible and not significant when viewed in the context of irreversible quarrying impacts.
- The development accords with the development plan and all other material considerations and guidelines.
- The development will have minimal impact on ecology.
- The various assessments have fully analysed the impact on fauna and the mitigation proposed will ensure that no adverse impacts result.

- No potentially ETA significant impacts on heritage assets were revealed by assessment and any impacts will be short lived and reversible.
- No adverse noise impact on residents will result.
- With suitable controls the construction and operation of the proposed wind turbines can be undertaken without causing any significant negative impact on the surrounding soil and water environment.
- Shadow flicker is restricted to only 4 properties. The company have committed to investigate this impact during the detailed design phase and if this establishes unacceptable impacts mitigation will be incorporated to the offending turbines at the correct time of day, in bright sunshine.
- The development will not interfere with telecom or aviation infrastructure.
- A Community Benefit Fund will be set up which over the course of 25 years will see approximately £1.5 million of investment in the local community.

In response to requests for further analysis by Council Officers and to address issues raised by consultees, the applicants have made further submissions during the consideration of the application as follows:-

On 30<sup>th</sup> July an addendum to the Environmental Statement was submitted which contained further analysis of the landscape and visual impacts from additional locations suggested by Council Officers. This was followed up by a further submission on 15<sup>th</sup> August and a final submission on 26<sup>th</sup> August which was submitted along with a written response to the consultee comments. The additional analysis of landscape and visual effects focused in on impacts on Bonsall, impacts on the setting of Minninglow, impacts on scheduled monuments at Moot Low and Harboro Rocks and impact on the listed building Griffie Walk Farm.

This further analysis was circulated for further comment from consultees.

The additional Written Statement made by the applicants goes into a detailed analysis of individual consultee comments. It is not considered that analysis of the scheme is aided by going through this response point by point by a summary of its findings is as follows:-

- In relation to landscape and visual issues the applicants consultants stand by their original conclusions in relation to the range of landscape and visual receptors that would be certain to or likely to sustain significant visual or landscape effects and the role of the newly existing and consented turbine. It is considered that Griffie Grange Wind Farm is acceptable in landscape and visual terms.
- In relation to the historic environment the applicant's consultants have considered the response from consultees and stand by the impacts and their magnitudes identified in the ES.
- In relation to ecology the applicants stand by their conclusions in the ES that the impacts on ecology are not significant either in terms of flora or fauna (birds and bats in this case).

Further description and analysis of the applicant's case is made as appropriate in "The Issues" section of this report.

**RELEVANT HISTORY:**

None directly relevant on the site itself, however, it is important to be aware that in addition to the 4 turbines in operation a further 3 have been granted permission, one of which is adjacent to the Sibelco Works (Viaton turbine) and 2 of which were granted on land to the west of Ryder Point Quarry (Ryder Point turbine). These extant planning permissions for turbines have fed into the assessment of environmental impacts.

**CONSULTATIONS:**

Peak District National Park Authority:

**Initial Response:**

Griffe Grange Application:

The effect of the four Carsington wind turbines has significantly affected the landscape character of the southern part of the National Park. The extant permissions at Viaton and Ryder Point will serve to intensify the magnitude of this impact. The seven resultant turbines will appear clustered in close proximity to each other. Five further turbines at Griffe Grange will be more loosely associated with the other seven and will stretch out in a line northwards towards the National Park boundary with no intervening landform to ameliorate their impact.

Landscape Impact:

The landscape and visual impact assessment prepared places great emphasis and weight on the landscape character types Wind Farm Landscape and Landscapes with Wind Farms. This terminology is new to the National Park Officers and Natural England.

The landscape character types are defined by geology, topography, drainage, vegetation, historical land use and settlement pattern. Whilst the presence of wind turbines can influence an areas landscape character positively or negatively, that is different from defining the landscape itself as a 'Wind Farm Landscape Character Type'.

Much of the reasoning in the LVIA for saying that Griffe Grange does not have a significant impact on landscape is based on the existing wind turbine creating a 'Wind Farm Landscape'. Their proposed boundaries for these new landscape character types in the case of Landscapes with Wind Farms (an area up to 3.5km from the nearest turbine) affects parts of the National Park. There is a recommendation that the NPA should change its landscape character type to become 'Wind Farm Landscapes'.

The LVIA acknowledges a significant landscape impact on the National Park up to 3.5 – 4km from the nearest turbine which covers 21.2km<sup>2</sup>. This, they argue, then equates to 1.5% of the total park area and as such would represent "no more than a negligible incremental landscape change that would not be significant on the National Park". No assessment of how this combines with other turbines within and without the Park has been done. Irrespective of this it is considered that to include the whole of the Park is irrelevant as a person standing in part of the Park cannot see and experience the whole of the Park at the same time. They only see and experience

the landscape they are in. Therefore, if the turbines have a significant landscape and visual impact in part of the National Park then that will affect the experience of the person within this area.

The addition of 5 more turbines to the 7 already granted will increase the visual footprint as well as increasing the visual density of the existing turbines. This means that the turbines are more visible from all viewpoints and their visual impact will increase above the baseline almost as much as if there were no other turbines in the area.

This factor of increasing density and visual footprint of the turbines has largely been ignored in the LVIA where visual impact is seen as negligible as they are often viewed against the backdrop of existing / proposed turbines. The visual increase in footprint size and the visual density of the turbines has been ignored and as such the visual impact assessment in the LVIA is incorrect and in reality the proposed turbines will have a greater overall impact of the National Park.

The 4 existing turbines already have a greater impact than suggested. They impact on the setting of Minninglow Scheduled Ancient Monument (SAM). When travelling down the A515 near Parsley Hay, looking south, the turbines detract from the setting of this SAM by breaking the horizon and dominating the SAM. This view has not been included as it is 11km away but the existing turbines are very clear in the landscape and the proposed turbines will add considerably to the existing impact.

Visitors do not appreciate the exact location of the boundary of the National Park and make the assumption that these high limestone plateaus lie within. The turbines, therefore, do not read as being clearly outside of the Park.

It is clear from the photomontages that there will be considerable impact on localised places such as Ible. The impact on views from Stanton Moor has been downplayed by the wide horizon shown and small percentage of this affected. However, visitors do not expect to see turbines on the horizon when visiting a site such as this and so their impact is intensified. The proposed turbines will add considerably to the visual impact of the existing turbines.

The LVIA identifies that the turbines can be viewed from 8km of the Limestone Way, 12% of its overall length. However, it is not the percentage that is important but rather the impact on their experience of using this National Trail. They may take 3 hours to cover this 8km section and this level of exposure to the turbines will have a significant impact on their enjoyment of the National Park. This principle applies to other Rights of Way in the area from where turbines are visible.

#### Cumulative Impact:

There will be a significant cumulative impact with the 7 turbines already granted. The combined effect will be a large wind farm stretching for over 2km in length.

The cumulative impact assessment utilised Scottish Natural Heritage guidance. This does not define what size of turbine should be included. However, the LVIA adopts a size limit of 50m which excludes smaller wind turbine developments such as Hill Top Farm, Parwich. The National Park Authority considers that there are important views, such as from Bent Lane running east from Tissington and unscreened parts of the

Tissington Trail, where the Parwich turbines are seen in the same view. Therefore, a full picture of cumulative impacts is not presented.

Heritage Assets:

The most significant impact of the turbines will be on the setting of Minninglow Hill chambered round barrow when viewed from vantage points to the north. The setting is already affected by the Carsington turbines but this does not identify further damage.

The turbines would dominate views to the south west from the extensive Bonsall Leys SAM. The turbines would be highly visible from Stanton Moor the whole of which is scheduled for its well preserved pre historic landscape remains. The turbines would break the skyline and draw the eye when looking south east. The heritage assets are highly valued and their setting should be protected under paragraph 132 of the National Planning Policy Framework. The zone of theoretical visibility suggests that further assessment is needed in relation to numerous listed buildings and conservation areas such as Aldwark.

Ecology:

Request that further information on displacement of over-wintering lapwing and cumulative impacts is provided. A condition needed to ensure construction phase falls outside bird breeding season.

In relation to bats express concern in relation to Noctule Bats flying near to the site of Turbine 2. Noctules forage at 10 to 40m and up to 70m above ground making them vulnerable to collision. Clarification is needed in relation to discrepancies between the suggested flight heights of the Noctule bats in the report and figures. If Noctules are at collision risk mitigation is needed and may require re-siting Turbine 2.

Impact on the Social Wellbeing of Park Communities:

The greatest impact will be felt by Ible residents. In parts of the hamlet the turbines will be within 300m of windows albeit on the opposite site of the Via Gellia, but elevated relative to them, therefore, increasing their dominance. This impact is intensified as many traditional properties in Ible have main habitable room windows facing south. The impacts are significantly overbearing and have the potential to damage residential amenity. Properties in Aldwark and Grangemill will also be affected by direct and close views.

Conclusion:

The National Park Authority has strong objections to the application. The proposed turbines will have a significant landscape and visual impact on the National Park and have the potential to adversely affect the ability of visitors and residents to enjoy its special landscape qualities. Rather than ameliorate it, the magnitude of this impact will be significantly increased where the turbines will be seen in the context of other wind turbine developments. The turbines will adversely affect the setting of several Scheduled Ancient Monuments and will affect the residential amenity of properties in the National Park, particularly those in Ible.

**Response to Additional Information Submitted:**

The Authority continues to strongly object to the proposal for the reasons previously stated. The Authority remains committed to the resolution made at its Planning Committee to support Derbyshire Dales in the event of an appeal if permission is

refused for the current application. Request that National Park representative attend and speak at Planning Committee.

Make some further comments on the additional information as follows:-

Figure 9 demonstrates the increased impact on Minninglow SAM as the new turbines close the gap and remove the visual separation of the Carsington turbines. The increased visual area that the turbines cover is apparent in figures 6 and 8 presented.

The public are not readily aware of the precise boundaries of the National Park and see the landscape as a whole not as separate landscape character types.

The image from Harboro Rocks presented identifies the difficulty in differentiating the landscape within and without the Park. It also serves to highlight the clear ridge line that separates the approved and built development from the proposed. The proposed turbines will spread the visual impact of the turbines by about 50% from this viewpoint.

The applicants argue that the site was excluded from the National Park for a reason in 1951. However, it is considered that the boundaries often followed easy administrative boundaries rather than be based on detailed assessment of landscape character. There are many areas around the Park where this is evident and landscapes outside the Park are equal to that within. The Via Gellia is an obvious local example where both sides are in an SSSI and have the same landscape characteristics but one side is in and one side out because the road was the chosen boundary. The quarries of Ben Bennett and Longcliffe were very small in 1951 but even now they have not degraded the landscape to the extent that large turbines will not have any impact. The application site has a higher landscape quality and sensitivity than implied in the LVIA and is very much a continuation of the landscapes that are found in the rest of the White Peak Landscape Character Area. If the boundary of the National Park were drawn today it would probably encompass the whole of the remaining White Peak. The turbines have a more significant impact than implied in the LVIA and the additional information has not altered the National Park views.

English Heritage:

**Initial response:**

Summary:

This development affects the significance of designated and undesignated heritage assets and harms their significance. These impacts need to be seen in their defined historic landscape context of Griffe Grange.

English Heritage Advice:

The broad limestone dale occupied by Griffe Grange is followed by the old route between Bakewell and Wirksworth. This 'Portway' is known from the cartulary (book of charters) of Dale Abbey where it is described as passing through the monastic grange (farm). The grange was established here based upon a pre-existing settlement and landholding which it had received as a gift.

At its north west end Griffe Grange meets Grange Mill (another monastic holding) and at its south east meets the lands of Hopton at Ivet (aka Abbot's) Low a scheduled monument.

There are multiple layers of archaeological and historic interest at Griffe Grange with the earliest visible being the levelled remains of an undesignated Neolithic chambered cairn located at the trig point at Harborough Rocks. This scheduled cave, designated on the basis of its national archaeological importance and Iron Age occupation, faces to the west away from the development, but the outcrop should be seen as a whole with the remains of the Neolithic chambered cairn. In this respect, impacts cannot be reduced to views west from the cave as Harborough Rocks is a key landscape feature which like Minninglow to the north, is visible across the White Peak and seem to form with other chambered cairns such as Green Low a structuring of the landscape by its first farmers into which the later Bronze Age round barrows were fitted.

The scheduled monument of Moot Low and its companion the undesignated Moot Low II lie to the north of Griffe Walk Farm. Their name is indicative of a place of public assembly in the early medieval period. The name 'Moot' and this function of public debate and justice delivered in the open on neutral ground seems likely given the proximity of the 'Portway' as a key route between settlements. A further undersigned tumulus lies south west of Pearson's Farm with another scheduled barrow adjacent to Hopton Quarries.

The landscape has not gone unmodified since the Neolithic (Bronze Age) and the area has been subject to lead working, quarrying and Roman, early medieval, monastic and later enclosure have altered and redefined the landscape. Griffe Grange remains however a bounded topographic space, a place separate and enveloping in which once one enters even the massive turbines recently constructed at Carsington drop out of view.

The introduction of the proposed turbines will dramatically alter and dominate the experience of this historic landscape. As very large moving structures they will become such a strong presence that the experience of the scale and fine grain of human shaping of this little landscape in which the prehistoric barrows were conceived, re-understood will be harmed.

Turbines 1 and 2 will have a clearly harmful impact on the significance of Moot Low and its undesignated companion but more broadly the domination of this discrete historic landscape unit will impact on the entire group of assets discussed above. The EIA cataloguing and atomisation of assets and minimisation of impacts fails to address the overall historic environment impact of the development.

In line with the National Planning Policy Framework and DCLG statement on renewable energy, Derbyshire Dales should weigh the overall impact of the development against the public benefits and ask whether given the impacts already sustained by the South Peak landscape through the neighbouring Carsington Pastures this development is sustainable.

Great weight must be given to the impacts upon the designated heritage assets but these were created and used and re-made by successive countless generations in a landscape and it is the overall historic landscape impact which is the key to understanding these setting issues.

Recommendation:

If your Authority is not convinced that the harm to the significance of designated heritage assets is offset by public benefits and supported by clear and convincing justifications as to why this specific important piece of historic landscape needs to be impacted then it should reasonably be refused in line with the National Planning Policy Framework.

**Response to Additional Information:**

Advice remains unchanged. However, wish to comment on appellant's assertion as follows:-

- AMEC's approach is at odds with the approach taken to understanding the significance of heritage assets set out in the National Planning Policy Framework. The significance of an historic asset or assets is always re-experienced in the present. The historic landscape relationships between the Portway and prehistoric and later monuments and how people interacted with them is a key element in what makes this landscape special and interesting. The issue is not whether the landscape is already altered but rather the issue is one of what the impact of the proposed development will be upon the significance of one heritage assets and the historic landscape in which they sit.
- Whilst modern mineral extractions within the landscape have involved change and a degree of harm to significance they are not the subject of this application and are not a basis in themselves for the acceptance of new harm, especially where the character of these new interventions would not speak to a history of mining and quarry activity.
- The Portway is a well-documented historic route passing through the valley. The experience of the historic landscape as one passes along this route is entirely relevant to the present application since it is a long-term context in which these sites were encountered and understood.
- Stand by the observation that Carsington falls out of view as one enters the valley.
- The assertion that the term 'dominance' has restricted usage in English Heritage advice is spurious. Put at its simplest the monuments represent quite subtle additions to the natural topography, the proposed turbines are large and move, they will tend to dominate the experience of the space to the detriment of the appreciation and understanding of the significance of the assets.
- Suggest that the applicant's consultants have misrepresented the National Planning Policy Framework and restate how paragraph 132 should be interpreted in relation to heritage assets.

- Urge the Council to consider English Heritage advice and the impacts of development upon the significance of the historic environment, within a holistic approach to the landscape impacts of the development and its sustainability in line with the National Planning Policy Framework and Planning Practice Guidance.

Derbyshire County Council:

**Initial Response:**

Local Member Comments:

County Councillors were consulted. Councillors Ratcliffe and Lower strongly objected on the grounds that the further massing of wind turbines in this area would exacerbate the environmental impact caused by the current turbines on Derbyshire's Special Landscape within the Derbyshire Dales and Peak District National Park. In addition, it is considered that the proposal, if approved, would possibly have a detrimental impact on Derbyshire's tourist economy.

Landscape Impact Assessment:

Overall, within the locality of the proposed turbines, the character of the landscape is complex with a number of different LCT's in close proximity to the proposed development. There is, however, a uniformity of character between these LCT's inside and outside, of the National Park designation. The assessment of landscape impact concludes that the Plateau Pastures LCT has a medium sensitivity "because it has a demonstrable capacity for wind development as it already accommodates seven wind turbines". It is not accepted that this is a fair assessment of landscape sensitivity.

It is evident from the baseline assessment that the character of the landscape and its characteristics (open and unwooded with panoramic views) offer a low potential to accommodate development of this type and constitute some of the finest landscape in the country as reflected in National Park designation. There is a consistency of character across the National Park boundary thus reflecting the overall sensitivity of this landscape to change of this type. The assertion that existing impacts relating to previously permitted turbines or unrelated modern quarries are mitigating factors are not accepted given that there are numerous vantage points where the landscape within and without the National Park can be appreciated as a whole with little effect from these current impacts.

The sensitivity of the landscape is further evidenced by recent sensitivity and tranquillity mapping undertaken by the County Council which demonstrates that this location has a secondary sensitivity by virtue of its ecological and visual unity and is an area of high tranquillity. It is considered that these physical and perceptual qualities, allied to proximity of the Park, requires this landscape should be assessed as having high sensitivity to change, regardless of existing impacts.

The EIA suggests that the magnitude of change would be medium, acknowledging that turbines are prominent but suggesting they accord with the dominant characteristics of the area, namely existing turbines at Carsington. This judgement is not accepted. The new turbines lie to the other side of the ridge to the north of Carsington and the proposal introduces turbines into a new landscape unit looking northward to the National Park where the impact of Carsington is more limited due to the ridgeline and local topography.

The County Council take the view that reassessing this impact which will be large in scale and extent, completely uncharacteristic in relation to the affected landscape, with the turbines being new elements in this component of the landscape would produce more logically a conclusion that the magnitude of change would be high resulting in an substantial impact, significant in terms of the EIA Regulations.

The impact on other LCT areas is limited because the effects are not direct effects and primarily relate to adverse effects from visual intrusion.

The temporary access proposed will also have a major impact on local landscape. The access has little regard to the pattern of field enclosure and requires significant cut and fill. Whilst 'temporary' it is unlikely that the naturally rugged landscape can be replicated. The provision of the substation will leave a continued legacy.

#### Visual Impact Assessment

The LVIA records key visual receptors and the Visual Impact Assessment records a number of locations, both inside and outside the National Park that would experience significant adverse visual impact. These include the settlement of Ible, parts of the Parish of Bonsall, scattered dwellings and farmsteads and numerous rights of way and recreational routes such as the High Peak Trail, Limestone Way, Midshires Way and Pennine Bridleway. The LVIA appears to diminish the significance of these particular locations by virtue of the numerous other locations identified that are recorded as having no significant impact.

The assessment of visual impacts is not as straightforward as suggested in the LVIA. The magnitude of visitors to the National Park and level of usage of trails and footpaths is not properly factored in and consequently the LVIA tends to underestimate the overall impact of development on the visual amenity of people living or visiting the area.

Furthermore, the 5 proposed turbines would extend the cumulative impact of the approved turbines. The approved development at Carsington has been seen as a precedent for further turbines. Whilst this might have justified Viaton and Ryder Point these existing and consented turbines have a limited impact on the National Park and the visual amenity of visitors as they lie south of the ridgeline. The five proposed turbines lie to the north of this ridgeline opening up extensive new views to the north as well as increasing the impact from locations where all twelve turbines would be visible.

The suggestion that a 'Landscape With Wind Turbines' has been created is highly debatable as this proposed landscape type straddles 6 landscape character areas. The proposal has no natural response to landscape character and can only be assessed as an impact. The impacts extend into the National Park and the notion that this constitutes a 'working' and 'degraded' landscape has been advanced to help downgrade the essential quality of the landscape character type affected.

#### Overall

Although the LVIA is constructed in accordance with the relevant guidance the results and outputs are highly subjective and not necessarily supported by the baseline evidence. The sensitivity of the affected landscape has been underestimated and the magnitude of change on the landscape and particularly that protected by the National Park would be far greater than assessed. The visual impacts from these locations

noted as being significant in the LVIA are also those locations which would see the greatest number of people affected.

The LVIA has gone to great lengths in attempting to justify the cumulative impact alongside existing and approved turbines. Despite this the argument that consented turbines have established a precedent is not considered to be valid and instead emphasises how this proposal would contribute to cumulative impact of turbines in this locality.

**Response to Additional Information:**

Local Member Comments:

Councillors Ratcliffe and Lewer strongly object on the grounds that the further massing of wind turbines in this area would exacerbate the environmental impact caused by current turbines on Derbyshire's special landscape within Derbyshire Dales and Peak District National Park. In addition, if approved would possibly have a detrimental impact on Derbyshire's tourist economy.

Officer Comments:

Archaeology

The comments submitted by the Peak District Mines Historical Society (PDMHS) raise two issues not adequately addressed by AMEC. Firstly the atypical mine hillocks, which may be a rare feature. The potential significance of these needs to be reassessed.

Secondly, PDMHS comments refer to a lack of review of below ground workings, which could impact on turbine construction. The extensive underground workings could impact on turbine construction and likewise the turbine construction could have significant impacts on what could be historically significant underground workings. The Local Planning Authority should be satisfied that everything has been done to establish the level of risk involved.

The Archaeological Evaluation suggests that the assessment of impacts of the proposed access track can be dealt with by condition. Suggest that the whole route of the tracks be evaluated in line with paragraph 128 and 129 of the NPPF. Little detail is included about the potential impact of the access road on the historic landscape character. The route will cut across the pattern of fields and through dry stone walls. Whilst the western section of the track is to be restored no detail of the extent of cut and fill is provided.

A major concern in considering this proposal is the impact on the setting of designated and undesignated heritage assets as well as visual impact on the wider landscape. Whilst there is much discussion on impact on individual monuments what appears to be lacking is the consideration of cumulative impact on the setting of the heritage assets, which together contribute to the landscape character.

Further information is required with regard to the impact on the potential archaeological interest of the route of the access road and the area of lead mining directly impacted.

Heritage Assets

The comments made by the Development Control Archaeologist are supported.

Figure 16 illustrates the impact of the turbines at the Grade II listed Griffie Walk Farmhouse. It shows two turbines visible in summer conditions and this level of change to the setting of the building and farmstead is not acceptable. In winter months three turbines would be visible. The absence of any view from the Grade II listed Primitive Methodist Chapel at Ible is noted. Evidence should be submitted to show this impact.

Whilst the presence of quarries and pylons is noted these are sunken or relatively permeable. The impact of turbines with their moving components distract the eye from the setting of heritage assets. The infrastructure such as hard standing, road and sub-stations could also further damage the setting of heritage assets by urbanising the landscape.

It is likely that the development will result in a large negative impact on the setting of heritage assets through cumulative change.

#### Landscape Impact Assessment

The additional information does not provide any further evidence that would alter the original assessment of impacts. Figures 1, 3 and 10 clearly demonstrate cumulative impacts on the Carsington Pastures scheme. The cumulative impact would be felt even in distant views such as Wetton Hill and Thorpe Pastures.

Additional Figure 18 demonstrates that the scheme would introduce turbines into a new landscape unit looking outwards looking northwards towards the National Park. The impact of the ridgeline to the south of the proposed turbines is clear in figure 18.

It is not accepted that the National Park boundary was drawn to exclude this area of landscape for landscape reasons. It is evident on site that the landscape character seamlessly runs through a relatively arbitrary boundary. The landscape affected by this proposal is more sensitive than presented in the Environmental Statement and alongside the high magnitude of change would give rise to more significant impact.

The supplementary information has not altered the County Councils previous views.

#### Natural England:

##### **Initial Response:**

The site lies in close proximity to the Peak District Dales Special Area of Conservation which incorporates Via Gellia Woods. Whilst this is protected by European legislation Natural England raises no objection in relation to any potential for impact on this designated site.

Via Gellia Woods is also a site of Special Scientific Interest (SSSI) but Natural England are satisfied that the development as proposed will not damage or destroy the interest features for which the site has been notified and no objection is raised in relation to impact.

Natural England advise the Local Planning Authority to also assess the development for its impacts on local wildlife sites, protected species and priority habitats and local landscape character.

### Protected Landscapes

The proposal lies in very close proximity to the boundary of the Peak District National Park, on high ground which is likely to be visible from some way within the National Park, as well as views towards the National Park from the south. The proposed turbines will also form part of a combined view with the consented turbines to the south. The current proposal has the potential for significant landscape and visual impacts upon the special landscape qualities of the National Park, both alone and in combination with these other turbine developments. The LVIA should therefore be given detailed scrutiny by your Authority. In particular the following shortcomings of the LVIA should be given careful consideration as part of any analysis.

The LVIA acknowledges the significant impact upon the National Park but the report appears to attempt to dismiss this by considering the National Park as a single receptor. This, therefore, suggests that only 1.5% of the total area of the Park is impacted upon. However, it is suggested that the overall impact should be more accurately recorded as being a number of separate and significant negative impacts with each Park receptor, having been selected on the basis of its potential sensitivity to such an impact, being considered in its own right. The significance of the impact from each viewpoint or receptor should be considered in terms of the scale of the intrusion into the view either from the National Park towards the countryside beyond the Park boundary, or from the viewpoints towards the National Park with the potential impact being upon views with the National Park as a backdrop. In this regard the proximity of the site to the National Park and, therefore, location within its setting is of particular importance in the assessment of these impacts.

The visual impacts from a development of this nature, and specifically turbines of this scale upon local residential properties, roads, key routes and even close, middle and long distance views are acknowledged in the LVIA as being unavoidable and widely recognised. However, the report then downplays these impacts by asserting that the majority of these views are already impacted upon by the 4 operational turbines and 3 further consented turbines. The addition of 5 additional turbines will almost double the numbers which already compromise these views and the statement that the increase in visual impacts should be considered merely as an incremental increase is therefore questionable.

The Local Planning Authority should seek the advice of landscape specialists working for the National Park. Their knowledge of the location and wider landscape setting will help establish if the proposal impacts significantly on the purposes of the National Park designation.

### Biodiversity Enhancements

The application may provide opportunities to incorporate features into the design which are beneficial to wildlife through measures such as bird and bat boxes. The Authority should consider requesting these if you are minded to approve the application.

### **Response to Additional Information**

Previously highlighted concerns over potential for landscape and visual impacts to affect National Park and identified areas of the LVIA which were considered inadequate or potentially misleading concerning the scale of the impact upon the

National Park and the extent to which the impacts may be felt over the Park landscape.

Did not raise an objection but highlighted the need for Derbyshire Dales to seek appropriate professional advice and draw on the knowledge of National Park landscape specialists. Whilst the comments of the National Park Authority have not been viewed the additional information referenced would certainly seem to indicate that the visual impacts of the proposal, both alone and in combination with the other development of this type in the area, extend a considerable distance into the National Park landscape. Do not, therefore, wish to submit any further comments but confirm that the potential landscape and visual impacts must be given due consideration in determination. The continued advice of the National Park Authority should be sought.

#### Development Control Archaeologist

##### **Initial Response:**

##### Direct (on-site) archaeological impacts:

The applicants submitted with the application the results of test-pitting on the 5 turbine locations. Artefacts were restricted to turbines 4 and 5 at the southern end of the scheme with a small cluster at turbine 5. This will need further investigation but can be secured through a planning condition. This would secure further test-pitting with closer intervals with subsequent strip and record to identify any sub-surface features.

Of concern is the lack of archaeological evaluation of the proposed wind farm infrastructure outside the turbine bases. This includes a significant length of access track involving areas of cut and fill. At its northern end this track passes through an area of archaeological interest associated with surface finds (HER2425) close to the scheduled Moot Low bowl barrow. There also appear to be impacts on the medieval (and perhaps earlier) trackway known as the Portway (HER99027) and the Environmental Statement (ES) chapter identifies an impact to a possible barrow identified during a recent Aggregate Resource mapping programme in the vicinity of Griffé Bage mine. These areas of archaeological significance should be investigated by a programme of archaeological evaluation and this should include test pitting and trial trenching. Because of the lack of evaluation of the wider scheme footprint the application does not currently meet the requirements of National Planning Policy Framework paragraph 128.

##### Indirect Impacts to Designated Heritage Assets

The setting of designated heritage assets within the Griffé Grange landscape is fundamentally structured by the landscape itself. Support the comments of English Heritage that this functions as a 'bounded topographic space', experienced and structured by reference to the monuments of the past and their relationship to topography. In particular the scheduled barrows at Moot Low and Ivet Low, the group of (designated and undesignated) sites at Harboro Rocks, the other undesignated burial monuments (Griffé Walk, Round Low, Moot Low 2) the likely medieval site of Griffé Grange itself, the post-medieval farmhouse at Griffé Walk and the historic route of the Portway. The historic landscape at Griffé Grange remains relatively unaltered by the existing turbines at Carsington Pastures.

Although the EIA provides a discussion of impacts in relation to individual assets it fails to address the landscape relationships of these assets and the ways these contribute to their setting. There is no photomontage photography associated with cultural heritage viewpoints to show how they are impacted. This should at the least be done for Moot Low, Harboro Rocks and Griffe Walk Farm supported by consideration of the landscape relationships and articulation between assets and an assessment of proposed impacts of significance.

Without this analysis, it is not possible to reach an informed and evidence based judgement on the impact on setting of heritage assets, although it seems scarcely credible that there will be no EIA significant impacts to designated assets. The requirements of paragraph 128 of the National Planning Policy Framework are not currently met.

#### Recommendation

Based on the above failure to meet the requirements of paragraph 128 of the National Planning Policy Framework a holding objection was maintained.

#### **Response to Additional Information:**

With regards to below ground archaeology, whilst discussions have been ongoing over the scope of further evaluation both pre and post-consent, the situation has not changed materially since earlier comments as no further field evaluation has occurred. The statement of significance in relation to historic mining remains has also not been revised, a holding objection remains as the requirements of NPPF paragraph 128 has not been met.

In relation to visual impacts to designated heritage assets (through their setting) the applicants have provided visualisations from near heritage assets and Minninglow Hill. On this basis with caveats it is now possible to provide some comments on the level of impact to the settings of designated assets.

- The following general comments pertain to the applicant's study of setting impacts as a whole.
- The visualisations and accompanying discussion focus on turbine impacts and omit discussion of likely visual impacts from ground level infrastructure. The ground level impacts are likely to be significant and widely visible, particularly in relation to the access track which proposes significant cut and fill. This will be a significant disruption to the grain of the historic landscape and to the setting of heritage assets which draw on it for significance through highly visible infrastructure and reprofiling natural topography. Whilst the intention to restore the ground is noted at the western end of the track it will not be possible to fully restore aspects of the historic landscape such as limestone grassland and dry stone walling. Because this omission the visualisations and assessments of visual impacts to those heritage assets within close landscape of the turbine scheme represent an underestimate of the true impact.
- Much is made of the 'individual' character of the landscape. The area and its historic landscape is indeed characterised by a long-standing symbiosis between upland agriculture and the extractive industries, typified by individuals supplementing income from the land by seasonal work in mines and quarries. Because of this integral role of mines and quarries within the rural environment

and economy the remains are considered to strongly contribute to historic landscape character rather than detracting from it. Notwithstanding this the landscape remains predominantly rural, dominated by enclosure walls, fields and small woods. Industrial aspects do not dominate views. It is, therefore, concluded that the industrial character of the landscape is overstated and the elements of extractive industries form only an integral part of the landscape in the White Peak and are not of such a scale as to overbalance the predominant rural landscape.

- The cultural heritage chapter considered impacts on assets in isolation. There is no assessment on cumulative impact of harms to the setting of assets over a wide area. In EIA terms the significance of an environmental impact may be magnified by its cumulative effect over a number of receptors. Whilst individual impacts may not be key to decision-making, the cumulative effect of a number of impacts can be magnified to become such a factor. Because of the large number of assets in the viewshed the failure to consider cumulative impact is a serious omission in assessing heritage assets and has led to under-assessment of harms to setting.
- The historic landscape at Griffie Grange remains relatively intact and can be read in terms of land use through time with prehistoric barrows using prominent locations, a medieval grange site, the reuse of Moot Low as a place of assembly, piecemeal post-medieval enclosure, remains of lead-mining and quarrying and post-medieval farmsteads (Griffie Walk). Movement through the landscape was also important via the Portway. The historic landscape remains relatively unaltered by the Carsington turbines and key views across the landscape contain little in the way of modern intrusion. Whilst this cultural landscape has no heritage designation, its legibility forms an important part of the historic context and setting of the designated assets within it and makes a key contribution to their significance.

#### Moot Low Bowl Barrow Scheduled Monument

Key contributions are made to the significance of Moot Low by aspects of its setting. It has a sense of elevation and dominance afforded by its location, visual relationship with the Portway and other prehistoric monuments including Round Low and a barrow on Middleton Moor, views over and relationship with Griffie Grange 'cultural landscape'. The setting to the north is compromised by a quarry and planting belt and works at Curzon Lodge to the west have further impacted on setting. The open views to the east are, therefore, considered doubly important in preserving a sense of historic context in relation to Griffie Grange and the surrounding landscape.

The proposed wind farm will impact negatively on aspects of the setting of Moot Low. The sense of topographic dominance and elevation will be eroded by the scale and dominance of the turbine group. The turbines will introduce a dominant and competing element interrupting visual relationships and lines of sight to Round Low and Middleton Moor and the legibility of Griffie Grange 'cultural landscape' will be harmed by the introduction of these 'moving' industrial elements on an unprecedented scale.

It is considered that this understates the level of impact at 'low-medium' and the setting impacts to Moot Low represent a material level of harm, though falling short

of 'substantial harm'. Ground level impacts could potentially elevate this level of harm still further (towards 'substantial harm'); the line of the Portway will certainly be obscured by the access track and the proposed cut and fill in the vicinity of Moot Low at least initially will have a major landscape impact.

#### Griffe Walk Farmhouse

The significance of the listed farmhouse draws on aspects of its setting, notably the post-medieval agricultural landscape resulting from gradual enclosure of open 'sheep walk', with areas of contemporary mining and quarrying and the 'cultural landscape' allowing these post-medieval developments to be read in topographical and temporal context. In this landscape modern elements like the pylons and Sibelco Works are only a modest intrusion. The turbines in contrast are a discordant 'industrial' element of unprecedented scale. This will harm the legibility of the historic landscape and hence the setting of Griffe Walk. The ES understates the impact and a material level of harm results though falling short of 'substantial harm'. The disturbance at ground level associated with infrastructure works could elevate this harm towards 'substantial harm'.

#### Harboro Cave (Scheduled Monument) – and associated undesignated assets

The significance of the scheduled cave draws on the associated undesignated assets at Harboro Rocks (the chambered cairn) – HER2451, and the Iron Age Settlement Site (HER2453) as well as the dominance of Harboro Rocks as a landscape feature. Whilst the cave is on the southern side with no direct views, the heritage asset is experienced in the context of the other undesignated assets and the rocks as a whole. The viewpoint produced shows harm to the setting of the cave through erosion of the sense of Harboro Rocks as a dominant landscape feature. This is a cumulative impact – the current proposals adding to the existing turbines at Carsington Pastures. Whilst the harm is tempered by the lack of direct views from the monument there is still material harm to its significance.

#### Scheduled Lead Mining Remains

There are scheduled former lead mining works in the wider locality. Whilst the ES suggests otherwise, as these lead mining works have played an integral role in the formation of the historic landscape and are generally fairly low key, the introduction of wind turbines to their setting represents a modern element of unprecedented scale and character. Wind turbines, therefore, have the potential to impact negatively upon the setting of these scheduled extraction sites by introducing competing and dominant elements out-of-character with the historic landscape setting.

The viewpoints presented show harm to the setting but this harm decreases with distance. The harm is perhaps moderate for closer sites and low where they are further away.

#### Scheduled Prehistoric Funerary Monuments (Various Sites)

Minninglow Hill includes prehistoric monuments and an 18<sup>th</sup> century plantation. The hill is an iconic Peak District landmark which is widely visible and recognisable; the prehistoric monuments were clearly placed for visual dominance and sightlines to other monuments and higher ground. The significance of the monument draws upon this historic landscape and upon the landmark character of the hill. The setting will experience harms from the proliferation of dominant and competitive

elements in views of the hill in addition to harm resulted from consented turbines and in views from the hilltop.

Middleton Moor platform barrow, though not illustrated will experience harm to its significance through the disruption of westward views towards the scheduled and unscheduled barrows in the site.

### Conclusions and Recommendations

The proposal will involve material harms to the significance of numerous designated heritage assets with the viewshed of the proposed scheme. For the most part these harms fall into the bracket of 'moderate' impacts in EIA terms, though the closer assets – in particular Griffie Walk Farmhouse and Moot Low barrow – are likely to experience a higher degree of harm which might be elevated to 'substantial harm' if the ground level elements cause substantial disruption to the legibility of the landscape.

Because of the number of assets involved – and leaving aside impacts on Conservation Areas and other Listed Buildings the environmental significance of these impacts is magnified by the cumulative impact of a large number of 'less than substantial' harms to heritage assets across a wide area.

The National Planning Policy Framework, paragraph 132, requires that any harm to designated heritage assets requires 'clear and convincing justification' whilst paragraph 133 requires that such harms (where less than substantial) are shown to be outweighed by public benefits.

Whilst this is a matter of planning balance, I recommend that harms to heritage assets weigh strongly against the proposed scheme and the level of justification in terms of public benefit required to be demonstrated by the applicants is considerable because of the cumulative effects discussed above, approaching the 'exceptional' level required in cases of substantial harm.

### Comments on Additional Archaeological Evaluation Report

The report addresses some of previous comments on below-ground archaeology in that test pitting has been carried out within the proposed areas of cut along the access track footprint with three trenches excavated.

Having reviewed this trial trenching and its results it is considered that the prehistoric potential could be adequately treated through a planning condition; with a conditional scheme of work comprising test-pitting at tighter intervals where Lithics have been identified with subsequent strip-and-record of target areas to test for sub-surface features.

With regard to the Portway the line and depth of any surviving remains is still unclear. The applicant should either submit a no-dig proposal or carry out further evaluation to clarify potentially impacts.

With regard to historic mining remains and particularly the Griffie Bage complex, where there will be substantial impacts from the access track between T3 and T4 the position has not substantially changed since previous comments and the significance cannot be judged or impacts understood. Therefore wish to maintain a holding objection on the grounds of non-compliance with NPPF paragraph 128.

This could be addressed by further evaluation or a mitigation proposal for the line of the Portway and further information / consultation with PDMHS on historic mining remains within the specific zones of development impact and in particular with HER 8377.

Carsington and Hopton Parish Council:

**Initial Comments:**

Do not agree with visual impact assessment. The applicants correctly identify existing and proposed turbines as the baseline. However, the argument that these mitigate the addition of a further 5 turbines is specious. The percentage impact on the overall wind turbine installation would be very significant. There is no basic justification in the argument that just because the landscape has been judged to be able to sustain the installation of a certain number of units it can be assumed that it can sustain more.

The turbines already consented to and installed are all agreed to have a significant and adverse impact – agreed to ‘on a fine balance’ at the last application. This new application cannot be seen to be within this balance and we do not accept that the existing consents imply that these turbines would be absorbed within the view. Believe that the visual impact on the Peak Park is significant and adverse. Do not accept that this should be assessed as if the Peak Park was a single receptor. This cannot be a valid way to assess visual impact as it would imply that any single development within the Park would have such a negligible impact on the Park as a whole that visual impact assessments could only ever conclude that there was minimal impact. This can only be incorrect.

The visual impact on dwellings in Ible would be extremely significant and adverse. Because of the landform it is believed that they should be assessed as severe. Note also that the baseline data is believed by the residents of Ible to be incorrect as many of the properties identified as being north facing are in fact of south, or south east aspect.

Taking into account the shadow flicker data, which implies a significant adverse effect and the visual impact of the turbines, we think it would be reasonable to assess that the impact on the dwellings would be ‘overbearing’ and the living conditions could be considered ‘unsatisfactory’.

It should also be noted that whilst noise levels are predicted to be within limits, there is little or no screening between the dwellings and turbines and the prevailing wind will mostly create ‘downwind’ conditions.

It is our experience in Carsington that where there are clear sightlines and downwind conditions, the existing turbines are clearly audible. Given the overbearing nature of the turbines and shadow flicker believe that the noise would be a contributory factor to a situation where living conditions could be assessed as ‘unsatisfactory’.

**Response to Additional Information:**

In relation to the further submissions from the applicants, the Parish Council have reiterated the views expressed above.

Brassington Parish Council:

Brassington Parish Council does not object to the Griffe Grange Wind Farm as they have not objected to previous wind turbine applications.

The application is on the boundary of the Parish and have considered the drawbacks and the benefits to the local area very carefully.

The consensus of opinion based on wide consultation is that the Parish Council supports the scheme. The Carsington Wind Farm causes no noise problems to the Parish despite its close proximity.

Quarries and industrial works already in the immediate area cause noise and traffic problems which residents live with and accept.

There is a concern that rural areas would be affected if electricity supply becomes threatened in the near future and despite the temporary negative impact on the rural landscape Derbyshire Dales District Council must accept that it has to deal realistically with this concern and support a solution.

The existing bridle path and footpaths should be protected at all costs.

Civil Aviation Authority:

Provide general advice on the rules and guidance that apply to turbines from an aviation perspective. Do not provide any comments specific to the scheme proposed.

Ministry of Defence:

No objection. In the interests of safety all turbines should be fitted with safety lighting, 25 candela omni-directional red lighting or infrared in nature with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.

If permission is granted wish to be informed of the date of construction, maximum height of construction equipment and the latitude and longitude of every turbine. This information is used to update flying charts in the interests of air safety.

National Police Air Service:

Neither supports nor objects to the application. However, as the turbines are only 128ft higher than minimum daytime helicopter operating height and only 162ft below minimum night time operating height strongly recommend that they are fitted with aviation lighting. This applies particularly to T5 which lies on high ground and in a location with little background lighting. Emergency service helicopters are required to remain 500ft from all structures at night and this can only be achieved by safely lighting them. The service is now a national and not a regional one and the lack of familiarity of pilots heightens the need for lighting.

Suggest a form of lighting called 'Segmented' lighting to minimise visual intrusion as this lighting sits in a shallow bowl on the hub thereby limiting its wider visibility.

Derbyshire Wildlife Trust:

**Initial Response:**

Satisfied that the Environmental Statement has identified the key ecological features relevant to the proposed development. Note the desk-study was limited to data consultation with Derbyshire Wildlife Trust. Given that the main ecological receptors are bats and birds would expect desk-study to include data consultation with Derbyshire Bat Conservation Group and Derbyshire Ornithological Society. However, as the survey was comprehensive in nature these limitations should not significantly affect the results of the overall assessment.

Advise that the layout has largely avoided impacts upon any habitats of substantive value. However, the Phase 1 Habitat Survey identified a raised area of hillocks with diverse grassland species within the Griffie Bage Mine potential local wildlife site close to the access to and Turbine T4. Further information on the extent of the species rich calcareous grassland is required to fully assess the impact.

Aware of the presence of other turbines built and approved in the area. Whilst referred to in the ES, the cumulative effect of 12 turbines potentially creating a barrier effect to bird movements associated with Carsington Water thereby increasing collision risk has not been adequately considered. Further consideration of the cumulative effects in respect of the barrier effect and increased collision risk is required.

The supporting information suggests that the site is not a migration route. However, await comments from Carsington Bird Club before concurring with this view.

The highest impact on key bird species is in respect of Lapwing with predicted mortality rate of 4.6 birds per year for collision during the winter period for this proposal alone. Lapwing is a UKBAP priority species and although such mortality would not be considered significant in a national context and the number of birds is well below the threshold for SPA selection take the view that such mortality of a priority species is not acceptable in a local context. New Online Planning Practice Guidance states that planning decisions need to consider the potential effect of a development on priority species. It is likely that the mortality rate will increase if an assessment factors in the potential presence of 12 turbines.

Adequate survey work has been carried out for bats. Three main areas of bat activity were identified with Turbines T1 and T2 proposed for siting on the edges of the elevated bat activity. Whilst it is noted that the reference is made to siting turbines at least 50m away from the nearest boundary feature that could be used by bats, seek confirmation that the siting of Turbines T1, T2 and T3 has been carried out in accordance with the guidance provided in Natural England's Technical Information Note TIN051. It is not acceptable to be simply 50m away as the guidance requires a 50m buffer into which no part of the turbine blade should intrude.

In addition to monitoring and surveillance of bats monitoring and surveillance of birds, ideally for 15 years, should be carried out with the potential for remediation as necessary.

Satisfied that there are unlikely to be impacts upon great crested newts or badgers.

**Response to Additional Information**

Griffe Bage Mines:

The suggestion of a more detailed pre-construction botanical survey of the area to inform the alignment of the access track and avoid the calcareous grassland is supported and should be secured by condition.

Cumulative Collision Risk:

Whilst it is noted that the collision risks models have been considered separately for the turbine installations in the area maintain that the collision risk, particularly for target species including Lapwing has not been recalculated taking into account the cumulative effect for 12 turbines. This assessment is needed to determine if the collision risk increases due to the barrier effect. The reassessment of the collision for 12 turbines should still be carried out.

Bat Buffer

Having considered the further information submitted are satisfied that the location of turbines can satisfy guidance in TIN051 subject to the appropriate micro-siting of Turbine T2.

Monitoring for Birds

Welcome addition of monitoring surveys for birds which should form part of a planning condition. This condition should incorporate mitigation and remediation measures as necessary.

Environment Agency:

No objections but suggest conditions relating to controlling the form of foundation proposed to prevent mobilisation of lead contamination to groundwater, controlling the infiltration systems to ensure only clean water is discharged to ground, the method of dealing with contaminated material on site and the storage of oils, fuels and chemicals on site.

Suggest that hard standing areas are drained in accordance with SUDS principles and a further condition is suggested in this regard.

Peak and Northern Footpaths Society:

Strongly object. The visual impact and noise of the turbines will completely spoil the peaceful rural landscape and the excellent views of the countryside from numerous public rights of way including:-

Hopton Bridleways 4 and 21

Hopton Footpaths 5, 6, 12, 13, 14, 15, 17 and 18

Carsington Bridleway 12 (Part of High Peak Trail and Pennine Bridleway National Trail)

Carsington Footpath 11

Brassington Bridleway 7

Brassington Footpaths 14 and 15

and others further away from the site along with the important archaeological and recreational site of Harborough Rocks.

The new access road would be constructed along a section of Hopton Bridleway 4 (part of historical Chariot Way) and cross Carsington Footpath 11 twice and Hopton Footpaths 5 and 15 and Brassington Footpath 15 with inevitable inconvenience to walkers from surface damage and vehicle noise and conflict.

The whole area would deteriorate so that it is no longer popular for informal recreation. The fact that there are large turbines on Carsington Pastures is not a reason to allow more but to the contrary a reason to retain peaceful nearby areas of countryside.

Ramblers Society:

Object for the following reasons:-

Scale of development and potential overdevelopment around the site

Already 4 constructed and 3 approved turbines. A further 5 would mean a lot of turbines in a small area. This does not seem appropriate for an area of open countryside, criss-crossed by rights of way and well used by walkers, cyclists and horse riders. The turbines will dominate the landscape and blight the area for other users. The creation of some of the access roads across green fields where it appears access already exists will exacerbate the harm and make the area semi-industrial, changing the landscape completely.

Visual Impact and Loss of Amenity

Many of the footpaths across the site have open-vista views facing north and south. The turbines will be highly visible from a great distance. The development would negatively impact on the amenity value of the area both for those crossing the site and for those with a view of the turbines using other routes. This includes long distance routes like the Midshires Way, High Peak Trail / Pennine Bridleway and routes within the National Park. The routes affected are:-

Footpaths:

Hopton footpaths 5, 6, 12, 13, 14, 15, 17 and 18  
Carsington footpath 11  
Brassington footpaths 14, 15

Bridleway:

Hopton bridleways 4, 21  
Carsington bridleway 12 and Brassington bridleway 38 (both on the High Peak Trail and part of the Pennine Bridleway)  
Brassington bridleway 7

There is a cumulative negative impact for users travelling through this site and beyond. Visual amenity will be harmed and the experience of walking through the area will become very unpleasant reducing recreational value.

Danger – the height of the turbines:

Some of the turbines are dangerously close to public rights of way, in terms of their 'falling-over" distance. Understand that Government guidance suggest a safe separation of turbine height plus 10% from occupied buildings and presume the same principles should apply to public rights of way. For bridleways the British Horse Society has recommended turbines should be 3 times their height away with this

increasing to 4 times for National Trails. Some turbines are closer than these recommendations.

**Derbyshire County Council Rights of Way:**

A number of footpaths and a bridleway are affected by the proposal. The applicants should be made aware of the legal alignment of the bridleways and footpaths in the locality. The application does not appear to take account of the bridleway or mention horse riders using it.

There is no statutory distance of separate from a wind turbine is a Right of Way. However, the British Horse Society recommends 4 times turbine height for bridleways on National Trails as these are used by inexperienced riders. In addition, turbines should be positioned a minimum of height to tip plus 10% away from footpaths. The scheme does not achieve these separations in all cases.

The applicants should be advised of the need to maintain the bridleway unobstructed on its legal alignment, the need to prevent disturbance of path surfaces without prior agreement, the need to consider path users at all times and that temporary closures of footpaths and bridleways may be granted in the interests of public safety but in the case of bridleways an off road alternative route will be required due to the high level of usage.

**Local Highway Authority:**

There will be an influx of traffic during construction but this will be masked by existing HGV movements in the locality. Maintenance trips once operational will be infrequent.

It is presumed that site access 3 (Access Point of Operational Traffic) will be a new access point and not using the existing field gate. Visibility in the locality is reasonable within the constraints of the public highway. It is, therefore, likely to be acceptable for the anticipated level of traffic as the secondary access. Appropriate sightlines should be secured by condition.

The main access and abnormal load access is the existing access from Manystones Lane which has been previously approved for the Viaton turbine. This access and the overall route proposed are acceptable and highway conditions should reflect those imposed on previously approved schemes.

**Environmental Health:**

Based on submitted information raise no objections. Suggest detailed noise limit conditions for operation as a single wind farm and as a wind farm operating in conjunction with already constructed and consented scheme.

**REPRESENTATIONS:**

A total of 40 individual letters of support and 87 individual letters of objection. In addition, comments have been received from adjoining Parish Councils at Winster and Ballidon and Bradbourne and comments have also been received from the National Trust, Derbyshire and Nottinghamshire Chamber of Commerce, Longcliffe Quarries Limited, the Campaign for the Protection of Rural England, the Peak District Mines Historical Society and Brassington Recreation Ground Charitable Association. It is logical to deal with these latter representations first before summarising the comments of individual members of the public.

Winster Parish Council:

Object. The development will be prominent in public vantage points within the Civil Parish of Winster. Views from Winster Moor / B5056, Winster Public Footpaths 16, 17 and 18 and Pikehall Lane have not been assessed in the planning application.

The development will have a major detrimental impact to views into and out of the Peak District National Park. The development will have a significant impact on the hamlets, isolated properties and the residents who live on the Limestone Plateau.

The development will have a landscape impact on the setting of neighbouring national statutory designations at Stanton Moor, Via Gellia Woods and Minninglow.

Bradbourne and Ballidon Parish Council:

The zone of theoretical visibility shows that the turbines would be clearly visible from Ballidon and Bradbourne. The Griffe Grange turbines will be close to the Carsington Pastures turbines which are clearly visible from Ballidon and Bradbourne parish. The existing 4 turbines have significantly affected the landscape character of Ballidon and Bradbourne part of which is within the boundary of the National Park. The additional approved but not yet constructed turbines at Viaton and Ryder Point will further increase the detrimental impact on the landscape of Ballidon and Bradbourne and the National Park.

Ballidon and Bradbourne Parish Council strongly object to the proposed turbines on the basis of the cumulative harm that will result from the wind farm that will be created stretching over 2km in length.

The current proposal does not include full and fair assessments of the cumulative impacts of wind turbine developments on the surrounding areas. People in the Parish have commented that the Carsington Pastures turbines have had a negative impact on the landscape. The large size is a particular concern because they appear to dominate the landscape. It has been suggested they appear imposing and sinister. A larger wind farm is, therefore, unwelcome in a landscape remarkable for its outstanding natural beauty, heritage sites, (e.g. Minninglow, Wigberlow) and sites of special scientific interest (e.g. Bradbourne Mill Meadows).

As noted in CPRE policy documents it is imperative to 'protect the character of the countryside – its landscape, tranquillity, wildlife, heritage and amenity. Wind turbines should be sensitively located to take account of their individual and cumulative impact on the countryside. In addition CPRE is in principle opposed to proposals for wind turbine development that would cause AONB's, National Parks, or their settings, in places where they would damage heritage sites and in locally important areas where they are judged to have an unacceptable impact on the landscape, tranquillity, wildlife, heritage and amenity. Bradbourne and Ballidon Parish Council endorse the CPRE guidance and objects to the proposal based on the insidious detrimental cumulative impact on the landscape. People living in or visiting the parish will suffer a significant loss of amenity because of the impact of a large wind farm in areas used for walking, cycling and other leisure activities.

The Parish Council recognises the need to increase renewable energy and does not oppose wind turbines in principle, however, in this case the suggested benefits are outweighed by significant detrimental effects on the landscape and amenities within and adjacent to the parish including areas within the National Park.

The Parish Council endorse the opposition raised by the Peak District National Park.

#### National Trust

##### **Initial Response:**

The National Trust is concerned about the considerable cumulative effects resulting from this scheme in association with existing, consented and proposed schemes to the north and south. It is evident from the Environmental Statement that these schemes, will, in combination, fundamentally change the character of the landscape on the limestone plateau. This is a landscape of high sensitivity and high value as it extends into the National Park as part of the White Peak National Character Area. Part of the National Park's core purpose is to conserve natural beauty and such a fundamental change in landscape character would be unacceptable in this location.

Relative to existing and consented scheme the current proposal would extend northwards in a linear form so that the turbines would become a continual feature along the ridgeline when viewed from the east or west. Whilst the existing and consented schemes exhibit a degree of separation from the National Park the current proposal extends to the National Park boundary. An independent smaller proposal for a turbine at Slipper Low Farm in the National Park could accentuate the impact by further extending the line of turbines to the north.

Viewpoint 22 of the ES illustrates cumulative impact from Gag Lane to the west. It is likely that views from the west would extend along Gag Lane and extend to include parts of Thorpe Pasture and Wetton Hill. All these areas are in the National Park and the latter 2 are in National Trust ownership.

The proposal is considered to conflict with policy SF3 of the Council's Adopted Local Plan.

Alport Height is a National Trust property in Derbyshire enjoyed for its extensive views. The photomontages show a striking impact from this viewing location.

Kedleston Hall is a Grade I Listed Building in a Grade I Park and Garden. Carsington Pastures is visible from at least one point in the gardens. It is possibly based on the ZTV that cumulative impacts will result from this vantage point. The National Trust considers the setting of this heritage asset may be harmed to some degree.

In conclusion the National Trust consider that the landscape and visual effects associated with the current application would be substantially harmful both alone and especially in combination with consented and proposed schemes. To allow such a fundamental change to landscape character within a landscape that flows across the National Park boundary would be contrary to plan policy.

**Response to Additional Information**

A recurring theme within the applicant's submission is that in the real world a clear line exists which distinguishes land within the National Park from land within its immediate setting. This of course is not the case.

The National Trust maintains the view that the fundamental change that will result to the limestone plateau would be unacceptable as it runs contrary to the National Park core purpose of conserving its natural beauty. Whether or not a 'landscape with wind turbines' already exists in this location, clearly a critical threshold would be crossed if the turbines were to become 'the dominant landscape elements'.

The concerns expressed about earlier terminology are noted but it remains that the turbines appear above the horizon in a linear formation. The proposed turbine at Slipper Low Farm may indeed appear in the same view. The Local Planning Authority should consider viewpoint 22 in conjunction with the submission of additional photomontages for Slipper Low made in August 2014.

The Local Planning Authority is invited to view the impact of turbines from Gag Lane to form a view on impact rather than rely on baseline photography. The additional viewpoints 11 and 12 are welcomed.

The National Trust remains concerned about potential impacts on views from National Trust property.

In relation to Alport Heights recommend that the Local Planning Authority makes an on-site assessment of the impact.

**Peak District Mines Historical Society**

**Initial Response:**

Concerned that the mining archaeology present within the development area has not been suitably considered as part of the EIA. The walkover survey only notes the presence or absence of mining remains without any attempt to identify specific features within this. No reference is made to the most recent inventory of significant lead mining sites in the Peak District (Barnatt et al 2013). Marks Dale, included in this inventory and part of the development site, falls within the area of the entry.

From examination of satellite images the area around turbine 4, affected by access roads, contains areas of atypical mine hillocks where a large number of shafts or pits have been sunk close together and not following any obvious pattern of veins or jointing in bedrock. Similar pit scatters elsewhere like this one have been generated by working of a near-surface mineralised flatting within the host rock bedding or naturally redeposited mineral. If this is the case here, it is a very rare feature within the Peak District Orefield, where only one other such extant feature is known.

The applicants have cited the Carsington Pastures windfarm application as a model for their own. However, that application included a report on the mining history of the site by the highly knowledgeable Dr. Jim Rieuwerts. This application includes no attempt to consider the historical record and significance of the mines other than a photograph of an historical map. Given that at least one published source on mining history (Slack 1999) is freely available on the PDMHS website and this appears

second on this list when a google search is done on “Griffe Grange Mines” it suggests the historical research is superficial at best.

No consideration has been given to the possible presence of underground features in the development area, particularly around turbines 2, 3 and 4 where turbine location plans show a significant number of mineshafts. This is a major omission for two reasons.

Firstly, the impact of construction on underground remains and their relative importance is consequently impossible to judge and secondly, the insufficient consideration of underground features at this stage could result in additional work being required to create safe foundations as it did with Carsington, where the project was subsequently more expensive and delayed. Other than a cursory consideration of the local geology there does not appear to be a detailed investigation of the geological condition of the bedrock at turbine sites in relation to the possibility of sub-surface voids.

Although recording during construction is offered as mitigation of destruction of mining remains little appreciation of their relative significance is demonstrated in the application document. Given this lack of understanding of the significance of remains it is a concern of PDMHS that features of importance will not be recognised and hence recorded. This is a particular concern in relation to turbine 4 where apparently rare features around the base could have their significance damaged or destroyed without adequate record.

Taking the above into consideration feel that insufficient work has been done to properly establish the archaeological and historical significance of the lead mining remains. Thus the Planning Committee do not have sufficient information to make a judgement on the impact on the most prevalent archaeological feature in the central part of the application site.

Note that the application is for 25 years but concerned that after 25 years a further set of turbines could be located on this site as there would be no planning barrier to a windfarm of like for like replacement. With this in mind suggest that the potential visual impact to some of the scheduled lead mining sites in the near vicinity could be much more long-lasting and the development would not, therefore, constitute an ephemeral change.

In spite of the applicant’s repeated assertion that this is an industrial landscape and the turbines are, therefore, not out of place, consider that this is a landscape of extractive industry where the primary vertical focus is down into the ground. Whilst there are a number of quarries in the area which form a significant part of the vista many of these are now disused and in the process of re-vegetating which gives a sense of temporal continuity and counterbalance the active quarries. By contrast introducing 100m high wind turbines would be an overbearing addition to the setting of these monuments.

**Response to Additional Information**

Have reviewed the response from AMEC to our original comments and wish to make the following observations.

Still feel that further investigation is needed, particularly to properly characterise the unusual pattern of pitting in the area of turbine 4. Also feel that the correct time to engage with the expertise of PDMHS is either before or during the consideration of an application to highlight the types and relative importance of any mining remains on site so that judgements or decisions are properly informed. It is unrealistic to expect a general archaeological contractor to be fully conversant with the range of remains that can be found on lead mining sites, particularly when dealing with often subtle differences between features which are commonplace or rare and anomalous.

In relation to underground remains feel AMEC fundamentally fail to understand the issue raised. In the case of Carsington Pastures the applicants identified all entrances to underground workings and as far as possible thereby had the workings investigated. This resulted in the proper consideration of possible impacts such as the collapse of underground features or the running-in of shafts leading to loss of access or destruction of physical remains. There is little evidence of work in the current application to establish the location of shafts other than marking them where OS Maps indicate them to be.

No consideration has been given as to whether the shafts are filled or capped and if the latter applies, if the underlying works are of any consequence. Just noting the presence of shafts and assuming they can be assessed during construction is not a safe assumption. Shafts uncovered during construction may no longer be in a safe condition for descent and appraisal so assessment should take place before an application is submitted.

AMEC repeat the applicant's view that the turbines do not look out of place in an industrial landscape. This gives no consideration to the actual character of a landscape and makes its primary distinguishing feature the fact that these have at some time been industrial activity in it. The lead mining remains are well integrated into their surroundings and have become a valuable resource for wildlife and archaeology. Given this longstanding integration into the landscape we consider that their wide lateral extent does not provide a justification for introducing significant vertical elements into the landscape.

AMEC's response to PDNPA comments regarding the lead mining landscape suggests that the setting of these landscapes is not part of their importance. One of the 11 lead mining landscapes is Bonsall Moors. Siting wind turbines so prominently in this area will have a major visual impact on this landscape. Clarification should have been sought from the PDNPA on the extent of the Lead Mining landscape.

Do not agree that the previous concerns raised about the potential for longer term impacts on the setting of schedule monuments is contrary to planning guidance. The applicants themselves have raised the possibility of equipment renewal and use of the site beyond 25 years – English Heritage advice specifically mentions recurrence as a factor to be considered in assessing impact. Do not, therefore, consider it appropriate to limit assessment of impacts to 25 year time span.

Concerns about the development still stand and these should be given due weight in consideration.

### **Further Response to AMEC Submission**

Remain of the opinion that the case has not been proven that the heritage impact on Tinnisdale Rake is minimal both through the assumption that a lead rake is an homogenous feature and the lack of consideration of underground features and also that the area around the base of turbine 4 which will be affected by access tracks is potentially of much greater importance than previously thought.

Campaign for the Protection of Rural England (CPRE) – Friends of the Peak District  
Are limiting comments to the impact of the development on the context and setting of the National Park.

In summary, strongly object to the application on the grounds of its significant and direct visual impact as seen from closely adjacent areas within the PDNPA and its prominence in medium distance views.

Our organisation is strongly supportive of renewable energy development, including wind turbines, as long as the scale is appropriate to the landscape. In such cases we have judged that the benefits in terms of low carbon energy and diversification of the economy can outweigh the disbenefits (in the case of wind energy, the landscape impact).

This is not the case for this application. By reason of their size the turbines will be readily prominent in near views from the south eastern border of the PDNP; including from the nearby and sensitive viewpoints of Ible and Bonsall Moor (Viewpoint 6 in LVIA). The impact on this area is wholly unacceptable and we disagree strongly with the evaluation of 'not significant' in terms of the significance of effect reported in the LVIA Technical Annex.

The visual impact is significant from a number of viewpoints within the PDNP including viewpoints 1, 6, 9, 16, 19, 20 and 22. Even as distance intervenes to make the turbines less prominent in longer, wider views, they are still the most visible and dominant alien features in the view frame.

The experience of Carsington suggests that the turbines will be more prominent in reality than portrayed in the pre-construction photomontages.

In terms of visitor amenity, figures 5.18 and 5.19 of the ES highlight the density of the local rights of way network which will be affected. This includes parish footpaths and regional and national trails that pass close to the proposed development.

Visitors using these trails, especially in the PDNP will not expect to have views dominated by huge wind turbines.

For people using footpaths over Bonsall Moor and viewing the landscape as part of this experience the landscape either side of the Via Gellia is broadly similar and equally sensitive to large scale development irrespective of which side of the PDNP boundary it falls.

The most damning evidence of impacts is contained in figure 5.27a which describes a potential new local landscape character type 'Landscape with Wind Turbines' extending some distance into the Park. This clearly identifies the major significant

adverse impact that the proposed windfarm would have on the setting of a nationally designated landscape. Such an impact is contrary to local and national planning policy and on this basis the scheme should be refused.

Longcliffe Quarries Limited

Concerned that some of the objections suggest a lack of consultation on previous application for Longcliffe Quarry turbines with the local community. Can confirm that every property in Ible was notified of the Longcliffe application and people were invited to exhibitions at Brassington and Wirksworth. The leaflets were hand delivered and our Energy Director openly discussed the scheme in delivering the leaflets to Ible.

Note also public comment regarding light pollution resulting from Longcliffe Quarries. The company have a policy to tackle this and the introduction of low energy LED floodlights and sensors will significantly reduce night time lighting over time and thereby also save energy.

Derbyshire, Nottinghamshire and Leicestershire Chamber of Commerce

Endorse the application. At a time when the priorities focus on growth and the creation of jobs, these plans correspond with the business-led economic recovery that Government and the Chamber have been calling for.

The proposal makes a compelling case for optimising the available skills of the local workforce, as well as offering supply chain opportunities that would allow local firms to prosper and help retain expenditure within Derbyshire Dales.

Brassington Recreation Ground Charitable Association

The Trust would like to support the application. The BRGCA is completing a major sporting and recreation facility for the Parish and has been dismayed that earlier wind turbine applications and the finished facility on Carsington Pastures has led to minimal benefit to the local community.

In the case of this application the applicants have gone out of their way to ensure that Brassington and surrounding Parishes do receive substantial benefit. They have also agreed, if granted permission, to fund upfront a sports pavilion for the recreation ground which would otherwise be extremely difficult.

The two westerly Carsington Pastures turbines are visible from a large part of the Conservation Area. It is extremely important that this should not be allowed to happen again and also that this is the limit to the erection of turbines in our area. However, subject to these provisos, because it is adjacent to the industrial area of Longcliffe and will be of benefit to our community, we ask that the application be supported.

Individual Letters of Support

A total of 40 individual letters have been received, a substantial proportion of which have a standard format with the contributor only identifying their name and address.

The letters raise the following points:-

1. We need to build more turbines whenever the landscape will allow and the current turbines at Brassington look fine.

2. The scheme will benefit the local community through supporting local facilities such as playing fields and support community groups.
3. Green energy will reduce our reliance on gas and oil from troubled areas such as the Middle East.
4. Wind power is clean and free with no cost to the local taxpayer.
5. The turbines will not in any way detract from their surroundings and will enhance the area.
6. The appearance of the turbines is not objectionable and they can be an inspiring addition to the landscape.
7. The turbines will have no significant impact in terms of noise.
8. The turbines will not detract from enjoyment of the countryside and to the contrary will be a powerful symbol of a community tackling climate change.
9. The financial support for local communities is sorely needed in these difficult times.
10. The development will benefit the local economy.
11. Peak Park controls on planning are too restrictive.
12. There is a history of small scale turbines in the landscape being used to pump water.
13. Wind turbines are a preferred means of generating electricity we all need.
14. The build quality of windfarms is high and fits in with the Council's high planning standards.
15. We need to reduce our dependence on fossil fuels.
16. The current turbines at Carsington Pastures have no detrimental impact in terms of noise.
17. We need to act now to safeguard the environment for our grandchildren.
18. This project will contribute to tackling global warming.
19. Wind turbines offer us energy security.
20. The existing turbines at Carsington have a statuesque quality, are not visible for substantial parts of the year and more than 10 miles away have no impact on people at all.
21. This locality is an industrial corner on the park boundary and will not have a significant impact on the vast majority of visitors.

22. Only renewable energy does not cause harmful environmental impacts.
23. I operate a small turbine and the local community have only had positive things to say about it. All the impacts suggested in relation to impact on wildlife in terms of bats and birds are overstated.
24. Most people even in rural areas support windfarms and only the selfish minority are concerned about loss of property value object.
25. It would be good if the cost of electricity were reduced for the local community.
26. People and wildlife soon acclimatise to the presence of turbines.
27. The movement of the turbine blades is graceful.
28. The development would not impact upon Brassington as it is out of sight.
29. The turbines will not have a significant additional impact for users of Carsington Reservoir as they will sit behind the Carsington turbines well back from the horizon.
30. From the High Peak Trail they will not be fully in view.
31. The Council should show leadership in supporting this application.
32. The area has a strong history of harnessing renewable energy.

Individual Letters of Objection

A total of 87 individual letters of objection have been received which raise the following points:-

1. The proposal will have a significant detrimental and overbearing impact on the National Park.
2. The proposal will harm the enjoyment of national walkways, cycleways and attractive landscape areas by visitors and residents alike.
3. The proposal by having an adverse impact on the visitor experience will also have a permanent adverse impact on the local economy and businesses.
4. The tranquillity and special nature of Ible, rare in the National Park, will be irrevocably damaged by the development which will be both visible from Ible and from numerous other settlements and vantage points locally.
5. We have a duty to protect our National Parks.
6. Energy production should be fully sustainable and economical rather than the heavily subsidised and damaging installation proposed.
7. No amount of community fund can compensate for the loss of amenity that will result to the residents of Ible.

8. The standard letters of support are largely from those residents who will not have a view or whom wish to benefit from the Community Fund and will not suffer an adverse impact.
9. The scale of the development would have an overwhelming impact on the landscape.
10. Government policy has turned significantly against onshore wind because of the harm being caused to rural landscapes. The UK has 4,800 turbines already with permission for 1,800 more and Government targets will be met on this basis. The policy change is reflected in a reduction in subsidies.
11. The National Grid can only handle a limited proportion of non-baseline power, the sort generated by wind turbines and now on occasions wind operators are being paid not to export electricity to the grid.
12. The applicants use consented turbines as a baseline and suggest that on this basis the additional turbines will blend in. However, permitting a further 5 turbines would change the character of the landscape considerably and would be a very substantial development. The landscape cannot absorb further development without being significantly harmed.
13. The application seeks to downplay the importance of the landscape by describing it as a working landscape and highlighting the impact of local quarries. However, the quarries largely sit down in valley bottoms and cannot be seen over great distances. In contrast the existing turbines dominate the skyline from a range of important vantage points in the National Park.
14. A large number of residents of Ible have no view of the quarries and currently have an unspoilt view looking south. The proposed turbines sitting high in the landscape and closer to Ible will have a dominant impact on views from the village and National Park in which it sits.
15. The turbines rotation would further add to their conspicuous and dominant impact, something that cannot be portrayed in photomontages.
16. The LVIA details a “highly adverse” effect on the “highly sensitive” landscape of the National Park but then plays this down by suggesting only 1.5% of the Park is affected. This is disingenuous and goes against the requirement to protect and conserve the special qualities of the National Park.
17. The presence of a history of quarrying and lead mining does not devalue the landscape as suggested by the applicants.
18. Adding to the harm caused by Carsington Pastures and existing quarries would be entirely the wrong approach in this sensitive locality.
19. The harm caused to the residential amenity of the residents of Ible, whom are mostly permanent residents, would fail the “Lavender Test” and would not be in the public interest.

20. The turbines are very close to the village with the nearest barely 650m away and elevated above the village such that they could never be obscured by landscape features and will dominate the outlook from Ible.
21. The proximity of the turbines will adversely affect property values and residents may have a claim to reduce council tax.
22. The claims of local economic benefits are not borne out. At Carsington most of the labour came from outside the district to this remote location and local businesses did not benefit.
23. The claimed employment benefits are outweighed by the likely harm to the tourism industry. The applicants claim 80% of people wouldn't be deterred by wind turbines in choosing to holiday. Therefore, 1 in 5 would. A potential drop of 20% in business could be very serious for local tourism businesses. The example of the impact of wind turbines on a caravan park in Harrogate, which has been significantly affected by nearby turbines support the view that tourism can be significantly adversely affected. Enjoyment of trails and footpaths would be significantly impacted upon by the scheme in conjunction with consented turbines which would exacerbate the harm to the tourist industry.
24. The applicant's claims of lack of opposition to the scheme do not bear scrutiny. The proposals have been poorly published and difficult to view. This combined with the apathy generated by the overturn of the decision on Carsington and the fact that many visitors are unaware, has artificially suppressed the level of public opposition.
25. The level of bird interest identified in the study undertaken does not reflect the range of species present with Buzzards, Dunnocks, House Sparrows, Song Thrushes, Kingfishers, Swallows, Grey Wagtails and Sparrow Hawks observed on site.
26. The archaeology associated with lead mining has not been adequately surveyed. This means that its value cannot be properly assessed and in addition ground stability cannot be guaranteed.
27. The Community Engagement carried out has produced a misleading picture as the questionnaire was leading. In addition Carsington had not been completed at the time which may have properly influenced the outcome.
28. The Community Fund is overestimated as its figures relate to an earlier draft scheme of 6 turbines. The suggested figure may be further reduced by the level of actual exported electricity and devalued over time if not index linked. The nearest residents were not identified for any community benefit.
29. The green credentials of the scheme are over emphasised as they have no regard to the carbon footprint of construction and decommissioning. They also fail to acknowledge the limitations on wind energy and its relationship to the need for baseline energy generation.
30. The proposal will lead to noise nuisance to nearby residents.

31. The applicants have not visited individual properties in Ible to assess the impact of the turbines. If they had visited Brunswood Farm, Sycamore House and Beeches Farm they would have concluded the scheme failed the “Lavender Test” whereby they will be rendered unattractive and unsatisfactory places to live.
32. There are clear distinctions to be drawn between the harm / benefits associated with quarrying and the turbines. Quarrying has largely occurred at low levels and, therefore, has limited long distance visibility and in addition the environmental harm has been balanced by significant levels of long-term employment. Wind turbines are far more conspicuous and the employment benefits are limited.
33. Residents of Ible will suffer from shadow flicker harming their amenity.
34. Noise generated will be amplified by the topography in certain weather conditions.
35. The photomontages produced for wind turbines are deliberately misleading and under represent what is seen by the common eye.
36. A further 5 turbines would deter me from visiting this beautiful area in the future.
37. The proposed turbines extend significantly closer to the National Park boundary than those already built and consented and consequently their impact is far greater than the approved scheme.
38. Ryder Point turbines were only granted on a “fine balance”. The addition of 5 further turbines takes the landscape beyond saturation.
39. The turbines do not sit with the approved cluster. They are a linear group which run along the flank of Griffie Grange.
40. The scheme extends turbines towards the National Park without intervening landform to provide screening / mitigation.
41. Brunswood Farm has its aspect entirely facing south towards the proposed turbines. Ten of the 16 house windows face south and sit below the level of the turbines which exacerbates the dominance that will result. Every view from every room will be dominated. Had the applicants done a detailed site visit they would have reached a different conclusion.
42. Recent research by the LSE has revealed a definite impact on house prices with a price reduction of 5-6% for housing with a visible wind farm within 2km and 3% within 4km.
43. The landscape impact assessment fails to apply Natural England guidance published in 2010. The guidance requires a threshold-based analysis to the introduction of wind farms into landscapes which if applied would argue strongly against this new development. The applicants cite the existence of Carsington Pastures Wind Farm as evidence that further turbines will not harm the landscape but have not applied the guidance. The guidance puts great weight

on settlement pattern, landform and absence of development on the skyline all of which would add considerable weight against the development

44. The basic tenet in assessing the impact of wind farms in or adjacent to a National Park is whether it would harm or compromise the basic rationale for designation. These reasons for designation are to conserve and enhance the natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of the Park's special qualities. The key landscape area that will be affected is the White Peak National Character Area and the Limestone Plateau area of this. The PDNPA have a landscape strategy which aligns with the reasons for designation and seeks to protect the character and appearance of the landscape and this specifically says in relation to the limestone plateau that inappropriate wind generation projects could adversely impact on landscape character, the setting of historic features and landscape, amenity value and tranquillity. The close proximity of the scheme to the National Park boundary means it will have a strong visual impact on extensive parts of the White Peak plateau for many miles, with particular harm being done to the landscape south and west of Winster. This landscape is criss-crossed by footpaths and trails and is an ancient one. The wind farm will dominate the landscape and harm it contrary to the aim of designation.
45. The application is fundamentally flawed in relation to its assessment of cumulative impact. The impact of the proposed turbines are markedly different from those constructed and approved as they sit to their north on a north facing slope directly facing the Park at much greater proximity. No credence should be given to them in association with Carsington Pastures when assessing the impact on the White Peak plateau and the National Park. The proposal must be assessed on its own terms.
46. The development will cause significant additional harm to the setting of Minninglow, a scheduled Ancient Monument and needs to be assessed for its additional harm to Stanton Moor. The historic landscape is undervalued in the landscape assessment.
47. The proposed turbines are to be sited on land which overlooks Via Gellia Wood. These woodlands have SSSI and SAC status and are some of the most important woodlands in the UK. The windfarm will be seen in views from the south and south west across this woodland and will appear as a highly artificial and industrial element on its unspoilt skyline.
48. The turbines will be clearly visible from properties in Aldwark harming views of the National Park.
49. The landscape does not have the capacity to accommodate a further 5 turbines.
50. The proposed windfarm will generate noise which will adversely affect noise levels in Brassington at night.
51. The proposal fails to safeguard the character and appearance of Brassington Conservation Area.

52. The reply-paid publicity card sent to 1,800 homes in the area made clear links between a windfarm approval and financial payment to local villages. This appears a financial inducement to support.
53. Whilst Brassington is not directly affected have concerns that residents in other villages in or just outside the PDNP will have their environment destroyed.
54. The suggestion that this is a 'somewhat industrialised landscape' is disputed. The site has rock formations of national importance, is traversed by trails and has numerous natural habitats of interest.
55. The suggestion that users of bridleways and footpaths have short term views of the turbines and this will minimise the impact is misleading. Walkers and cyclists take a long time to traverse the landscape and will be exposed to views of the turbines for significant periods of time in utilising footpaths and trails causing significant harm to their enjoyment.
56. The local roads will be clogged with traffic during construction and are unable to cope.
57. Did not object to Carsington turbines because we need to make use of renewable energy resource. However, they are visible from Buxton and junction 28 of the M1 and have an unwanted detrimental impact on the landscape of the area. The new turbines will massively increase this impact and cause immeasurable damage to the amenity of lble residents making their properties virtually unsaleable.
58. The development would cause significant impairment to the area and be contrary to the Derbyshire Dales strapline "a clean, safe, healthy and beautiful place to live, work and visit".
59. The turbines would be located on land higher than Carsington Pastures and would dominate the horizon.
60. The favourable determination of this application would encourage yet more turbine applications.
61. These huge structures with their massive concrete foundations will harm flora and fauna.
62. The consultation exercise with community was poor. A meeting in Brassington Village Hall was held in the afternoon with only 3 days' notice, making it very difficult for people to attend.
63. Wind farms around the country have been rejected for a range of reasons and the energy benefits do not override the need to properly consider the environmental harm.
64. Griffe Grange Wind Farm is a subsidiary of a London based investment company with no interest in the Peak District. The wind farm company does not exist as a company on searching the records at companies house.

65. The turbines are grossly out of proportion with the landscape context.
66. Minninglow is a Neolithic monument and the largest and most prominently sited cairn in Derbyshire. The proposed turbines will add significantly to the harm to its setting already caused by Carsington Pastures.
67. The scheme is looking to benefit from wind farm subsidies which account for 60-70% of developer income and will be 6 billion per year by 2020.
68. The noise nuisance is under estimated by ETSU97 as turbines are much larger than was envisaged. The noise nuisance is a complex mix of low frequency noise, infrasound and amplitude modulation.
69. Wind farms are associated with a range of health problems.
70. Shadow flicker is caused by the sun behind the rotating blades and causes a range of health problems.
71. Wind farms should be at least 1¼ miles from dwellings.
72. Ducks and Geese cross the site on a flight path to Carsington Reservoir and the additional turbines will put them at much greater risk.
73. It takes 1000 wind turbines to replicate a conventional power station but in reality they can never replace them because of the intermittent nature of the wind.
74. Government subsidy support for onshore wind is likely to be removed in the next parliament.
75. If this scheme is approved the impact of Carsington Pastures will be tripled by pipeline schemes.
76. The landscape assessment submitted with the Carsington Pastures scheme was misleading and did not convey the scale and dominance of the turbines that has resulted.
77. The applicant's assertion that visitors may be attracted to the area to look at the turbines is laughable.
78. In views from Bonsall the impact of the proposed turbines will be much greater than the Carsington turbines which sit the other side of the ridge.
79. Notices about the planning application should have been posted in Ible and the placing of the notice in the Ashbourne Telegraph has failed to inform people as the local population read the Matlock Mercury.
80. Contrary to the applicant's assertion the majority of properties in Ible face south and have aspects towards the turbines.
81. The worst affected properties due to elevation and aspect in Ible are Woodend Cottage, The Croft, Ashes Farm, The Two Cottages, Sycamore House,

Brunswood Farm, Beeches Farm and Home Farm Cottage. These are all owner occupied and the harm to their amenity will be exacerbated by shadow flicker. They will be dominated by the turbines given the local topography and proximity and feel like they were living on a wind farm.

82. Ible as a community will receive no advantage and suffer all the harm.
83. The local employment benefits claimed will not materialise.
84. Ible is blessed with wildlife especially bird and bat populations which will be harmed by the turbines.
85. The village of Ible has connections with the writing of D.H. Lawrence.
86. The stability of the turbines may be affected by shot blasting at local quarries.
87. The residents of Ible were not consulted over Ryder Point or Viaton turbines which will be conspicuous but their harm will be greatly magnified by the proposal.
88. Planning Committee should visit Ible to fully assess the impact on this unique hamlet.

**POLICIES:**

1. Adopted Derbyshire Dales Local Plan (2005)
  - SF3: Development Conspicuous From The Peak National Park
  - SF4: Development In The Countryside
  - SF5: Design And Appearance of Development
  - NBE1: Sites Of International Importance For Nature Conservation
  - NBE2: Sites Of National Importance For Nature Conservation
  - NBE3: Other Sites Of Importance For Nature Conservation
  - NBE4: Protecting Features Or Areas Of Importance To Wild Flora And Fauna
  - NBE5: Development Affecting Species Protected by Law Or Are Nationally Rare
  - NBE7: Features Important In The Landscape
  - NBE8: Landscape Character
  - NBE16: Development Affecting A Listed Building
  - NBE21: Development Affecting A Conservation Area
  - NBE24: Archaeological Sites And Heritage Features
  - NBE25: Derwent Valley Mills World Heritage Site
  - TR1: Access Requirements And The Impact Of New Development
  - CS5: Renewable Energy Installations
  - CS6: Wind Turbine Generator Development
  - L9: Safeguarding Public Rights of Way
  - L10: Leisure Routes and Trails
2. National Planning Policy Framework (2012)
  - Paragraphs 7, 11, 12, 14, 17, 19, 20, 93, 97, 98, 109, 113, 115, 116, 118, 119, 120, 121, 123, 128, 129, 132, 133, 134, 139, 214, 215
3. Other Material Considerations:
  - Planning Practice Guidance – Renewable and Low Carbon Energy.

Landscape Sensitivity Assessment for Renewable in the Peak Sub Region July 2009  
Landscape Character of the Derbyshire Dales : Supplementary Guidance to the Local Plan

National Policy Statement for Energy (EN-1)

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

## **ISSUES:**

### 1. Introduction

Assessing a complex and contentious application such as this requires a structured and considered approach. It is logical to first identify all of the elements of the Development Plan that apply and view these in conjunction with the guidance given in the National Planning Policy Framework which reflects the Government stance on planning incorporating the key objective of promoting sustainability encompassing energy policy. Reasoned assessment should then factor in any other material considerations that are relevant in seeking to weigh the planning issues and reach a balanced judgement.

A significant material consideration which carries weight in the assessment of this application is the granting on appeal of a scheme for 4 turbines, constructed and operating at Carsington Pastures. Further turbines have subsequently been approved to serve the Viaton Works (now Sibelco) and at Ryder Point to create grouping of 7 in the landscape.

Irrespective of the Local Planning Authority and National Park Authority opposition to the Carsington Pastures scheme and the harm that may result from these, and the subsequent additional harm that will result from the construction on the Viaton and Ryder Point turbines, the approved turbines within the landscape on adjacent land provide an important part of the baseline for how landscape impacts are assessed and sensitives analysed and also feeds into the assessment of any noise impact.

Whilst there remains a healthy national debate on the direction of energy policy and the merits of onshore wind reflected in the public comments, this planning application is not the forum for challenging Government energy policy which remains supportive of wind energy as part of the renewable energy mix.

### 2. Policy Framework

The Development Plan currently comprises solely the Derbyshire Dales Local Plan (2005).

The National Planning Policy Framework (NPPF) was published in March 2012 and sets out Government guidance on the full range of planning issues.

Paragraphs 214 and 215 of the NPPF explained the relationship between local plans adopted after 2004 and the guidance in the NPPF. Full weight was given to local plan policies for 12 months following publication of the framework (up to March 2013).

Paragraph 215 now applies as it deals with the situation after the initial 12 month period and states that due weight should be given to the relevant policies in existing plans according to the degree of consistency with the framework (the closer the policies in the plan to the policies in the framework, the greater the weight that may be given). The degree of conformity of Local Plan policies with the framework is discussed below but first it is relevant to assess the thrust of current Government guidance on the continued development of renewable energy.

At the time Carsington Pastures was determined, there was a clear spatial component to the delivery of national energy targets on renewable energy as the Structure Plan and Regional Plan included target figures for delivery. However, indicative targets no longer form part of the Development Plan. Even though spatial targets no longer exist the thrust of national energy policy and national planning policy in relation to renewables has not significantly altered and there remains strong support in principle for renewable energy proposals subject to their benefits outweighing the harm caused.

Paragraph 97 of the National Planning Policy Framework sets out the general approach that is expected of Local Planning Authorities and of relevance to this applications states:-

“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 whilst ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts,”

The National Planning Policy Framework further states in Paragraph 98 in relation to determining planning applications that Local Planning Authorities should:-

- not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- approve the application if its impacts are (or can be made) acceptable”

Having provided a brief overview from the National Planning Policy Framework as to how renewable energy projects are to be assessed it is pertinent to return to the Development Plan and in so doing assess the relevant policies that apply to assessing this application and consider their conformity with the National Planning Policy Framework, as their degree of consistency is then directly reflected in the weight to be attributed to them in decision making.

Policy CS6 of the Local Plan is the most directly relevant Local Plan policy as it deals specifically with wind turbines. Whilst its negative wording is not consistent with the National Planning Policy Framework, which in paragraph 14 places emphasis on approving development unless adverse impact would significantly and demonstrably outweigh the benefits, it is considered to remain relevant and generally consistent with the National Planning Policy Framework in highlighting

those other planning considerations that Local Planning Authorities need to weigh in the balance in reaching a judgement on their acceptability or not of wind turbines. The policy requires the decision maker to consider impact on the immediate or wider landscape and problems in terms of the relationship between the proposal and neighbouring uses and the provision of safe access without permanent damage to the immediate and wider environment.

Policy CS5 concerns wider Renewable Energy Installations and is more in tune with the positive wording of the National Planning Policy Framework and continues as such to carry substantial weight in the assessment of this scheme.

Policy SF3 of the Local Plan is directly relevant as it seeks to protect the National Park from development that may adversely affect the purpose of the National Park or be harmful to its valued characteristics. Whilst the National Planning Policy Framework does not deal specifically with the setting of National Parks the emphasis on the protection of their landscape in paragraph 115 of the National Planning Policy Framework reiterates previous Government guidance and in this context the protection of their landscape from major development on the boundaries whose impacts spill into the National Park remains consistent with the National Planning Policy Framework and Government Policy.

Policy NBE8 of the Local Plan seeks to protect landscape character and appearance. Whilst the negative wording is at variance with the tone of the National Planning Policy Framework the aim of the policy broadly aligns with the objectives of Paragraph 109 of the National Planning Policy Framework such that the policy retains significant weight.

Policies NBE16, NBE21 and NBE24 of the Local Plan seek to safeguard listed buildings and their settings, Conservation Areas and their settings and scheduled monuments or other important archaeology and its setting. The requirements of these policies generally accord with the guidance in the NPPF and they retain weight in the decision-making process.

The site lies close to Via Gellia Woods, which is defined as a Special Area of Conservation and Site of Special Scientific Interest. These European and National Ecological designations are covered by Policies NBE1 and NBE2 of the Local Plan. Their emphasis on protecting these areas from harm resulting from development is considered consistent with paragraphs 118 of the NPPF.

The other policies listed in the policies section of the report are not assessed in detail but will be referred to as relevant in the analysis that follows.

Whilst the Local Plan as the Development Plan is supported by the overarching NPPF and the Planning Practice Guidance, on the one hand it also has supplementary guidance and background papers that aid in the analysis of this application.

The Peak Sub-Region Climate Change Study July 2009 in particular is a significant material consideration. However, the designations on landscape sensitivity with this site assessed as highly sensitive to large turbines cannot be viewed in isolation from the Inspector's decision on Carsington Pastures and subsequent Viaton and Ryder Point approvals which help define the baseline for this application.

As mentioned earlier in the introductory section the wider environmental benefits of renewable energy projects have been acknowledged as a material consideration in the assessment of planning applications.

The weight to be given to them, however, has not been specified and is in the hands of the decision maker. The fact that a scheme is providing a relatively modest contribution to overall energy production targets is not something that should count against it and, likewise, a very significant contribution to meeting energy targets is not a basis for setting aside proper assessment against development plan policies and relevant guidance in reaching a balanced judgement.

The site selection process can be a relevant consideration for wind farms as the development is subject to Environmental Impact Assessment. Notwithstanding the commercial forces that influence wind farm proposals it remains a relevant consideration to examine the degree to which an applicant has considered alternative proposals to minimise adverse impact arising individually and cumulatively.

It is also relevant in considering EIA development to address the degree to which the EIA submitted complies with the regulations in terms of identifying those aspects of the environment likely to be significantly affected, the description of the significant effects on the environment, direct, individual and cumulative, a description of the measures envisaged in order to prevent / avoid, reduce, remedy or offset those affects, and the data required to identify and assess the main effect. Should the EIA, in its totality be deficient in survey information or adopt a significantly flawed methodology, in analysing the impact, it would not be a reliable or sound document on which to base a planning decision.

From this assessment of the Development Plan and other material considerations, the comments of consultees and the public, a number of key issues arise around which the consideration of the merits of this scheme are logically discussed. These key issues are as follows:-

- (i) Visual / landscape impact incorporating impact on the National Park and cumulative impacts
- (ii) The impact on heritage assets individually and cumulatively
- (iii) The impact on the amenity of nearby residents
- (iv) The noise impact
- (v) The effects on nature conservation and fauna
- (vi) The impact on users of the countryside and consequences for the local economy
- (vii) The quality of the Environmental Impact Assessment

The analysis of the major effects of the development are then fed into the assessment of the planning balance.

i) **Visual / Landscape Impact Incorporating Impact on the National Park and Cumulative impacts**

The applicants as part of the Environmental Impact Assessment submitted a Landscape and Visual Assessment. It's worthwhile recounting the conclusions of

this piece of work which are summarised below before discussing landscape impact. The application is subject to substantial objection from consultees and public alike in regards to its landscape impacts and in particular those impacts on the National Park. Having regard to the difference of opinions expressed and based on the experience of having dealt with the complexities of assessing the landscape impacts of wind turbines in previous applications independent landscape consultants with considerable experience in this specialist area were appointed to aid in the review of the submitted Landscape and Visual Assessment and provide an independent view on the impacts.

The applicant's landscape consultants both before and during consideration of the application have cooperated with Council Officers in providing wireframes and photomontages of a generally appropriate quality to allow the impacts to be considered and addressed. As can be deduced from the "consultation" section of the report, they have also responded to some of the criticisms made, but their fundamental assertions about the impacts of the scheme have not changed.

The applicants' key findings and conclusions on the landscape and visual impact are as follows:-

1. During the construction phase there would be no significant landscape effects upon the National Park or the host and nearest landscape character types. Significant visual effects during construction would be limited to residents of Griffie Walk Farm and New Harboro Farm, however, residents of both have a financial interest in the development. Users of the Limestone Way and users of public rights of way would also experience temporary high magnitudes of change, however these are not considered significant given the transient nature of views and brevity of construction works. Construction works would be short-lived over approximately 10 months.
2. The LVIA concludes that during the 25 year operational period the magnitude of landscape change generated by the presence and movement of five 100m turbines would not exceed 'medium' and would more frequently be 'low' or negligible. None of the three landscape designations or the 20 landscape character areas defined within assessments undertaken on behalf of Derbyshire Dales or the PDNPA would sustain significant effects across the majority of their area.
3. The host landscape character type (LCT), namely Plateau Pastures is assessed as unlikely to receive significant effects due in large part to the presence of 7 granted turbines, which already ensure that a good proportion of its host sub-area is within a 'Wind Farm Landscape' LCT or a 'Landscape with Wind Turbines' LCT.
4. With regard to PDNPA landscape character types, there are three where one sub-area would be certain or likely to sustain magnitudes of landscape damage that would result in significant effects upon landscape character in one or two sub-areas. These LCT's would be the Limestone Hills and slopes LCT, the Limestone Village Farmlands LCT and most pertinently its Limestone Plateau Pastures LCT.

Nevertheless when these LCT's are assessed as a single landscape receptor the effect upon landscape character is assessed as not significant because there are other, more spatially extensive sub-areas of each LCT where the magnitude of landscape change would be negligible or there would be no effects pathway linking the proposed turbines to that LCT sub-area.

5. Significant landscape effects on the National Park would be restricted to an area of the National Park within 3.5 – 4km of the proposed turbines. This area represents approximately 21.2km<sup>2</sup> or approximately 1.5% of the National Park. In considering the setting of this area of the Park, the core study area and the area immediately around it contains a number of features which give it a sense of being a worked landscape, these including quarries, associated works and electricity transmission towers. The Carsington Pastures appeal decision noted with reference to the land between the Griffie Grange Valley and Carsington Pastures, which effectively covers the current application site that “this part of the Park setting..... does not contribute particularly positively to the qualities of the Park itself” (Para 38). Given the overall scale of the Park the presence of an additional five turbines is assessed as representing no more than a negligible incremental landscape change that would not be significant. It should be noted that this small proportion of the Park would be affected by the presence of the existing granted turbines.
6. In relation to visual effects it is widely recognised that wind energy developments will always result in some significant visual effects due to height and movement. It is inevitable that five 100m turbines will be seen by a high proportion of the limited number of people living in settlements and isolated properties within relatively close proximity. The number of significant visual effects assessed as certain or likely to arise is relatively limited, being again concentrated upon residents in properties sited within 1.5km of any of the turbines. Specifically residents of half (11 of 22) of the properties in this radius would experience significant visual effects, all of these lying within or north of the core study area. The core study area is within an area relatively dense with Public Rights of Way (PROWS) and associated long distance recreational routes and it is inevitable that users of some of these would experience significant visual effects. Those receptors likely to experience significant visual effects would be users of four sections of long distance routes which overlap, (which results in overcounting of effects), visitors to Harborough Rocks, users of PROWS within the core study area, and two other groups of PROWS to the north. However, these significant effects would be limited to sections of the routes of areas of PROWS within 3-4 km of the closest turbine.
7. The existing and consented turbines would also be a presence in many of the views available to visual receptors and are a strong visual context for the current proposal. These constructed and consented turbines are all approximately the same height as the proposed turbines. Generally in views from the south, these baseline turbines would appear to the front of Griffie Grange turbines and thus in many cases would appear more prominent. Conversely in views from the north of the Griffie Grange site the Griffie Grange turbines would appear to the front of the baseline, tending to appear more prominent than the baseline.
8. The cumulative assessment concludes that the only significant effects arising from the interaction of the Griffie Grange Wind Farm with other wind energy development within 60km that have not been identified elsewhere in the LVIA would be in relation to sections of three PROWS (Footpaths 15, 18 and 19). Footpath 18 is located to the northwest part of Middleton Parish within 3km and footpath’s 15 and 19 are located in the central eastern part of Brassington Parish within 3km.
9. In line with best practice the visual assessment also included a detailed assessment of potential visual effects upon the visual component of overall residential amenity

of the residents at all the properties located within 1.5km of any of the turbines. The residential visual amenity assessment concluded that none of the local residents would sustain effects upon their residential visual amenity such that the turbines would become 'overbearing' and/or result in 'unsatisfactory living conditions' arising.

10. Overall the landscape and visual assessment concludes that the Griffie Grange Wind Farm is acceptable in landscape and visual terms.

The independent consultant appointed by the Council visited the site and a range of sensitive viewpoints in conjunction with the case officer to assess the scheme and has fully reviewed the original landscape and visual assessment, subsequent supplementary information submitted and the comments by the applicant's consultant on their work. A summary of conclusions on the landscape and visual assessment undertaken and the landscape impacts makes the following key points:-

1. Baseline conditions – central to the consideration of the current application for a five turbine scheme on the edge of the Peak District National Park is the presence in the landscape of an existing four turbine wind farm and consents for a further three turbines. I undertook the reviews for both the Viaton and Ryder Point schemes which followed on from the inspectors granting of Carsington Pastures. In both of these cases it was considered that the increase in landscape and visual harm did not constitute a significantly additional adverse impact so as to recommend the sites were unsuitable. However it was recognised at the time that there would be loss to the special qualities of the landscape and that given the proximity to the Peak District National Park it was likely that the capacity of the area for wind turbines had been reached.
2. Methodological Approach to Cumulative LVIA –  
The LVIA argues that the presence of the existing turbines has reduced the sensitivity of the landscape to wind turbine development and increased the capacity. It is quite contrary to common sense to suggest that the capacity for wind turbine development can be increased by the presence of wind turbines. The importance of considering cumulative effects has been stressed in Planning Practice Guidance which states 'cumulative impacts require particular attention, especially, the increased impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases'.

The applicants approach reflects that of another applicant at an appeal recently determined at Holme-on-Spalding Moor. The appellants in this case argued that existing turbines reduced the sensitivity of the landscape. The Secretary of State's decision on this appeal has just been issued and neither the Inspector nor Secretary of State accepted the approach. The Inspector concludes that for the purposes of Cumulative Landscape and Visual Impact Assessment the position of constructed and consented turbines increased the sensitivity of the landscape to the change that would result from further turbines. The Secretary of State agreed 'that the cumulative effects of the appeal proposed along with existing and consented turbines are particularly important in this case with respect to the likely impact on the character and appearance of the area and on heritage assets'.

3. Landscape Impacts - In reviewing the current application it is clear that the capacity of the area for wind turbines has been reached and that the cumulative

impact would be exacerbated because the Griffie Grange proposal (five turbines) is larger than any of the previous schemes. The Griffie Grange proposal would result in an approximately 70% increase in turbines.

In addition to the cumulative impact, there are a number of site specific factors that cause the current application to be particularly harmful to the landscape.

- All five turbines are much closer to the Peak District National Park than any of the consented turbines.
  - The turbines are located in Griffie Grange which is a topographically distinct area.
  - The turbines are not located within an industrial complex and only turbine five could be considered immediately adjacent to an industrial area.
  - The turbines are located on the Peak District National Park side of an area of higher ground (including Harboro Rocks) that separates the Peak District National Park from much of the area of industrial/quarrying activity.
4. Impact on the Peak District National Park – The LVIA acknowledges that there will be significant adverse impacts on the Peak District National Park including adverse impact on the special qualities of the Peak District National Park. However, it reduces these to non-significant impacts by treating the Peak District National Park as a single receptor and concluding that only 1.5% would be significantly harmed. It is hard to conceive of any development that would affect the whole of the Park and Inspectors have refused applications for wind turbine development that affects only part of National Parks and their setting including the Matlock Moor wind farm which was significantly further away from the Park boundary. The current proposals would not conserve or enhance the landscape or the scenic beauty of the Peak District National Park and would therefore conflict with NPPF Paragraph 115 and the statutory purposes of designation.

There are clearly substantial differences between the applicants and the Council's consultants in the conclusions reached on the harm that would result to the host landscape and adjacent National Park from the proposed scheme. Before seeking to reach a judgement on the degree of harm it is logical to revisit the history of the consented schemes, describe the locational difference between the current scheme and the approved turbines, assess the increased spread and visibility and explain the differences in landscape and relationship to the National Park.

Carsington Pastures was granted on appeal at a time when targets for renewable energy were a component of the Development Plan. The Inspector considered this along with the locally despoiled landscape and relationship to the National Park and in Paragraph 115 of his report only identified adverse effects on the setting of the Park at close range to the west and as such observed that in terms of policy SF3 of the local plan the purpose of the National Park would not be adversely affected or its valued characteristics harmed. He concluded that the planning balance weighed in favour of the scheme.

It is important to note that the Inspectors decision predated the Councils assessment of landscape sensitivity to renewables. This independent assessment assesses both Carsington Pastures and the application site as intrinsically highly sensitive to the construction of large wind turbines which would normally consequently be considered inappropriate in landscape terms.

The subsequent application for Viaton was considered to increase the adverse impacts because of its elevated location which would increase the prominence of the group and spread of turbines in the landscape. The greater harm to local landscape character and the valued characteristics and setting of the National Park to the west, northwest and west was however ultimately considered to be outweighed by the benefits of renewable energy generation.

The Ryder Point turbines were considered by committee in June 2013. In the report it was acknowledged that the two additional turbines would noticeably increase the influence and adverse impacts of wind turbine development on two areas of the Peak District National Park. These were firstly the areas between the boundary of the Peak District National Park, Upper Town Bonsall to the east and Winster to the northwest and secondly in views from an area to the northwest of Mininglow looking back towards the turbines. Whilst the increased harm to the wider landscape to the east, south and west was not considered to be a significant impact the impact on the National Park was considered to lead to an increase overall in the adverse impact on the Peak District National Park. Although the scheme was considered not to significantly further diminish the already diminished quality of some views it was stated that the number of turbines visible from the areas identified of the Peak District National Park to the north and west had reached the point where additional turbines are very likely to have adverse cumulative impacts.

Whilst ultimately the planning benefits of the Ryder Point scheme in a fine balance outweighed its harm the concluding paragraph of that report states that 'serious doubts exist as to whether this landscape has the capacity to absorb further turbines without cumulative impact that seriously undermines the setting and valued characteristics of the National Park'.

Whilst every application needs to be fully considered on its own individual merits and a planning balancing exercise undertaken, it can be deduced from the above that in terms of impact on the landscape and particularly the setting of the National Park officers had concerns at the time Ryder Point was considered that a tipping point had been reached whereby the initial harm caused by Carsington Pastures would be substantially increased by the continued expansion of the wind turbine group.

It is important to now describe how the Griffe Grange turbine locations relate to the approved grouping of seven. Carsington Pastures sits to the south of a ridge which runs east/west and has Harboro Rocks at the high point such that only the upper sections of these turbines are visible from land in the National Park to the north. Viaton sits closer to the ridge and will be more visible but in views from the north is partially concealed by Harboro Rocks and the adjacent industrial works. The two Ryder Point turbines extend the turbine grouping to the east but the highest of the two sits 10m below the altitude of the Viaton turbine and the other turbine a further 20m lower.

The grouping as a whole, though still prominent in landscape terms, appears to sit behind the ridge defined by Harboro Rocks when viewed from the north and northwest.

The proposed turbines extend in a line running north/northwest from a high point to the southeast of the Viaton turbine. Turbine 5 is approximately 5m higher than the Viaton turbine and the turbines are then spaced at regular intervals extending down the eastern flank of Griffie Grange valley which falls away from Harboro Rocks in a northerly direction. The northernmost turbine is approximately 40m below the height of turbine 5 at 310m and the line of turbines extends almost 1.5km. The northernmost turbine lies less than 400m from the National Park boundary and approximately 650m as the crow flies from properties at Ible which lie at an altitude of approximately 275m. Whilst Griffie Grange itself is a shallow valley flanked to the east and west the land generally in the locality falls down to the north from Harboro Rocks to the low point of Griffie Grange Valley before rising steeply again up to Bonsall Moor.

When viewed from the west the current consented turbine group has a spread of approximately 800m. This is increased to 2.3km by the addition of five new turbines. The same increased spread also obviously applies to views from the east. In a view from due south the turbines appear behind the consented turbines and obviously from the north they sit in front of consented turbines. The increased spreads identified above are the maximum additional expansion but it is fair to say that from a range of compass points in between the expansion of the wind farm in the landscape will be substantial. In addition to this increase in the spread of turbines in the landscape the number will increase by 70% and the varying altitudes and blade movement will further increase their visual impact.

Landscape architects are adept at sub-dividing and categorising the landscape. However, as can be seen from the differing views expressed they often reach divergent conclusions on the sensitivity of the landscape to change and the magnitude of change that will result from development. In order to step back a little from this it is important to assess a landscape on site and experience how it fits together and inter-connects through continuity of form, views or movement through it.

Whilst the site maybe physically adjacent to Carsington Pastures, when you move over the hill into Griffie Grange you have the impression of moving into a largely unspoilt and substantially more tranquil location. You largely escape the industrial influences immediately to the south and although quarries are located in the valley bottom to the northwest they are largely concealed from view. The landscape is pastoral with remnants of lead mining. Views across the steep sided Griffie Grange Valley connect the site to the National Park to the north where there is a continuity of farming practice and industrial heritage. In looking across the landscape from the northeast from above Bonsall and Middleton you are simply looking at two sides of the same valley. The topography of the site sloping to the north and facing the National Park and its basic characteristics mean that it is intrinsically more sensitive to change than the land to the south beyond Harboro Rocks and any change that is imposed upon it is likely to have a much more substantial impact on the National Park as it is in closer proximity, the topography of the land faces onto the Park and the landscape has a greater affinity with the National Park landscape.

Having set the scene of the history of consented schemes, described the increased impact of the proposal and explained the differences in sensitivity that

have been identified, it is pertinent to draw on the wireframes and photomontages that illustrate these impacts before reaching a conclusion on this topic.

Viewpoint 1 prepared by the applicants both illustrates the continuity of the landscape and provides a clear indication of the magnitude of impact. The view is taken from the Limestone Way above Ible but illustrates the impact that this National Park community will experience.

Whilst the existing consented turbines which are at Viaton and Ryder Point will be noticeable on the far horizon, the proposed turbines appear to march down the hill to Griffie Grange Valley and will dominate the view thereby harming landscape character and appearance with those effects clearly extending into the National Park.

Viewpoint 4 taken from the west from Aldwark, although setting the turbine in the context of quarrying in the valley bottom, illustrates the much greater spread of turbines in the landscape and increased influence on the National Park.

Viewpoints 5 and 11 from above Matlock Bath and Middleton give a clear impression of the imposition that will result on views looking west up the Griffie Grange Valley. The landscape and the setting of the Park will be substantially affected.

Viewpoint 6 takes in the view from the Limestone Way across Bonsall Moor. Whilst consented turbines would also be in view, the substantial increase in the spread of turbines and their comparative proximity to the Park significantly increase the harm that will result.

Viewpoint 9 looks across the site from 3km to the north. Whilst they appear more distant, the increased number of turbines emphasises their imposition on this landscape not well suited to absorbing their impacts.

Viewpoint 10 takes in the view from the west at 3.7km and amply demonstrates the increase in spread across the landscape. The further image taken from 6.2 km illustrates how this interacts with the historic landscape.

Viewpoint 19 is a typical panorama looking out over the Park from the south-west. The additional harm caused by the increased spread and number of turbines is readily evident.

In conclusion, on visual / landscape impacts incorporating impact on the National Park, including cumulative impacts, it is considered that the applicants have substantially underestimated the impacts and harm that will result. The siting of 5 turbines within the sensitive landscape of Griffie Grange will harm its landscape character and appearance. More pertinently the turbines will be sited close to and visible from a range of vantage points in the National Park. In such a location and with the degree of visibility identified they will damage and dominate the setting of the National Park and its landscape character thereby undermining its special qualities.

The harm caused by the turbines in isolation is exacerbated by their cumulative effects with the already consented turbines as the spread and number of turbines

significantly increase their influence upon the character and appearance of the landscape and the setting of the National Park. The level of harm identified puts the scheme in conflict with Local Plan Policy and guidance in the National Planning Policy Framework.

ii) **The Impact on Heritage Assets Individually and Cumulatively**

The local landscape is rich in man-made heritage of different eras. The consultation responses of English Heritage and the Development Control Archaeologist in particular highlight the range of assets that exist and the part they play in defining the qualities of the historic landscape. The effects on heritage assets and their settings also extend into the National Park.

The applicants, in their EIA, included an assessment of the impact on the historic environment. This identified the heritage assets that are present within the influence of the proposed turbines. The applicants then assessed these impacts with the aid of wireframes and photomontages, having due regard to the baseline of consented turbines, in terms of setting and by archaeological investigation in terms of on-site heritage associated with lead mining.

The applicant's key findings are summarised as follows in the EIA:-

1. Direct effects of the proposed Griffe Grange Wind Farm on the historic environment will be limited to the loss of a small proportion of remains relating to the historic (post medieval) working of lead within the site. Recording this will have a low level of effect on the heritage significance of the remains as a whole.
2. Small sections of drystone walling of local historic environment interest will also be lost but the impact on their heritage significance derived from the organisation and appearance of the landscape will be negligible.
3. The desk-based assessment of the site has established the general potential for finds of archaeological interest, including prehistoric remains, in the area. However, field evaluation indicates the potential for such finds during development as low and, because the development footprint is small, the risk to archaeological remains is small. Archaeological monitoring will allow any remains to be identified and treated appropriately for their heritage significance.

Provision will be made for any sufficiently important remains to remain on the site through micro-siting and use of floating access tracks. No EIA significant effects are predicted.

4. The assessment has considered the potential impact on nationally designated monuments, historic buildings and conservation areas within a 5km radius. It has found there will be some level of effect on views relevant to the setting of heritage assets, although the magnitude of impact in any relevant views is seen in the context of changes wrought to the landscape during time, especially from lead mining, which is itself of heritage value and interest. It is suggested that, as a wind farm is a visually permeable development it will not change user capacity to understand and appreciate the landscape's historical meaning and significance and will, therefore, not fundamentally reduce its overall value.

5. The effects are entirely reversible on decommissioning which, given the 25 year term of the application, is a relatively short lengthy of time in view of the longevity of buildings, particularly of monuments. No potentially EIA significant effects have been identified.

These summarised conclusions of the applicants are not reflected in the impacts identified by key heritage consultees on the application. Mindful of this divergence and the inter-relationship between the setting of heritage assets and landscape, the Council asked the appointed landscape consultants to also have regard to the impact of the proposed turbines individually and cumulatively with the consented turbines on the range of heritage assets. Their conclusions were as follows:-

1. The methodological approach of the applicants shows a misunderstanding of the NPPF and the need for clear and convincing justification for harm to any heritage asset.
2. Neither the initial assessment or additional information submitted indicates an awareness of the recent Appeal Court decision regarding wind turbine development and the setting of heritage assets (Barnwell Manor). This judgment and subsequent Secretary of State decisions have confirmed that harm to heritage assets that are less than substantial may weigh heavily in the balance against wind turbine development.
3. The ES has underestimated the impact of development on the following heritage assets:-
  - i) **Moot Low Barrow Scheduled Monument** - This lies only 700m from the turbines. The assessment notes that the setting and available views from this monument were “intended to make a strong contribution”. However, this does not sit easily with the subsequent assessment of the magnitude of change to be medium / low and the harm considered to be “not significant”. The impact of the turbines on the setting of this scheduled monument is underestimated.
  - ii) **Scheduled Monuments at Minninglow** - The applicants conclude that the effect on the heritage significance of these would be low and not significant. This is considered to be an underestimation as Figure 10 of the photomontage shows how the additional turbines would encroach on valued views towards Minninglow from the north. Although there are existing and consented turbines in this view, the Griffe Grange turbines would be significantly closer and result in a skyline to one side of Minninglow entirely dominated by turbines. The visual dominance of the hill on which the scheduled monuments are located would be diminished.
  - iii) **Griffe Walk Farmhouse** - The applicant’s assessment acknowledges that the setting of the farmhouse makes a contribution to the significance of the asset as if forms the historical land-holding with which it has a functional relationship. The turbines would be arranged to the east of the farmhouse and would dominate its setting. Whilst the applicants conclude that the effects on its heritage significance would be low and not significant, it is considered that, due to the proximity and number of

turbines, this is an underestimation of the impact on the setting of this listed building.

- iv) **Bonsall Conservation Area** - Although impacts on Conservation Areas on the whole will not be significant, there will be greater impacts on the setting of the Bonsall Conservation Area than suggested from a number of viewpoints where there will be cumulative impacts on views towards the enclosing 'ridge' looking south from and across the Conservation Area which includes the stacking of turbines.

Having summarised the applicant's findings and the opinions of the Council's consultants, and having due regard to the detailed comments of statutory consultees, it is logical to assess this development in turn for the direct impact on archaeology, scheduled monuments, listed buildings and conservation areas.

The applicants have carried out only limited on-site assessment of archaeology and done no detailed assessment of below ground archaeology. The site has significant potential and the comments of the Peak District Historic Mines Society highlight particular concern over the route of the track being created between turbines 3 and 4 and the archaeological interest of the Griffe Bage Mine complex. On the basis of the failure to fully evaluate this area and thereby establish its importance, the Development Control Archaeologist has maintained a holding objection for non-compliance with NPPF Paragraph 128. Whilst this is understandable, it is not considered an overriding objection that could not be overcome by further analysis and modifications to the scheme submitted.

Turning to Scheduled Monuments. Moot Low is the closest scheduled monument, lying in a dominant hilltop position to the west of turbine 1. It is common ground amongst the statutory consultees and the Council's consultants that the impact on this heritage asset has been underestimated by the applicants.

The monument is located so as to dominate the hilltop and have connecting views with other historic sites. The eastern view from this site is the least diminished currently and the proximity and scale of the turbines will significantly increase any impact over and above consented turbines and will become a dominant element in views, thereby causing significant harm to the setting and consequently the significance of the asset.

Harboro Rocks lies to the south west of the turbines. Its cave faces south west away from the turbines. The significance of this site is however derived from a combination of the cave, the hilltop locality and undesignated assets. Whilst the principal asset does not face the turbines, the wider setting will be harmed, to some degree, by the imposition of further turbines to the 7 already consented.

Minninglow Hill's chambered round barrow is some 3.7km distant to the northwest. The distinctive form of this hill and its hilltop trees make it a dominant feature in views across the historic landscape of the Peak District. The existing approved turbines in views from the west to Minninglow are starting to extend across the ridgeline when viewed towards this iconic hilltop. The addition of the proposed turbines will erode the separation of turbines from the hilltop and, thereby, in

causing significant harm to views of this monument cause significant harm to its wider landscape setting.

Stanton Moor as a hilltop with a number of scheduled monuments is another iconic presence in the Peak District. The site was chosen for its intervisibility across the landscape and is, therefore, sensitive to change to its skyline which can impact on its wider setting. The applicants were asked to produce a photomontage of the impact. Whilst this demonstrates some additional impact on the view looking south, the turbines are a significant distance away at 6.5km and the intervening topography softens the impacts to a degree, whereby they are not significant.

Finally, in terms of monuments, the wider area has a number of scheduled lead mining remains. These have a connection with the landscape as an historical industrial evolution. Wind turbines will affect their setting to some degree but this impact is much lower than that of a hilltop burial ground whereby it was chosen to have distant views and connections across the landscape.

Listed buildings have their setting protected by the planning system. What comprises the setting can vary considerably from a building such as Chatsworth whose setting may extend some miles into the surrounding landscape to a cottage in a village street whose setting will usually be very localised. There is only one listed building whose setting is considered to be affected to any significant degree by this proposal. Griffie Walk Farm lies immediately to the west in very close proximity.

The building is Grade 2 listed and its main elevation faces south. Its setting extends beyond the immediate context by reason of the farm grouping beyond and the connection to its farmland in this relatively remote and tranquil shallow valley. Whilst consented turbines already impact on its setting to some degree, the proposal will introduce a line of turbines visible to virtually full height in much closer proximity to the west. These will dominate the property and erode its connection to an agricultural landscape and cause a significant diminution in the setting of this heritage asset.

The setting of conservation areas is protected in the planning legislation. Having viewed the site in the round, the only conservation area by reason of its proximity and topographical positioning to experience any significant impact is that of Bonsall. The existing wind turbines are visible from Uppertown and across the village from land to the north east. The current and consented turbines, because of their separation and intervening topography, appear distant and screened to a significant degree by intervening vegetation.

The applicants were asked to produce two additional photomontages taken from Uppertown and the north east of Bonsall. The latter reveals a much more conspicuous presence on the horizon and the former, looking south from the junction of Bell Lane, shows the turbines as a very significant new element in the southern vista which will draw the eye. Significant harm will, it is considered, be caused to the setting of Bonsall which needs to be factored into the overall balance.

Although the presence of Carsington Pastures cannot be ignored, and the impact on heritage assets will increase once the three other consented turbines are erected, it is clear from the above analysis that both significant harm and additional

cumulative harm will result to a range of heritage assets from the construction of the proposed turbines. Recent appeal decisions, following the Barnwell Manor Court judgment, have confirmed that harm to heritage assets, even if this is found to be less than substantial, may also weigh heavily against wind turbine development.

The extent of harm identified to individual assets and the range of heritage assets affected in this case mean that the development would have a significant adverse impact on the historic environment. This harm weighs significantly against the proposal.

**iii) The Impact on Amenity of Nearby Residents**

The two principal impacts that are usually associated with large wind turbines in close proximity to dwellings are the overbearing and pervasive impact of turbines where they are close to dwellings and of a size and proximity so that they represent an unpleasantly overwhelming and unavoidable presence in the main views from a house or garden and the impact in terms of noise nuisance. The issue of noise is dealt with separately below. Other factors such as shadow flicker can be relevant and are considered briefly later in this report.

The closest properties to the scheme are Griffie Walk Farm, New Harboro Farm and Griffie Grange Farm. All of these would experience significant impact but because they have an interest in the application are excluded from this analysis. Beyond these, the nearest properties lie to the north in Ible.

The applicants, in their photomontages, have produced what they consider to be a representative view (photomontage 1) from the route of the Limestone Way just to the north of properties in Ible. In addition as a separate exercise in Technical Appendix 5.3, they have done an analysis on individual properties and the impact of development on their residential visual amenity. The findings are summarised in the LVIA.

The assessment concluded that of 22 individual or small groups of properties identified within 1.5km of any proposed turbine, there would be no residential properties at which turbines would be likely to have an 'overbearing' effect and / or result in 'unsatisfactory living conditions' leading to these properties being 'widely regarded as unattractive and thus an unsatisfactory place in which to live' and none of the nearby properties would fail what has become known as the 'Lavender Test'.

The applicants explain that the relatively narrow angle of view of the turbines, no greater than 69° for Griffie Grange and 78° in association with consented turbines and the separation of properties to the south at 600m would avoid the sense of any property being surrounded by or suffering an overbearing impact. The intervening presence of Griffie Grange Valley would provide further mitigation.

Notwithstanding the applicant's findings, it is very apparent in visiting Ible that the turbines will be highly conspicuous at close quarters. Accordingly, the Council's consultant was asked to provide an independent view on the impact of the turbines on residential visual amenity. Their findings are as follows:-

1. Consider that the impact on the residential visual amenity of properties within Ible had not been fully considered. The turbines would appear above the south

facing ridge and would dominate the village and views from some individual properties.

2. At the Enifer Downs Inquiry where the Lavender Test was first drawn, the concern related to the impact on a village. This village was set on a downward facing slope facing the turbines at a separation of 1km. The Inspector concluded that the outlook of the whole community would be dominated by the unavoidable presence of the turbines. The spread of the turbines was judged to be visually invasive so as to make the settlement a less satisfactory place to live in than it currently was.
3. The situation at Ible would be equally affected as the community identified above. In addition to the Griffie Grange turbines, two of the consented / constructed turbines would be visible and the blades of four others. The spread of the turbines would be over 45° for all properties and over 50° for some. Consider that the impact on the visual amenity of residents at Ible would be substantially adverse. The impact on Ible, which is within the National Park, and the impact on visual amenity of the village also constitute impacts on the natural beauty of the Peak District National Park.

As with other topics of landscape and heritage, there is a significant divergence of conclusions on this matter. In order to gain a clearer understanding it is important to assess the experience that some Ible properties will have. Officers visited, amongst other properties, Sycamore House and Brunswood Farm. Both of these historic properties, lying to the south of the road through the village, have their main orientation facing south towards the proposed turbines. The majority of habitable room windows and the layout of gardens are set out to benefit both from this southerly aspect and to enjoy the attractive views of the landscape.

The closest turbine to these properties, number 1, sits just over 600m from Brunswood Farm but because of the topography also sits approximately 35m above that level in terms of elevation. It is difficult to conclude, having visited these properties, that the impact will be anything but overbearing and the wind farm will come to dominate their outlook at close quarters where they currently have open and unrestricted views. These properties will be rendered unattractive and unsatisfactory places to live. Other properties within the village will suffer slightly lesser impacts but will, nonetheless, suffer significant adverse impact to residential amenity such that the hamlet of Ible as a whole will have its visual amenity seriously compromised with consequent additional impact on the Peak District National Park. This impact on residential amenity is a further significant adverse impact that weights against the substantial scheme.

iv) **The Noise Impact**

Government guidance on this matter requires Local Authorities to assess noise against 'The Assessment and Rating of Noise from Wind Farms' (ETSU-R-97). Good practice guidance on noise assessments has been produced by the Institute of Acoustics in 2013 to supplement this.

The guidance sets out standards for how background noise levels should be assessed at the nearest noise sensitive properties and then sets limits for daytime and night-time noise related to this. The sound power output of turbines at different wind speeds is then overlaid on this.

Normally speaking, if a wind farm is ETSU compliant there would not be a sound basis for objection in terms of noise nuisance although this does not equate to turbines being inaudible.

The noise survey work was carried out following liaison with the Council's Environmental Health Officers and background noise surveys carried out in Ible, Armlees Farm, Griffie Walk Farm and Lonsdale House, Longcliffe. Earlier assessments of background noise for previous turbine applications were also fed into the analysis.

Environmental Health Officers consider the background levels recorded to be representative.

The noise assessment submitted suggests that the development will be ETSU compliant for both daytime and night-time noise limits. Whilst there may be occasions at certain wind speeds where noise exceeds background levels by a small margin, the noise levels that have been calculated for the individual scheme and for cumulative noise falls well within ETSU daytime and night-time limits for the surveyed properties and properties in other settlements to the south.

Whilst the public invariably raise the spectre of noise nuisance as a potential issue and there may be rare occasions when some background noise is audible, ETSU seeks to strike a balance between the operation of wind farms and protecting amenity by setting limits to noise levels that will be tolerated. As the scheme individually and cumulatively does not breach these daytime and night-time limits, there is no basis on which to object on noise grounds and Environmental Health Officers have recommended conditions.

v) **The Effect on Nature Conservation and Fauna**

The application is accompanied by ecological studies covering site flora, fauna and specifically surveys for bats, birds and Great Crested Newts. The applicants identified species and habitats of interest and protected by legislation requirements. Habitats included small areas of broadleaved woodland and unimproved Calcareous grassland. Species included a number of bats, (e.g. Pipistrelle and Noctule), and a small number of birds (e.g. Lapwing). Great Crested Newts were recorded for ponds outside the site boundary.

The potentially significant effects on species have been assessed and the applicants have concluded that, with the proposed mitigation measures, significant effects can be reduced to non-significant.

This ecological survey information and assessment of impacts has been assessed by Natural England and Derbyshire Wildlife Trust. Natural England has highlighted the proximity to Via Gellia Woods and its inclusion within the Peak District Dales Special Area of Conservation (SAC) and status as a SSSI. Notwithstanding this, they do not anticipate that any adverse impacts will result. Although the turbines

will be conspicuous in views of Via Gellia Woods which will impact on their setting this is not a planning basis to object.

Derbyshire Wildlife Trust is satisfied that the main ecological features have been identified. Their comments are recorded earlier in the report and, following further clarification from the applicants, the only area where they maintain some concern is in relation to cumulative collision risk that could result from the 12 turbine in total forming a barrier and consequently having an impact on target species, including Lapwings.

The applicants have not come forward with any collision risk modelling based on the cumulative effect for the 12 turbines. Whilst this is regrettable and the full effects on species such as Lapwing cannot be appropriately considered, the Derbyshire Wildlife Trust has confirmed that this impact in itself would not form sufficient grounds for rejecting the proposal on ecological grounds.

vi) **The Impact on Users of the Countryside and Consequences for the Local Economy**

The locality of the application site contains a National Trail, the Limestone Way long distance footpath and numerous other well used footpaths. As a result, the area is very popular with ramblers, cyclists and horse riders. The proximity to the Peak District National Park means that recreational users and holiday makers pass seamlessly between the Park landscape and this area. The local economy has a substantial tourism and recreation component to it, both in terms of accommodation and businesses providing other services.

Whilst traditionally Planning Inspectors have been reluctant to try and ascribe any weight to impact on tourism and local economies, it seems inevitable that effects will occur, particularly when the landscape resource is relatively limited in scale. The Peak District is uniquely positioned as an oasis of relatively remote and tranquil countryside where people can escape for recreation within easy reach of major conurbations. It is, because of its limited size, very vulnerable to urbanisation around the fringe. The introduction of a further 5 wind turbines in this locality will serve to further erode its qualities and encroach into the tranquil attractive landscape of the Park. The experience of ramblers, cyclists and horse riders using the area will, it is considered, be diminished. This has the potential for a knock on effect for visitor numbers as people seeking a sense of remoteness and unspoilt beauty may well bypass the locality and choose to go elsewhere.

Whilst the experience of recreational users as a key receptor can be factored into the assessment of harm to landscape character and appearance, the consequent impact on the local economy is a separate component of the impact of this development. Whilst it is acknowledged that the existing and consented turbines form a baseline for any such effect, it is considered that the expansion of the influence of turbines on the landscape will magnify the impacts. Though inherently difficult to quantify, this potential for adverse impact on the local economy is a consideration which weighs against the proposal.

vii) **The Quality of the Environmental Impact Assessment**

The Environmental Impact Assessment Regulations make it clear that planning permission cannot be granted for EIA development without substantial compliance with the Regulations.

Although the EIA submitted is a far from perfect document and the LVIA has been criticised by consultees and the Council's independent consultant, this is not a failure of identifying that impacts will result but rather a difference in opinion as to how to fully represent and weight these impacts. Experience has shown, in the case of Matlock Moor Wind Farm, that Inspectors tend to take a relatively light touch on this issue provided that all matters have received a proper airing. Although the regulations expect an applicant to fully explain the alternative options explored, in reality, in relation to wind farms it has been accepted that this only need relate to the application site and different arrangements within it, which the applicants have done in this case. Therefore, in conclusion, whilst the EIA has its flaws, it is sufficiently robust to serve the purpose intended.

viii) **Other Issues**

Highway safety is always a consideration in an application such as this. The applicants have identified two vehicular routes to the site, one from Manystones Lane and the other taken from opposite Curzon Lodge on the Longcliffe to Via Gellia Road. The former is the main access and the later will be a secondary access. This secondary access will only be used to serve a substation once the project is constructed and the route of the access will be reinstated. The Highway Authority is satisfied that both access points are fit for purpose.

Experience with Carsington Pastures suggests that with appropriate conditions over the routing of traffic, no detriment to highway safety or the amenity of nearby villages should result.

Shadow flicker is caused when the sun passes behind moving blades, thereby casting a moving shadow in the windows of neighbouring properties. The sun needs to be low in the sky for this effect to occur. The applicant has carried out an initial assessment based on a worst case scenario modelling properties within 820m of a turbine. This identifies up to 13 properties that may be affected in Ible. Of those identified, the only periods when effects may occur are for short periods in the afternoon from November to January. Houses at the eastern end of the hamlet have the maximum possible effect with up to 79 days of impact with total exposure of under 35 hours.

In reality, more detailed modelling may identify that properties are not affected to a significant degree where significant effects are generally considered to be 30 hours exposure per year. Houses within the site suffer more significant impacts and may need adaptation / mitigation but they have an interest in the development.

Notwithstanding the fact that shadow flicker can have a significant impact on amenity, the operation of the turbines can be controlled to prevent their operation at times when nuisance will occur. With this in mind, and the possibility of dealing with

this issue by condition, it is not an overriding concern that warrants an adverse weighting in the planning balance.

Impacts on aviation can be a consideration with wind turbines. However, it is noted that no objection has been raised by consultees.

Land drainage and telecommunications are also relevant considerations but the proposal raises no overriding concerns in regard to these matters.

ix) **The Planning Balance**

The desirability of promoting renewable energy sources and on shore wind energy installations is not questioned. Government policy remains supportive of renewable energy development in order that greenhouse gas emissions are reduced to tackle climate change and energy security improved. However, notwithstanding this supportive stance, all wind turbine developments need to be appraised on their planning merits which should have due regard to the development plan and other material considerations. The Planning Policy Section of this report covers what are considered to be the relevant policies of the development plan and the weight that should be attributed to them. As the policies of the adopted plan are largely consistent with Government guidance in the NPPF they can be afforded significant weight. The National Planning Policy Framework, Planning Practice Guidance for Renewables and the Council's Landscape Sensitivity Assessment for Renewables are all relevant material considerations. The renewable energy generated is also an important material consideration to be weighed in the balance. It is important also to have full regard in this location to the history of permission having been granted for Carsington Pastures and the Council subsequently supporting 3 more turbines at Viaton and Ryder Point. This baseline of 7 turbines in the landscape is essential to the understanding of cumulative impacts on the landscape, the National Park and heritage assets.

Of the issues highlighted above, a number raise no significant concerns, namely highway safety, noise, shadow flicker, ecology, aviation and the quality of the EIA. Of the others, whilst the potential impact on the economy and incomplete archaeological assessment need to be considered and given some weight in deliberations, the key matters to be assessed where significant impacts will result are the impact on the landscape and the National Park, the impact on heritage assets and the impact on residential amenity. These impacts have to be quantified and weighed against the wider benefits of renewable energy.

The application has been independently assessed by Landscape Consultants for the Council whom were also consulted previously on the acceptability of Viaton and Ryder Point. This is important as they consequently have a detailed understanding of the way these previous schemes related to Carsington Pastures, the prevailing planning circumstances at the time they were approved and the sensitivities of the landscape and the intimate relationship to the National Park. They have also assessed in detail the impact on the heritage assets and drawn on their experience of extensive planning appeals in providing a view on how the impact on residential amenity might reasonably be assessed. The consultees on this application have also carried out very detailed assessments on the impact of the development in relation to heritage assets and, in the case of the Peak District National Park Authority, the impact on the special qualities of the National Park.

In relation to impact on the landscape, impact on the setting of the National Park and cumulative impact on these, the findings of the Council's consultants are clear. They consider that the capacity of the area for wind turbines has already been reached with consented schemes. They consider significant adverse cumulative impacts will result, noting that the scheme is larger than the previous schemes and will result in a 70% increase in turbines.

In addition to this cumulative harm, they recognise that the current application on its own merits is particularly harmful on the landscape because all 5 turbines are closer to the National Park than any consented turbines; the turbines are located in the geographically distinct Griffie Grange shallow valley; the turbines are not located within an industrial area and only turbine 5 has any relationship with this; and the turbines are located on the Peak District National Park side of an area of higher ground that separates the National Park from much of the area of industrial / quarrying activity.

In relation to the National Park, they consider that there will be significant adverse impacts on the Peak District National Park, including adverse impacts on its special qualities. They consider that the proposal would not conserve or enhance the landscape or scenic beauty of the Peak District National Park and, as such, conflicts with paragraph 115 of the NPPF and the statutory purposes of the designation.

This independent assessment is considered fair and balanced and reflects the judgment reached by Council Officers from visiting the site and surrounding landscape. The development spreads the wind farm in the landscape beyond its capacity to absorb it. As a single entity, it will cause significant harm to the landscape character and appearance of the locality and will extend down the hillside to the north towards the National Park, adversely affecting its landscape, special qualities and scenic beauty as it imposes itself in the immediate setting of this nationally designated landscape. The harm caused by the wind farm on its own is exacerbated by the cumulative impact with consented turbines which magnifies the harm to the host landscape and the adjoining National Park. The very significant harm that will result brings the proposal into conflict with Policies SF3, SF4, NBE8, CS5 and CS6 of the Derbyshire Dales Local Plan and guidance in the National Planning Policy Framework.

In relation to heritage assets, the Council's consultant considers that the ES has underestimated the impact of the development on the heritage assets of Moot Low Barrow; the scheduled monuments at Minninglow; the Grade 2 listed Griffie Walk Farmhouse and Bonsall Conservation Area. In addition, consultees have highlighted cumulative harm resulting to the setting of Harboro Rocks which will become increasingly surrounded by turbines. Although it is recognised that there are differing views of the level of harm resulting, it is clear from recent decisions on wind farms following on from the Barnwell Manor Court judgment, that even if that harm is less than substantial it may weigh heavily in the balance against wind turbine development.

The range of heritage assets affected and the degree of harm identified to their settings, both by the turbine scheme on its own and cumulatively with the

consented scheme, weigh heavily against this scheme and bring it into conflict with Policies NBE16, NBE21 and NBE24 of the Local Plan and guidance in the NPPF.

Over time, a picture has emerged on wind farm proposals as to how the impact on the amenity of residents should be assessed and protected. The 'Lavender Test' has been quoted by the applicants and objectors and the Council's consultant was asked to draw on their experience in assessing schemes and apply the logic of the 'Lavender Test' to how the turbines impacted on the properties of nearby residents in Ible.

Having visited a range of properties in the settlement with Council Officers, and having due regard to house design, orientation, local topography and relative proximity, the Council's consultant concluded that the impact on the visual amenity of residents at Ible would be substantially adverse. The turbines would appear over the south facing ridge and would dominate the village and views from individual properties with their scale, pervasive movement and spread across the landscape with consented turbines. The imposition on individual properties and the settlement would make the settlement a far less satisfactory place to live than it is now and this and the subsequent harm in this National Park community weigh significantly against the scheme.

This scale of impact on residential amenity brings the development into conflict with Policies CS5 and CS6 of the Local Plan and guidance in the NPPF.

Paragraph 98 of the NPPF has a positive outlook to renewable energy and requires Local Planning Authorities to approve applications if their impacts are (or can be made) acceptable.

Whilst it is obviously important to fully recognise the benefits that accrue from a 12.5MW wind farm in terms of renewable energy production, the reduction in greenhouse gases and increased energy security, these have to be properly weighed and balanced against the adverse impacts that will result.

In the analysis above, significant adverse impacts have been identified to the host landscape and setting and special qualities of the National Park individually and cumulatively with consented turbines. In addition, a range of heritage assets would have their settings significantly compromised and thereby their significance harmed by the scheme and cumulatively with other turbines. Finally, the residential amenity of residents in Ible would suffer a significant adverse impact, making their properties markedly less satisfactory to live in.

These impacts are considered to be substantial adverse consequences of this scheme which, in the final balance, are assessed to significantly and demonstrably outweigh the benefits that would accrue.

**OFFICER RECOMMENDATION:**

Refuse planning permission for the following reasons:-

1. The proposed wind turbines, by reason of their scale and location, would be a visually dominant and pervasive addition to the countryside in this sensitive landscape, close to the Peak District National Park boundary. This landscape is incapable of visually absorbing them such that they would result in significant harm

to the character and appearance of the host landscape and this harm would be compounded by their cumulative impact with the 7 consented turbines to the south. Moreover, the turbines would, as an individual group, dominate the immediate setting of the Peak District National Park thereby harming its landscape character and special qualities. The harm to the setting of the National Park would be compounded by the adverse cumulative impact that would be caused by the influence of the wider grouping of turbines that would result. As such, the proposal conflicts with Policies SF3, SF4, NBE8, CS5 and CS6 of the Derbyshire Dales Local Plan and guidance in the National Planning Policy Framework.

2. The proposed turbines, as an individual scheme and cumulatively with already consented turbines, would have a significant adverse impact on the setting of a number of heritage assets. The listed building Griffe Walk Farmhouse, scheduled ancient monuments at Moot Low, Minninglow and Harboro Rocks and Bonsall Conservation Area would all suffer significant harm to their settings. As such, the proposal conflicts with Policies NBE16, NBE21 and NBE24 of the Derbyshire Dales Local Plan and guidance in the National Planning Policy Framework.
3. The proposed turbines, by reason of their scale and positioning in close proximity to residential properties in Ible, many of whom would have direct and uninterrupted views from their houses and gardens of the turbines, would have a dominant, overbearing and oppressive impact on these properties thereby seriously undermining the residential amenity of their occupants. As such, the proposal is contrary to Policies CS5 and CS6 of the Adopted Derbyshire Dales Local Plan and guidance in the National Planning Policy Framework.