

SADBERGE PARISH COUNCIL

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Dear Adrian,

Application reference: 09/00741/FUL

Sadberge Parish Council **objects** to the application to construct a wind farm at Moor House for the following reasons:-

- (1) Commercial-scale wind turbines should not be situated amongst the settlements on the Tees Plain to the north-east of Darlington

Planning Committee members need to appreciate the truly massive scale of these industrial structures, and it would be advisable for them to visit existing wind turbines of the size proposed for Moor House as part of their preparation for determining this planning application.

- (2) The proposed development would be contrary to Saved Policy E26 from the Darlington Local Plan, which states that:-

"Proposals for wind turbines must satisfy the following criteria:

- *[Outside the Area of High Landscape Value], proposals do not significantly affect landscape character or visual amenity.*
- *Proposals do not adversely affect the amenity of neighbouring properties or the character and setting of settlements by reason of noise, shadow-flicker, visual dominance or electro-magnetic interference."*

The Moor House Environmental Statement (p46) admits that the first of these criteria *"would be almost impossible for any commercial scale wind energy project to satisfy"* and that the second of these criteria *"would be very difficult to satisfy"*.

The Parish Council appreciates that Policy E26 appears to be at odds with Government guidance, for example Planning Policy Statement 22 (PPS22). However, Policy E26 does represent Darlington Borough Council's current policy on wind turbines, and as such must be given due weight in the planning process.

Also, please note that Policy E26 was saved in September 2007, which is after PPS22 was issued (in 2004). It therefore cannot be argued that PPS22 supersedes Policy E26.

If Darlington Borough Council wishes to bring its policies into line with Government guidance then it should go through the proper process to change the relevant policies. In the meantime, Policy E26 should stand.

- (3) The Addendum to Arup's report on "Wind Farm Development and Landscape Capacity Studies: East Durham Limestone and Tees" states that *"overall the level of development proposed at [Moor House] exceeds the capacity of the landscape"*.

Arup's assessment was that any scenario involving the construction of the Moor House Wind would have a **Severe** impact on receptors in Sadberge. "Severe" is the worst category of impact.

Note that the Landscape Capacity Studies Addendum generally refers to "potential impact" because Arup's assessment did not take account of any screening from trees, buildings, etc. It needs to be emphasised that there is absolutely no screening of this type between the northern edge of Sadberge and the Moor House site. This is very clear from the photomontage showing the view of the proposed Moor House wind farm from the Sadberge Village Hall car park.

- (4) No permission should be given for any wind farm on the Tees Plain until and unless Durham Tees Valley Airport makes a formal, public statement that it is satisfied that aircraft safety will not be compromised.

The Moor House Environmental Statement (p161) admits *that "the turbines will be displayed on the DTVA radar"* and that Durham Tees Valley Airport has indicated that *"clutter on the radar caused by the proposed turbines will make the job of air traffic controllers harder"*.

The Moor House Planning Statement (p7) also admits that Durham Tees Valley Airport has indicated concerns regarding the impact of the turbines on radar and says that *"discussions with DTVA are ongoing"*.

It would be perverse – and totally unacceptable – for planning permission to be granted for the proposed Moor House Wind Farm until and unless it has been established that aircraft safety will not be compromised. Also, since the issue of safety is very important and is of legitimate concern to local residents, no planning permission should be granted until and unless Durham Tees Valley Airport has made a public statement confirming that it is satisfied that aircraft safety will not be compromised. This matter should not be dealt with "behind closed doors".

- (5) There is no reliable assurance that noise from the proposed Moor House Wind Farm will not cause harm and annoyance to residents of individual properties and/or settlements in the surrounding countryside.

The Moor House Environmental Statement describes a noise assessment that has been carried out in accordance with ETSU-R-97. However, the guidance in ETSU-R-97 is badly out of date and ineffective. In particular, it takes no account of – and provides no protection against – the phenomenon of **aerodynamic modulation**, which causes wind farm noise to take on a loud, "thumping" character and to become audible at a considerable distance from the wind farm.

Sadberge Parish Council has previously submitted a portfolio of evidence about wind farm noise in general and aerodynamic modulation in particular. If you would like any further information on this subject then please contact me.

No planning permission should be given for any wind farm on the Tees Plain to the north-east of Darlington until and unless there is a satisfactory way of protecting local residents from all types of noise from wind turbines, not just the types of noise covered by ETSU-R-97.

Note: The Government is aware of the existence of aerodynamic modulation (AM). A Government statement on the findings of a Salford University report into "Aerodynamic Modulation of Wind Turbine Noise" acknowledged *that "the study concluded that although AM cannot be fully predicted, the incidence of AM resulting from wind farms in the UK is low"*. Also, in his response to the Renewable Energy Foundation's application for a judicial review, the Secretary of State for BERR said that *"it is clear beyond argument that the Secretary of State was aware that AM was an issue in the UK, albeit that the number of complaints was limited"*.

However, despite being aware of the existence of aerodynamic modulation, the Government has so far declined to either (i) commission further work to understand it, or (ii) update ETSU-R-97 to take account of it.

- (6) There is no proper mechanism for addressing the issue of cumulative impact of wind farms in the area to the north-east of Darlington.

PPS22 states that *"Planning authorities should also take into account the cumulative impact of wind generation projects in particular areas"*.

Phil Wilson MP has pointed out that there is a great deal of interest by wind farm developers in East Durham and the Tees Plain, and that he is concerned about the cumulative impact that so many proposed wind farms could have on the local landscape.

In the area close to Sadberge, planning applications have been submitted for two wind farms (the A1 Wind Farm and the Moor House Wind Farm) and a scoping report has been issued for another wind farm (at East Newbiggin). One of the main conclusions in the Addendum to Arup's Landscape Capacity Studies report is that *"development of Moor House and East Newbiggin would result in possibly unacceptable effects on Sadberge"*.

Note: As explained above, the word "possibly" is inserted because Arup's assessment did not take into account any screening by trees, buildings, etc. As pointed out above, there is no screening between the northern edge of Sadberge and the Moor House site.

Darlington Borough Council has not yet proposed any process for taking account of the cumulative impact of wind farm proposals, either within the Borough of Darlington (e.g. Moor House and East Newbiggin) or across Local Planning Authority boundaries (e.g. A1 Wind Farm and Moor House).

The Arup Landscape Capacity Studies report (p81) concluded that the Tees Plain "least impact" area has the potential to accommodate a total of *"around 9-15 turbines"* in *"two wind farm clusters separated by around 5km (from existing, consented or each other)"*. According to the Moor House Environmental Statement (p30), the proposed A1 Wind Farm is 3 km from the Moor House site and the proposed East Newbiggin Wind Farm is 2.5 km from the Moor House site. Therefore, development of the Moor House Wind Farm in combination with either the A1 Wind Farm or the East Newbiggin Wind Farm would be contrary to the Landscape Capacity Studies conclusions.

No planning permission should be given for any wind farm on the Tees Plain to the north-east of Darlington until and unless there is a proper, satisfactory process for taking account of cumulative impact of wind farms. In particular, the Moor House Wind Farm application should not be considered until there is a proper mechanism for assessing this proposal in the context of all other known wind farm proposals in the area.

- (7) Although it realises that this is not classed as a material planning consideration, the Parish Council is also concerned that the proposed development would be likely to have a detrimental effect on property prices in the surrounding area, including Sadberge.

Sadberge Parish Plan

Please note that the Parish Council's comments on this planning application are in line with the Sadberge community's views on wind farms in this area, as expressed in the Wind Farms Addendum to the Sadberge Parish Plan.

Work on the Wind Farms Addendum began in July 2008 (which was after the scoping reports for the proposed Moor House and East Newbiggin wind farms had been issued). Preparation of the Wind Farms Addendum involved extensive consultation with Sadberge residents, including an Open Meeting held in Sadberge Village Hall on 18th September 2008 and a questionnaire that was delivered to all Sadberge households.

The questionnaire asked whether we should oppose or accept the construction of wind farms near Sadberge. There was a 43.1% response rate, and 75.7% of the responses said that we should oppose wind farms in this area. Further details are available on the Sadberge web site at www.sadberge.org.uk.

On 16th December 2008, Sadberge Parish Council formally approved and adopted the Wind Farms Addendum as part of the Sadberge Parish Plan.

A copy of the Wind Farms Addendum to the Sadberge Parish Plan – together with two supporting documents – is available on the Sadberge web site.

If anything in this letter requires further clarification then please contact me.

Yours sincerely,

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