

SADBERGE PARISH COUNCIL

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Dear Adrian,

WIND FARMS NEAR SADBERGE

I am writing on behalf of Sadberge Parish Council to give the Council's responses to the points made in the letter from Banks Developments dated 30th January 2009.

First, I would like to remind you the community of Sadberge opposes any commercial-scale wind turbines in this area. Sadberge Parish Council believes that it is not appropriate to situate these large structures amongst the settlements in the north-eastern part of the Borough of Darlington. Our suggestions on policy and planning conditions are a back-up strategy to try to minimise the harm caused by any wind farms that do end up obtaining planning permission despite our opposition.

With regard to the points made in the letter from Banks Developments:-

Suggested Wind Farm Planning Conditions

- 2.2 The important point is that aircraft safety must not be compromised. If Durham Tees Valley Airport is unwilling or unable to make a formal, public statement that aircraft safety will not be compromised by a proposed wind farm then that wind farm should not be given planning permission.
- 2.3 The Council would have no objection to the assessment of the impact on birds being made by English Nature rather than the RSPB.
- 3.2 Banks Developments suggest that they would be willing to consider a methodology for the assessment of any audible beating noise that "does not contradict ETSU-R-97". Please note that the Council's case is that ETSU-R-97 is deficient because it fails to take into account the nature of the noise. In particular, it is the Council's contention that in some circumstances a wind farm can generate a type of noise that, although it does not exceed the limits set in ETSU-R-97, nevertheless causes a great deal of nuisance and harm to people living nearby.

The methodology prescribed in ETSU-R-97 is particularly poor at giving protection from 'beating' noises because the specified measurement is of the average noise over a period of time. This means that the volume of a periodic noise is under-reported. Also, periodic noises cause much more disturbance than more constant

noises. For example, a dripping tap just on the threshold of hearing can be much more disturbing than a louder rushing of wind in trees.

The Council will be happy to participate in work to develop a practical definition of what constitutes an 'audible beating noise' and a methodology for assessing such noise. What is the best way of initiating and co-ordinating such work?

- 3.3 The Council considers it rather odd that Banks Developments should say that "the design of the turbines is not within our influence". As the purchasers of the turbines, Banks Developments have the power to select the particular design of wind turbine that they believe will meet their needs.

Their suggestion that the design of the wind turbines is not within their influence is akin to a company saying that it cannot meet a requirement for its company cars to comply with current best practice in safety standards because "the design of the cars is not within our influence".

Note that the proposal in Sadberge's **Suggested Wind Farm Conditions** document is that "the wind turbines are designed and installed in accordance with current best practice regarding noise reduction". This should not be an onerous condition to fulfill.

- 3.4 - 3.5 Banks Developments suggests that "complaints should be investigated and appropriate mitigation measures undertaken prior to any turbine being stopped". The problem with this approach is that local residents can be left suffering from the negative effects of the wind turbines for a considerable period of time while the complaints are investigated and mitigation measures are designed and implemented. It also makes it possible for the farm operator to 'drag out' the investigation in order to keep the wind turbines running.

Where the possibility of a problem can be anticipated in advance, the Council suggests and requests that this is made the subject of a planning condition specifying that if the problem occurs then the relevant wind turbine(s) must be stopped. This means that remedial action will be taken as soon as it has been established that there is a problem, rather than allowing the wind farm operator to embark on a long-drawn-out investigation process.

Basically, the relevant principle is that the risk of such problems should be borne by the wind farm operator, not local residents. If the wind farm developers wish to avoid the risk of lost income then they should do the necessary work to identify the likelihood of any problems and install precautionary measures to prevent them from occurring.

Shadow flicker and interference with television reception both come into the category of problems that can be anticipated in advance and therefore should be the subjects of planning conditions.

- 3.8 Suggested condition 3.8 is effectively a stronger version of 3.7.

The standard planning condition that a wind turbine should be removed if it is out of operation for six months is rather weak. Suppose that, for whatever reason, a wind turbine is not able to make any significant contribution towards the UK's

electricity requirements. Under the standard planning condition, the wind farm operator can avoid the need to remove the wind turbine by, for example, choosing to run it for three days every six months.

The principle should be that a wind turbine that is not generating any significant amounts of electricity does not justify the harm that it is causing in terms of visual intrusion into the landscape. If only one out of 3.7 and 3.8 is going to be imposed it should be 3.8, because this does a better job of embodying the principle.

Suggested Wind Farm Policy

- 3.1 There is sufficient space within the 'least impact' area for the numbers of wind turbines suggested in the Landscape Capacity Studies report. In fact, in its conclusions (on page 81) the report states that:

"The Tees Plain wind resource area could potentially exceed the identified draft RSS recommended levels of development within the capacity of the landscape. This study has derived a "least impact" area where this should occur."

Given that, it is reasonable and sensible to restrict wind farm development to within the 'least impact area'.

- 3.2 - 3.3 There is no reason why policy should not restrict the number of commercial-scale wind turbines in a given area and the number of wind turbines in a wind farm.

It is normal for policies to restrict the location and scale of particular types of development. For example, there are policies preventing factories from being built in residential areas.

Restricting factories to specified locations is an effective way of preventing them from causing harm to residents, because factories generally only have a localised impact. However, because of their size, commercial-scale wind turbines have a visual impact over very large area. This is why attention is paid to 'cumulative impact', and it should be noted that a great deal of the Landscape Capacity Studies report is concerned with addressing this issue.

The cumulative impact of commercial-scale wind farms can be addressed by limiting the overall numbers of wind turbines, the number of wind turbines in any one 'cluster' and the distance between wind turbine clusters.

Given that, it is entirely reasonable and sensible for planning policy to place limits on the numbers of wind turbines in the north-eastern part of the Borough of Darlington (suggestion 3.2), the numbers of wind turbines in each wind farm (suggestion 3.3) and the separation distance between wind farms (suggestion 3.6).

Please note that the conclusions of the Landscape Capacity Studies report state that:

The potential has been identified for around 9-15 turbines within the "least impact" area in addition to the existing and consented development."

and that:

"the study suggests that generally any additional two wind farm clusters separated by around 5km (from existing consented or each other) may be acceptable in the Tees Plain "least impact" area."

As the relevant area within the north-eastern part of the Borough of Darlington makes up only part of the Tees Plain 'least impact' area, the Council believes that specifying that there will be no more than 8 wind turbines in the north-eastern part of the Borough of Darlington is in line with the Landscape Capacity Studies report's suggestion that there is potential for 9 -15 turbines within the 'least impact' area.

- 3.5 - 3.6 Commercial-scale wind turbines are large, intrusive pieces of industrial equipment, and they should not be sited near where people live.

The Council believes that there is a very strong argument that no commercial-scale wind turbines should be situated amongst the settlements in the north-eastern part of the Borough of Darlington. If, however, National and Regional policies have been biased to the extent that commercial-scale wind turbines may be forced into this area despite the opposition of local residents then they should at least be sited as far as possible from both individual dwellings and settlements.

Please note that the suggested 1.5 km separation distance between wind farms and settlements is already a compromise. The Council would have preferred at least a 2 km separation distance.

Imposing a 1.5 km separation distance between wind farms and settlements still leaves sufficient space for the numbers of wind turbines suggested in the Landscape Capacity Studies report.

The suggested minimum distance between wind farms is based directly on the conclusions on page 81 of the Landscape Capacity Studies report. (See the quote on the previous page.)

There was no intention for the suggested policies to limit the implementation of micro renewable generation. This is why the **Suggested Wind Farms Policy** document defines a "wind farm" as a wind power facility with a total installed generating capacity of more than 100 kW. A micro generation facility is normally defined as having a generating capacity of less than 50 kW.

- 4.2 - 4.4 Given the effect of man-made carbon dioxide on our planet's climate systems, we clearly need to reduce the amount of electricity generated from fossil fuels. Wind power has an important role to play in this, but wind turbines should not be situated amongst settlements, where they will cause nuisance and harm to residents.

The Government is seeking to encourage off-shore wind farms, and there is a huge potential for this type of development off the coast of the north-east of England.

It is likely that the push to build on-shore wind farms – including amongst settlements – will come to be seen as an aberration on the route to a more sustainable solution based on off-shore wind power.

Sadberge Parish Council believes that there is a strong argument that no commercial-scale wind turbines should be situated amongst the settlements in the north-eastern part of the Borough of Darlington. If, due to National and Regional policies, some wind farms do end up being constructed in this area then implementing the conditions described in **Suggested Wind Farm Planning Conditions** policies described in **Suggested Wind Farms Policies** will at least help to minimise the harm to local residents.

If anything in this letter requires clarification, or if you would like any further information about Sadberge Parish Council's views or suggestions, then please contact me.

Yours sincerely,



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Copies to:	Millie Scaife	Chair of Sadberge Parish Council
	Brian Jones	Ward Councillor for Sadberge & Whessoe
	Martyn Earle	Banks Developments