

**8. CONSULTATION RESPONSE – PROPOSED DEVELOPMENT OF AN ALTERNATIVE SCHEME OF 3 WIND TURBINES WITH HEIGHT TO BLADE TIP OF UP 100M AND ASSOCIATED SUBSTATION BUILDING, NEW AND UPGRADED ACCESS TRACK FROM MANYSTONES LANE AND B5056, HARDSTANDING, TEMPORARY COMPOUNDS AND ASSOCIATED WORKS AT GRIFFE GRANGE, MANYSTONES LANE, BRASSINGTON (14/00224/FUL, APPEAL REF: APP/P1045/W15/3130874 02/05/2016/CF)**

**APPLICANT: Griffie Grange Wind Farm Limited**

**Introduction**

In February 2015, Derbyshire Dales District Council refused planning permission for the erection of five 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 on a site that is often referred to as 'Griffe Grange'. The applicant subsequently lodged an appeal against the District Council's decision, which was supported by this Authority, but rather than seek a determination on the original application; the appeal proposals now comprise a revised scheme of three turbines.

**Site and Surroundings**

In its wider sense, Griffie Grange is part of a broad limestone dale which includes the historic 'Portway' route between Bakewell and Wirksworth located between high ground at Harboro Rocks to the south and Griffie Grange Valley to the north along which the Via Gellia road runs (A5012). The boundary of the Peak District National Park follows the valley bottom of Griffie Grange Valley and at its closest point is approximately 350m from what would have been the northernmost turbine at Griffie Grange. The land to the north of Griffie 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.

The plans submitted to the District Council with the original application showed 5 wind turbines would be erected in a line running south south east to north north west at high level along the eastern flank of Griffie Grange. Notably, these turbines would have been sited close to the existing cluster of turbines near to Griffie Grange including the four operational turbines at Carsington Pastures, the operational turbine adjacent to the Sibelco Works (formerly Viaton) and two operational turbines on land to the west of Ryder Point Quarry.

These operational turbines already have a significant visual impact on their landscape setting because they are visible from a wide range of public vantage points over a large area of the limestone plateau of the White Peak within the National Park boundary. The existing turbines can also be seen from long sections of various public footpaths and bridleways in the local area including from the Tissington Trail and the Limestone Way, and affect the setting of a range of designated and non-designated heritage assets including Minning Low, which is a Scheduled Monument that is an iconic and highly visible feature within the surrounding landscape.

**Planning Merits of Original Submission**

One of the key concerns arising from the original Griffie Grange proposals was that a further five large turbines close to a cluster of seven large turbines would mean that the surrounding landscape would become even more heavily influenced by these turbines, which cumulatively would have an increasingly harmful impact on the scenic beauty of the National Park increasingly detract from the significance of its cultural heritage, and detract from the quiet enjoyment of the special qualities of the National Park.

Furthermore, the Griffie Grange proposals would have exacerbated the visual impacts of the existing turbines because they would have been sited closer to the National Park with the northernmost turbine of the five being sited within 400m of the National Park boundary. The Griffie Grange turbines would have also been sited on the northern side of a 'ridge line' that runs broadly east to west from Ryder Point to Harboro Rocks. This is significant because the existing turbines are all sited on the southern side of this ridge, which means that the full height of the existing turbines is not always appreciated from vantage points within the National Park because of the intervening topographical feature in the landscape.

In contrast, the Griffie Grange turbines would be seen 'closer to the National Park from various vantage points over a wide area of the White Peak. Moreover, the turbines at Griffie Grange would extend the visual impact of the existing turbines especially when seen from vantage points to the east or the west of the site because they would have been sited in a line at broadly 90° to the existing turbines that are sited in a much tighter cluster running east to west further away from the National Park.

By virtue of the siting of five large turbines within the sensitive landscape of Griffie Grange, their scale, and the intervisibility between the site and a range of vantage points within the National Park, it was also considered that in isolation, the five turbines would damage and dominate the setting of the National Park and its landscape character thereby undermining its special qualities. Consequently, it was considered the harm caused by these five turbines in isolation would be exacerbated by their cumulative effects with the already consented turbines as the spread and number of turbines significantly increase their influence and result in increased harm to the character and appearance of the landscape and the setting of the National Park, as set out above.

Therefore, it was considered by this Authority that the original Griffie Grange proposals would have had a significant adverse visual impact on the landscape character of the National Park and would harm the significance of a range of designated and non-designated heritage assets within the National Park that would also have been affected by the original proposals. Moreover, it was considered that the proposed turbines would detract from the quiet enjoyment of the special qualities of the National Park as well as have an unacceptable adverse impact on living conditions of local residents living in and around Ible, which is the local community that would have been most directly affected by the Griffie Grange proposals.

Consequently, this Authority strongly objected to the original proposals for five turbines at Griffie Grange, which were refused planning permission by the District Council for a number of reasons including the adverse impact of the proposals on the National Park landscape, its cultural heritage and local residents. However, when the applicants lodged an appeal against this refusal they submitted a revised scheme of three turbines to the Planning Inspectorate. The revised scheme omits the two northern most turbines but seeks permission for the other three in their original locations running in a line running south south east to north north west along the eastern flank of Griffie Grange from a point close to the former Viaton site and the site of one of the existing operational turbines within the local area.

### **Next Steps**

The Planning Inspectorate has subsequently confirmed that the appeal will be determined on the basis of this revised scheme and the District Council is currently carrying out a consultation exercise before determining whether the revised scheme is now acceptable or whether to continue to defend the current appeal because the revised scheme is still not considered to be acceptable despite the omission of two turbines. The purpose of this report is to consider the Authority's own response to the revised proposals and whether the Authority should maintain its commitment to supporting the District Council at the upcoming Public Inquiry.

However, it should be noted that the Authority has not sought Rule 6 status in this case, which means that the Authority's commitment to the District Council extends to providing the necessary officer time to present evidence to the Inspector dealing with the Inquiry on the potential impacts of the revised scheme on the National Park through written submissions and appearing at the Inquiry to give expert evidence.

### **Recommendation**

**The National Park Authority OBJECTS to the revised proposals for three wind turbines (100m to blade tip, 59m hub height) at Griffie Grange for the following reasons:**

- **By virtue of their design and siting, and size and scale, the three turbines at Griffie Grange would have a significant adverse visual impact on the landscape character of the National Park, substantially detract from the enjoyment of its special qualities, and result in harm to its cultural heritage.**
- **The harm caused by these three turbines in isolation would be further exacerbated by their cumulative effects combined with the presence of seven other operational turbines within the local area as the increasing spread and number of turbines would significantly increase their influence and result in increased harm to the character and appearance of the landscape and the setting of the National Park.**
- **The revised proposals would therefore conflict with the statutory purposes of the National Park's designation and conflict with national planning policies in the Framework.**

**Accordingly, it is also recommended that this Authority should continue to support any subsequent defence of the current appeal by the District Council.**

### **Discussion**

#### **Policy Context**

In this case, the revised proposals for Griffie Grange would affect the National Park because of the proximity of the site to the boundary and the size and scale of the turbines. Nonetheless, it would not be appropriate to assess the turbines against policies in the Authority's Development Plan because the site is actually outside of the National Park. Therefore, it is more appropriate to consider the revised proposals in the context of national planning policies in the National Planning Policy Framework and in the context of other relevant considerations including Planning Practice Guidance and the Written Ministerial Statement made on 18 June 2015 giving local people the final say on wind farm applications.

The most relevant paragraphs in the Framework in respect of the Griffie Grange proposals include paragraph 98, which says when determining planning applications, 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 unless material considerations indicate otherwise.

As these proposals affect the National Park, Paragraph 115 of the Framework is also a highly relevant and material consideration. This paragraph says that great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural

heritage are important considerations and should be given great weight in the National Parks. The provisions of this paragraph are also important insofar as they place a limitation on the presumption in favour of sustainable development set out in Paragraph 14 of the Framework.

Equally, the proposals would affect a range of designated and non-designated heritage assets within the National Park including Mining Low, a range of other scheduled monuments, various listed buildings and designated Conservation Areas in Aldwark and Bonsall. Paragraphs 132–135 of the Framework offer specific guidance on an appropriate approach to the conservation of designated and non-designated heritage assets where a development proposal would result in harm to their significance.

Paragraph 132 says when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. Paragraph 134 says where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Notably, Planning Practice Guidance says that as the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of wind turbines on such assets. Depending on their scale, design and prominence a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset. Planning Practice Guidance also sets out further guidance on assessing proposals for wind turbines and says that whilst the National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities.

In terms of addressing the concerns of local communities affected by wind turbine proposals, the Written Ministerial Statement made on 18 June 2015 is quite clear that when considering applications for wind energy development, local planning authorities should only grant planning permission if, following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

In this case, it is considered that national planning policies, planning practice guidance and the Written Ministerial Statement are wholly consistent with the statutory purposes of the National Park's designation and its statutory duty. The two statutory purposes for National Parks in England and Wales are to conserve and enhance the natural beauty, wildlife and cultural heritage; and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. When national parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks.

It is therefore considered appropriate to consider the acceptability of the revised proposals for the wind turbines at Griffe Grange within the context of Government guidance and national policy with full regard to how the proposals would impact on the statutory purposes of the National Park's designation and the local communities within the National Park that would be affected by these proposals.

## **Planning Merits of the Revised Scheme**

In the first instance, when comparing the original scheme to the revised scheme, it is important to recognise that the omission of the two turbines closest to the National Park is not wholly without merit. In particular, the revised scheme would help to reduce the impacts of the turbines on the living conditions of the local community living in and around Ible. Moreover, the Authority's Ecologist has indicated that it is now less likely that the reduced numbers of turbines would impact on protected species and has no overriding objects to the revised scheme on nature conservation grounds.

The additional benefits of reducing the number of turbines down to three would also include a reduction in the extent of the area that would be covered by the turbines at Griffie Grange, and a reduction in the overall increase in the cumulative area covered by turbines when taking into account the presence of the existing operational turbines at Carsington Pastures, the former Viaton site and Ryder Point.

However, this is not to say that the impacts of the revised scheme would now be acceptable because it is clear that the remaining three turbines would continue to have a significant visual impact on the National Park landscape. This is because of the size and scale of the turbines (100m to blade tip, 59m hub height) and because of their siting on higher land in close proximity to the National with the nearest turbine sited within 1km of the boundary of the National Park.

## **Landscape and Visual Impact**

The Landscape and Visual Impact Assessment submitted with the revised proposals also confirms that the three turbines would be seen from a range of vantage points across the White Peak area of the National Park. However, one argument that has been consistently used to support the Griffie Grange proposals is that the wind turbines would not have a significant visual impact on the surrounding landscape because of the presence of the existing wind turbines within the local area. In summary, this argument suggests that the setting of Griffie Grange has become a 'landscape with wind farms' and therefore, three additional turbines would be in keeping with the character of the surrounding landscape. However, this approach does not properly take into account the individual or cumulative impacts of the Griffie Grange proposals.

At present, as noted earlier in this report, the existing turbines close to Griffie Grange often appear to be on the other side of a ridge line from many vantage points within the National Park, which means the full height of these turbines is often not always obvious from many viewpoints within the National Park. This is also significant because this ridge line forms an important visual and physical break between the more industrialised land to the south of the ridge line where the existing turbines have been sited and the pastoral landscape associated with Griffie Grange, which is primarily influenced by its underlying geology and therefore links more seamlessly with the landscapes of the National Park especially those around Ible and Bonsall.

This means that the turbines at Griffie Grange (and often their full height) would be much more readily seen in an area that has been largely unspoilt and industrialised compared to the land beyond the ridgeline to the south and within an area that is much more closely related to the National Park by virtue of its landscape character and the extent to which it forms part of the setting of the National Park in panoramic views across the limestone plateau of the White Peak. In these respects, it is not immediately evident that Griffie Grange lies outside of the National Park when seen from a range of public vantage points.

Therefore, the turbines at Griffie Grange would not simply 'blend in' with the existing turbines, they would increase the visual impact of the existing turbines in a way that would be harmful to

their landscape setting and detract from the scenic beauty of the National Park. Firstly, they would increase the area covered by wind turbines and increase the visual envelope of the existing turbines especially when seen from vantage points broadly to the east and west of Griffie Grange. From vantage points to the north of the site, the turbines at Griffie Grange would also increase the visual density of the existing wind turbines and increase the visual impact of the existing turbines.

By increasing the visual density of the existing turbines and the area covered by these turbines, the Griffie Grange proposals will undoubtedly increase the cumulative visual impact of the existing operational turbines but this impact will be especially harmful because all three turbines are much closer to the Peak District National Park than any of the existing turbines and the turbines are located in Griffie Grange which is a topographically distinct area that flows much more directly into the National Park than the sites of the existing turbines.

At present, the physical distance between the existing turbines does help to reducing their visual impact. However, it can be seen that as the turbines at Ryder Point and the former Viaton site were erected, these turbines increased the influence of wind turbines on the character of the surrounding landscape rather than harmonise with the turbines already in place at Carsington Pastures. The additional three turbines had the affect of drawing more attention to the four turbines at Carsington Pastures and as they are seen together in the same panoramic views from within the National Park, the seven turbines have a significant cumulative visual impact.

The additional three turbines would draw even more attention to the existing turbines, which means that cumulatively, the ten wind turbines would have a much stronger influence on the setting of the National Park and more dominant impact on the character of the landscape within the National Park. Taken together, the ten turbines would be much more visually intrusive in views across the White Peak from a wide range of public viewpoints within the National Park and the three turbines at Griffie Grange would alter the current impacts of the presence of individual turbines beyond the National Park boundary by creating the presence of a wind farm in the landscape that would appear to extend in to, and possibly appear to be sited within, the National Park.

Therefore, the cumulative impact of granting planning permission for the turbines at Griffie Grange would be substantial and this impact would be harmful not least because the proposed turbines would have an adverse impact in their own right. Primarily, this is because the three turbines at Griffie Grange would be located in a landscape setting that flows into the White Peak and because the turbines will be sited close to and be visible from a range of vantage points in the National Park, these turbines would appear to be a dominant feature in their own right within panoramic views across the White Peak limestone plateau and from viewpoints closer to Griffie Grange.

In these respects, the turbines would not reflect or respect the recurrent visual themes of the White Peak and the landscape character types within, which amongst other things, can often be characterised by the openness of the sparsely populated higher land, pastoral farmland enclosed by drystone walls, prehistoric monuments, often on hilltops, the relics of former lead mines, and wide open views to the skyline.

Moreover, whilst there is clearly evidence of human intervention in the landscape, to a large extent the remains of historic activities within the landscape and the isolated field barns and dry stone walls associated with farming and other man-made features form part of the historic and valued landscape character of this area and contribute to its scenic and timeless quality in a landscape largely devoid of obvious modern structures. In contrast, the proposed wind turbines, with their strident architectural form and movement, would appear modern and visually disruptive.

Consequently, the omission of two turbines from the original application does not address the Authority's original concerns because the siting of three large turbines within the sensitive landscape of Griffie Grange would still damage and dominate the setting of the National Park and its landscape character thereby undermining its special qualities. The harm caused by these three turbines in isolation would be exacerbated by their cumulative effects with the already consented turbines as the spread and number of turbines significantly increase their influence and result in increased harm to the character and appearance of the landscape and the setting of the National Park, as set out above.

It is therefore concluded that the revised scheme would have a significant adverse visual impact that would harm the scenic beauty of the National Park and would detract from its landscape character contrary to the statutory purposes of its designation and contrary to national planning policies in the Framework. Consequently, it is recommended that the Authority should maintain its objection to the revised proposals and continue to support any subsequent defence of the current appeal by the District Council.

### **Impact on Cultural Heritage**

As noted above, the many historic features within the White Peak contribute positively to its special qualities and its scenic beauty. Of particular note are the Scheduled Monuments at Minning Low and Bonsall Leys lead mines, which the Environmental Impact Assessment submitted to support the revised proposals acknowledges would be affected by the three turbines proposed at Griffie Grange. However, in common with criticisms that could be made of the Landscape and Visual Impact submitted to support the revised proposals, the submitted information does not supply a convincing assessment of the impacts of the proposals on these two nationally important heritage assets.

In the case of Minning Low, this site lies within the south-eastern uplands of the Derbyshire limestone plateau. The monument comprises a well preserved Neolithic chambered tomb and two adjacent well preserved Bronze Age bowl barrows. The chambered tomb is of a circular form that is common to the Peak District but unusual nationally, and is the largest of its kind in Derbyshire. All surviving chambered tombs are considered to be of national importance, as few Neolithic structures survive as upstanding monuments and are rare survivals. The monument as a whole is illustrative of the continued use of Neolithic sites as the focus for Bronze Age burial and ritual activity, and the changing burial custom across these periods.

It has been acknowledged in the Environmental Impact Assessment (submitted with the revised proposals) that its setting makes a considerable contribution to its significance, as prehistoric ritual and burial monuments of the Neolithic and Bronze Age were placed in visually dominant locations in the landscape (hill tops, ridge lines, false summits etc.) in order to give large viewfields both to and from the monument and sightlines to the surrounding landscape and to other related prehistoric ritual and burial monuments. This is the historic landscape context in which these monuments are understood and experienced, and the features themselves are relatively subtle additions to the natural topography and landforms.

However, what is underplayed is the extent of the harm that might arise from any element that alters these views, and in particular, it is not recognised in the Environmental Impact Assessment that the proposed turbines, would be large, modern structures, in a vertical axis, bringing movement, which would add a dominant and competitive element into the views that would harm the setting of Minning Low. The addition of the three proposed turbines at Griffie Grange would also result in an intensification of the cumulative impact of existing wind turbines over a wider area of the setting of Minning Low, and in turbines encroaching further into its setting, dominating

the landscape views to the south east, resulting in harm to how this nationally designated heritage asset is experienced and understood, and eroding its landscape setting.

Similarly, the lead mines at Bonsall Leys form one of a number of lead mining sites within the locality and whilst these are relatively low relief and subtle landscape features, they are a key part of the historic landscape of the White Peak. Within this context, the proposed turbines encroaching on the higher land at Griffie Grange and towards the Scheduled Monument at Bonsall Leys will harm the setting of this heritage asset because of the introduction of large, modern structures, out of character to the surrounding landscape, in a vertical axis, bringing movement and dominating and competing with the historic character of the area.

In the case of Bonsall Leys lead mines, it should also be noted that the Scheduled Monument comprises two areas of protection for the remains of lead mining that took place between the 16th and 19th centuries (including ruined buildings, earthworks and buried remains) of the Bonsall Leys leading mining area. The monument includes a range of surviving archaeological remains that illustrate the history and development of lead mining as it was practiced in Derbyshire, from early small holder miners, the impact of technological development and change in lead exploitation over the centuries. The site is thought to be a unique surviving representation small scale, intensive lead working in post-medieval Derbyshire and the site's complexity is unparalleled nationally. However, the Environmental Impact Assessment submitted with the revised proposals does not adequately address the impacts of the Griffie Grange proposals on this site.

Equally, the impact of the proposed development on Scheduled Monuments within the Peak District National Park has only been assessed for half of the nationally important heritage assets that would be potentially affected by the Griffie Grange proposals in the submitted Environmental Impact Assessment. Of the Scheduled Monuments that have had an assessment, only Minning Low has been given more than minimal consideration. The assessment of the Scheduled Monuments within the National Park likely to be affected by the Griffie Grange proposals is therefore not in proportion to their significance and importance as nationally important and designated heritage assets, and in itself, this can be seen as a failure to meet the requirements of Paragraph 128 and 129 of the National Planning Policy Framework.

However, this issue is compounded by the failure to consider the cumulative impact of the proposed development when taking into account the effect it would have over numerous heritage sites as well as considering the cumulative impact of wind turbines within the local area on individual sites. In summary, the significance of the impact of the proposed development would be increased when the impacts arising from the turbines at Griffie Grange would be experienced across a number of different nationally important sites. In this respect, less than substantial harm taken over a number of different designated heritage assets can amount to substantial harm cumulatively. In this case, the degree of harm when taken over the number of designated heritage assets over a wide area likely to be affected by the proposed development, including sites outside of the National Park, the substantial harm threshold may have been reached.

The finding that the substantial harm threshold may have been reached is supported by concerns that the proposed turbines would harm the significance of other designated heritage assets including two Grade II listed buildings and the setting of both the Aldwark and Bonsall Conservation Areas. In terms of both Aldwark and Bonsall, the relationship between these settlements and their rural setting positively contributes to their setting and the views out of these settlements across the surrounding landscape has been identified as one of the special qualities of their respective Conservation Areas. However, in both settlements, the views out of both Conservation Areas can be limited by other features in the landscape or the surrounding built development and this means that some of the most important views out of the settlement are already influenced by the presence of turbines in the landscape. The special qualities of these



views out of the settlement would be further eroded, if not dominated by the three turbines proposed at Griffie Grange, and therefore the Griffie Grange proposals would detract from the significance of both the Aldwark and Bonsall Conservation Areas.

The Grade II listed Whitelow Farm is located high up on the side of the valley facing the proposed turbine site. The farm house and associated outbuildings have a predominantly pastoral setting that has very little tree coverage. Therefore, there is intervisibility between the farmstead and the location of the proposed turbines, which would be highly visible within the setting of the designated heritage asset. Similarly, the Grade II listed Primitive Methodist Chapel at Ible is perched on an elevated position at the eastern end of the settlement. The Chapel is south facing and looks directly to the site of the proposed wind turbines. As with Whitelow Farm, the proposed turbines would detract from the appreciation of this listed building in its setting.

In these respects, the harm to the setting of the these listed buildings and the Conservation Areas affected by the Griffie Grange proposals is primarily with regard to the strident architectural form and movement of the turbines, which means the turbines would appear to be visually disruptive modern interventions within the tranquil and pastoral landscape settings of these heritage assets. This harm would be exacerbated by increasing the cumulative visual impact of the other individual turbines within the local area. Whereas this may be considered to be less than substantial harm when assessing the impacts of the proposals on each asset individually, as above, the cumulative impact of these successive impacts on a wide range of designated heritage assets within the National Park may constitute substantial harm but the submitted Environmental Impact Assessment does not properly assess this issue.

When taking into account a fuller assessment of the impacts of the proposed development on other non-designated heritage assets within the National Park has not been undertaken, and when taking into account the Griffie Grange proposals would also affect a range of designated and non-designated heritage assets outside of the National Park, it therefore appears that it is open to the District Council to consider whether (i) the proposals would result in less than substantial harm within the scope of Paragraph 134 of the Framework or substantial harm within the scope of paragraph 132 of the Framework (with regard to designated heritage assets affected by the revised scheme) and conflict with paragraph 135 of the Framework (with regard to non-designated heritage assets affected by the revised scheme) and/or (ii) that there is conflict with paragraphs 128 and 129 of the Framework (with regard to the adequacy of the assessment of the impacts of the proposed development).

However, it is clear from the analysis in this report that the proposed turbines would not conserve or enhance the National Park's cultural heritage which gives rise to further conflict with the 'conservation purpose' of the National Park's statutory designation and further conflict with national planning policies in the Framework. Moreover, the revised proposals do not provide an adequate assessment of the impact of the proposals on designated and non-designated heritage assets that is proportionate to the importance placed on cultural heritage within National Parks in Paragraph 115 of the Framework and the great weight that national planning policy says should be given to conserving cultural heritage in National Parks.

These issues exacerbate the adverse landscape impact identified in the above sections of this report. It is therefore concluded that there are strong grounds on which to recommend that the Authority should maintain its objection to the revised proposals and continue to support any subsequent defence of the current appeal by the District Council.

### **Other Relevant Considerations**

As noted above, national planning policies do allow for public benefits to be balanced against less than substantial harm to designated heritage assets. Equally, the District Council (and ultimately the Inspector dealing with current appeal) will need to balance the public benefits

arising from granting planning permission for the proposed turbines against the harm to the National Park that would result as consequence of doing so. However, there is nothing in the information submitted with the revised proposals that explains how the turbines at Griffie Grange would contribute to the conservation or enhancement of the National Park, promote opportunities for its quiet enjoyment, or foster the social and economic welfare of its local communities.

It is therefore considered that the public benefits of granting planning permission for the proposed turbines at Griffie Grange, from this Authority's perspective, would be limited to their potential contribution to increasing the provision of renewable energy. Although this consideration should carry weight in any planning balance, it is clear from recent case law that the benefits of renewable energy should not in itself offset or outweigh harmful impacts on nationally important heritage assets or offset or outweigh the highest level of protection afforded to the conservation and enhancement of the National Park's scenic beauty and cultural heritage.

In short, the desirability of renewable energy cannot easily override these planning considerations when also taking into account the nation has chosen to protect the landscape of the National Park for its scenic beauty and similarly, chosen to protect designated heritage assets, which are simply irreplaceable. This view is also consistent with Planning Practice Guidance and national planning policies but it still remains open to the developer to seek to demonstrate that any harmful impacts associated with the proposals can be addressed.

In these respects, no specific mitigation has been proposed to offset the impacts of the turbines on the National Park but mitigation, such as landscaping, would not be effective in any event because of the size and scale of the proposals and their siting. Notably, the scheme would be reversible and would be temporary for a period of some 20-30 years. Whilst that would be a negligible time in terms of the time Minning Low has been part of the local landscape, for example, this would amount to a generation in human lifespan. As such, it seems difficult to give this particular matter significant weight in the planning balance especially when taking into account the impacts of the proposals on the quiet enjoyment of the special qualities of the National Park.

The landscape and visual impact assessment submitted with the revised proposals confirms that the turbines would be seen from a wide range of public vantage points within the National Park, from long lengths of various public rights of way and several National Trails, and would have a significant impact on the appreciation of a range of designated heritage assets including nationally important sites such as Minning Low. As set out above, the turbines would have a substantially adverse impact on the character of the National Park's landscape and cultural heritage. Therefore, the proposed turbines would seriously detract from the enjoyment of the special qualities of a whole generation of visitors to the National Park and would outlive an unquantifiable number of the visitors who already visit the Park.

It is therefore concluded safeguarding the special qualities of the National Park in the face of clearly identifiable and demonstrably harmful impacts weighs more heavily in the planning balance and is more clearly in the wider public interest compared to the less specific and more generalised benefits arising from the renewable energy that might be produced from the proposed turbines especially when taking into account the absence of any meaningful mitigation for the impacts of the three turbines.

Finally, public consultation by the District Council on the revised proposals ends on 12 May 2016. So, at the time this report was written, it was not clear whether the planning impacts identified by affected local communities in response to the original application have been fully addressed by omitting two of the five turbines originally proposed. In this respect, there were 87 individual objections to the original application for five turbines alongside objections from several Parish Councils and a number of objections from conservation specialists and interested third parties.

There was also support for the proposals but turbine proposals are not determined by a referendum.

The Written Ministerial Statement made on 18 June 2015 is quite clear that when considering applications for wind energy development, local planning authorities should only grant planning permission if following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. If the revised proposals do generate further objections from local communities affected by the proposals on valid planning grounds then it self-evidently cannot be demonstrated the omission of two turbines has fully addressed their concerns.

However, whilst it would be down to the District Council to make their own determination on this issue, it seems unlikely from the analysis of the revised proposals in this report that it will be demonstrated that the omission of two turbines has fully addressed the concerns of local communities affected by the proposals.

### **Conclusions**

It is therefore concluded that there are no other material considerations that offset or outweigh the conclusions reached in this report that the revised proposals would conflict with the statutory purposes of the National Park's designation and conflict with national planning policies in the Framework. In this case, it is considered the three turbines would have a significant adverse visual impact on the landscape character of the National Park, substantially detract from the quiet enjoyment of its special qualities, and result in harm to its cultural heritage. Accordingly, it is recommended that this Authority should object to the revised proposals and continue to support any subsequent defence of the current appeal by the District Council.