EDWARDSON ASSOCIATES

Planning & Diversification Consultants

Mr Chris France
Director of Planning
North York Moors National Park Authority
The Old Vicarage
Bondgate
Helmsley
York
YO62 5BP

Date : 29 January 2024

Our Ref: BUT. A 2023.01

Dear Mr France

Planning and Design and Access Statement

Proposal: **Installation of 1no. 20m (hub height), 27.13m (blade tip height) wind turbine at Grouse Hill Caravan Park, Blacksmith Hill, Fylingdales, Whitby, YO22 4QH**

1.0 Introduction

1.1 This application comprises a full planning application for the installation of 1no. 20m (hub height) (27.13m high to blade tip), 25kW wind turbine to provide a source of renewable energy for Grouse Hill Caravan Park at Fylingdales.

1.2 The application proposals are considered to comprise an acceptable form of sustainable development, contributing positively to the caravan park's desire for greater use of renewable heat and energy technologies, in an effort to be more self-sufficient and energy secure. Our clients recognise the increasing importance of green energy and low carbon energy production and climate change issues and therefore remain committed to minimising the carbon footprint of their business.

1.3 Policy ENV8 of the adopted Local Plan, 2020 offers support to wind turbine developments where they are in a position identified as suitable for wind energy development in the North York Moors Renewable Energy Supplementary Planning Document, and subject to a number of criteria designed to protect the special qualities of the National Park.

1.4 We hope that officers can agree that there will not be any adverse environmental, residential amenity, highway safety or other impacts as a consequence of the application proposals.

2.0 Application Particulars

2.1 This application is accompanied by the following supporting plans and particulars: -

- 001 Location Plan
- 002 Site Plan as Existing
- 101 Site Plan as Proposed
- 102 Elevations / Sections as Proposed

www.edwardsonassociates.com
Email: info@edwardsonassociates.com

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Trading name of Edwardson Associates Limited - Registered in England No. 4413614

Paddock House
10 Middle Street South
Driffield • East Yorkshire • YO25 6PT
Tel 01377 249720 • Fax 01377 259052

- Application Forms
- Planning and Design and Access Statement (this document)
- Bat Report, by Ecology & Forestry Ltd, January 2024

3.0 The Proposals and Site Location

3.1 The proposals comprise a full planning application for the installation of 1no. 20m hub height, (27.13m high to blade tip), 25kW wind turbine, to provide a source of renewable energy for the applicant's well-established caravan park.

3.2 For the purposes of planning, the site is located within the open countryside, but relates to an existing well-established caravan park. The site is located within Flood Zone 1 (low risk). The caravan park is located within the North York Moors National Park

3.3 The proposed wind turbine will be installed in a field between the caravan park and the applicant's dwelling next to an array of ground mounted solar panels. Furthermore, as can be seen from the site layout and site section on Drawing 101, the position of the turbine is situated a considerable distance from any public land or property, and furthermore, its height is similar to the existing telecommunications mast on the wider application site.

4.0 Planning Policy and Principle

Climate Change Legislation

4.1 Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their Local Plans policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

4.2 The Climate Change Act 2008 established a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels.

National Planning Policy Framework (NPPF)

4.3 Section 14 of the updated Framework deals with meeting the challenge of climate change. Paragraph 152 of the Framework states: -

"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimize vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure".

4.4 Paragraph 155 of the Framework states that: -

"To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources, that maximizes the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily, and identify opportunities for development to draw its energy supply from renewable or low carbon energy systems".

4.5 Paragraph 158 of the Framework states that: -

"When determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse emissions, and approve the application if its impacts are (or can be made) acceptable".

4.6 It is clear from the Framework that the Government emphasises a clear positive presumption in favour of renewable energy schemes of all scales, including for local businesses.

4.7 Having regard to the above planning policy context, the principle of renewable energy proposals is considered acceptable.

Planning Practice Guidance – Renewable and Low Carbon Energy

4.8 The Government's planning practice guidance reinforces the NPPF's support for renewable energy. Planning practice guidance sets out the following key statement: -

"Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable". (Paragraph 001 Reference ID:5-001-20140306).

North York Moors National Park Authority Local Plan, July 2020

4.9 The following policies are considered to be of most relevance to this proposal: -

- Strategic Policy A – Achieving National Park Purposes and Sustainable Development.
- Strategic Policy B – The Spatial Strategy – Open Countryside
- Strategic Policy C – Quality & Design of Development
- Strategic Policy E – The Natural Environment.
- Strategic Policy F – Climate Change Mitigation & Adaptation.
- Strategic Policy G – Landscape.
- Strategic Policy H – Habitats, Wildlife, Biodiversity and Geodiversity.
- Policy ENV2 – Tranquillity.
- Policy ENV8 – Renewable Energy.

Other National Park Documents

- Renewable Energy Supplementary Planning Document, April 2010.
- Landscape Character Assessment, 2021

5.0 Key Issues

- Planning Policy & Principle – Compliance with Policy ENV8 and the Renewable Energy Supplementary Planning Document.

6.0 Planning Policy & Principle

6.1 Policy ENV8 of the adopted Local Plan offers some support to renewable energy proposals within the National Park, subject to satisfying a number of criteria relating to scale and design being appropriate to the locality, meeting local energy needs, respecting and complementing landscape character, protecting the special qualities of the National Park (either on its own, or in combination with other schemes), provision of environmental enhancement or community benefit wherever possible, and making provision for the removal of the facilities and reinstatement of the site, should it cease to be operational. Proposals for wind turbines must also satisfy additional criteria, namely that they are in a position identified as suitable for wind energy development in the North York Moors Renewable Energy Supplementary Planning Document, and any planning impacts identified by an affected local community have been addressed and it can be demonstrated that the proposal has their backing.

(1) It is of a scale and design appropriate to the locality and contributes to meeting energy needs within the National Park

6.2 A single wind turbine is proposed to provide for the sustainable energy needs of Grouse Hill Caravan Park, a well-established holiday park that makes an important contribution to the local economy. The existing business helps to fulfil one of the National Park's statutory purposes; that of understanding and enjoyment. The proposed turbine will be functional in appearance and is likely to be white/off-white/grey in colour. It will measure 20 metres to hub height, with 6 metre blades, and an overall height to blade tip of 27.13 metres. The turbine will be installed on a 5 metres square and 1 metres deep reinforced concrete foundation. The turbine will be sited next to the caravan park, manager's house and an existing array of ground mounted solar panels. The siting is on a downward slope which enables the turbine height to reflect that of the existing telecommunications mast on the site – see Section A on Drawing 101. The proposed siting will be approximately 440 metres south of the A171 and a similar distance north of the nearest public right of way located to the south. The surrounding landscaping is undulating in nature and there are mature woodlands located to the east and south of the caravan park. Having regard to its siting and height, the position on a downward slope, distance from the public highway and nearest public right of way, presence of the screening woodland to the east and south, presence of the existing telecommunications mast and the fact that the proposal will provide for the renewable

energy needs of a well-established business, it is considered that the proposals would accord with criteria 1 of Policy ENV8 of the adopted Local Plan.

(2) It respects and complements the existing landscape character type as defined in the North York Moors Landscape Assessment

6.3 The site is located in landscape character type LCT 4: Coastal Hinterland. This LCT forms the transition between the coast and the higher land (including moorland) inland. It has strong physical, cultural and visual connections with the coast, and is largely within the North Yorkshire and Cleveland Heritage Coast (not the application site however). It comprises a gently rolling patchwork of farmland, interspersed with steep wooded valleys which run towards the sea or the River Esk. The landscape is locally influenced by moorland, forestry, estates and industry, as well as the coast . . . It supports coastal tourism (most of the caravan parks are within this LCT) and also contains road corridors and historic railway lines.

6.4 Specifically, the site is located in LCA 4b: Whitby – Cloughton. This LCA comprises the southern part of the Coastal Hinterland . . . it extends inland from the England Coast Path to the edge of Moorland. However, here the Coastal Hinterland is much narrower, and the moorland extends much closer to the coast.

6.5 In the 'Plan' section for LCA 4b on Page 97 of the document it states the following: -

"Avoid siting masts and other vertical features in open locations, particularly where they would appear on the horizon. When they are unavoidable, site them close to existing trees or buildings, and consider non-standard designs to manage visual impact".

Assessment against LCA

6.6 The proposed turbine is located in an area of undulating landscape between the coastal A171 to the North and the higher moorland to the South. The applicant's landholding slopes down from Blacksmiths Hill to the North and Brown Rigg Beck in a valley bottom to the South beyond an established mature woodland. There is also a large mature woodland to the East. The turbine has been proposed on a downslope 400m + away from any public views and will not appear on any exposed horizon. Furthermore, as recommended by the LCA, the turbine has been located close to trees to the East and South. The presence of the existing telecommunications mast nearby also indicates that the local planning authority has previously considered the characteristics of the local landscape to be one capable of accommodating a tall, vertical structure without causing undue visual harm – reference NYM/2015/0277/FL.

(3) It does not result in an unacceptable adverse impact on the special qualities of the National Park, either on its own, or in combination with other schemes

6.7 It is considered that the siting, height and detailed design characteristics of the proposed turbine can accommodated without exerting unacceptable adverse impacts on the special qualities of the National Park. There is existing built development within the immediate site context, including the caravan park, manager's dwelling, agricultural buildings and

telecommunications mast. None of these existing developments are particularly exposed to view because the undulating landscape and the mature woodlands. There should be no particular effects in terms of tranquillity or dark night skies and likewise no material impacts on any sense of remoteness, particularly when out walking on the moorland top (High Moor) located some 1,200 metres to the south. There will be views of the top of the mast and the blades, but these are likely to be restricted to medium distance views from the A171 to the north and longer distance views from the high moorland to the south. Views will be broken up by undulating topography, mature woodlands and hedgerows. There are no other wind turbine developments in the locality with which the application proposal could exert any cumulative harmful effects.

(4) It provides environmental enhancement or community benefits wherever possible

6.8 The application proposals do not propose any particular wider environmental enhancement or community benefits. The renewable energy to be created is intended to meet the local requirements of the business, as required by policy. If a much larger commercial windfarm proposal to be connected to the wider grid were being proposed then the provision of wider benefits could more reasonably be sought.

(5) It makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational

6.9 The applicant has no objection to the imposition of a standard condition requiring the wind turbine to be decommissioned and the site restored to its original undeveloped state if/when the turbine reaches the end of its life. The proposed turbine is likely to have a lifespan in the region of 25 years.

(6) They are in a position identified as suitable for wind energy development in the North York Moors Renewable Energy Supplementary Planning Document

6.10 The application site is located in Landscape Type 'Coast and Hinterland' in Appendix 2 of the Supplementary Planning Document. The document states that wind turbines could be located in association with farmsteads or settlements, but should be sited away from open views along the coastline. Wind turbines may be more easily assimilated into the more modern developments on the cliff top areas.

6.11 The application site does not comprise the most sensitive and visually exposed open moorland or coastal stretches. The site is set 4-5km inland from the coast and approximately 1km from the nearest open moorland. As such, it is considered that the application site does occupy a reasonably suitable location for some form of wind turbine development. The site is in a location where another vertical structure (a telecommunications mast) has been deemed acceptable. The proposed siting is close to and visually related to this existing mast, likewise to the developed caravan park and management dwelling and other associated buildings. There are also mature woodlands to the south and east which provide key visual back-drops. As can be seen from Section A on Drawing 101, the height to blade tip will be similar in height to the telecommunications mast, and certainly no more than 50% higher that this existing vertical structure given that the turbine will be sited on a downward slope. The

proposed colour will also be a semi-matt white or grey in accordance with the recommendations of the SPD. Furthermore, there will be no significant ancillary developments required and there is no proposal to connect to the grid. Having regard to these factors it is considered that the proposed location is a suitable one.

(7) Any planning impacts identified by an affected local community have been addressed and it can be demonstrated that the proposal has their backing

6.12 The existing caravan park is located in the open countryside, some distance from any settlement. Realistically, the 'local community' is likely to comprise of 'Fylingdales located 400 metres to the north, where there is The Flask Inn and the Flask Inn Holiday Park on the south side of the A171, and Meadowbeck and Low Flask Farm cottages on the north of the A171. There is also Wragby Farm a similar distance (400 metres) to the East (screened by an established woodland) and Pond Hill Farm 1km or so to the West. It is not unreasonable to say that any affected community is some considerable distance away from the proposal. That is not to say that they would not see the turbine, but having regard to distance, undulating topography and the presence of mature hedgerows that line the local highways and the mature woodlands to the east and south of the site, any potential impacts are likely to be minimal. The planning application process will determine if there are any objections and whether the proposal has the backing of the local community.

7.0 Ecology (Bats)

7.1 The application is supported by a bat survey report, as requested by the National Park Authority. This concludes that bat activity on the site is low and the proposed position of the wind turbine should not have any harmful effects on commuting/foraging bats. To further mitigate against the highly unlikely event of a bat strike, it is recommended that livestock do no graze within a 20 metre radius of the wind turbine.

8.0 Conclusion

8.1 This is an application for the installation of 1 no. wind turbine to provide sustainable energy for Grouse Hill Caravan Park. The proposed heights to hub and blade tip are 20 metres and 27.13 metres respectively. The proposed siting is not considered to be visually exposed or harmful and should be no more visually exposed or harmful than the existing telecommunications mast nearby. Whilst there will be views, these will be over medium and long distances, and will be minimised by undulating topography and mature woodlands and hedgerows. Having regard to the Renewable Energy SPD and Policy ENV8 of the adopted Local Plan, the proposed site is considered to be a suitable location and one which can accommodate the proposal whilst protecting the special qualities of the National Park.

8.2 Please get in touch should you require any additional information.

Yours sincerely

Edwardson Associates Ltd