ST BEES PARISH COUNCIL

Application Ref 4/24/2334/0F1 – Removal of existing wind turbine & erection of replacement wind turbine up to 76m blade tip height with associated development

St Bees Parish Council wishes to submit the following comments in response to the additional information supplied to support this application:

The Parish Council is, in principle, supportive of wind energy and would not object to a replacement of the existing turbine with one of similar size. However, the Parish Council has serious concerns about the proposal for such a large turbine and believes the application should be refused.

The proposed replacement turbine will be very substantially larger than the existing turbine which it is to replace. It is noted that Policy CC2 of the adopted Local Plan states that new turbines over 50m in height must be sited in an Area Suitable for Wind Energy with a **possible** exemption for repowering of existing turbines or wind farms. This site is not within a designated area and a new turbine of this size would not be permitted. The Policy states that proposals for the re-powering of turbines in areas which are identified as unsuitable in principle could **potentially** be permitted **where the impacts of such development, including cumulative effect, are considered acceptable**. The proposed new turbine is almost the largest that can be permitted for repowering. It is the view of the Parish Council that the impacts of this development would be substantial and cannot be regarded as acceptable.

The development involves a significant difference in turbine size to achieve the increased power output. However, it seems that pre-existing ancillary infrastructure is being used for exporting power. It is not evident from the information submitted that the Distribution Network Supplier (DNO) – Electricity North West – has been involved to approve the grid connection; therefore there is no confirmation of the suitability of controls for power export from this larger and more powerful turbine into the grid. The involvement of the DNO would seem to be a planning requirement.

The purpose of this development is stated as being the installation of a larger and more efficient turbine to sustain peak 225kW power output over longer periods compared with the current turbine. This increase in power output is defined in the planning statement variously as an additional 139 or 146 homes-worth of power. The statement goes on to state that "the additional energy produced is likely to be utilised within the region providing immediate community benefit." It is difficult to see how this can be regarded as a benefit to the local community impacted by the development.

There is no indication that alternative methods of enhancing the power output whilst maintaining the current turbine size have been investigated. The visual impact from the larger turbine would be significant and detrimental to the local area disproportionate to the increase in overall power potential. The application should not be considered until alternative means of power output enhancement have been considered.

The MOD has a condition that larger turbines require aviation warning lights. As a minimum the MOD requires that these be infra-red lights which MOD night vision technology can observe. This technology is not available to other air users and the warning lights in these cases

are most likely to be in the visible spectrum. Visible warning lights, which would in effect become flashing lights due to the rotating blades, would have a significant detrimental impact on the visual landscape and the amenity and wellbeing of local residents. This would not be an issue if alternative means of power efficiency enhancement could be achieved with the existing turbine height, which is below aviation concern levels. The public consultation has been limited and has excluded the major population areas affected.

Considering the broader visual impact, this proposal requires an increase in the overall blade tip height of approx. 70% with commensurate increases in hub height (66%) and diameter (80%). These are substantial increases that will have a marked visual impact on the local landscape. The applicant has submitted various visualisations of how the larger turbine will be viewed on the landscape. These do not show the visual impacts from the B5345 Whitehaven to St Bees road – the main route in to St Bees and the main tourist route to the village. Below is a visualisation of the likely impact from this route, Figure 1 (with scaled markup), showing the current view of the turbine and how this will alter if the larger turbine is installed.

Figure 1: Existing and Proposed Turbine Comparison View from B5345

Figures 2-4, appended, show the views of the existing installation from the Seacote Caravan Park, the golf course, and the coastal cliff top footpath. The installation of a much larger turbine (i.e. 170% larger at the blade tip) would make it even more prominent in the landscape, resulting in significant visual impact from the Heritage Coast which cannot be justified.

Sound generation from the operating turbine is significant and is stated in the application as in the "very loud" range close to the turbine, but this drops off with distance from the turbine. It is reported that at the key closest receptors the sound is within considered limits. However, the Parish Council believes infrasound is inappropriately dismissed in section 3.10 of the Noise Impact Statement. It is stated that "there is no robust evidence that low frequency noise

(including noise and ground-borne vibration) from wind farms generally has adverse effects on wind farm neighbours." There are, however, many published articles to the contrary.

Although infrasound is outside the range of normal hearing for moderate sound pressure levels, it can produce secondary structural vibrations when it interacts with buildings. Audible sound produced, persisting over extended periods, may be perceptible to the occupants. Whilst most people may be unaffected by wind turbine infrasound, some people have a phobic reaction to it. The low frequency vibrations produced can extend over larger distances than higher frequency sounds. In some people the central nervous system becomes sensitised and they suffer the symptoms of chronic noise stress such as anxiety, depression, cognitive dysfunction, and disrupted sleep. The risks and impacts from this type of sound wave can be significant to those affected and need to be properly considered.

In summary, the Parish Council believes that this application should be refused.

J Donaldson, Clerk to St Bees Parish Council

25 March 2025

Figure 2

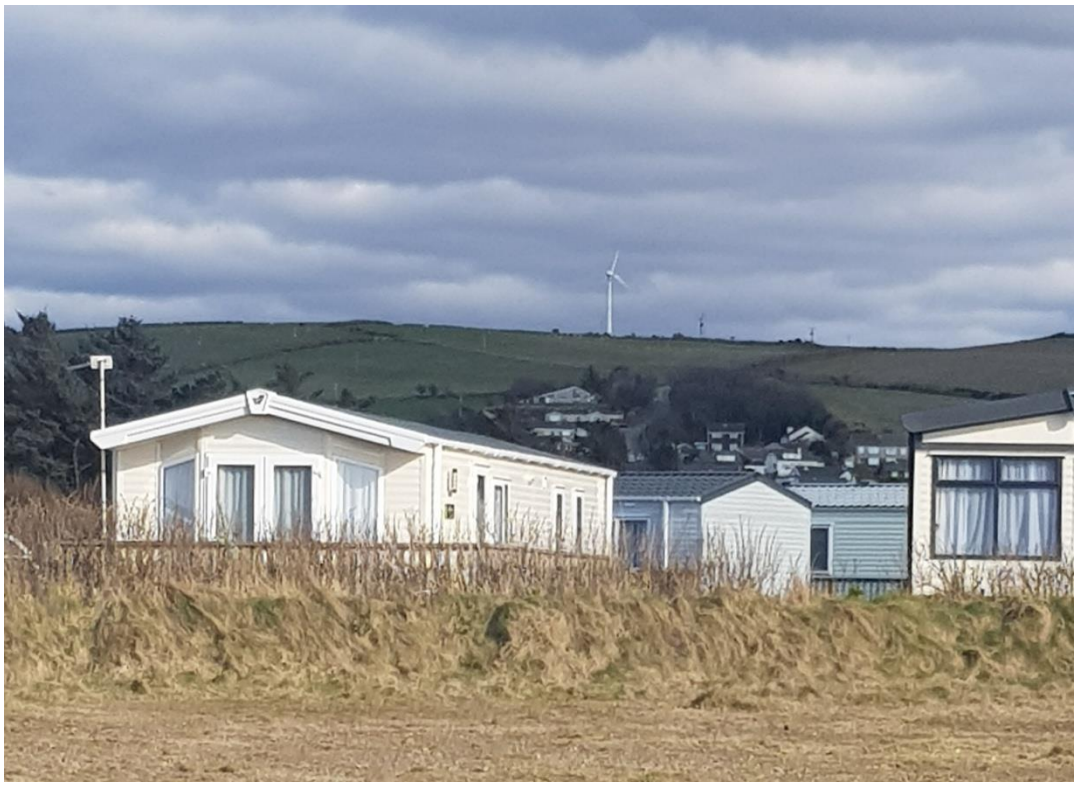

Figure 3

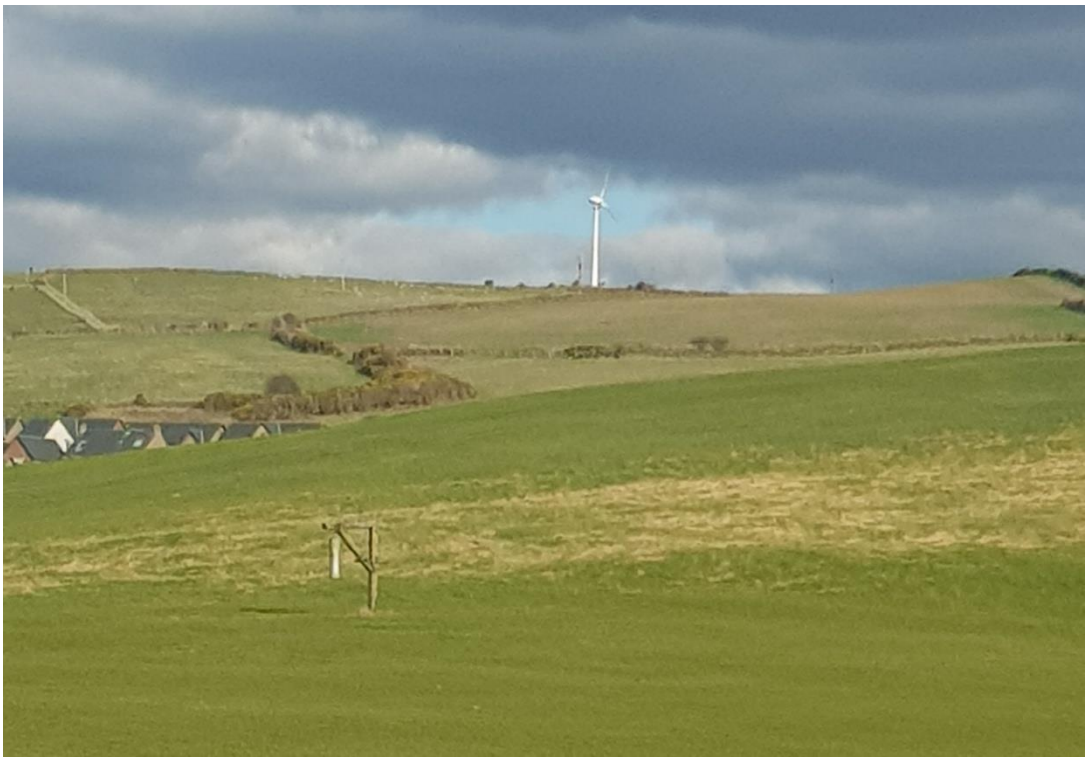

Figure 4