

## Oliver Hoban

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**From:** [REDACTED]  
**Sent:** 27 November 2023 12:58  
**To:** Oliver Hoban  
**Subject:** Fw: Planning Application 4/23/2198/0F1 - wind turbines Frizington

**CAUTION: External email, think before you click!**  
us email to our [IT Helpdesk](#)

Dear Mr Hoban

### Planning Application 4/23/2198/0F1 - wind turbines Frizington

Arlecdon and Frizington Parish Council would welcome your observations on the concerns raised by [REDACTED] regarding the above planning application. The parish council did not receive any other concerns from residents.

kind regards  
Gwynneth Everett  
Clerk to Arlecdon and Frizington Parish Council

----- Forwarded message -----

**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent:** Friday, 24 November 2023 at 11:41:06 GMT  
**Subject:** Planning Application 4/23/2198/0F1 - wind turbines Frizington

Good morning,

I am writing as a concerned Frizington resident regarding the Planning Application 4/23/2198/0F1 -

Application Details

Valid Date: 11 Jul 2023

Proposal: ERECTION OF 2 NO. SD6 MICRO WIND TURBINES (17.8M MAXIMUM TIP HEIGHT)

Site: THE PARKS, PARK STREET, FRIZINGTON

Applicant: J. Jackson & Son

Agent: c/o H&H Land and Estates

Case Officer: Sarah Papaleo

Parish: Arlecdon & Frizington

Link here: <https://www.copeland.gov.uk/planning/application/42321980f1>

Is the Parish Council aware of these plans? Have any concerns been raised with yourselves? A number of us residents have only recently found out, and are understandably concerned about the plans.

There are a range of errors and missing information within the application which we have come together to examine and summarise in the letter at the end of this email. Are you able to have a look and possibly raise and ensure these are examined by the Council please?

Kind regards,



Frizington

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LETTER OF CONCERN

Application 4/23/2198/0F1

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Applicant: J. Jackson & Son

Agent: c/o H&H Land and Estates

Case Officer: Sarah Papaleo

Parish: Arlecdon & Frizington

Dear Ms. Papaleo,

I write to express significant concern regarding the above planning application.

Firstly, I am deeply disappointed that numerous residential properties, who will be affected by this installation, were not notified of this planning application. All affected residents within the immediate 'visual impact assessment zones' should have been contacted by the council to make them aware.

I would like to draw your attention to a series of significant geographical discrepancies within the documentation and plans submitted.

Both the 'Site Location Plan' and 'Block Plan' demarcate the turbines in a different proposed site position to the position of the turbines used to complete the 'Landscape Visual Assessment (LVA)'. In the LVA, the turbines are shown to be tucked up much closer and further north to the 'Park Street' access road, whereas in the Site Location and Block Plan they are considerably further south into the field. This is a significantly different location for the turbines

than that originally proposed, and undermines both the accuracy, validity and overall trustworthiness of the conclusions drawn from the LVA documentation.

The LVA again either misleads or omits key information which is highly relevant to the planning application. There are only 8 viewpoints considered for the turbines. The only viewpoint taken from Park Street is immediately in front of the proposed location, albeit with the turbines in a different location and closer to Park Street than in the proposed Site Location and Block Plans. Hence, this is a gross inaccuracy within the LVA, and ultimately misleading to those considering the plans and local residents. Similarly, there are no viewpoints from further down Park Street or Frizington Road where there are a considerable number of residential properties which overlook the untouched and characteristic natural landscape of the Pillar and Ennerdale Fells, a Special Site of Scientific Interest (SSSI) and within the boundaries of the Lake District National Park. I would like to know why this key viewpoint area has been omitted from the LVA, as it significantly undermines the documents comprehensiveness as a tool of planning development suitability assessment. There are no viewpoints in the LVA along Frizington Road (A5086) with numerous viewpoints which look directly over to the farm and from where the two turbines given their height at ~58 ft will be clearly visible. How can this be considered a comprehensive assessment when an entire residential road with viewpoints of the farm is omitted from survey? The LVA points have been very carefully selected to detract from and downplay the significant visual impact that these turbines ultimately and undeniably will have on residents, users and those who enjoy the area, and local tourism which relies on the Ennerdale region as being considerably less developed and 'closer to wilderness' than other areas within the borough, Lake District, and wider county. Given the above concerns, the landscape impact of this proposal warrants a more comprehensive and thorough assessment, perhaps by a neutral 3<sup>rd</sup> party.

A significant essential element of the planning application case is absent or has been omitted. There are no 3D visual drawings or artist impressions or plans which allow for a scaled site and landscape view representation of what the wind turbines would look like against this landscape. There are no submitted drawings or architectural plans detailing the elevations of both the existing site and proposed plans. The LVA does not provide this, only arrows denoting the location of the proposed turbines site. It is standard procedure for any planning application to provide detailed technical drawings of the structures proposed in the context of the site. This would provide a true visual scale and sense of impact that these turbines would have on the landscape, but is completely omitted and thus disregarded in this application.

I firmly believe that this planning application directly contravenes the acceptable criteria of Copeland's Policy DM2, as there will be unacceptable adverse visual effects and unacceptable adverse effects on landscape character and distinctiveness arising from these turbines should the planning application be accepted. The visual impact will be accentuated by the location of the turbines on a topographic high point. I would strongly encourage an LVA re-assessment incorporating more viewpoints and technical site elevations, drawings and annotated to-scale photographs.

This concern regarding an inappropriate landscape impact is strongly supported by previous refused planning applications at Parks Farm. Application Ref: 4/06/2175/0 dated 10 March 2006 was refused on 3 May 2006, citing that "the proposed dormer bungalow is considered to represent an unsuitable design in solution, unsympathetic to its visually prominent rural setting, and as such, is at variance with Policies DEV 7 and HSG 8 of the Copeland Local Plan 2001-2016 Deposit Version". (Available here: [https://www.copeland.gov.uk/sites/default/files/attachments/CIS/pdf/pp\\_070207\\_item\\_6.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/CIS/pdf/pp_070207_item_6.pdf)). This went to appeal, and the building was permitted subject to a range of conditions to minimize landscape impact. This dormer bungalow is the building closest to the proposed turbines location within the same field, as outlined on the site plan. This document describes this residential building as "1.5 storey", which is stated as 'entirely appropriate and would also relate well in scale and form to the adjacent calving shed which is also of limited height. A two storey structure would

appear more prominent and intrusive in this location". I am deeply concerned, that if a 2 storey dwelling was considered 'intrusive', then at 17.8 m or ~58 ft these turbines would be grossly intrusive and inappropriate given the character and setting of this site in relation to the surrounding landscape. Following these same principles at this site, it is without doubt that these structures will be unsympathetic to their visually prominent rural setting, and are at variance with Copeland's Local Plan (2013-2028) Strategic Objectives 16 to Conserve and enhance all landscapes within the borough, and Strategic Objectives 17 to Protect and enhance the many places and buildings of historical, cultural and archaeological importance and their settings. This comparatively structurally minor residential dwelling had to be modified to minimize landscape impact due to its "visually prominent rural setting", so why would it be considered acceptable to erect two structures on the adjacent land that will inevitably be at least double the height of the existing adjacent dwelling?

I appreciate that Parks Farm is attempting to reduce their energy costs and achieve more climate friendly milk production, however there are significantly less-obtrusive means of green energy generation such as solar panels. I appreciate that the farm already has a limited number of solar panels installed, however I would query why the option for solar panels as a means of energy generation at the site has not been explored as an alternative to the proposed two wind turbines. From examination of the site plans and satellite imagery freely provided on Google Maps, Parks Farm has an array of buildings, including the newer farmhouse built in 2014, with rooves that are orientated in a southerly direction, and hence are ideal for the installation of solar panels. Cumbria Action for Sustainability (CAFs) note that "Despite all appearances, there is plenty of sunshine in Cumbria to generate worthwhile amounts of power". They offer a scheme working with small businesses, such as the farm, to help businesses harness the potential of solar power. More here: (<https://cafs.org.uk/solar-made-easy/#:~:text=Despite%20all%20appearances%2C%20there%20is,solar%20PV%20infrastructure%20as%20possible>). Given the stated annual average energy consumption at Parks Farm of 8,000 kW / year, I would query why two turbines, each providing on average 11,000 kW / year thus totaling 22,000 kW / year of annual electricity generation, are warranted as they significantly exceed the current energy demands of the farm. Their energy demands could be sufficiently met with roof-mounted solar panels, with minimal impact upon the character of the local landscape and considerably lower impact than the proposed turbines.

The planning application states there will be wider economic, social and environmental benefits from the installation of these turbines. Could the details of this be expanded upon for the local community to investigate please? No new jobs will be created as noted from the application report, not even in the installation phase, and the local community will not receive any subsidized surplus electricity from the turbines. Furthermore, the milk is not available to buy locally hence there is no prospect of locals purchasing 'net zero' milk. There are environmental benefits for the farm itself in terms of generating electricity from these turbines, however any surplus will be simply sold back to the National Grid. Again, this contravenes DM2 as this development proposal does not deliver direct significant benefits to the local community as the planning proposal elusively alludes to.

The proposed installation site is a mere 800 m away from the Lake District National Park, denoted a World Heritage Site in 2017. The Pillar and Ennerdale fells in the vicinity of the farm are one of the few remaining areas of the Lake District which are lacking in 'industrial' or considerable built man-made features. This is a key tourist attraction and draw to the area; the erection of these turbines directly disturbs this and causes unacceptable adverse change to the natural landscape and its rural untouched character. The proposal is overbearing and considerably out of scale when compared with the surrounding farm buildings and surrounding open space. The proposal

reiterates numerous times that the maximum height of the turbines is 'only' 17.8 m, however at just over 58 ft, this is double of the average height of a house in the U.K. and will be at least double the height of the adjacent second farmhouse (1.5 storey) at Parks Farm. The height of the turbines will more than likely exceed the height of a range of nearby trees, hence standing out and significantly altering the visual tree line, skyline, and overall character of the area and surrounding vicinity. The comparisons provided in the supporting documentation listing a range of tree species and the heights to which they can grow should not be used as a waiver for this installation – only the heights of the trees currently growing in the vicinity are relevant to this application so that the scale of the two turbine installation can be considered appropriately with respect to the surrounding landscape and in a site-specific context. Again, this is impossible to inspect without 3D site drawings and artist impressions. It was disappointing to see surrounding tree canopy height at the site not comprehensively examined by the LVA via survey methods. This proposal is unsympathetic to its visually prominent rural setting and intrusive upon the landscape.

The Planning, Design and Access Statement denotes no ecological impacts. However, there are a number of breeding Barn Owl pairs in the immediate area which nest in local disused former mine-works buildings and use the immediate areas as hunting grounds owing to the high mice population from hens kept at nearby Mowbray Farm. Furthermore, the area is home to a number of buzzard and kestrel pairs which also hunt in the area. Protected and rare Hen Harriers are known to over-winter in the West Cumbrian foothills and lowlands around farmland in which this area sits. All birds, their nests and eggs are protected by law under Part 1 of the Wildlife and Countryside Act 1981 (as amended). Hen Harriers are listed on Schedule 1 which gives them special protection. I am concerned these turbines would disturb their roosting and hunting sites and breeding grounds, particularly given their sensitivity to noise at frequencies inaudible to humans that are likely to be generated by the turbines. There are reported sightings of bats nearby, and I would like to be assured that there are no bat roosts at the farm which would inevitably be disturbed by this installation and turbine operations. A number of red squirrels are known to reside in nearby woodlands and shrub areas and into the Ennerdale area. These red squirrels, along with their resting places, are fully protected under Schedules 5 and 6 of the Wildlife and Countryside Act 1981. Studies have shown that wind turbines disrupt the behaviour of squirrels (Lawrence Rabin, 2006, Journal of Biological conservation; Eva Scholl, 2021, Journal of Biological conservation). There is no allusion to in the proposal about how the development may impact these protected species, nor how any impacts will be appropriately mitigated in line with PPS 9 or Circular 06/05.

My final query relates to the letter of support sent from Parks Farm to yourself dated November 2023. The photo in the letter is of a wind turbine, equivalent to those proposed, located on Kingstown Park Carlisle adjacent to the DVSA Carlisle LGV Driving Test Centre, CA3 0EH. A street view on Google Maps allows a view of the turbine. The letter states that the photo viewpoint is from 40 m away, however when looking on the map and measuring the linear distance using the scale bar on the map from the point at which the photo was taken, this is actually only 20 m away. I am concerned that this is a distortion of the true size and scale of the turbine and advise you to examine this for yourself.

In summary, I urge you to consider the above points of grave concern that I have raised. These include:

- The discrepancies between Site Planning documents regarding turbine location which have been inaccurately used in the LVA
- The aforementioned limitations of the LVA

- A lack of technical drawings and 3D models of what the turbines would look like at the location and from the surrounding land
- The conflicting formerly refused planning application at Parks Farm (Application Ref: 4/06/2175/0 dated 10 March 2006) on the grounds of citing that “unsuitable design in solution, unsympathetic to its visually prominent rural setting, and as such, is at variance with Policies DEV 7 and HSG 8 of the Copeland Local Plan 2001-2016 Deposit Version”.
- The absence of direct community socio-economic or environmental benefits for the wider community
- The consideration of solar panels as an alternative
- The disruption and obtrusiveness given the scale of installation and character of the surrounding landscape
- The unexplored ecological impacts that these turbines may have on protected local wildlife species.

There are a range of net-zero energy generation methods which could easily meet the needs of powering the farm which would have significantly fewer impacts and obtrusions on the local surrounding landscape and ecology whilst conserving the natural character of this beautiful landscape. The benefits of this proposal for the wider community do not outweigh the permanent harm it will bring to a landscape and community that we should be seeking to conserve in line with the National Planning Policy Framework section 15 regarding the conservation and enhancement of the natural environment.

I would kindly ask the planning committee to consider the following with regards to this application: do the business economic desires of one or two to benefit from cheap electricity warrant the blemishing and unacceptable adverse effects of doing so upon a unique, characteristic and historic landscape which should be persevered for all to benefit from and enjoy?

Kind regards,