

Hastings Local Plan, Development Management Plan Examination

Matter 5: The Proposed Allocations by Focus Area

Focus Area 3 – Filsham Valley & Bulverhythe
Focus Area 4 – St Helens

Prepared October 2014

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA

Issue 5: Whether each and every proposed allocation has a realistic prospect of contributing as envisaged to the Borough's assessed housing and employment needs, consistent with environmental and other considerations, including proposed transport schemes eg the proposed link road between Queensway and the A21 road as reported in the Hastings and St Leonards Observer October 3 2014.

5.3 Focus Area 3 – Filsham Valley and Bulverhythe; all proposed allocations, including The Grove School, the Former West St Leonards Primary School and land south of Upper Wilting Farm

Introduction

- 5.3.1. The general introduction to Matter 5 and site allocations as a whole is provided in Matter Statement HBC/8(a).
- 5.3.2. Focus Area 3 – Filsham Valley & Bulverhythe extends from West Marina in the east and Queensway in the north, to the western boundaries of the Borough.
- 5.3.3. Policy FA1 in the Hastings Planning Strategy (Library reference HBC/DMP/22) allows for 630 - 700 new homes over the lifetime of the Plan for this Focus Area. Justification of housing distribution for different focus areas is set down in paragraph 12-13 in the Explanation of Housing Evidence, 2012 (Library reference HBC/DMP/45). This allowance is based on a positively prepared plan as concluded by the Inspector in his report (Library reference HBC/DMP/25) and consistent with paragraph 182 of the National Planning Policy Framework (NPPF) (Library reference HBC/DMP/67). The allocated sites in the submitted Development Management Plan (DMP) would deliver some 781 homes. Additionally, new sites are expected to come forward through windfall development, of which the redevelopment and reuse of existing buildings will be an important part.
- 5.3.4. Allocations in Focus Area 3 are effective because they are deliverable over the plan period. The whole Plan together with its site allocations was also subject to viability testing by NCS consultants to ensure deliverability/viability of all sites selected (Library reference HBC/DMP/164). The site allocations themselves reflect the latest position with the developers and landowners.

Site Allocation & Policy FB1 The Grove School

- 5.3.5. This former East Sussex County Council school site is currently being demolished and the County Council is actively taking steps to secure planning permission and dispose of the site in the near future. A planning forum is due to be held on 20th November 2014 and a resulting planning application is expected sometime shortly afterwards. The DMP suggests an indicative potential capacity of 240 units on this 9.4Ha site. Given the advances made in bringing this site forward for redevelopment and subject to meeting the requirements of Policy FB1, the Council believes there is reasonable prospect that build-out and delivery of new dwellings on this site could begin towards the end of the current 5-year supply period.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Site Allocation & Policy FB2 Former West St Leonards Primary School**

5.3.6. The DMP suggests an indicative capacity of 100 units on this 3.9Ha. A planning forum has recently been held in respect of this site (2nd October 2014) and a planning application is expected to follow shortly. The site was tested as part of the Council's Whole Plan viability study (Library reference HBC/DMP/164). Whilst the headline results show this site to be unviable the Report at paragraph 7.10 states that *"negative viability is not necessarily a fair reflection of actual market circumstances...All of the individual site assessments make allowances for abnormal costs and site specific mitigation factors. These factors are not taken into account in the land value allowance for the site. In order to reflect a reasonable return to the landowner..., the value must assume that the site can gain planning permission and be in a developable state. Therefore the abnormal costs of bringing a site into a developable state would normally be deducted from the site value. This would certainly be the assumption adopted by any" prudent, experienced "house builder" or prospective "in purchasing land."* As such the report goes on to say that site is considered deliverable.

Site Allocation & Policy FB3 Seaside Road, West St Leonards

5.3.7. The Council is committed to making the best and most sustainable use of brownfield sites in accordance with the key objectives of the Planning Strategy and the Framework. The site is shown in the Development Management Plan (DMP) for mixed use with a potential capacity to deliver 120 units. The Council has already commented on the importance of bringing forward this Council owned brownfield site in it's Matter 3 statement, and to the fact that there has been some recent developer interest in this site which was previously allocated for a mixed use development in the 2004 Local Plan. At present the Council is currently investigating options to bring forward development proposals for this site that are in line with Policy FB3.

Site Allocation & Policy FB4 Former Westerleigh School

5.3.8. This is the site of a former private school, the playing field to the north was also part of the original school complex but is proposed as a separate residential allocation (FB8). FB4 has a potential capacity of 68 units. The site owners have indicated their willingness to release the site for development and there is a history of developer interest with pre-application discussions having taken place with the Council on a number of occasions, most recently in July 2014. As yet no application has been submitted.

Site Allocation & Policy FB5 Former Hastings College St Saviours Road

5.3.9. This site is shown in the DMP with a potential capacity shown as 44 units. It is now under construction, development having first commenced in March 2014 (Planning application reference HS/FA/09/00485). This is reflected in the latest Local Plan Monitoring Report (Library reference HBC/DMP/27). In view of its imminent completion it is considered that this site could be removed from the DMP. The Council will propose a minor modification to cover this.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Site Allocation & Policy FB6 Cinque Ports Way (former Stamco Timber Yard & TA Centre)**

5.3.10. The site is shown in the DMP for mixed use with a potential capacity to deliver 25 units. It is currently in two ownerships and the Council has and continues to discuss with both parties the potential timing and release of the site. Both parties have reaffirmed their willingness and intention to make the site available for redevelopment.

Site Allocation & Policy FB7 123-125 West Hill Road (Former Malmesbury House)

5.3.11. This site has an extant planning permission (Planning application reference HS/PR/05/00980) for 117 units though the longevity of the permission and the start made on the site do suggest that it is unlikely that this particular scheme will be built out in the early part of the plan period and it may be that the Council will receive a revised scheme. The SHLAA process had found the site to be suitable for development and the owner continues to state that they intend to bring the site forward for development. The potential capacity shown in the DMP is 117 units which reflects the character of the site and the earlier permission.

Site Allocation & Policy FB8 Former Westerleigh School Playing Fields

5.3.12. In September 2012 the Council resolved to grant full planning for 7 units on this site subject to the completion of a legal (s106) agreement.

Site Allocation & Policy FB9 190 Bexhill Road

5.3.13. This site is currently occupied by a number of commercial uses. Planning permission for the development of 32 residential units has been renewed twice and the site currently has an extant permission (Planning application reference HS/FA/12/00197) granted in March 2013. The owner's intentions will continue to be monitored by the Council for housing land supply and housing delivery purposes.

Site Allocation & Policy FB10 Land south of Crowhurst Road

5.3.14. Site FB10 has outline planning permission for the provision of 2 permanent pitches for gypsies and travellers (Planning application reference HS/OA/12/00968). The allocation of this site is meeting identified traveller accommodation needs identified within the Planning Strategy for the Borough to at least 2016. The Council's strategic approach to carry out needs assessments of Gypsies and Travellers and in meeting any identified future needs is set out in more detail in the Council Statement under Matter 2.

Site Allocation & Policy FB12 Land south of Upper Wilting Farm

5.3.15. The Council commissioned a comprehensive feasibility study in 2013 (Library reference HBC/DMP/159) in order to explore the potential for developing this site for wind energy generation. The 2013 Study explored the potential for this type of development in relation to ecology, landscape, heritage and economic viability. Following concerns raised by Natural England (NE) regarding ecological and other impacts and also aware of the changes in Government subsidy regarding

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renewable production, the Council has continued to examine the feasibility and viability of this proposed allocation. Three further addendums to the initial 2013 Study have since been commissioned (Library reference HBC/DMP/166, HBC/DMP/167 and Appendix 1 of this statement). Addendums 1 and 2 directly address concerns raised by NE in relation to the potential impact of a wind turbine development on the neighbouring Combe Haven Site of Special Scientific Interest (SSSI). The Ecological Appraisal Addendum – Birds (Library reference HBC/DMP/166) provides a more in depth analysis of the pre-existing data relating to the Combe Haven SSSI and its designated ornithological interests, and the implications of a wind turbine development in its near vicinity. Further the Bat Appraisal Addendum (Library reference HBC/DMP/167) examines the potential impact of a wind turbine development on bat populations in the locality. Relatively few wind turbine-related bat deaths have been reported in the UK, although the report notes that this could be as a result of a lack of post-construction monitoring. This Addendum provides a preliminary assessment of bat activity and interest on the allocated Policy FB12 site, based on field sampling in July 2014. Information is also provided as to how these factors could be managed in the context of a wind turbine development coming forward.

- 5.3.16. Both Addenda concentrated their researches upon the impact of bird and bat potential collision risk with a wind turbine development. Importantly the Bird Addendum concludes that:

“The level of uncertainty regarding the true bird species suite at Upper Wilting Farm with potential turbine collision risk is typical of any proposed wind turbine development site at the site feasibility stage. This level of uncertainty is independent of the presence of the SSSI, and does not at this time present sufficient evidence to conclude either way regarding whether there would, or would not, be effects on either the SSSI or locally occurring species of conservation importance at a level of significance warranting removal of this policy allocation from the Development Management Plan.”

- 5.3.17. The Bat Addendum concludes that:

“Detailed bat surveys would be required to investigate further the distribution and species composition of bat activity on and near the FB12 site, including at least bi-monthly (and preferably monthly) recording between May and September, and at-height measurements which can be correlated with wind speed data. These data would subsequently inform development design and options for operational-phase mitigation which would enable potential bat constraints at FB12 to be dealt with effectively.”

- 5.3.18. Whilst Natural England has confirmed that they withdraw their objection (see appendix 2 to this statement) to the proposed allocation subject to relevant recommendations contained within the bird and bat addenda being incorporated into the Policy FB12, the Council has also commissioned a third piece of work to the 2013 Feasibility Study (Economic Viability Appraisal Addendum). The third Addendum attached at Appendix 1 to this statement was commissioned specifically to look at deliverability and viability in the light of the recent and rapidly changed landscape to Government support surrounding subsidies and feed in tariffs regarding wind generation. The study looks at the economic viability of a wind

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turbine development at this location in the light of the changes to the Government's Feed In Tariff (FiT) and the likely requirement to shut down the development for certain periods of the day at certain times of the year in order to minimise the potential impact on foraging bats. The outcome of this work is that given the current economic situation and the likelihood of further reductions in the Government support mechanisms for wind power, the site now appears unlikely to prove attractive, at least in the short term to medium, to commercial wind developers. The report concludes that:

"In view of the current economic situation and the likelihood of further reductions in the government support mechanisms for windpower, the site is considered not to be attractive, in the short term, to commercial wind developers. However, it is possible that, in the medium to longer term, sufficient support might be available to community groups to enable them to develop the site for a community turbine".

- 5.3.19. Whilst the Council has endeavoured through other Policies in both the Planning Strategy and the Development Management Plan (DMP) to encourage renewables and to combat the effects of climate change it accepts that the Wilting Farm proposal may well not now be deliverable in the light of studies carried out. We consider that it may therefore be appropriate for the Inspector to consider recommending removal of this from the Plan.

Site Allocation & Policy FB13 Hastings Garden Centre, Bexhill Road

- 5.3.20. The owners of this site have confirmed their intention to release the site for development. The potential capacity shown in the DMP is for 12 units.

Site Allocation & Policy FB14 Land north of 31 Fern Road and FB15 Land north of 14 Fern Road

- 5.3.21. Both of these sites are in the ownership of a local housing developer – Park Lane who have worked closely and successfully with the Council on a number of developments. Both have extant planning permissions (Planning application numbers HS/FA/12/00197 & HS/FA/14/00172 regarding number 31 and applications HS/FA/08/00797 allowed on appeal on 01.02.11 and HS/FA/14/00713 regarding number 14).

Conclusion on site allocations in Focus Area 3

- 5.3.22. Overall it is considered that the allocations within Focus area 3 are consistent with the Borough's assessed housing and employment needs, consistent with environmental and other considerations. The allocations themselves and the delivery of growth that they allow for provide a positive contribution towards the objectives set within the Council's adopted Planning Strategy.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**5.4 Focus Area 4 – St Helens; all proposed allocations, including land adjacent to Sandrock Park and at Osborne House, The Ridge****Introduction**

- 5.4.1. The general introduction to Matter 5 and site allocations as a whole is provided in Matter Statement HBC/8(a).
- 5.4.2. Focus Area 4 – St Helens is primarily a residential area. Policy FA2 in the Hastings Planning Strategy (Library reference HBC/DMP/22) allows for 210 - 250 new homes over the lifetime of the Plan for this Focus Area. Justification of housing distribution for different focus areas is set down in paragraph 12-13 in the Explanation of Housing Evidence, 2012 (Library reference HBC/DMP/45). This allowance is based on a positively prepared plan as concluded by the Inspector in his report (Library reference HBC/DMP/25) and consistent with paragraph 182 of the National Planning Policy Framework (NPPF) (Library reference HBC/DMP/67). The allocated sites in the submitted Development Management Plan (DMP) would deliver some 194 homes. Additionally, new sites are expected to come forward through windfall development, of which the redevelopment and reuse of existing buildings will be an important part.
- 5.4.3. Allocations in Focus Area 4 are effective because they are deliverable over the plan period. The whole Plan together with its site allocations was also subject to viability testing by NCS consultants to ensure deliverability/viability of all sites selected (Library reference HBC/DMP/164). The site allocations themselves reflect the latest position with the developers and landowners.

Site Allocation & Policy SH1 Land adjacent to Sandrock Park

- 5.4.4. This is a large greenfield site partly owned by the Council and part in private ownership as well. The potential capacity shown within the DMP is 80 units. The private landowner has indicated their willingness to release the site for development. There are a number of heritage assets in close proximity to the site including the listed church on the eastern boundary of the site which is within the Ore Place Conservation Area. Careful regard will need to be given to the setting of these assets as required under Policy EN1 of the Planning Strategy and the development management policies proposed in the DMP. This will affect both the design of any new development and also the site's capacity in terms of housing numbers. It is however considered that the potential shown for the allocation overall is reasonable.

Site Allocation & Policy SH2 Land at Osborne House, The Ridge

- 5.4.5. This site is now under construction, development having first commenced in March 2014 (Planning application number HS/FA/13/00322, HS/FA/14/00521) and will ultimately provide some 55 residential units. This is reflected in the latest Local Plan Monitoring Report (Library reference HBC/DMP/27). In view of its imminent completion it is considered that this site could be removed from the DMP. The Council will propose a minor modification to cover this.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Site Allocation & Policy SH3 Hurst Court, The Ridge**

5.4.6. Some new housing development delivered under planning permission (Planning application number HS/FA/13/00162) for the provision of 6 residential units has already taken place on the rear part of the original Hurst Court site which was allocated for development in the 2004 Local Plan for 41 units. An additional dwelling was also approved in October 2014 (planning application number HS/FA/14/00394). At the time of preparing this statement an application for an alternative non-residential development of the remaining part of the site (that proposed for allocation) has been registered with the Council (Planning application number HS/FA/14/00477). An update of the progress on that scheme and its likely timeframe for determination will be given at the Hearing session. The site does have a relatively recent history of residential developer interest including an original scheme for the whole site which was withdrawn and a second for part of the site which was refused and subsequently dismissed at appeal.

Site Allocation & Policy SH4 Mont Denys, Pinehill & Ridgeway

5.4.7. This is an East Sussex County Council owned site. It currently operates as both a care home (Mont Denys) and a day care centre (Pine Hill). As part of its review of adult social services provision, the County Council has indicated that they are likely to vacate the site during the plan period. The site is given a potential capacity within the DMP of 31 units which is considered reasonable to reflect the character and density of the surrounding area.

Site Allocation & Policy SH7 191 The Ridge

5.4.8. This site is now under construction, development having commenced in February 2014 (Planning application number HS/DS/13/00621) and will provide 9 units. This is reflected in the latest Local Plan Monitoring Report (Library reference HBC/DMP/27). In view of its imminent completion it is considered that this site could be removed from the DMP. The Council will propose a minor modification to cover this.

Conclusion on site allocations in Focus Area 4

5.4.9. Overall it is considered that the allocations within Focus Area 4 are consistent with the Borough's assessed housing and employment needs, consistent with environmental and other considerations. The allocations themselves and the delivery of growth that they allow for provide a positive contribution towards the objectives set within the Council's adopted Planning Strategy.



Policy FB12 Economic Viability Appraisal Addendum
produced for Chris Blandford Associates
on behalf of Hastings Borough Council





NORTH ENERGY

Policy FB12 Economic Viability Appraisal Addendum
produced for Chris Blandford Associates
on behalf of Hastings Borough Council

North Energy Associates

October 2014

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Please note that all the financial estimates and costs in the report are prepared in good faith using local and client-provided information, correct at time of writing, but are indicative only and require further detailed work before action is taken.

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QUALITY ASSURANCE

 NORTH ENERGY			
Document Identifier: <i>T:\Current jobs\Chris Blandford Hastings Upper Wilting Farm update 734\Draft reports and statements\Policy FB12 Economic Viability Appraisal Addendum.docx</i>			
	Name	Signature	Date
Checked by	Jane Hunter		
Approved by	Charlotte Hatto		

Introduction

North Energy Associates, consultants in renewable energy and sustainability, was commissioned by Chris Blandford Associates on behalf of Hastings Borough Council, to examine the economic viability of developing a site allocated for wind energy development in the Hastings Development Management Plan (Revised Proposed Submission Version 2014) site reference Policy FB12 - Land south of Upper Wilting Farm.

Hastings Borough Council was concerned that an addendum to the 2013 feasibility study and its July update was necessary, (in order to) consider both the potential effects on local bat populations and the change in Government subsidies to renewable energy schemes, which might have some bearing on the feasibility and delivery of the site as proposed to be allocated in the Development Management Plan.

This report is an Addendum to the original report and July 2013 update, aiming to provide a further assessment of the economic viability of the Hastings site, showing the effect of reductions in the Feed-in Tariff (FiT) rate in 2014 and of the proposal to switch off turbines at night to protect bats. All the capital and running cost figures have been increased by 1.5% (CPI) and potential income adjusted to reflect lower FiT rates and lost income during night-time switch off.

Three areas were initially considered for siting turbines; Areas A and B within Rother District and Area C within Hastings District. The original report and July 2013 update did not fully consider the Hastings site due to the telecoms links that run through it, rendering the site unusable without re-routing the links and the possible costs associated with this. However if these links are re-routed there is an area on the Hastings site which would be available to site a turbine. A figure was obtained from BT for re-routing the links which, in the scheme of the total costs, suggested that it would not be an excessive cost. This figure, with a CPI increase in line with other figures, has been included in the capital costs. The average wind speed for the area covers all the turbine sites considered for the original study, and therefore the generation data, produced for the original report, has been used for three candidate turbines to provide the estimated output in the table below. There is some height variation across the site and therefore wind monitoring for the Hastings site would provide more accurate generation data. Notwithstanding that a full feasibility study has not been carried out specifically for the Hastings site and therefore some site specific costs have not been included such as site access, the table below provides an indication of the economics for the three size options for a single turbine on the Hastings site. Also below are tables to indicate the effect of turning off the turbines to mitigate for bats.

- One 900kW turbine, 50m tower height, 77m to blade tip
- One 2.3MW turbine, 70m rotor diameter, 74m tower height, 109m to blade tip
- One 3MW turbine, 82m rotor diameter, 85m tower height, 126m to blade tip

A 900kW turbine is considered to be a 'medium scale' commercial turbine. A 2.3MW and 3MW turbine would be considered to be 4-5 'large scale' commercial turbines.

The identified site (FB12) is suitable for wind turbines, although the wind resource cannot be considered particularly high. The site will also suffer from turbulence due to the surrounding hills and trees, which will affect the output of any turbines. Wind monitoring is advisable, firstly to confirm the estimated energy outputs and secondly to help the turbine manufacturer give assurances that the wind turbulence is within turbine design limits.

The available location for a turbine on the FB12 site is constrained by surrounding trees leaving only a small area in the middle of the field sufficiently far from the trees to satisfy generous wildlife off-sets of 75m. In addition, the site is crossed by two microwave links. Links can be affected by turbines, and it is not possible to use the site for turbines without re-routing the links. However, a survey by BT Open Reach commissioned by Hastings Borough Council has shown that the BT links could be re-routed at a modest cost.

A gas pipeline runs near the site and the utility would need to be consulted at the next stage to assess if the project's construction would affect this pipeline.

Access to the identified site is reasonable, although a new site track would have to be built, possibly cutting across land which is currently used for arable purposes.

Because of the archaeological sensitivity of the area, an archaeological survey for the proposed development would be needed at a mid-range cost estimate of £500,000.

Grid connection of turbines to the local network by the local distribution network operator, UK Power Networks, would be possible. For a 900kW turbine the cost could be in the region of £245,000. For the larger turbines, the costs would be in the order of £920,000 to £1,220,000. This is because the higher power rating and generation output of these turbines would require a connection back to a primary substation some distance from the sites.

It is not anticipated that there will be objections from aviation interests, as the identified site for turbines is not believed to be within line of site of radar facilities.

Shadow flicker might affect some houses - but only for a few hours per year. Shadow flicker is something that can easily be mitigated by an inexpensive technical fix on the wind turbines should the need arise. It should not affect the chances of a project being approved.

Wind turbines have high capital costs and some running costs to consider. The output, costs and income of the turbines can be summarised as follows (including planning application costs, wind monitoring, archaeology costs, ecology costs, telecom links re-routing costs, access costs and grid connection costs):

Upper Wilting Economic Update	single turbine on Hastings site 2014		
	900kW, 50m hub	2.3MW, 74m hub	3MW, 85m hub
Electricity generated kWh/yr	1,860,955	4,138,390	5,385,645
Total capital costs**	£1,707,230	£2,965,830	£4,173,173
Total annual running costs**	£37,610	£63,527	£58,218
Gross annual income	£ 223,500.70	£ 324,449.78	£ 422,234.57
Net annual income	£ 185,890.24	£ 260,922.37	£ 364,016.11
Payback yrs	9.18	11.37	11.46
CO ₂ savings kgCO _{2e} *	899,902	2,001,201	2,604,336

*grid emissions factor 2011- 0.48357kgCO_{2e}/kWh

Grid rolling average figure removed as of 2013

**inflation increase of 1.5%

Economically, the larger turbines bring in a bigger revenue stream, once capital expenditure is repaid. However, they also require a larger capital investment and take longer to achieve 'simple payback' (i.e. taking no account of interest payments). *Payback will be seriously impacted if turbines need to be switched off during bat feeding times, as indicated in the table above. More research into bat feeding patterns and site wind speeds might show this to be unnecessary.*

The different paybacks are due in part to the high capital costs (including a more expensive grid connection) and running costs of the larger machines, but is also because of the way the financial support system for wind turbines currently works in the UK. This has two parts - the generation tariff and the export tariff. It is assumed that all electricity would be exported - but if a use for the electricity could be found, it would improve profitability.

The Feed-in Tariff has different bands of support, with higher generation tariffs for smaller installations. Option 1 (900kW turbine) takes advantage of the 500kW to 1,500kW band, which currently, 2014, pays 7.24p/kWh. Over 1,500kW, the tariff is only 3.07p/kWh, which means that turbines have to generate at least twice as much as the smaller installations to receive the same level of generation tariff income.

The large scale turbines are considered to be less favourable options due to the more significant impact they would have on the landscape. The smaller medium scale turbine will have a lower impact within the landscape and therefore is considered to be a more suitable option.

The tables below provide an indication of the effect on the economics of shutting down the turbines to mitigate for bats giving a 'Best case scenario' and a 'Worst case scenario'.

Tables for bat mitigation.

Best case scenario			
Shutdown from half an hour before sunset till midnight and 2 hours before sunrise	900kW	2.4MW	3MW
Total capital costs	£ 1,707,230	£ 2,965,830	£ 4,173,173
Total annual running costs	£ 37,610	£ 63,527	£ 58,218
Percentage of generating hours of lost	13	13	13
Gross annual income adjusted for shut down	£ 194,446	£ 282,271	£ 367,344
Loss of income due to shut down	£ 29,055	£ 42,178	£ 54,890
Net annual income	£ 156,835	£ 218,744	£ 309,126
Pay back yrs	10.89	13.56	13.50
CO2 savings reduction kgCO2e* due to shut down	116,987	260,156	338,564

Worst case scenario			
Shutdown from half an hour before sunset till sunrise	900kW	2.4MW	3MW
Total capital costs	£ 1,707,230	£ 2,965,830	£ 4,173,173
Total annual running costs	£ 37,610	£ 63,527	£ 58,218
Percentage of generating hours of lost	20	20	20
Gross annual income adjusted for shut down	£ 178,801	£ 259,560	£ 337,788
Loss of income due to shut down	£ 44,700	£ 64,890	£ 84,447
Net annual income	£ 141,190	£ 196,032	£ 279,569
Pay back yrs	12.09	15.13	14.93
CO2 savings reduction kgCO2e* due to shut down	£ 179,980	£ 179,980	£ 179,980

CONCLUSION

In view of the current economic situation and the likelihood of further reductions in the government support mechanisms for windpower, the site is considered not to be attractive, in the short term, to commercial wind developers. However, it is possible that, in the medium to longer term, sufficient support might be available to community groups to enable them to develop the site for a community turbine.

From: Lister, John (NE) [REDACTED]
Sent: 09 September 2014 10:53
To: Tim Cookson
Subject: 129573 - Development Management Plan (DMP) - Addenda and Amendments

Dear Tim,

Thank you for your email of 15th August, and the links to a range of documents.

On the basis the documents to hand, relating to representations 5882, 5883, 5884 and 5885, I can confirm that the concerns in raised in our previous comments on the plan, have been adequately addressed, and that the plan is sound.

On the basis of the Ecological Appraisal Addendum – Birds, it is reasonable to conclude that the historic data indicates that development associated with Policy FB12 is unlikely to have a significant effect on the notified features of the Combe Haven SSSI. The addenda on bats and on birds indicate that there is potential effect of species noted in the citation for the SSSI and on protected species present in the locality. In both cases, the addenda call for an assessment of ecological and ornithological impact of the proposals, to inform consideration of any windfarm proposals at the project stage. As a result, in terms of representations 5886, I can confirm that the concerns raised in our previous comments on the plan have been adequately addressed, and that the plan is sound, subject to relevant amendments. We note that you are recommending addition minor amendments to the policy wording as suggested by Applied Ecology for the Upper Wilting Farm Wind Turbine site allocation at FB12, to the inspector.

I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England please use the appended form.

<<Natural England Consultation Feedback(v4)_pub_0001 (2).pdf>>

Yours sincerely,

John Lister

Lead Adviser

Kent, West Sussex, East Sussex Team (Area 14)

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