

**Development Management
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire, SG17 5TQ**

Date

5 December 2011

Attn: Lisa Newlands

Dear Madam,

Application No: CB/11/04077/FULL

Proposal: Erection of a wind turbine, up to 120.5 metres in height, and ancillary infrastructure

Location: Marston Vale Millennium County Park

Decision: CPRE recommends that this application be refused

1.0 Background:

- 1.1 CPRE Bedfordshire responded to a similar application (**10/01359/FULL**) at this site on 25 May 2010 and then, as now, recommended refusal.
- 1.2 Subsequently CPRE defended its decision at the Planning Development Committee meeting at which the application was determined.

2.0 Balance between Renewable Energy Production and Public Amenity Loss

- 2.1 CPRE is fully aware of the need to conserve energy, reduce carbon emissions and to develop renewable sources of energy generation. In principle it supports a policy which aims to bring about an increase in renewable energy generation which is efficient in terms of carbon saving and investment cost. However CPRE also has a duty on behalf of the whole nation to ensure that any loss of amenity due to adverse environmental impact on the countryside is proportionate to the level of benefit.
- 2.2 It is of great importance to the nation – and the wider world - that renewable energy sources give the highest possible level of energy production. In the case of wind generation this aim is directly related to siting and associated wind speed values.
- 2.3 Maximum wind turbine energy capacity can at best only be achieved for between 45%-50% of the time ('load factor'). To achieve the highest load factor, sites have to be positioned in areas of the high wind speed. These are predominantly off-shore, at wind-swept coastal areas or high-level open sites. By comparison lowland inland sites produce much lower levels of output, evidenced by European wind speed maps which indicate that Bedfordshire and the East Midlands lie within an area of low wind speed which seriously constrains energy output.

Standing up for your countryside

CPRE Bedfordshire is the Bedfordshire Branch of the Campaign to Protect Rural England which exists to promote the beauty, tranquillity and diversity of rural England. We advocate positive solutions for the long term future of the countryside.

- 2.4 In the previous application the applicant predicted a 'load factor' value for this turbine of only 22% - a level that has been described by at least one major energy company as too low to justify development. And even this is high compared with the output achieved by other 'operating' turbines within the sub region. CPRE has no reason to believe that this level of predicted output has been revised upwards.
- 2.5 Attempting to generate wind energy in areas such as that currently proposed is highly wasteful of resources, would take a long time to offset its carbon footprint, while at the same time adversely affecting the quality of the landscape amenity.
- 2.6 The question should be asked: *Is the contribution to renewable energy supply and the reduction of global warming sufficient to justify the loss of landscape amenity in this area?*
- 2.7 CPRE strongly believes in this case it is not.
- 2.8 Notwithstanding the poor level of efficiency a turbine in this location would be capable of, the proposed size is much greater than that required to support the energy requirements of the Forrest Centre.
-

3.0 Covanta

- 3.1 Part of CPRE's objection to the Covanta proposal is that it runs counter to the policy of continued restoration of the Marston Vale to include amenity for nature study, leisure and tourism, further development of agriculture and the meeting of 'green infrastructure' targets. In addition it would have the effect of re-industrialising the Vale for at least a generation (consent is for 32 years).
- 3.2 The Infrastructure Planning Commission (IPC) has given consent for the Covanta development and, subject to the approval of the Development Consent Order about to be placed before Parliament, will become a reality.
- 3.3 If the Covanta development goes ahead, and at this stage CPRE has no reason to believe that it will not, the plant will generate considerable amounts of renewable energy of which the adjacent Forrest Centre and its associated infrastructure may be able to avail itself.
- 3.4 CPRE understands that the Millennium Park, which adopted a neutral stance in response to the Covanta proposals, stands to benefit financially from the Covanta development.

4.0 Landscape Value:

- 4.1 The Landscape Character Assessment study for this area of Central Bedfordshire acknowledges that in landscape terms the area has suffered a period of decline due to past industrial activities but also records that it is an "improving landscape". This is not only due to the end of major industrial activity but also natural regeneration plus a conscious effort on behalf of local authorities to reinstate the rural character of the area.
- 4.2 While rating the area as *moderately sensitive to change* it emphasises that change could have a strongly adverse impact on features such as the adjacent Greensand Ridge.
- 4.3 It also points out that change could impact on the setting of the listed brickworks chimneys.
- 4.4 In this context the proposed turbine would produce an adverse impact on setting in the wider landscape.
- 4.5 CPRE supports continuing ruralisation of this area. Many positive steps have already been made to realise this aim and nature itself has played a significant part.

5.0 Siting of the Proposed Turbine:

- 5.1 CPRE drew attention to issues regarding siting in its response to the first application, particularly as there is a high level of public use experienced in the Park. CPRE wishes to reiterates these issues, and add others which have emerged subsequently - are:
- 5.1.1 In the interest of safety the public should be excluded from the immediate area of the turbine (i.e. 'fall over' distance - 120m + 10%) or at the very least should not pass under the blades.
 - 5.1.2 The size of the turbine foundation of 12m diameters is smaller than the usual 15m diameter, possibly increasing the chance of a 'fall-over' event.
 - 5.1.3 Indicated 'separation distances' of 17m & 80m for pedestrian routes are obviously less than 'fall-over' distance while the first of these would result in 'oversailing' by the turbine blades.
 - 5.1.4 The separation distance of 93m for the 'horse trail' is over 100m less than that stipulated in PPS22 and over 200m less than the British Horse Society recommendation for a turbine of this height (120.6m x 3).
 - 5.1.5 CPRE understands that there is currently an exercise being carried out by Central Bedfordshire Council concerning *Wind Turbines near Public Rights of Way* in order to establish guidance where conflict might be a consideration.
 - 5.1.6 In CPRE's view, this constitutes 'emerging policy' and should be used to measure the compliance of this application.
 - 5.1.7 The noise assessment section of the application fails to fully consider users of the park, and the ambient noise monitoring locations appear to be near to watercourses, hence the higher than expected noise levels.
 - 5.1.8 The 'noise contour map' only shows the 35dB contour and not the full range of noise levels.
 - 5.1.9 The noise prediction uses the IoA method, ruled as not to standard at the Podington Wind Farm Inquiry (2010), has been described as having no official status by the review carried out by Hayes McKenzie Partnership on behalf of the Department of Energy and Climate Change.
 - 5.1.10 The significance matrix of the effect on birds - particularly migratory birds using the lakes is unbalanced in terminology and CPRE would argue that the potential harm has been inadequately presented.
 - 5.1.11 The relatively low level of energy output produced by this single turbine tends to negate justification for siting it in a bird reserve.
 - 5.1.12 CPRE still believes that to consider placing a turbine in such a sensitive location is totally inappropriate.
 - 5.1.13 Furthermore in the current rush to progress the development it appears that the mitigation work designed to lessen the impact on the local 'great crested newt' population may be less than comprehensive. Again, hardly the action expected of a wildlife park whose primary concern should be maximising protection of natural species.

6.0 Conclusions:

- 6.1 CPRE is of the view that this proposal would serve to reverse the process of improving the rural character in this area of Bedfordshire and would reduce the level of amenity benefit to the community.

- 6.2 On balance we believe that the potential benefits in terms of renewable energy are considerably outweighed by the overall harm to the rural quality of the area and the nature of the wildlife park.
- 6.3 CPRE is alarmed by the unsafe site chosen for the position of the turbine, which would not be improved sufficiently by a 'micro-siting' adjustment of 10 metres.
- 6.4 The Health & Safety issues highlighted (see 5.1.1 to 5.1.6 above) would impact adversely and dangerously on members of the public frequenting the Country Park.
- 6.5 CPRE believes that if the Park wishes to enhance its 'green credentials' then there are more sympathetic ways of achieving this without resorting to means which are both intrusive and possess an unacceptable element of danger.
- 6.6 CPRE believes that the Park management views this proposed development first and foremost as a 'money spinner'
- 6.7 In seeking to obtain a 'green icon' it has lost sight of its primary principles.
- 6.8 The financial benefits obtained via the Covanta development, i.e. £10K annually for the life of the Covanta installation (32 years) as a contribution to the electricity costs of the Forrest Centre, should help offset any financial losses that rethinking this whole 'green conscious' strategy might bring.
- 6.9 Furthermore CPRE believes that 'wind scoping exercises' at Stewartby and at Brogborough could bring about an adverse cumulative wind turbine effect that would damage further the rural qualities of the Marston Vale and its surrounding landscape.
- 6.10 CPRE is opposed to this application and recommends that it be refused.

Yours faithfully,

**Peter Scott,
CPRE Bedfordshire**