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Your Ref: S/0439/12/FL

21st March 2013

Dear Mr Sexton

**Amended Planning Application S/0439/12/FL
Land at Highfield Farm, west of Royston Road, Litlington
Installation of five wind turbines to a maximum height to tip of 100m; a single lattice tower
meteorological mast; on site substation; access tracks; hardstanding areas; external
transformers; temporary construction compound; and associated infrastructure**

Litlington Parish Council held a well attended meeting last week to discuss the above amended application. Councillors agreed that the comments made on the original application should be reiterated. Please see following objections and comments in italics in relation to the new information provided. The Parish Council would like these comments considered in addition to the original comments and it should not be taken to suggest the original comments have been addressed satisfactorily by the new information provided.

Litlington Parish Council object to the proposed development in the strongest possible terms permitted by law because of

- The Impact of health and well being of residents
- The impact on the character of the landscape
- The impact on the visual amenity of residents
- The impact on cultural heritage
- Traffic and Transport
- Other considerations such as the question of whether any harm was clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify the development

The following comments are presented in the order in which they appear in the application.

Planning Appraisal

6.2 – National Planning Policy Framework (NPPF)

We note that the NPPF has now replaced the Planning Policy Guidance and Statements referred to in the Planning Appraisal. We would ask that the applicant revise the Planning Appraisal document to reflect this change. We also ask that the views of the residents of this Parish should now weigh heavily in the appraisal of this application in accordance with the principles of localism.

We have reviewed the interpretation of the NPPF provided by the developer¹ and we note that the NPPF acknowledges the possibility that 'adverse impacts' could 'outweigh the benefits'². We ask that considerable adverse impacts identified in this submission and the submissions of others are duly weighed in proportion to the limited expected benefits of the application.

Chapter 2 - Development Rationale

20.28 – Renewable Energy

We do not accept that the application has any realistic prospect of meeting 1.5% of the entire onshore regional renewable energy target, and 1.5% of the 2015 waymark target for wind energy. This is because we believe that the calculations provided in Appendix 1.1 cannot be relied upon (see ***We note that no new information has been offered in response to this observation and so we trust that the planning department will consult widely and fully to ensure that the full implications of the proposed development on these activities is properly understood and considered.***

Chapter 17. Socio-Economics).

See Chapter 17. Socio-Economics.

Chapter 7 - Construction, Operation and Decommissioning

7.55 – Decommissioning Phase

We note that during the decommissioning period 'the site will be reinstated with electrical connections isolated and made safe and turbine foundations removed down to a level where they would have no impact on farming practice.'

We see no justification as to why leaving the electrical connections and turbine foundations largely in place would have an acceptable impact on the environment. We recommend that a full impact assessment is undertaken to determine what the implications of leaving the electrical connections and/or turbine foundations largely in place will be and if these are found to be significant and adverse, the applicant should be asked to undertake whatever mitigation is necessary to make the residual impacts acceptable.

We have reviewed the comments of the developer on Decommissioning and note that no explanation is offered as to why leaving the turbine foundations largely in place would result in '...less environmental impact than complete removal.' Our view therefore remains unchanged that a full impact assessment should be undertaken to determine what the implications of leaving the electrical connections and/or turbine foundations largely in place would be.

Chapter 8 - Traffic and Transport

Junction of A505 and Royston Road

We note that the assessment on traffic and transport 'has been limited to the construction process', a period of 9 months. It takes no account of the implications to road safety of the proposed development for the operating phase, a period of 25 years. This is in spite of the fact that the Landscape and Visual Assessment (9.277) notes that the proposed development would result in

¹ plan.scambs.gov.uk/swifftlg/MediaTemp/1124229-442931.pdf

² Paragraph 14

significant effects on the visual amenity of motorists, in particular those using the minor road adjacent to the site (Royston Road).

The junction turning right from the A505 onto Royston Road requires drivers to cross two lanes of fast moving traffic travelling at or in excess of the maximum speed limit. This requires heightened presence of mind and sound powers of observation at the best of times. The presence of 5 turbines, each 100metres tall, with moving rotors in the direct line of sight of drivers attempting this challenging manoeuvre can only increase the risk of distraction, accident and resulting harm to drivers and passengers.

We consider that the level of driver distraction posed by these structures when navigating this junction would be unprecedented for a wind farm application so close to a major public highway. We recommend that a full assessment is undertaken of the risk of driver distraction during the operational phase to determine if and how this risk could be mitigated.

We have reviewed the comments of the developer on Traffic, Transport and Driver Distraction and note that the Technical Annex of the PPS22 Companion Guide referred to was published 9 years ago and does not therefore reflect more recent understanding of the impact of wind turbines on traffic and transport. We consider that the level of driver distraction posed by these structures when navigating this junction would be unprecedented for a wind farm application so close to a major public highway and this cannot be adequately assessed by dated and generalised commentary. Our view therefore remains that a full assessment should be undertaken of the risk of driver distraction during the operational phase to determine if and how this risk could be mitigated.

Chapter 9 - Landscape and visual assessment

We have reviewed the comments of the developer on Landscape and Visual and Cultural Heritage and our comments are set out in the relevant sections below.

9.261 – Litlington

We note that many residents of Litlington would have views towards the turbines, particularly houses on South Street, Royston Road, Church Street and Bassingbourn Road. We further note that the wind turbines would result in significant effect in the views from their properties; would become a defining characteristic of these views; would contrast with the existing landscape; and would be in views that are valued by these residents, and so would result in a significant effect on their visual amenity.

We note that in Appeal Decision ID 2146094 the Planning Inspector comments in paragraph 45: "In assessing the impact on the landscape it is important to have regard to the communities that inhabit that landscape and are affected both positively and negatively by its appearance and character and other less tangible qualities, such as a sense of openness, that enable the landscape to enrich the daily lives of residents."

We ask that considerable adverse impacts on the landscape and the living conditions of residents identified in this submission and the submissions of others are duly weighed in proportion to the limited expected benefits of the application.

9.266 – Therfield Heath

We note that visitors to Therfield Heath would experience a significant effect on their visual amenity.

We note that one of the reasons given for the refusal of planning permission at the Horse and Groom, Baldock Road³ is '...that the neighbouring SSSI Therfield Heath has a very high landscape quality that is highly valued with extensive public access over the semi natural chalk grassland and expansive views over the arable land to the North. It is considered to have a very high sensitivity to development that is already affected by the A505 and industrial and commercial development to the North East.' It goes on to say that the development proposed would '...have a significantly adverse impact on the surrounding landscape.' It concludes that the application '...is therefore considered to be contrary to the requirements of Policy DP/3 that states planning permission will not be granted where the proposed

³ S/0702/12/FL

development would have an unacceptable adverse impact on the countryside and landscape character.'

We conclude that this reasoning would be equally relevant and applicable to this application.

9.268 – Ickniel Way

We note that users of the Ickniel Way, which runs within 700m of the proposed turbines, would experience significant effects on their visual amenity as a result of the development.

We have reviewed the additional visualisation 'Viewpoint A - Ickniel Way along Ashwell Street'.

This reaffirms our view that significant effects on the visual amenity of walkers would arise as a result of the development.

9.269 - Hertfordshire Chain Walk

We note that walkers on the Hertfordshire Chain Walk, which runs within 1.5 km of the proposed turbines, would experience significant effects on their visual amenity as a result of the development.

We note that Cambridgeshire County Council has raised some matters of law in relation to Public Rights of Way but the additional information provided does not say what these are. We would welcome clarification on what these points of law are and trust that the Planning department will give full consideration to these.

9.274 - Walkers, Equestrians and Cyclists

We note that walkers, equestrians and cyclists on local footpath, byways open to all traffic and bridleways would experience significant effects on views, that the turbines would become one of the key defining characteristics of views, would contrast with the existing landscape and would be on routes for purposes that include the appreciation of the view. Taken together, the development would result in significant effect on the visual amenity of walkers, equestrians and cyclists using local public rights of way.

We have reviewed the additional visualisations and these give further weight to our view that the development would result in significant effects on the visual amenity of walkers, equestrians and cyclists using local public rights of way.

9.277 - Motorists

We note that the proposed development would result in significant effects on the visual amenity of motorists, in particular those using the minor road adjacent to the site (Royston Road). We consider that this poses a threat to the safety of drivers and passengers as discussed in

We have reviewed the comments of the developer on Decommissioning and note that no explanation is offered as to why leaving the turbine foundations largely in place would result in '...less environmental impact than complete removal.' Our view therefore remains unchanged that a full impact assessment should be undertaken to determine what the implications of leaving the electrical connections and/or turbine foundations largely in place would be.

Chapter 8 - Traffic and Transport.

See previous comments in Chapter 8 - Traffic and Transport

Whitethorn Wood

The application makes no mention of Whitethorn Wood, a Cambridgeshire woodland fund site created in partnership with South Cambridgeshire District, Cambridgeshire County council and local people.. Whitethorn Wood lies ½ outside the village of Litlington and approximately 530 metres from the nearest proposed location (Turbine 1). Whitethorn Wood abuts two public rights of way, the public byway of Ashwell St to the north and a public footpath to the south. The proposed development would result in a significant effect on the visual amenity of residents and visitors to this cherished woodland.

The commentary provided by E4environment Ltd notes that Whitehorn Wood was planted in 1994 and is currently approximately 3m at most but goes on to suggest that '...as the woodland grows and matures it is reasonable to expect that the proposed turbines would

***gradually become more screened...'* We would suggest that, if it has taken 19 years for the planting to reach a height of 3 metres, it is not reasonable to suggest that an array of 5 turbines, each 100 metres tall, have any realistic prospect of being screened to any meaningful extent in the foreseeable future and consequently we remain of the view that the proposed development would result in a significant effect on the visual amenity of residents and visitors to this cherished woodland.**

War Memorial – RAF Steeple Morden

The application makes no mention of the war memorial at RAF Steeple Morden, home of the 355th Fighter Group of the United States Air Force (USAAF), who flew combat missions to Germany, Belgium and France between 1943 and 1945.

The 355th was awarded a Distinguished Unit Citation for 'extraordinary heroism in action against an armed enemy for displaying such gallantry, determination, and esprit de corps in accomplishing its mission under extremely difficult and hazardous conditions so as to set it apart from and above other units participating in the same campaign.' The memorial commemorates 98 American and 142 Commonwealth service personnel who lost their lives from the base.

The memorial stands in an elevated location overlooking the proposed development and the presence of turbines would result in a significant effect on the tranquillity and solemnity of the site.

We have reviewed the additional visualisation 'Viewpoint C - Steeple Morden War Memorial' and the comments of E4environment and note that 'The introduction of the proposed turbines would result in a significant change in the view...', '...introduce moving elements...into the view...' and '...the movement of blades would be clearly visible'. E4environment suggest, however, that '...movement and sound are already features of the overall experience of visiting the memorial as the traffic on the adjacent local road and overhead air traffic are both discernible features.' We would suggest that local traffic bears no meaningful comparison to the prominence, movement and sound of 5 turbines, each 100m tall distributed across the visible landscape. We conclude that, as the additional visualisation makes clear, the development would result in a significant effect on the tranquillity and solemnity of the site.

Chapter 10. Cultural Heritage

10.76 – Landscape and Setting of Cultural Assets

We note that the type of change discussed takes no account of the fact that the proposed turbines will be vastly out of proportion with any other man made changes to the landscape and that the presence of moving rotors will be entirely alien to the landscape. Taking these factors into consideration we resoundingly reject the suggestion that the landscape has a tolerance for wind farm development.

As previously noted in 9.266 – Therfield Heath, the refusal of planning permission at the Horse and Groom, Baldock Road, . '...Policy DP/3 that states planning permission willnot be granted where the proposed development would have an unacceptable adverse impact on the countryside and landscape character.' This supports our view that the suggestion by the developer that the landscape has a tolerance for wind farm development is wholly unjustified.

10.87 - Conservation Areas

We note that the Litlington Conservation Area is classified as being of 'High' importance, i.e. a cultural heritage asset of national importance.

We note that the magnitude of change to the Litlington Conservation Area has been classified as 'Moderate Adverse', i.e. 'Detrimental alteration to an asset or its setting due to the introduction of a prominent feature in the landscape'.

We consider that, by any reasonable measure, the magnitude of change can only be described as 'Major Adverse', i.e. 'Considerable, detrimental alteration to an asset or its setting due to the introduction of a dominant feature in the landscape'.

Taking the 'Site Importance' and the 'Magnitude of Change' together, the 'Significance of Effect' will be 'Large/Very Large' and not 'Moderate/Large' as the application suggests.

Important Countryside Frontage

We note that Viewpoint 3 – Church Street, Litlington, makes no mention of the fact that this is a designated Important Countryside Frontage. We further note that Development Control Policy CH/7 states that planning permission for development will be refused if the proposed development would

compromise the strong countryside character. We consider that the proposed development would unquestionably compromise the strong countryside character.

We have reviewed the comments of E4environment on this subject and conclude that they make a lengthy but ultimately inconclusive case that policy CH/7 is somehow not compromised. We remain of the view that the presence of 5 turbines, each 100m tall, plainly visible from this important countryside frontage can reasonably be expected to compromise the strong countryside character.

Chapter 11. Ornithology

11.158 - Avian Species of Elevated Conservation Status

We note that a number of avian species of elevated conservation status were found to be present at the site, including: Stone Curlew, Hobby, Nightjar, Montagu's Harrier, Merlin, Whimbrel, Honey Buzzard, Bar-tailed Godwit, Peregrine, Marsh Harrier, Red Kite, and Golden Plover.

A local ornithologist has observed healthy breeding populations of Grey Partridge (*Perdix perdix*) and Corn Bunting (*Emberiza calandra*) and Dotterel have been observed resting whilst migrating. These species are 'red listed' by the IUCN (International Union for Conservation of Nature), indicating the highest level of conservation concern.

We also note that the applicant did not record the presence of barn owls and concludes that the species may not be present in the vicinity of the study area. A local ornithologist has recorded this species in the area as recently as 2010.

Lastly, we note that Development Control Policy NE/6 Biodiversity states that planning permission will not be granted for development which would have an unacceptable adverse impact on the biodiversity of Natural Areas and we would ask that this policy is given due weight in assessing the impact on ornithology.

Chapter 12. Non-Avian Ecology

12.123 - Ecological impact

We note that negative ecological impacts of a significant magnitude for some species will occur at a Parish/local level. We do not accept, therefore, that the proposed development will have no significant effect on valued ecological interest as suggested by the applicant.

Chapter 13. Noise

The potential impact on public health from the presence of turbines so close to housing is a source of great concern to residents.

We note that the assessment has carried out according to the recommendations of ETSU-R-97 as agreed with South Cambridgeshire District Council. We separately note, however, that the number of reported cases of wind turbines affecting the health and well-being of residents living nearby continues to grow. A peer-reviewed paper published in the British Medical Journal in March of this year notes that a large body of evidence now exists to suggest that wind turbines disturb sleep and impair health, particularly amongst children, at distances of up to 2 kilometres. The entire village of Litlington lies within 2 kilometres of the proposed developed.

We ask that the applicant explain how they will defend claims for damages and costs from residents who successfully demonstrate that the turbines have adversely impacted their quality of life, health and well being.

We note that the developer does not offer any assurances that noise will not adversely impact the quality of life, health and well being of residents. Moreover, the developer does not explain how they would defend claims for damages and costs from residents that may be affected by noise.

Chapter 15. Utilities and Telecommunications

Terrestrial Television

We note that the proposal could interfere with the terrestrial television reception of 2,106 homes for which there is no alternative off-air service and 235 homes for which there may be an alternative off-

air service (15.28) but that interference can be resolved through technical solutions (15.43). We separately note, however, that the applicant does not propose to address any problems until after the development is complete and offers no undertakings on how promptly issues will be resolved (15.45). We consider that if a problem of this nature can be predicted and a technical solution is known to exist then it is reasonable to expect that the applicant should undertake to implement appropriate mitigations before a problem arises rather than simply wait for a resident to report a problem.

Chapter 16. Aviation

16.13 – Civil Aviation

The airspace above Littleington is regularly used for training and aerobatic practice (aircraft) and low-level flying (military helicopters). We expect that you will consult with the relevant stakeholders regarding these activities but we would ask you to note that any adverse consequences arising from the increased risk posed by the proposed turbines would be borne by this parish. We ask, therefore, that you consult widely and fully to ensure that the full implications of the proposed development on these activities is properly understood and considered.

We note that no new information has been offered in response to this observation and so we trust that the planning department will consult widely and fully to ensure that the full implications of the proposed development on these activities is properly understood and considered.

16.58 – Military Aviation

We note that no tactical training areas were identified in consultation with Defence Estates. We would ask you to note that military helicopters (Apache or similar and Chinook or similar) regularly fly at low-level above the village in close proximity to the proposed development.

We note that no new information has been offered in response to this observation and so we trust that the planning department will consult widely and fully to ensure that the full implications of the proposed development on these activities is properly understood and considered.

Chapter 17. Socio-Economics

17.67 - Predicted Electricity Production of the Highfield Wind Farm

We note that the prediction for the amount of electricity the proposed development will produce is not supported by actual wind speed data captured from the anemometer installed on the site for over two years for this purpose.

We separately note that the Stop Littleington Wind Farm Action Group (SLWFAG) has prepared a separate forecast using three independent, local sources of wind speed data. Their analysis suggests that the proposed development has little realistic prospect of ever generating the amount of energy claimed. Moreover, they suggest that the specification of model of turbine referred to is unsuited to the wind speed in this area and has simply been included to inflate the prediction of the amount of electricity this development would produce.

We consider that the prediction from the application cannot be relied upon and a more rigorous, objective methodology for measuring the amount of electricity using relevant, local, independent real-world data should be used. Moreover, we consider that the weight given to the 'benefits' of this application should be adjusted in proportion to a more realistic projection of the amount of electricity the site is likely to produce.

We have reviewed the comments of the developer on Wind Speed and Energy Production Estimates and note that no new information has been provided to support the claim for the amount of electricity the proposed development will produce. Our conclusion therefore remains unchanged that the calculations provided in the application cannot be relied upon.

Separately, the developer suggests that '...energy production from renewable sources is afforded the same positive benefit irrespective of the magnitude of energy produced.' This view is not supported by Appeal Decisions published by the Planning Inspectorate. By way of example, in decision ID 2150950 the inspector states in paragraph 81:

"There is no suggestion in national or local planning policy that pursuit of renewable energy targets overrides environmental considerations."

Appeal decisions consistently refer to the balance between adverse impacts and expected benefits and therefore the 'magnitude of energy produced' is evidently a material consideration in determining whether the expected benefits outweigh the adverse impacts. We urge the planning department to weigh the considerable adverse impacts identified in this submission and the submissions of others in proportion to the limited expected benefits of the application.

Yours sincerely

SALLY WALMESLEY