

StopCWF - Stop the Cambridge Wind Farm

OBJECTION SUMMARY



Consultation Response Volume 1

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www.stopcwf.org.uk

PREFACE

StopCWF (**Stop** the **C**ambridge **W**ind **F**arm – www.stopcwf.org.uk) is an Action Group formed specifically to oppose a planning application (reference S/1663/04/F) submitted by Your Energy Ltd (“the Applicant”) for a proposed wind farm located between Boxworth and Conington in the district of South Cambridgeshire.

StopCWF opposes the proposed wind farm because:

- There is strong evidence that local residents would be adversely affected by various types and levels of noise during the day and at night.
- The proposed development is totally out of scale with the surrounding villages and rural landscapes and will intrude unacceptably on the landscape and on a large number of properties.
- The A14 is a major road carrying very heavy traffic and it experiences a high level of accidents. “Driver distraction” will increase the number of accidents.
- The safety of aeroplanes and their passengers would be adversely impacted.
- The construction effects will permanently damage the local environment.
- Property values and transactions will be adversely affected.
- The wind farm proposal contravenes a wide range of planning policies.

These are just some of the factors that would unacceptably degrade the quality of life in the affected villages and the amenity that local residents derive from their rural environment if this wind farm were to be constructed.

As a non-statutory consultee, StopCWF have prepared a Consultation Response consisting of 4 volumes of documentation and a 1:200 scale model. The model contrasts the proposed turbines with the existing Wood Green turbine, Boxworth Church and the large oak tree on Boxworth green. The documentation consists of;

- Volume 1 – Objection Summary
- Volume 2 – Objection Statement
- Volume 3 – Planning Application Commentary
- Volume 4 – Environmental Statement Critique

This document is Volume 1 of our Consultation Response, the Objection Summary. It summarises our explanation of the reasons why StopCWF, on behalf of many hundreds of local residents, oppose the wind farm application.

Comments on StopCWF’s Consultation Response or requests for further information should be directed to:

Peter Hawkes
Secretary, StopCWF

7 Segraves
Boxworth
Cambridge
CB3 8LS

E-mail: ag@stopcwf.org.uk

1. Introduction

The purpose of this report is to set out in detail the reasons for STOPCWF's objections to the proposed wind farm.

StopCWF believe the proposed site is inappropriate for a wind farm for a wide range of reasons. These reasons all relate to valid planning issues that are specific to the proposed site.

None of these reasons relate to any prejudice against renewable energy or wind as a source of renewable energy.

Our case is very simple: "***The Applicant has selected an inappropriate site***".

It has been our experience whilst conducting this campaign that the majority of people greet the possible arrival of a wind farm with the comment, "*it's green, it's free, it's renewable – what's the problem?*"

Well the answer is: "*There isn't a problem with wind farms – but putting a wind farm next to the A14, close to a lot of villages could be a problem*".

So we looked into it.

We discovered that the proposed turbines are taller than "Big Ben" and that there would be 16 of them – this discovery exposed other issues i.e. the impact on landscape and visual amenity.

Then we discovered that the wind turbines will create a new accident risk in our skies.

And then we heard about health issues occurring in communities already living in close proximity to a wind farm and we discovered that there are no health and safety regulations protecting residents from encroachment by wind turbines.

Eventually, the obvious question arose, "*What are we going to do?*" The result was the creation of StopCWF. That was in early June (2004). In the intervening months, we have canvassed in 12 of the affected villages, delivered over 40,000 leaflets, raised nearly £10,000, attracted more than 1,000 members, built our web-site (twice) and featured in the local press/radio many times, visited 7 different wind farms around the UK, held over 30 exhibitions and 10 public meetings, met with many of the statutory consultees, employed a number of technical specialists and held countless committee meetings.

This Consultation Response is one of the results of our work. We ask you to read it all carefully. Please let us know if you disagree with any of our statements, conclusions, calculations etc. We have aimed to inform, not mislead because we fervently believe this planning application is misguided.

On a balanced evaluation of the facts and an objective weighing of the benefits against the adverse impacts, we believe it is patently obvious that this planning application should be **refused**.

2. Background

The Applicant using a shell company named “Cambridge Wind Farm Limited” has submitted a planning application (S/1663/04/F) for a wind farm to be located on the ridge between Boxworth and Conington which runs parallel to the A14.

In outline;

- The planning application is for a period of 25 years.
- The proposed wind farm consists of 16 wind turbines and associated infrastructure.
- Each turbine is 60m high with a blade length of 40m, giving a total height of 100 metres. This is taller than “Big Ben” and the swept area of the blades of each turbine will be bigger than a football pitch. This will be significantly bigger than the largest wind farm currently built in England.
- Each turbine will have a nominal generating capacity of 2MW giving a total nominal capacity of 32MW.
- The wind farm covers an area of land approximately 1½ miles long and ¾ mile wide. The nearest turbine will be only 250m from the A14.
- There are 7 villages within 2.5kms and some 20,000 people identified by South Cambridgeshire District Council as being potentially affected.

The following sections of this Objection Summary outline the reasons for StopCWF’s objections and explain why we believe this planning application should be rejected.

3. A14 safety

The A14 is already unacceptably dangerous and the Chief Constable has launched a campaign (“Operation Tornado”) to improve its safety record.

The high volume of traffic, (69,000 AADT), includes an abnormally high percentage of HGVs. This, combined with sub-standard entry/exit points and continual sudden changes in speed mean that an additional distraction represents an unacceptable increase in risk with potentially fatal outcomes.

It is undeniable that 16 turbines with rotating blades (each over 120 feet long) will attract the attention of drivers. This is admitted in the planning appraisal: *“Significant effects will be experienced by users of the A14(T) and on minor roads in the vicinity of the site where prolonged and unobscured views of the turbines are available”*.¹

¹ Cambridge Wind Farm Planning Appraisal, p44

Previous planning appeals have upheld this point. E.g. Mr D R Cullingford concluded²: *“Even if the proposal was finely balanced in relation to its effect on the landscape, I think that the risk that the scheme would distract drivers on an awkward stretch of road, and so exacerbate the road hazards here, serves to conclusively tip the scales against it.”*

An additional problem, (which was not even considered by the Applicant), is that at sunset, the problem of shadow flicker will affect drivers on a 2.9km stretch of the A14.

Given the unacceptably dangerous nature of the A14 and the proximity of the proposed wind farm, the precautionary principle must be applied and the application should be refused.

4. Aviation Risks

The proposed turbines will adversely impact the radar safety service provided by Cambridge Airport to planes passing through the skies above the proposed site.

This will have two effects. Firstly, aircraft in the vicinity of the wind turbines may simply “disappear” off the radar screen. Secondly, “false targets” may be generated on the radar screen, thus appearing as aircraft that may be in conflict with other real aircraft.

Cambridge Airport and the M.O.D. have both lodged objections to this planning application as a result of concerns over these problems. In an attempt to overcome these objections, the Applicant has appointed consultants, Cyrrus Associates, to assess the impact that the proposed wind farm might have on operations at Cambridge Airport, the significance of that impact and any mitigation measures that could be put in place

Their report concludes that there is an adverse impact on the ability of Cambridge Airport to offer a full radar safety service in the vicinity of the wind farm and admits that there are no certain technical solutions.

This clear evidence shows that the wind farm will cause a reduction in air safety in the skies around Cambridge, thus putting the lives of people in the air and on the ground at risk.

As David Still, Chairman British Wind Energy Association says *“We work in partnership with government and the aviation communities to ensure that the delivery of clean, green energy does not cause any adverse effects to our national defence or air safety”*

Therefore this application should be rejected.

² Planning Appeal Reference APP/Q2908/A/02/1099718 – 3 x 91m turbines near Alnwick.

5. Landscape and Visual Amenity

The turbines will be completely out of scale with the surrounding landscape and will represent an industrialisation of an agricultural site.

At 100m high they will dwarf all other structures in Cambridgeshire and will be seen for over 20km.

In addition, as they will involve movement which unconsciously draws the eye, they will be significantly more intrusive than a static building.

The proposed site lies where the Claylands Landscape transforms into the various Fenland types on relatively open ground close to village centres. This landscape is not capable of accommodating such large structures.

Landscape is part of the general amenity of life in small villages. Destruction of the essential qualities of the landscape reduces the quality of life of local people.

These issues are sufficient to warrant refusal of the application.

6. Noise Assessment

Wind turbines produce two types of sound – normal aerodynamic noise and low frequency infrasound.

Research has shown that low frequency sound causes extreme duress to a number of people who are sensitive to its effects. People living near wind turbines have been shown to experience health problems including sleep problems, headaches, irritability and stress.

As part of our research, StopCWF commissioned an independent consultancy, Campbell Associates Ltd, to undertake noise modelling and additional noise measurements in order to properly evaluate the content of the Applicant's own Noise Assessment.

The key conclusions from our analysis of the Applicant's data and our additional measurements were:

- 1) The baseline surveys reported in the Noise Assessment do not cover a sufficient spread of locations, seasons and wind conditions to allow proper judgement of the case.
- 2) The prediction in the Noise Assessment contains significant errors and unwarranted adjustments.
- 3) Even using the existing baseline noise survey and allowing for errors and measurement uncertainties 75% of the cases presented do not meet the recommended limits.
- 4) Sound levels from the proposed wind farm are highly likely to exceed the guidelines in ETSU-R-97 under many common circumstances. There will therefore be a loss of amenity by many neighbouring residents due to noise

These conclusions show the Applicant's Noise Assessment to be fundamentally and irredeemably flawed and inaccurate.

This provides justifiable cause to reject this planning application.

7. Visual Intrusion

There has been no attempt by the Applicant to quantify the level of visual impact on the surrounding villages. To rectify this, StopCWF undertook a survey of every road and sub-road within a 3km radius and lines of sight were used to determine the visibility of the turbines. The results show:

- 1,224 houses within the 3km radius will have a view of the wind farm from their property.
- 83% of properties in Conington will have a direct view.

From these figures it is clear that the proposed wind farm will severely intrude upon the existing visual amenity enjoyed by local residents and that this impact will be very significant.

Given that the wind farm will be visible for at least 20kms³ in many directions, then it is inevitable that many more properties outside the 3kms will be adversely impacted.

8. Health

The impact of noise on health has been explained in Section 6 above.

To date, wind farms have been placed in areas of low population density. Consequently, there are no major studies of health impacts.

However, Dr Amanda Harry, a Plymouth G.P. studied the people who lived near the Bears Down wind farm and found that 93% had been adversely affected by the effects of the turbines and 70% were having problems sleeping and suffering anxiety symptoms.

It is proven that wind turbines produce infrasound and that people living near wind farms experience health problems. Although no large scale study has been done on these effects yet larger wind farms are proposed close to areas of high population density. Furthermore, there are no health and safety regulations governing the construction of wind farms in populated areas.

Given that the proposed wind farm would be the most extreme example of this trend to date, the risk that local residents may experience health problems is too great.

The precautionary principle must apply and the planning application rejected.

³ ES Vol 3, Figure 17a

9. Wildlife

It is well known that birds and bats are susceptible to wind turbine kill as the tips of the blades are travelling at around 180mph.

The proposed site is less than 2.5km from the Fen Drayton Gravel Pits and is the winter roosting home to 2% of the national population of Golden Plovers.

The Cambridgeshire Bat Group have concluded that "*the proposed development requires a comprehensive study for the presence of bats to include roost locations, flight paths, feeding areas and migration routes.*" This has not been carried out by the Applicant.

English Nature has submitted an objection due to worries over the well-being of the badgers and great crested newt that live on the site and inadequacies in the Applicant's Environmental Statement.

These are sufficient grounds on which to refuse the application.

10. Impact on TV

The BBC and Ofcom recognise that wind farms have a disruptive effect on television reception.

The proposed wind farm would create a "barrier" 1.5 miles wide and 330 feet high. This barrier will create problems for the villages of Fen Drayton, Swavesey and possibly Over, affecting between 1,300 and 2,300 houses.

If the wind farm were built, any signal degradation would be instantaneous and universal. The Applicant has said that this can be resolved through a planning condition, but has provided no analysis of the problem or possible solutions. There are documented examples of communities having to wait months and years to get problems sorted.

Given the number of households affected, and the importance of T.V. viewing to most households, it is a major weakness in the planning application that no attempt has been made to analyse the problem and institute plans for solving the problems once they arise.

This is an unsatisfactory response, is symptomatic of the lack of rigour of the Applicant, and means the application should be refused.

11. Property Values

The loss of amenity in an area will have an adverse impact on property values.

A court case in January 2004 where a judge ruled that the value of a property fell by 20%, provides concrete evidence that the presence of a wind farm will reduce local quality of life and hence impact property values.

12. Construction

The construction phase is stated as lasting 6 months, but similar schemes from other developers quote 9-12 months.

The Applicant states that the delivery of ready mixed concrete for the bases would require about 55 truck deliveries per day but that this was “*unlikely to cause any significant inconvenience to users of the highway network in the area.*”

Given that this would mean a slow turning movement every 4 minutes, it would clearly lead to congestion at the site access on a minor rural road and on the approaches to the site. Added to this will be the problem of delivering 40m long loads and the over 3000 lorry trips during the construction phase.

As the Applicants have dismissed this so lightly, there is real concern that an objective appraisal has not been carried out.

13. Conflict with Planning Policies

This proposed wind farm contravenes various local, regional and national policies. These are summarised below:

- 1) South Cambridgeshire Local Plan No 2: Policies EN1, EN3, EN4, EN12, EN13, 44, ES6.
- 2) South Cambridgeshire Local Development Framework: policy CS61, CS64
- 3) South Cambridgeshire Local Performance Plan 2004: Corporate Objective No. 2 – Quality of Village Life
- 4) Cambridgeshire and Peterborough Structure Plan 2004: policies P1/2, P7/1, P7/4, P7/6, P7/7.
- 5) Regional Planning Guidance Note 14: Policy ENV2, Appendix C: Strategic Principles paragraph 2.1 and 3, Technology-Based Criteria paragraph 4.6
- 6) PPS 22: Key Principle vii, viii: paragraph 11, 21, 22, 25

The proposed wind farm is in significant conflict with a wide range of planning policies. On this basis the application must be refused.

14. Benefits Appraisal

The calculation of the potential benefits that the wind farm will produce is a vital part of calculating whether they outweigh the negatives. Electricity production from wind farms is inefficient because wind is randomly intermittent.

StopCWF's calculations show more realistic figures for the generation of electricity, numbers of homes supplied and reduction of CO₂ emissions.

Electricity produced:	56,064 MWh	reduction of 33%
Homes supplied:	11,929 homes	reduction of 38%
CO ₂ emissions reduced:	24,100 tonnes	reduction of 66%

The amount of CO₂ saved in a year by all 16 turbines is the equivalent of only that produced by 32 lorries running 24 hours a day.⁴

These figures show that the proposed wind farm will produce relatively little energy and environmental benefits compared to their massive negative impact on the surrounding area and local residents.

It is clear that the Applicant's claims are over-stated.

15. Local Consultation

The Applicant states in their brochure, "*We are committed to working together with the local community and ensure that they are consulted and informed of developments*".

The reality has been the complete opposite.

Since July 2003, after receiving planning approval for an anemometer mast, despite prompting from SCDC, they have only held one exhibition, to which only residents of Boxworth and Conington appear to have been invited.

There has been no true discussion, merely a fait accompli. No significant, if any, changes were made post the exhibition where considerable concerns and opposition were expressed and no attempt afterwards to engage with the thousands of people who will be affected.

The Applicant's approach is direct conflict with the guidelines produced by the BWEA and the Applicant's own published procedures.

⁴ Standard Road Transport Fuel Conversion Figures, DEFRA

16. Public Opinion

The wind farm Planning Application was circulated to 16 local Parish Councils for their consideration. The recommendations of these Parish Councils is shown in the table below and represents an overwhelming rejection of the wind farm.

Village	Response	Population
Bar Hill	Refuse	3,761
Boxworth	Refuse	206
Childerley	No Recommendation	28
Conington	Refuse	126
Dry Drayton	Refuse	552
Elsworth	Refuse	604
Fen Drayton	Refuse	750
Fenstanton	Refuse	2,870
Hilton	Refuse	850
Knapwell	Refuse	86
Lolworth	Refuse	117
Longstanton	Refuse	1,799
Oakington	Approve	1,244
Over	Refuse	2,499
Papworth Everard	Refuse	2,030
Swavesey	Refuse	2,267

- Over 300 letters of opposition have been sent to the SCDC planning Department.
- Over 1,000 people have joined the StopCWF campaign and donated over £10,000 to fund the campaign against the proposal.
- Over 75% of both Boxworth and Conington have signed up as members of StopCWF.
- South Cambridgeshire's MP, Andrew Lansley unequivocally opposes the proposed wind farm.
- 92% of respondents to Elsworth's questionnaire opposed the wind farm.
- 76% of respondents to Fen Drayton's questionnaire opposed the wind farm.
- The MOD, Cambridge Airport, English Nature, CPRE have all objected to the wind farm.

There can be no doubt that the opposition to this scheme is widespread, deeply held and represents public opinion in the affected villages.

17. Conclusions

The proposed location for this wind farm is totally inappropriate due to:

- 1) Increased safety risk on the A14
- 2) Visual intrusion for local residents
- 3) Industrialisation of a rural landscape
- 4) Adverse impact on radar safety at Cambridge Airport
- 5) Potential noise and health impact on local residents
- 6) Conflict with national, regional and local planning policies
- 7) Adverse impact on bird, bat and other wildlife
- 8) T.V. reception degradation

A number of these issues (e.g. A14, aviation, noise, visual intrusion) would be sufficient on their own to warrant rejection, consequently the cumulative effect is overwhelming. Furthermore:

- The Environmental Assessment produced by the Applicant is flawed, inaccurate and lacks the required rigour and objectivity.
- The Applicant has undertaken no meaningful consultation with local people or the local parishes.
- Public opinion is implacably opposed to this development.

18. Recommendations

This Planning Application be rejected for the reasons outlined above