

Case No: 1200967FUL (FULL PLANNING APPLICATION)

Proposal: ERECTION OF SIX THREE BLADED HORIZONTAL AXIS WIND TURBINES UP TO 126M IN HEIGHT TO BLADE TIP, TOGETHER WITH ASSOCIATED INFRASTRUCTURE INCLUDING: NEW VEHICULAR ACCESS, ONSITE ACCESS TRACKS, FOUNDATIONS, EXTERNAL TRANSFORMERS (IF REQUIRED), CRANE HARDSTANDING AREAS, ONE PERMANENT ANEMOMETRY MAST, ONE TEMPORARY ANEMOMETRY MAST, TEMPORARY CONSTRUCTION COMPOUND, CONTROL BUILDING AND COMPOUND AND UNDERGROUND CABLING

Location: LAND SOUTH WEST OF RAF MOLESWORTH WARREN LANE BYTHORN

Applicant: RWE NPOWER RENEWABLES (FAO MS D NUNN)

Grid Ref: 506281 276942

Date of Registration: 18.06.2012

Parish: BYTHORN AND KEYSTON

Appeal Against Non-Determination

1. PURPOSE OF THIS REPORT

- 1.1 The applicant company has lodged an appeal against the non-determination of this planning application. The decision will now be made, following a Public Inquiry which is likely to start in December 2013, by an Inspector appointed by the Secretary of State. As part of the appeal, the Local Planning Authority will need to set out its case. The Panel is therefore asked to indicate the decision it would have made on the application.

2. DESCRIPTION OF SITE AND APPLICATION

- 2.1 The proposal seeks full planning permission to erect six wind turbines each of a maximum height of 126 metres in height the blade tip. According to the application documents the turbines would have an installed capacity of between 1.8MW and 2.5MW; thus a maximum of 15MW in total. The application advises that this would generate enough energy to supply annually approximately 7,800 to 8,700 UK homes.
- 2.2 Also as part of the application are a number of associated developments including new vehicular access, onsite access tracks, foundations, external transformers (if required), crane hardstanding areas, one permanent anemometry mast, one temporary anemometry mast, temporary construction compound, control building and compound and underground cabling.
- 2.3 Planning permission is sought for a 25-year period; taken from the first export of electricity.

- 2.4 The application site comprises a 245 hectare area broadly consisting of land to the east, north-east, north and north-west of Bythorn. The location of the proposed wind turbines themselves though can broadly be described as being to the north-east, north and north-west of Bythorn. The turbines also relate to the village of Molesworth (particularly the northern and western parts of that village) and broadly they are proposed to be situated to the north-west of Molesworth.
- 2.5 The application is considered to be development which requires the submission of an Environmental Statement (ES) under the Environmental Impact Assessment Regulations 2011. This is discussed further within the body of this report.

3. NATIONAL GUIDANCE

3.1 The National Planning Policy Framework (2012) sets out the three dimensions to sustainable development – an economic role, a social role and an environmental role – and outlines the presumption in favour of sustainable development. Under the heading of Delivering Sustainable Development, the Framework sets out the Government's planning policies for: building a strong, competitive economy; ensuring the vitality of town centres; supporting a prosperous rural economy; promoting sustainable transport; supporting high quality communications infrastructure; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; protecting Green Belt land; meeting the challenge of climate change, flooding and coastal change; conserving and enhancing the natural environment; conserving and enhancing the historic environment; and facilitating the sustainable use of minerals.

- **PPS5 Practice Guide:** - 'Planning for the Historic Environment' – provides guidance in relation to the consideration of proposals in relation to the (now deleted) policies within PPS5.
- **PPS22 Companion Guide:** – 'Planning For Renewable Energy' – provides practical and technical advice for all forms of renewable energy. Section 8 deals with on shore wind power and deals with issues of noise, landscape and visual impact, heritage assets, safety, proximity to roads, railways and power lines, ecology and ornithology, electromagnetic transmissions, shadow flicker and construction and operational disturbance.

3.2 National Policy Statement EN-1: Overarching Energy (2011)

This document is intended to provide policy for developments considered by the Infrastructure Planning Commission which in the case of wind turbine development would be schemes capable of generating 50MW or more but may also be a material consideration in determinations by an LPA. The Statement describes the challenge of cutting greenhouse gases by at least 80% by 2050 (compared to 1990 levels) and that rapid change will be required in the UK. It also confirms that about a quarter of the UK's generating capacity is due to close by 2018; that the UK needs all types of energy referred to in the document in order to achieve energy security; there is an urgent need for new energy (certainly in the next 10-15 years).

3.3 National Policy Statement EN-3: Renewable Energy (2011)

Section 2.7 discusses onshore wind with reference to a number of considerations. It states that appropriate distances, having regard to noise and visual amenity, should be maintained between turbines and sensitive receptors; appropriate spacing should be provided between turbines; grid connection can have an impact upon commercial feasibility; the time-limited nature of wind farms is an important consideration; a tolerance for micro-siting of between 30 and 50 metres is typical; reducing the scale of a proposal may not be feasible; noise assessments should use ETSU-R-97.

3.4 The Climate Change Act 2008 became law on 26 November 2008 and sets legally binding targets for reducing UK greenhouse Carbon Dioxide emissions for 2020 and 2050.

The Renewable Energy Strategy 2009 outlines the move to a low-carbon economy, and the need for a dramatic change in renewable energy use in electricity, heat and transport.

Energy Bill 2012 sought to put in place measures to attract the £110 billion investment which is needed to replace current generating capacity and upgrade the grid by 2020, and to cope with a rising demand for electricity.

3.5 Annual Energy Statement 2012 (November 2012)

This document identifies two immediate priorities for UK energy policy – to upgrade the energy infrastructure to help to rebuild the economy, and, putting households back in control of their energy bills. It also states that renewable energy contributed 3.8% of all energy consumed in the UK in 2011 (from 3.2% in 2010). This is in line with the stated 4% increases projected for 2011 and 2012. The Statement also identifies the economic growth (including employment) which has resulted from renewable energy technologies.

3.6 UK Renewable Energy Roadmap – July 2011 (updated 2012)

The headline objective is to ensure that 15% of the UK energy demand is met by renewable sources by 2020. On-shore wind is identified as a key component in the renewables mix. The aspiration is for 30% of electricity to be generated from renewable sources by 2020. A central scenario of 40% by 2050 is also included.

3.7 The Planning System: General Principles 2005: seeks to establish the principles within plan-making and decision taking.

3.8 English Heritage 'Wind Energy and the Historic Environment 2005': aims to provide a strategic approach to the land-use planning system which will maximise the benefits of renewable energy projects, while minimising their adverse effects on the historic environment.

3.9 English Heritage 'Conservation Principles Policy and Guidance April 2008': sets out principles of Conservation.

3.10 English Heritage: 'Climate Change and The Historic Environment 2008': Developments designed to generate renewable energy – like any other infrastructure developments – can have a wide variety of impacts, both positive and negative, that vary from the insignificant to the unacceptable. The benefits delivered by these new technologies can also vary considerably, particularly when considered on a whole-life basis. It is always important, therefore, to evaluate these benefits and impacts on a case-by-case basis. Among typical issues that will need to be considered are:

* The construction of new renewable energy infrastructure, including hydro-electric and tidal plants and onshore and offshore wind farms, may have direct impacts on archaeological remains.

* Wind farms need to be carefully sited to avoid compromising significant landscapes or the visual setting of important sites or buildings where the integrity of that setting is an important part of their significance.

3.11 English Heritage: The Setting of Heritage Assets 2011 – although this document is currently under revision following the publication of the NPPF it remains current guidance. This document sets out English Heritage guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. The document includes the consideration that in assessing any resulting harm alternative designs or locations should be considered.

3.12 English Heritage: Seeing the History in the View 2011.

3.13 Guidelines for Landscape and Visual Impact Assessment by the Landscape Institute/IEEMA 2013 – provides guidance on the best practice for the identification, prediction and evaluation of key environmental effects.

3.14 A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise 2013 by the Institute of Acoustics.

4. PLANNING POLICIES AND LOCAL GUIDANCE

4.1 Huntingdonshire Local Plan 1995

- **R15:** "Countryside Recreation" – will seek to improve access to the countryside, including the network of public rights of way with a view to modifying, extending and improving the network where appropriate.

- **En2:** "Character and setting of Listed Buildings" - indicates that any development involving or affecting a building of architectural or historic merit will need to have proper regard to the scale, form, design and setting of that building

- **En5:** "Conservation Area Character" - development within or directly affecting conservation areas will be required to preserve or enhance their character and appearance.

- **En9:** “Conservation Areas” - development should not impair open spaces, trees, street scenes and views into and out of Conservation Areas.
- **En11:** “Archaeology” – Permission will normally be refused for development that would have an adverse impact on a scheduled ancient monument or an archaeological site of acknowledged importance.
- **En12:** “Archaeological Implications” – permission on sites of archaeological interest may be conditional on the implementation of a scheme of archaeological recording prior to development commencing.
- **En17:** "Development in the Countryside" - development in the countryside is restricted to that which is essential to the effective operation of local agriculture, horticulture, forestry, permitted mineral extraction, outdoor recreation or public utility services.
- **En20:** “Landscaping Scheme” - wherever appropriate a development will be subject to the conditions requiring the execution of a landscaping scheme.
- **En22:** “Conservation” – wherever relevant, the determination of applications will take appropriate consideration of nature and wildlife conservation.
- **En23:** “Conservation” – development which has a significant adverse effect on the interests of wildlife in an area will not normally be permitted.
- **En25:** "General Design Criteria" - indicates that the District Council will expect new development to respect the scale, form, materials and design of established buildings in the locality and make adequate provision for landscaping and amenity areas.
- **T18:** “Access requirements for new development” states development should be accessed by a highway of acceptable design and appropriate construction.

4.2 Huntingdonshire Local Plan Alterations 2002

- None relevant.

4.3 Huntingdonshire Local Development Framework Core Strategy 2009

- **CS1:** “Sustainable development in Huntingdonshire” – all developments will contribute to the pursuit of sustainable development, having regard to social, environmental and economic issues. All aspects will be considered including design, implementation and function of development. Including minimising the use of non-renewable energy sources, preserving landscapes and conserving sites and areas of historic importance and their settings, reducing water consumption and wastage, minimising impact on water resources and water quality and managing flood risk.

- **CS9:** “Strategic Green Space Enhancement” - coordinated action will be required to safeguard existing and potential sites of nature conservation value, create new wildlife habitats and contribute to diversification of the local economy and tourist development through enhancement of existing and provision of new facilities.

4.4 Cambridgeshire and Peterborough Minerals and Waste Development Plan - Core Strategy DPD 2011

- **CS1:** “Strategic Vision and Objectives for Sustainable Minerals Development” – sets out the overarching requirement for mineral extraction with reference to geographic areas across the County.
- **CS26;** “Mineral Safeguarding Areas” – development, other than those excluded within the policy, will not be permitted unless the mineral is no longer of any economic value; the mineral can be extracted before development takes place; the development will not inhibit future extraction; there is an overriding need for the development or the development is incompatible.
- The application site is identified on Map C of the Proposals Map as being wholly within an area of Brickclay extraction.

4.5 Huntingdonshire Draft Local Plan to 2036: Stage 3

- **Draft Policy LP1:** “Strategy and principles for development” – development proposals will be expected to, amongst other things, support the local economy and minimise greenhouse gas emissions.
- **Draft Policy LP5:** “Renewable and Low Carbon Energy” – a proposal will be supported where all potential adverse impacts including cumulative impacts have been avoided or minimised as far as possible. In addressing adverse impacts the proposal will demonstrate how it will seek to avoid harm to the environment and local amenity (including noise), heritage assets, biodiversity and the character of the surrounding landscape. If adverse impacts are identified and they are proven to be unavoidable the proposal will be required to demonstrate that such impacts have been minimised as far as possible. Where effects remain the proposal will include alternative enhancement and/or compensatory measures. The level of harm will be weighed against the public benefits. Provision should be made for the removal of apparatus and the reinstatement of the site to an acceptable condition.
- **Draft Policy LP6:** “Flood Risk and Water Management” – in relation to flood risk a proposal will be supported where it is not in area at risk of flooding; suitable protection/mitigation measures can be agreed and there will be no increase in the risk of flooding. With regard to surface water a proposal will be supported where SuDS are incorporated, the standing advice of the Appropriate IDB has been taken into account and there is no adverse impact.
- **Draft Policy LP7:** “Strategic Green Infrastructure Enhancement” – proposals consistent with the Cambridgeshire Green

Infrastructure Strategy 2011 (or successor documents) and/or which contribute towards the objectives of protecting, maintaining and enhancing, creating new and strengthening links with existing green infrastructure will be supported. In addition a proposal will be expected to provide replacement provision of equal or greater value that that which will be affected.

- **Draft Policy LP13:** “Quality of Design” – a proposal will need to be designed to a high standard based upon a through understanding of the site and its context.
- **Draft Policy LP15:** “Ensuring a High Standard of Amenity” – a proposal will be supported where a high standard of amenity is provided for existing and future surrounding residents.
- **Draft Policy LP28:** “Biodiversity and Protected Habitats and Species” – a proposal will be supported where it does not give rise to a significant adverse impact on protected species or sites of local or regional importance for biodiversity or geology unless the need for, or benefits of, the proposal outweigh the impacts. If adverse impacts are identified and they are proven unavoidable, every effort will be made to mitigate the impact. Where this cannot be achieved then alternative forms of compensation will be considered. A proposal will aim to conserve and enhance biodiversity.
- **Draft Policy LP29:** “Trees, Woodland and Related Features” – a proposal will be supported where it avoids the loss of, and minimises the risk of harm to hedges or hedgerows of visual, historic or nature conservation value. Where such a loss is proven to be unavoidable this will only be acceptable where there are sound arboricultural reasons to support the proposal or the benefits outweigh the loss.
- **Draft Policy LP31:** “Heritage Assets and their Settings” – great weight is given to the conservation of any heritage asset; more weight is accorded to assets of greater significance. A proposal which affects the special interest or significance of a heritage asset or its setting must demonstrate how it will conserve, and where appropriate enhance, the asset. Any harm must be justified and weighed against the public benefit. A proposal will be required to show that it would not have an adverse impact on views of or from the heritage asset or of the features which contribute positively to the asset.

4.6 The *Character of England Landscape, Wildlife and Cultural Features Map* (Natural England, 2005) – identified that the site falls within the southern boundary of National Character Area 88 (NCA88) “Bedfordshire and Cambridgeshire Claylands”. The site is also within close proximity of NCA 89 “Northamptonshire Vales” to the west. Natural England has further detail on each NCA and describes the Bedfordshire and Cambridgeshire Claylands as gently undulating topography and plateau areas, divided by broad shallow valleys; predominantly open and intensive arable landscape; fields bounded by open ditches or sparse closely trimmed hedges; variable woodland cover and smaller, dispersed settlements. With regard to the adjoining Northamptonshire Vales the description is one of gentle clay

ridges and valleys with little woodland and strong patterns of Tudor and parliamentary enclosure; distinctive river valleys; frequent small towns and large villages, prominent parks and country houses; frequent imposing, spired churches and great diversity of landscape and settlement pattern with many sub units.

- 4.7 Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document (SPD) (2007) – identifies the site as being within the Northern Wolds. The key characteristics listed in relation to this area are a strong topography of ridges bisected by pronounced valleys; valleys are well vegetated and intimate in scale, while ridges/plateaux feel more open; an historic landscape, containing medieval features; dispersed pattern of historic villages with little modern development; and distinctive square church towers topped with spires which form characteristic landmarks.

The assessment goes onto to state that:

- The area contains the highest land in the District;
- Most villages are situated near to the tops of the valley sides so that the church spires stand out on the horizon;
- The Northern Wolds are an attractive and relatively unspoilt area of countryside with a strong historical character;

- 4.8 Huntingdonshire District Council Wind Power SPD 2006

This document identifies the Northern Wolds as having a high capacity to accommodate a small group (2 – 12 turbines) at the lower end of this range (up to 2 or 3 turbines). The SPD lists ten criteria which a small-scale group should take into account. These criteria are:

- a) respect existing landmark features such as key views to church spires;
- b) respect the landform and relate turbines to the strong ridges and plateau; avoid locating turbines within the more intimate landscape of the valleys and along valley crests where they will be out of scale with the landscape and settlements such as Kimbolton;
- c) avoid siting turbines on areas of pasture with ridge and furrow;
- d) respect the site and setting of the historic villages which characterise the Northern Wolds;
- e) relate to existing building clusters in the landscape, for example the occasional large farm buildings, utility buildings or industrial areas (such as disused airfields);
- f) relate to the land cover pattern, in particular the woodland edges and field patterns with a consistent and repetitive spacing between turbines;
- g) consider the impact on views of the horizon from the Central Claylands, Fen Margins and Fens;
- h) consider a linear arrangement along contours as opposed to crossing contours;
- i) avoid the introduction of new pylon lines into the Northern Wolds. The area is currently characterised by the absence of disruptive features and pylon lines would be difficult to accommodate in relation to the distinctive ridge and valley topography;

- j) seek opportunities to achieve wider landscape management objectives identified in the Huntingdonshire Landscape and Townscape Assessment in association with any proposed development.

In relation to cumulative impacts the SPD advises that this is very little scope to accommodate more than one small-scale group. It goes on to advise that the Northern Wolds is a highly valued landscape for its unspoilt quality and harmonious character and that turbine development should not affect the perception of this special character.

4.9 Huntingdonshire LDF Consultation Draft SPD: Landscape Sensitivity to Wind Turbine Development 2012

This document was issued as a Draft Supplementary Planning Document on 16 November 2012 and sought comments until January 2013. This draft revision to the SPD identifies that the Northern Wolds has a moderate capacity for a windfarm consisting of 2 – 5 turbines but a low capacity for wind turbine development consisting of 6 – 12 turbines or greater. As a result there is no further guidance in relation to proposals for 6 – 12 turbines.

With regard to cumulative capacity the draft states that there is a low (later advised as 'very little') capacity for more than one small-scale group (2 – 5 turbines).

4.10 Keyston Conservation Area Character Statement (2003).

5. PLANNING APPLICATION CONSULTATIONS

5.1 There have been two rounds of public consultation – one during July and August 2012 and the other during January and February 2013. A summary of the consultation responses are set out below:

5.2 Original Consultation

- a. **Bythorn and Keyston Parish Council (copy attached): recommend refusal.**
- b. **Brington and Molesworth Parish Council (copy attached): recommend refusal.**
- c. **Catworth Parish Council: recommend refusal** due to unacceptable adverse effect on rural landscape and consider the proposal to conflict with the Council's wind farm policies.
- d. **Old Weston Parish Council: recommend refusal** based upon negative visual impact on the area and the environment; proximity to residential dwellings and road safety.
- e. **Leighton Bromswold Parish Council: recommend approval** as no objections recorded.
- f. **Winwick Parish Council: recommend refusal** due to impact on environment; loss of recreational amenity; visual impact and impact on wildlife.

- g. Clopton Parish Council: Clopton Parish Council and 95% of the village residents oppose the proposed Molesworth Wind Farm. It will adversely affect resident's quality of life, the wildlife and environment and have a devastating effect on the rich and varied landscape.
- h. Raunds Town Council: no objections but concerns about the amount of similar applications around our area.
- i. Lilford cum Wigsthorpe and Thorpe Achurch Parish Council: raise concerns due to detrimental impact on tourism (church spires) and visual amenity.
- j. Titchmarsh Parish Council: objects based upon comments provided in December 2010.
- k. Cambridgeshire County Council Highways: request additional information.
- l. Northamptonshire County Council Highways: request Routeing Agreement to ensure that no delivery or construction vehicles access the site via the B662 and B660 from the north.
- m. East Northamptonshire Council: objects on the basis of:
 1. The proposed turbines due to their scale, number and location would have an unacceptable visual impact on East Northamptonshire District and have an adverse effect on the landscape character of the district. The turbines would appear visually prominent from the A14, Titchmarsh Village, nearby local sites and buildings, and roads and public rights of ways within the district, and would also have a detrimental effect on the visual amenities of the district.
 2. The proposed turbines would have an adverse effect on the heritage assets within East Northamptonshire District. The submitted Environment Statement makes assertions that there would be no material effect on the setting or harm on any heritage asset. However, very limited information has been provided to demonstrate that there would not be an adverse effect on the closest conservation areas of Titchmarsh, Thrapston and Woodford and the heritage assets contained within and around the rural settlements of East Northamptonshire. There are concerns that the proposal would have an adverse impact on the local road network in the district. East Northamptonshire Council requests that it be consulted on the Traffic Management Plan, should one be available.
 3. Huntingdonshire District Council (HDC) will need to be satisfied that no protected species or other wildlife would be adversely affected by this proposal in accordance with the Habitat Regulations and other environmental and wildlife legislation. Also, HDC are advised that any impact on biodiversity should be minimised and that there would be a net gain, in accordance with the guidance contained in the NPPF.

4. There are concerns that there would be reception issues and HDC is requested to consider measures to secure mitigation i.e. by condition, should HDC be minded to grant planning permission for the development.
- n. English Heritage (East of England): the proposal is for 6 large turbines in a sensitive location in rural Huntingdonshire where there are a number of highly graded heritage assets close by. The development will result in harm to the significance of some of these assets and it will be necessary to weigh that harm against the wider public benefit resulting from the proposal. The letter considers the impacts on The Church of St Lawrence (Grade II*), Bythorn, Bythorn Conservation Area, The Church of St John the Baptist (Grade I), Keyston, Keyston Conservation Area, The Old Manor House Site (Schedule Monument), Keyston and other highly graded heritage assets in Molesworth, Brington and Old Weston. In conclusion English Heritage consider that given the quality of the assets affected and the level of harm that will result from this proposal, English Heritage doubt that there would be sufficient public benefit to outweigh the harm and they would expect the application to be refused.
 - o. English Heritage (East Midlands): no response received.
 - p. Huntingdonshire District Council Environmental Protection: request additional noise information.
 - q. CPRE Cambridgeshire and Peterborough: It is CPRE's contention that the adverse impacts of the proposal outweigh the benefits afforded by the creation of renewable energy in what is a relatively low wind speed area. Concerns raised in respect of the number and scale of turbines proposed and their location on the valley crest would overwhelm the gentle rolling landscape of this attractive part of Huntingdonshire; conflict with Wind Power SPD; consider that the development would have an adverse impact on Conservation Areas. In Bythorn, the turbines would appear above Listed Buildings and in views from open spaces in the heart of the village; in Keyston, the view from the south on the B663 of the Conservation Area and of the Parish Church would be compromised while at Molesworth turbines would appear above Listed Buildings as seen from the Millennium Green Open Space and the site boundary actually adjoins the Conservation Area.
 - r. Natural England: this application is in close proximity to the Nene Valley Gravel Pits SSSI, SPA, Ramsar and Grafham Water SSSI. However, given the nature and scale of this proposal, Natural England is satisfied that there is not likely to be an adverse effect on this site as a result of the proposal being carried out in strict accordance with the details of the application as submitted. We therefore advise your authority that the Nene Valley Gravel Pits SSSI does not represent a constraint in determining this application. We have some concerns about the proximity of red kite roosts to the turbines, and regarding the wider cumulative effects to red kites, given the quantity of wind turbines in the wider area. A 2.3% baseline mortality for red kite is not statistically significant but it is nevertheless worrying, particularly in the context of our Northamptonshire reintroduction programme.

Therefore, a programme of post construction monitoring (via condition) should be put in place. We are satisfied that, providing all mitigation is included as outlined in the ecology chapter, and an Environmental Strategy is secured by planning condition as suggested, there will be no adverse effects to bats, great crested newts or badgers during construction. However, we note that it is proposed not to include post construction monitoring for bats. We consider that it is important that data from sites with several bat species is collected to add to the data in the public domain so that in future we can more accurately assess mortality risk. We would therefore request that, as a medium wind energy development with seven bat species in close proximity to the site, the applicant includes post construction monitoring for bats. The monitoring strategy can be included in the conditioned Environmental Strategy, to be approved by the local authority prior to the commencement of the development. We are pleased the applicant intends to enhance existing field margins, hedgerows and ponds where not already included within the Environmental Stewardship schemes, and with the recommendation to improve linkages between wildlife sites and enhance the Molesworth Bridleway.

- s. RSPB: despite concerns about the proximity of the windfarm to Red Kite roosts we have no objection to the proposal. However further mitigation measures should be undertaken including removing turbines 1 and 3 (owing to Red Kite flight lines), managing the areas surrounding the turbine bases to ensure that it is unattractive as a foraging resource and carrying out post-construction monitoring for 5 years.
- t. Cambridgeshire Friends of the Earth: urge Huntingdonshire District Council to offer unequivocal support to this application and allow the construction of this development.
- u. The British Horse Society: object due to the location of the 6 turbines to bridleways and the impact of blade shadows.
- v. British Telecom: the Wind turbine Project indicated should not cause interference to BT's current and presently planned radio networks.
- w. Ministry of Defence: the MOD previously raised an objection with this proposal given it will be in line of sight to the Primary Surveillance Radar at RAF Cottesmore. As of 17 July 2012, the MOD has ceased safeguarding the Primary Surveillance Radar at RAF Cottesmore from wind farm development proposals. Therefore, the MOD recommends that in the case of Molesworth, Huntingdonshire District Council can now remove MOD's objection to this proposal. Conditions requested for any approval.
- x. NATS Safeguarding: no safeguarding objection.
- y. Cambridgeshire Airport: no objections.
- z. Anglian Water: no objection.

- aa. Cambs Police: The height of the turbines should have no detrimental effect on operation of the emergency services air operations unit. The only risk, prevalent to the development, is the theft of cabling linking the turbines to the outlet point.
- bb. Arqiva: are responsible for providing the BBC and ITV's transmission network. No objection.
- cc. Joint Radio Company: do not foresee any potential problems.

5.3 Second Consultation

- a. **Bythorn and Keyston Parish Council (copy attached): object** due to: inappropriate location; non compliance with the Council's planning guidance; landscape amenity; general amenity; heritage impacts; noise; warning lights; wildlife; cumulative impact; no commitments to local benefits; distribution of energy; traffic issues; insufficient quality of photomontages. Consider that local opinion is very much against this development. The District Council should respect localism and reject this proposal.
- b. Titchmarsh Parish Council: views remain the same.
- c. Huntingdonshire District Council Environmental Protection: the ES and supporting documents submitted have adequately quantified the predicted noise impacts of the proposal. These submissions indicate that noise levels will be within those advocated by Government supported guidance (ETSU-R-97) and noise is, therefore, not a reason for refusal. Under these circumstances a suite of noise conditions are recommended which should be attached in the event that permission is granted.
- d. Cambridgeshire County Council Highways: tracking movements can all be made within the highway; visibility is acceptable; road would have seen similar vehicular movements in the past. Therefore no objections subject to conditions.
- e. Northamptonshire County Council Highways: whilst there are no objections in principle to this proposal the Highway Authority (Northamptonshire) would request that a "Routeing Agreement" be conditioned to ensure that access to the site is served via the A14 and not the rural routes within Northamptonshire, serving the rural communities of Clopton, Thurning and the like, to ensure that no delivery or construction vehicles access the site via the B662 and B660 from the Northern side of the development site. I would request that should approval be given the above issues be considered and conditioned appropriately to address the issues of concern by this authority.
- f. Cambridgeshire County Council Definitive Map Officer: note that all the turbine sites are at least 200 metres from public bridleways and byways and welcome this. We have some concerns over the location of turbine 3, close to Public Footpath No 30, Bythorn and Keyston. Whilst it appears that this is just far enough from the footpath to avoid oversailing , it would be preferable if it were at least fallow height from the footpath. There are a number of places where the proposed access tracks cross public rights of way. We have no objection to this, however the developer will

need to be aware of this, particularly during the construction phase. The developer should ensure that all drivers are aware of the public rights of way and that they should give way to the public using them. Warning notices should be erected and we request that a condition is made to this effect.

- g. English Heritage: maintain concerns over heritage assets. Advise; in light of the Bicton appeal decision, that the harm is likely to be determined as being less than substantial for the purposes of the NPPF.
- h. Highways Agency: no objection subject to a S278 agreement in relation to the temporary works to the junctions of the A14. Limited shadow flicker not considered to be a significant driving hazard.
- i. Environment Agency: comments and suggested conditions regarding flood risk and biodiversity. Pollution prevention informatives suggested.
- j. Natural England: Natural England has no further comments regarding the supplementary information as it does not concern any of the points we raised in our letter of 20 September 2012. However our previous recommendations should be taken into account, in particular to include post construction monitoring for red kites. Note also that they have no concerns to raise about effects to the nearby Nature Improvement Area.
- k. RSPB: no objections provided that the conditions for a habitat management plan and post construction monitoring are imposed.
- l. Cambridgeshire Police: no further comments.

6. REPRESENTATIONS

- 6.1 There have been 480 responses to the application. Of those 151 support the application, 5 have made representations and 324 have objected. Objectors include Shailesh Vara MP, County Councillor Bywater (Sawtry and Ellington Ward), Councillor Capp (Barnwell Ward in East Northamptonshire) and the Parochial Church Council's of St John the Baptist, Keyston and also St Lawrence Church in Bythorn.
- 6.2 Two detailed objections have also been received from the Stop Molesworth Wind Farm Action Group (who are to be a 'Rule 6' party and will therefore appear at the Public Inquiry). Those objections comprise the following headings:
 - Planning policy context
 - Summary of objections
 - Landscape and visual amenity
 - Archaeology and cultural heritage
 - Environmental Impact Assessment
 - Noise
 - Ecology and nature conservation
 - Impact on health
 - Residential amenity
 - Shadow flicker

- Access, traffic and transportation
- Further points of objection (including need, benefits, tourism impact, aviation, telecommunications, control building, use of carbon fibre, safety, low wind speed area)
- Proposed planning conditions

6.3 In terms of the supporters these are mainly from the Huntingdon area and no letters of support have been received from residents in Bythorn, Molesworth, Brington, Keyston or Old Weston. Those in support raise the following considerations:

- Need to protect the environment
- Job creation
- Renewable and sustainable source
- Clean energy
- Don't want a nuclear power station nearby
- Parts of East Anglia arrived via wind power (the Fens)
- They look beautiful
- Need to do something
- Helps to combat climate change
- Best way to increase electrical power
- For future generations
- Windfarms are a necessity
- Part of the solution
- British energy

6.4 Of those objecting the vast majority are from the local area (including addresses within East Northamptonshire Council's jurisdiction). Objections include:

- Not environmentally friendly
- Impact on Bythorn Church
- Health concerns (vibration; sleep problems; shadow flicker; wind turbine syndrome)
- Blot on landscape
- Noise
- Proximity to houses
- Impact on landscape
- Impact on recreation routes (footpaths)
- Ruin character and charm
- Air safety danger (low flying zone)
- Amplitude modulation
- Small site sandwiched between several villages and an active RAF base
- Birds and bats are vulnerable to wind turbines
- Close to Titchmarsh Nature Reserve
- Ecology within RAF base
- Proximity to Listed Buildings and Conservation Areas
- Cost too much to produce and maintain
- Impact on road safety
- Contrary to Council guidance regarding capacity within the Northern Wolds
- Impact on wildlife
- Benefits will be far outweighed
- Noise and light flicker

- Impact on visitors
- Impact on community spirit
- Woolley Hill and Hamerton Zoo decisions have used up capacity in the Northern Wolds
- Impact on use of bridleways
- Ice throw
- TV and radio reception
- Efficiency not proven
- Should be sited further away from village
- Impact on property values
- Gross and overbearing visual intrusion
- Impact on local airfields
- Impact on red kites
- Construction traffic
- Loss of residential amenity
- Shadow flicker
- Too close to Molesworth Conservation Area
- Enjoyment of garden area will be spoilt
- Visual amenity of villages and surrounding countryside will be destroyed
- Impact upon tourist business
- Inefficient source of power
- Deter users of footpaths
- More bat mitigation should be provided
- No certainty over connection to sub-station
- Village will be surrounded by noise from A14 on one side and turbines on the other
- View from Catworth includes 7 villages (united benefice) – this would be dwarfed
- Suggest 2km standoff with dwellings
- Lights would destroy tranquil nature of the area at night
- Insufficient level of local consultation
- Impact on digital television reception – ‘ghosting’
- Proposal is fundamentally unacceptable in this location
- Criticism of subsidies
- Impact on farming at Foxholes Farm
- Titchmarsh Lodge East may re-inhabited
- Wind turbines have resulted in an increase in fuel bills
- Parts not made in Britain
- Low wind speed area
- Area will be ‘wind farm alley’
- Separation of 15km should apply between windfarms
- Concern over future proposals if approved
- Intrusive commercial use
- Impact on local economy

7. SUMMARY OF ISSUES

- 7.1 Before assessing the suitability of the proposal it is necessary to set out some procedural considerations in relation to the ES and the weight which should be given to planning policies and material considerations.

The Environmental Statement

- 7.2 As noted in the first section of this report the development has been accompanied by an ES. The ES was scoped formally with the Council in August 2010. An ES was then submitted with the original application, and following a request in August 2012 (under Regulation 22 of the Environmental Impact Assessment Regulations 2011) further information was requested in order to enable the ES to be considered suitable for purpose.
- 7.3 The December 2012 Supplementary Information updated the landscape and visual, noise, ornithology and non-avian ecology, cultural heritage and archaeology, traffic and transportation and grid connection assessments together with providing an assessment of impacts upon residential amenity.
- 7.4 The ornithology and non-avian ecology section of the supplementary ES includes an updated bat survey at Appendix 3 which appears to have been identified in Appendix 2 as being necessary. Given the consultation responses above (particularly from Natural England) the ES is considered to be complete for the purposes of the 2011 Regulations.
- 7.5 However with regard to the submitted visualisations whilst these have been helpful in aiding to assess the proposed windfarm some of the additional viewpoints do not appear to illustrate the viewpoints which Officers requested. It may have been prudent to identify the precise location where a view was sought from as, for example, Viewpoint AP3 (from Bythorn Churchyard) is not representative of the view which would be experienced from within the Churchyard. It is difficult to see why this view was taken from this location as it relates to grass mound which is unlikely to be used given the Church paths.
- 7.6 The Action Group and a number of local objectors have raised concerns regarding the accuracy of the photomontages which have been provided as part of the application. As noted above the details are considered to be sufficient for the purposes of the 2011 Regulations.
- 7.7 It is acknowledged that the viewpoints though are only a tool to assist in making the assessment of the impact upon views. The submission of additional viewpoints has enabled further views to be reviewed and assessed. Therefore, whilst it is unfortunate that some of the additional viewpoints are not fully representative of the actual impacts which would arise, the ES is considered to be sufficient.
- 7.8 Therefore the ES is considered to assess each issue satisfactorily for the purposes of the 2011 Regulations. Clearly it is for the Council to consider whether it agrees or disagrees with the conclusions reached in each part of the ES and then to assess the impacts arising against planning policies and material considerations.

Weight to Policies and Material Considerations

- 7.9 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and this application the development plan for Huntingdonshire comprises of the Core Strategy 2009, the Local Plan

1995 and the Minerals and Waste Core Strategy 2011. Relevant material considerations include the draft Local Plan to 2036: Stage 3, the Wind Turbine SPD 2006 and the NPPF.

7.10 Although not a legal requirement, paragraph 215 of the NPPF advises that when determining applications after the one year anniversary of the NPPF then the weight to be given to the policies in existing plans should be determined having regard to the consistency with the NPPF. The Act requires that “if regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

7.11 With regard to paragraph 215 of the NPPF the table below sets out the weight which Officers consider should be given to each respective development plan policy:

Policy	Weight having regard to paragraph 215 of the NPPF
Huntingdonshire Local Plan 1995	
R15 “Countryside Recreation”	Full weight owing to paragraph 75.
En2 “Character and setting of Listed Buildings”	Significant weight owing to paragraph 126. Reduced from full weight as there is no balancing exercise, as exists within paragraphs 132 to 134.
En5 “Conservation Area Character”	Significant weight owing to paragraph 126. Reduced from full weight as there is no balancing exercise, as exists within paragraphs 132 to 134.
En9 “Conservation Areas”	Significant weight owing to paragraph 126. Reduced from full weight as there is no balancing exercise, as exists within paragraphs 132 to 134.
En11 “Archaeology”	Reduced weight owing to the negative wording of the policy. However the general approach is consistent with paragraph 136.
En12 “Archaeological Implications”	Full weight owing to paragraph 136.
En17 “Development in the Countryside”	No weight for the purpose of this type of application as renewable energy generation is not explicitly included.
En20 “Landscaping Scheme”	Full weight owing to paragraph 118.
En22 “Conservation”	Full weight owing to paragraph 119.
En23 “Conservation”	Full weight owing to paragraph 119.
En25 “General design criteria”	Full weight owing to paragraph 56.
T18 “Access requirements for new development”	Full weight owing to paragraph 32.
Core Strategy 2009	
CS1 “Sustainable development in Huntingdonshire”	Full weight owing to paragraphs 7 to 17.
CS9 “Strategic Green Space Enhancement”	Full weight owing to paragraph 109.
Minerals and Waste Core Strategy 2011	

CS1: “Strategic Vision and Objectives for Sustainable Minerals Development”	Full weight owing to paragraphs 142 and 143.
CS26; “Mineral Safeguarding Areas”	Full weight owing to paragraph 144.

- 7.12 With regard to emerging plans the weight to be applied shall be based upon the stage of preparation, the extent of unresolved objections and the degree of consistency with the NPPF.
- 7.13 The Local Plan to 2036 is the only emerging plan which is engaged in this regard. Whilst a similar exercise to that set out above could be undertaken it is considered that only moderate weight can be given, at this time, to the draft Local Plan policies. All of these policies have been produced post the NPPF and they are therefore considered to be compliant with the objectives and principles of the NPPF.
- 7.14 With regard to other material considerations officers consider that full weight can be given to the NPPF. With regard to the 2006 Wind Power SPD again full weight can be given to this despite the fact that it pre-dates the NPPF. The SPD provides an analysis of capacity based upon the landscape characteristics of the District. The draft Wind Power SPD can be given limited weight owing to the level of comments which were received to the draft publication. It is anticipated that a revised SPD will be taken to Cabinet for adoption well ahead of the Public Inquiry.
- 7.15 Full weight can be given to the Huntingdonshire Landscape and Townscape Assessment 2007 as again this aids in assessing the baseline landscape character of the application site and its surroundings.
- 7.16 The East of England Plan (Regional Spatial Strategy (RSS)) has now been revoked and no longer forms part of the development plan. There is therefore no longer any regional target in relation to the generation of renewable energy. The documents which informed the RSS must therefore be viewed accordingly. The *Placing Renewables in the East of England* final report 2008 includes reference (paragraph 8.4) to a ‘broad area’ which could be termed as an ‘area of likely concentration’ for onshore wind. This area is not defined on plan but is described as being ‘an area of the region extending to the north of Bedford, St Neots and Cambridge, and west of Ely, Downham Market and Swaffham’.
- 7.17 Having regard to figure 6.1 of the report it is considered, owing to the medium high landscape sensitivity area within which the application site is located, that the site falls outside or at least on the margins of this ‘area of likely concentration’.
- 7.18 The Renewable and Low Carbon Energy Capacity Study 2011 appears to highlight on page 66 that the application site is within an ‘energy constrained’ location.

The Principle of Development Capable of Generating Renewable Energy

- 7.19 The main thrust of central government policy is to help counter the serious effects of climate change which are considered to be

significant and include potential increases in flooding, subsidence, water shortages and increased insurance associated with damage to buildings. The importance to Huntingdonshire District and Cambridgeshire as a whole cannot be underestimated since, amongst other things, much of the area is low lying close to sea level. In addition Huntingdonshire's residents have, on average, one of the highest annual per capita carbon footprints figures in the region at 9.2 tonnes of CO₂ (measured in 2010 and as calculated by DEFRA under the methodology for national indicator NI 186).

- 7.20 Huntingdonshire District Council is committed, as a signatory to the Nottingham Declaration, to taking steps to mitigate the negative effects of climate change. Common Barn Wind Farm (if allowed at appeal) will have an installed capacity of between 6 and 9 megawatts which is estimated to meet the annual power needs of approximately 4000 households. Other consented and operational windfarm developments within the District include Red Tile, Cotton Farm, Woolley Hill and Ramsey (the latter recently receiving a resolution to grant planning permission for additional turbines).
- 7.21 The raft of Government documents from the Energy White Paper, Meeting the Challenge May 2007 to the July 2009 Renewable Energy Strategy leave no reasonable room or dispute regarding the seriousness of climate change and its potential effects, the necessity to cut carbon dioxide emissions or the seriousness of Central Government's intention regarding its commitment to the generation of energy from renewable sources.
- 7.22 There are also several further publications that reinforce the national energy policy position with the Renewable Energy Strategy of July 2009 clearly identifying that wind generation both onshore and offshore has an important role to play in the provision of renewable generation in the UK. The EU Renewable Energy Directive requires the UK Government to ensure that at least 15% of energy consumed comes from renewable sources by 2020 whereas at the end of 2010 only 3.3% of consumed energy comes from renewable sources.
- 7.23 The Energy Act 2011 follows on from the Energy Acts of 2008 and 2010 and provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to our framework to enable and secure low-carbon energy supplies and fair competition in the energy markets. This has now been followed up with the Energy Bill November 2012 which seeks to provide certainty for investors.
- 7.24 The Climate Change Act 2008 has two main aims: to improve carbon management, helping the transition towards a low-carbon economy in the UK and to demonstrate UK leadership internationally, signaling commitment to and responsibility for reducing global emissions. The key provision of the Act is to introduce a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad. Also a reduction in emissions of at least 34% by 2020. Both targets are against a 1990 baseline. The Renewable Energy Roadmap further enforces national targets and identifies the urgency of the need to develop further renewable energy generating schemes.

- 7.25 National policy therefore remains strongly supportive of appropriately located proposals to generate renewable energy.
- 7.26 It is accepted that the 2020 national target is going to be a challenging target for the UK and a major push towards achieving these targets will need to take place over the next seven years. The timescale for enabling approved schemes to become operational is such that action is required urgently.
- 7.27 Paragraph 98 of the NPPF confirms that it is not necessary for an applicant to prove the need for renewable energy generating developments and recognises that all projects provide a valuable contribution to cutting greenhouse gas emissions and there is therefore no requirement to question the efficiency of the proposed wind turbines.
- 7.28 The scale of the proposal is such that it is capable of generating an installed capacity of 15MW of electricity. It would be the third largest windfarm in the District and while this brings with it other considerations the energy generating capacity means that the proposal enjoys strong support due to its ability to generate up to 15MW of installed capacity of electricity.
- 7.29 Putting the many detailed issues which this application brings to one side the principle of additional renewable energy generating development within the District is welcomed having regard to national policy. It is acknowledged also that the development would contribute towards the promotion of low carbon energy and assist in cutting carbon dioxide emissions. These targets are, following the revocation of the East of England Plan, only now found in national and international policy. There is therefore no local or regional target to aspire to. That said paragraph 98 of the NPPF confirms that the demonstration of need for renewable energy projects is not necessary.
- 7.30 Having established the position regarding the ES, the weight to be afforded to policies and material considerations and the principle of the development the remainder of this report considers the individual issues followed by the overall balancing exercise. The individual issues are considered to be: site selection and consideration of alternatives; cultural heritage; landscape and visual; residential amenity; economic impacts; ecology, nature conservation and ornithology; hydrology, hydrodeology and geology; traffic, transport and access (including public rights of way); infrastructure; community involvement and comments; personal circumstances and other considerations (including community benefit fund and house prices).

Site Selection and Consideration of Alternatives

- 7.31 Schedule 4 Part 1 (2) requires that the ES provides an outline of the main alternatives studied by the applicant and an indication of the main reasons for the choice made, taking into account the environmental effects. Section 3.3 of the original ES provides some limited consideration of the constraints and consultations which were undertaken in the build up to the public exhibition which took place in October 2010. This information fulfils the requirement of Schedule 4 Part 1(2) referred to above.

- 7.32 It is clear from the submission that the original scheme for this site comprised eight wind turbines. Following three design reviews, and having regard to byway separation distances, bat foraging and community areas and community consultation the scheme was reduced to its current scale of six 126m high turbines.

Cultural Heritage including Archaeology

- 7.33 The ES in relation to these matters comprises the original assessment which was then supplemented by the update. The update includes the results of trenching which took place across 22 locations. The County Council Archaeologist's comments are awaited and the Panel will be updated accordingly. However, until such time as the position has been identified by the County Council, the harm is not capable of being quantified by officers.
- 7.34 In relation to other heritage assets (including Listed Buildings, Conservation Areas and Scheduled Ancient Monuments) the submitted supplementary assessment seeks to address comments provided by English Heritage and new policy documents. The methodology adopted in the supplementary ES varies from that within the original ES and this does create significant concerns particularly as the supplemental ES does not assess all of the heritage assets. On that basis it is reasonable to utilise the original ES methodology as this adopts a consistent approach throughout the assessment. This methodology has therefore been utilised by officers in undertaking their own assessments.
- 7.35 Within the original ES the most significant impacts which were anticipated were to Scott's Farmhouse, Bythorn (Grade II) – 'Moderate' effect and Bythorn Conservation Area – 'Moderate' effect. All of the remaining impacts are recorded as 'Minor'.
- 7.36 English Heritage have not undertaken a similar EIA assessment in their own right. They have however stated that they consider that the ES has incorrectly assessed the settings of a number of heritage assets and has also under-assessed the impacts arising from the windfarm. For example they consider that the setting of the Bythorn Conservation Area extends onto the site of the windfarm. English Heritage also consider that the impact upon The Old Manor House, a Scheduled Ancient Monument in Keyston, might well be adverse and therefore result in harm to its significance.
- 7.37 East Northamptonshire Council raised concerns regarding the impacts arising from the proposal upon heritage assets within their District. Should any comments be provided by them on the additional information then this will be updated to the Panel.
- 7.38 Officers have undertaken their own assessments of the impacts and conclude that the setting of a number of heritage assets will be harmed. For EIA purposes it is considered that the following assets will experience a significant (for EIA purposes) effect:
- Scotts Farmhouse, Bythorn (Grade II) – Major effect
 - Bythorn Conservation Area – Major effect
 - St Lawrences Church, Bythorn (Grade II*) – Major effect
 - Church of St John, Keyston (Grade I) – Major effect

- Keyston Conservation Area – Major effect
- St Peters Church, Molesworth (Grade II*) – Moderate effect
- Old Manor, Keyston (Scheduled Ancient Monument) – Moderate effect
- All Saints Church, Brington (Grade II*) – Moderate effect
- St Swithens Church, Old Weston (Grade II*) – Moderate effect
- Molesworth Conservation Area – Moderate effect

- 7.39 In assessing the impacts for the purposes of applying planning policy and ultimately determining the proposal an important requirement is set out in law. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 7.40 It is clear from the analysis (and in some cases accepted by the applicant) that harm will be caused in varying degrees to the setting of various grades of heritage assets within a 5km area.
- 7.41 The NPPF recognizes the importance of preserving heritage assets and supports sustainable development. Paragraph 7 of the NPPF confirms the three strands of sustainability. In relation to environmental matters this confirms that this includes protecting our natural, built and historic environment.
- 7.42 Paragraph 132 also advises that great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.
- 7.43 With the exception of the unlisted cold war structures at RAF Molesworth, which is considered to be a heritage asset of local interest, this application affects designated heritage assets all of which are of national importance. In some cases the development affects the setting of Grade I and II* Listed Buildings which are considered to be of exceptional or more than special importance respectively.
- 7.44 In relation to the impacts which are not considered to be significant for EIA purposes these do need to be assessed against planning policies. The applicant states that there will be negligible magnitude of change to many assets; that is 'slight change within the setting of the heritage asset which does not affect the significance of the asset or its character value or interest'. If the change does not affect the significance then the development must be considered to fall outside the setting of the asset. This may be the case for some assets particularly those at a great distance from the windfarm or those assets where their significance is not affected but officers do not agree with a large number of the buildings allocated within that category.
- 7.45 Officers believe that the magnitude of the effect of the turbines has been underestimated in a large number of cases and that a degree of harm will inevitably be caused.

Assessing the Level of Harm

- 7.46 There will be varying levels of harm caused to the setting of heritage assets by the proposal. Where the presence of the turbines does not preserve or enhance the special architectural or historic interest of the asset, harm will be caused. This harm will range across a spectrum from very slight harm to the highest level of harm. At the highest end of the spectrum harm is considered to be substantial harm (as identified in paragraph 133 of the NPPF) where the level of harm is considered to be only acceptable where it secures substantial public benefits that outweigh that loss and as such permitting the proposal in such circumstances should, as set out in paragraph 132 of the NPPF, be exceptional (in the case of Grade II Listed Buildings and non-designated heritage assets) and wholly exceptional (in the case of Grade I, II* and Ancient Monuments). The public benefits must be weighed having regard to this guidance.
- 7.47 Below this level of harm is less than substantial harm; as English Heritage comment this can still range from low level harm to a great deal of harm just below the threshold for substantial harm. In these cases the level of harm should also be weighed against the public benefit of the proposal. In Officers views where the more important assets (Scheduled Ancient Monuments, Grade I and II* Listed Buildings) are affected it has to follow that a greater level of weight should be given to seeking to conserve rather than harm these assets.
- 7.48 In this case the level of harm attributed by Officers to Bythorn Conservation Area and Bythorn Church are both considered to fall within the 'substantial' category because the impacts will be readily apparent and large in number (both when viewed from and towards the assets). The impacts are considered to be unacceptable, as they will significantly harm the significance of the Church and the Conservation Area.
- 7.49 With regard to the Church this is an important landmark feature within the village and the wider character of the area. The turbines will be seen in approaches (within the village and at distance) to the church and experienced adjacent to the church in the churchyard and the Conservation Aea. The primacy of the Church at the centre of the rural settlement, and its symbolic significance will be harmed by the introduction of the dominant modern industrial moving character of the turbines which would be on land higher than the village and out of scale with the intimacy of the churchyard. The significance of the Conservation Area is made up of the buildings and spaces within it. The Church and other listed buildings contribute to the character and appearance of the conservation area as does the landscape framework of the settlement. The intrusion of views of modern industrial turbines into vista within and from outside the conservation area will harm the significance of this heritage asset and the way in which it is experienced..
- 7.50 It should be noted here that paragraph 132 of the NPPF advises that substantial harm to heritage assets of the highest significance should be wholly exceptional.

- 7.51 The impact upon Keyston Conservation Area, the Church in Keyston and Scotts Farmhouse in Bythorn are all considered to fall just below the 'substantial' threshold set out within the NPPF. With regard to the assets within Keyston the Church again marks the location of an historic settlement. The Church spire is an important landmark within the area and dominates many views into and out of the village. The visual dominance of the church and the rural character of the village are important parts of the significance of the Conservation Area. Views, particularly from the south of the settlement looking towards Keyston would be unacceptably compromised by the proposal as the windfarm would dominate the views and undermine the significance of the setting of the Church and the Conservation Area.
- 7.52 It is also necessary to consider the 'other less than substantial harm' which is considered to occur at the Old Manor (the Keyston Scheduled Monument), the Churches in Brington, Old Weston, Molesworth and Catworth, Molesworth Conservation Area, the Old Manor in Brington and RAF Molesworth. Comments from East Northamptonshire Council upon the supplemental ES are awaited although previously they raised concerns regarding the perceived under-estimation of the impacts upon heritage assets within their area.
- 7.53 In relation to the NPPF therefore paragraphs 133 and 134 are engaged. In this case the harm needs to be assessed against the public benefits. It is noted above that paragraph 132 of the NPPF advises that substantial harm to heritage assets of the highest significance should be wholly exceptional and that harm to Grade II Listed Buildings should be exceptional.
- 7.54 Policies within the Local Plan seek to apply the requirements of the 1990 Act, referred to above, into the determination of applications. Those policies, and the sections of the 1990 Act referred to above are important considerations within the Council's resolution on this proposal.
- 7.55 It is clear from the assessment above that Officers consider that harm is caused to a number of heritage assets and therefore special regard to preserving the setting of a number of Listed Buildings has not been demonstrated. Indeed in two situations the harm which would be caused is considered to be substantial and therefore would require wholly exceptional justification. In addition the proposal would harm, and therefore not preserve, the character and appearance of a number of Conservation Areas.
- 7.56 With regard to archaeology matters the position at this time (given that a response has not yet been received by the County Council, is that the harm cannot be quantified.
- 7.57 There is therefore significant conflict with the requirements of Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 and with Policies En2, En5, En9 and En11 of the Local Plan and draft Policy LP31 of the Local Plan to 2036: Stage 3.
- 7.58 It is acknowledged that this harm would be temporary; albeit for a 25-year period. Whilst English Heritage guidance (2005) 'Wind Energy and the Historic Environment' states that reversibility does not lessen

the harm to a heritage asset it is a factor to be considered when weighing harm against wider benefits. This assessment is undertaken at the end of this report.

Landscape and Visual Effects

- 7.59 As noted previously the site falls within the Northern Wolds landscape character area as identified within the Wind Power SPD. The supplemental ES seeks to address the criteria against which a proposal of this scale should be assessed. However the assessment does not draw clear conclusions and instead provides a descriptive analysis.
- 7.60 It is noted that the draft Wind Power SPD does not contain any guidance criteria for proposals of 6 or more turbines within the Northern Wolds as there is considered to be low or very little capacity.
- 7.61 As full weight can be given to the adopted SPD it should represent the starting point for any assessment. The purpose of the SPD is to “guide proposals to the most appropriate locations and ensure that the key features and values of Huntingdonshire’s landscapes are safeguarded” (SPD paragraph 1.3). In order to achieve that purpose it is comprised of two strands, both of which must be considered fully:
1. Numeric guidance on acceptable turbine group sizes
 2. Further guidance indicating “criteria that need to be taken into account when considering specific proposals “ (SPD para 1.1)
- 7.62 Many local objections have identified that the adopted SPD (at paragraph 8.4) advises that the Northern Wolds only has capacity for one small scale group windfarm. However the paragraph goes on to advise that decisions will need to be taken on a case-by-case basis. As it is evident that the approved windfarm at Woolley Hill (4 turbines) and that proposed in this application are 11.3km apart from each other (and therefore towards the eastern and western sides of the Northern Wolds character area) the cumulative impact concern within the Wind Power SPD requires a much more detailed analysis as referred to below. The approved and operational Hamerton Zoo turbines are similarly on the periphery of the Northern Wolds character area although the resultant landscape and visual effects of these operational and consented schemes do, and are likely to, extend well into the Northern Wolds landscape character area.
- 7.63 However in order to consider the overall assessment the key criteria listed in paragraph 8.3 of the Wind Power SPD are assessed below:
- 8.3 (a) Respect existing landmark features such as key views to church spires*
- 7.64 The supplemental ES advises that no wind turbine would be within one kilometre of a church with Bythorn and Molesworth being 1 kilometre to the south/south-east, Keyston 1.6 kilometre to the south-west and Brington 1.8 kilometres to the south-east. It advises that the relative concentration of these landmark features means that it is inevitable that wind turbines will be visible simultaneously or consecutively from certain locations.

7.65 The photomontages at ES Vol 2A viewpoint (VP) 8, ES Vol 2B additional viewpoints (AP) 6 and 8 and the Action Group VPs 1, 2 and 3 show one or both of the spires at Bythorn and/or Keyston. Officers consider that the respective Churches are unacceptably compromised by the presence of the turbines. Also within the ES Vol 2A VP14 and ES Vol 2B AP7 the spire of Bythorn Church is just out of view of the montage frame but will be highly visible. In ES Vol 2B AP5 Keyston spire is behind a hedgerow tree and will be visible from other locations on the footpath.

7.66 The current proposals will be intrusive and incongruous in views towards one or both of the distinctive spires of the parish churches at Bythorn and Keyston and there will also be some impacts upon other churches as noted in the heritage assessment above. The turbines will compete with the spires and distinctive qualities of the churches in these key views from roads and public rights of ways; the turbines will divert attention from the spires and other distinctive qualities and detract from their role as landmark features, marking the historic settlements in the Northern Wolds landscape character area. Key landscape characteristics would therefore be devalued, with inevitable unacceptable damage to landscape character.

8.3 (b). Respect the landform and relate turbines to the strong ridges and plateau; avoid locating turbines within the more intimate landscape of the valley and along valley crests where they will be out of scale with the landscape and settlements such as Kimbolton.

7.67 The supplemental ES advises that the turbines would be located on a strong ridge and plateau and would avoid more intimate valley and valley crests. It also advises that the addition of tall turbines into this landscape context will inevitably result in a noticeable contrast in scale with certain other features.

7.68 The photomontages at ES Vol 2A VPs 8 and 10, ES Vol 2B AP 6 and 7, and Action Group viewpoints VP 1 and 3 all illustrate the location of Bythorn on the valley side, with the land rising up as one moves north through the village. Warren Lane continues to rise as one moves northward and bisects the windfarm site, and it reaches its highest point near the northern tip of the site. The landform around Bythorn is complex with the main valley of the headwaters of the Ellington Brook running south of the village, but a tributary running from a point north of the village (as shown in Vol 2A, VP 10) then flowing past the eastern edge of the village.

7.69 From the south (ES Vol 2B AP6, Action Group VP3) the turbines appear to be spread along the top of the valley side, but analysis of the local contours combined with the turbine locations shows that there is a large variation in the heights (AOD) of the respective turbine bases.

7.70 The application site is centred around a strip of higher ground separating the watersheds of the Nene (to the north-west) and the Ouse (to the south-east). Turbines T1, T3 and T5 are on ground which is falling away to the north-west and are sited below the valley crest when viewed from this aspect. In the centre of the site T2 and T4 are on more level ground, but at T6 on the eastern edge of the

site, the ground is beginning to fall away to the south towards the upper reaches of the Ellington Brook.

- 7.71 The proximity of the turbines to the historic settlement of Bythorn, coupled with the landform and the layout of the turbines that comprise the proposed wind farm together produce a dominant effect on the smaller scale and more intimate landscape of the village and the meadows and pastures of its immediate surroundings.
- 7.72 The Wind Power SPD (and the draft updated document) advise that wind turbines be sited on the “strong ridges and plateau” but at this site there are neither strong ridges, nor a plateau – only fairly gently sloping valley sides to the south and north-west, and a narrow expanse of higher ground barely more than a kilometre in width. Beyond the site to the east and north-east the higher ground continues and broadens out to something more expansive which might be termed a plateau.
- 7.73 The limited extent of higher ground at the site is not sufficient to set the turbines back from the valley crests and sides, which would help reduce their visibility and impact. The current proposal fails to properly address the guidance in the SPD paragraph 8.3.(b) and the effect of the development will be substantially out of scale with the more intimate valley landscapes to the south and the historic settlement of Bythorn.
- 8.3 (c) Avoid siting turbines on areas of pasture with ridge and furrow*
- 7.74 There is not considered to be any unacceptable impact in this regard.
- 8.3 (d) Respect the site and setting of the historic villages which characterise the Northern Wolds.*
- 7.75 The supplemental ES suggest that views from Bythorn, Brington, Keyston and Molesworth will be screened and in certain cases indirect.
- 7.76 The photomontages at ES Vol 2A VPs 5, 6, 8, 9 and 10, ES Vol 2B APs 1, 2, 3, 4, 5, 6, 7 and 8 and Action Group viewpoints VPs 1, 2, 3, 4, 5, 6, 7 and 8 all illustrate effects of varying magnitude on the site and settings of the historic villages of Bythorn, Keyston, and to a lesser extent Molesworth and Brington.
- 7.77 The effects on the heritage assets within these historic villages are considered in the section above.
- 7.78 The four villages of Bythorn, Keyston, Molesworth and Brington all occupy positions towards the head of the valley of the Ellington Brook. All the villages occupy land which is rising from the valley floor up the sides to the higher ground which is generally some 30 metres above the small watercourses that combine to produce the Ellington Brook as it flows from west to east.
- 7.79 The proposed windfarm will compromise key issues identified for the Northern Wolds landscape character area in the Landscape and Townscape Assessment SPD. Positive resolution of these key issues is instrumental in protecting the landscape character, and respecting

the site and setting of the historic villages which characterise the Northern Wolds.

- 7.80 With regard to the sites of the four villages and potential views from within each village, Bythorn would be subject to the most significant impacts. There are views from within Keyston, Molesworth and Brington but these are not as regular as those within Bythorn. The view of the turbines at Bythorn would be more numerous and scattered throughout the village rather than being limited. This would compromise the amenity of residents and visitors to the village, as regular partial views would be apparent as one proceeds about and around the village.
- 7.81 In the wider countryside, especially in views from the south (across the broad west-east valley) round to the east (with views looking more along and up the valley), it is apparent that the turbine development would fall within the settings of all four villages. It is also apparent when considering the viewpoint information listed above that the setting of Bythorn and Keyston (the latter particularly when viewed from the south (which are noted as being 'spectacular' within the Conservation Area Character Statement)) would be dominated by the presence of the turbines – this would diminish the role of those key Northern Wolds characteristics which make Bythorn and Keyston such important villages in that landscape character area.
- 7.82 The ES has stated (para 6.6.45) that "*the character of the development site is consistent with the key characteristics of the Northern Wolds*" At Bythorn and Keyston in particular, that character would change due to the significant effects of the development on the setting of those two villages. It is an adverse effect because the development would militate against some of those key characteristics which determine existing landscape character. The development would be incongruous with the more intimate and small scale valley landscapes which surround the villages; it would detract from the perception of a historic landscape; it would downgrade the key role of the church spires and characteristics in their multiple functions as community focus landmark features identifying the position of a historic settlement; and the moving blades would add significantly to a marked distracting and alien impact in an area of recognised landscape quality.
- 7.83 Notwithstanding the lack of assessment within the ES regarding this criterion the information in the ES is sufficient to indicate significant adverse effects on landscape character and visual amenity.

8.3 e) Relate to existing building clusters in the landscape, for example the occasional large farm buildings, utility buildings or industrial areas (such as disused airfields)

- 7.84 The distance of the proposed turbines from the cluster of buildings at the RAF base, coupled with their relatively small scale when compared to the turbines, means that the wind farm only partially relates to the building cluster. A single turbine adjacent buildings and tower would relate to a greater degree, but a development of six turbines stretching away to the west is of a scale which denies any relation. Nevertheless the conflict with this criterion is not significant.

8.3 f) Relate to the land cover pattern, in particular the woodland edges and field patterns with a consistent and repetitive spacing between turbines

7.85 It is accepted that the turbines are situated within a linear double staggered row with generally consistent spacing; that field patterns are irregular in the immediate vicinity and that woodland cover is limited within the immediate vicinity. Accordingly this is not an area where this criterion can be given significant weight.

8.3 g) Consider the impact on views of the horizon from the Central Claylands, Fen Margins and Fens

7.86 Given the location of this site in relation to those character areas the impacts are considered to be acceptable. Viewpoint 3 (from Alconbury) demonstrates the limited impact on these views.

8.3 h) Consider a linear arrangement along contours as opposed to crossing contours

7.87 It is accepted that the proposal does not unacceptably cross contours.

8.3 i) Avoid the introduction of new pylon lines into the Northern Wolds. The area is currently characterised by the absence of disruptive features and pylon lines would be difficult to accommodate in relation to the distinctive ridge and valley topography

7.88 No new pylon lines are suggested within the application. A planning condition would be necessary to confirm this arrangement within the site.

8.3 j) Seek opportunities to achieve wider landscape management objectives identified in the Huntingdonshire Landscape and Townscape Assessment in association with any proposed development

7.89 It is accepted that the removal of a small portion of hedgerow and field boundary are required to provide access. Sufficient replacement and enhanced provision would need to be provided (as required by paragraphs 109 and 118 of the NPPF) and this could be secured via condition.

7.90 The SPD also includes reference to capacity and cumulative effects. It is apparent that the proposal for 6 turbines is well beyond the capacity guidance given in the SPD, where there is deemed only low capacity for groups of four (or more) turbines. The SPD explains (paragraph 2.4) that "low capacity to accommodate wind turbines" means that "development would be likely to have a significant adverse change in landscape character and/or affect key landscape values".

7.91 It must also be borne in mind that the numeric capacity guidance in the SPD was devised using a nil wind farm base. The current situation in the Northern Wolds and adjoining LCAs is that there are already a number of operational wind turbine developments of differing scales, and additional ones that are consented or "in planning". Consequently the numeric guidance must be seen as a probable maximum figure,

given the fact that some capacity has already been taken up by current existing and consented schemes.

7.92 The ES baseline information was gathered in August and September 2011 and updated to September 2012 in the SEI. However in this instance determination of the application is not being considered until 2014 (as the Inquiry is unlikely to start until the end of 2013); i.e. over two years after the initial base line situation. In that intervening period there have been many additional turbine applications submitted to the LPA that are located within the Northern Wolds. Consequently the situation regarding baseline information and assessment of cumulative effects on landscape character and visual amenity is now out of date and the Planning Inspectorate will have to determine whether it needs to be updated ahead of the Public Inquiry. It is suggested that the District Council raise this concern with the Planning Inspectorate.

7.93 The current situation in the Northern Wolds LCA is as follows: -

Location	Application Ref.	No. of turbines	Height to blade tip (metres)
OPERATIONAL TURBINES			
Hamerton Zoo Park	1200670FUL	2	46
Tilbrook Grange, Tilbrook	1101420FUL	1	25
Glebe Farm, Spaldwick	1002042FUL	1	25
CONSENTED TURBINES			
Woolley Hill Wind Farm	1001741FUL	4	130.5
Mill House, Old Weston	1201408FUL	1	20
Foxholes Farm, Leighton Bromswold	1201829FUL	1	34
"IN PLANNING" TURBINES			
Catworth Lodge, Catworth	1300264FUL	1	46
Haddon Lodge Farm	1201841FUL	1	67
East Lodge Farm	1200688FUL	1	27
West of Bicton Industrial Estate	1300512FUL	3	125

7.94 Of these, only those at Tilbrook, Woolley Hill and the original scheme for Bicton are considered in the ES cumulative assessment, and the SEI considers Hamerton but excludes Bicton as the appeal had been dismissed and the new application was not lodged at that time. So it is apparent that a higher level of cumulative effect (than that predicted in the ES and SEI) could be produced within the Northern Wolds.

7.95 The cumulative impacts are also exacerbated by existing and consented windfarms within the vicinity but outside of the District. In views from the north of the proposal to the south and south-west the consented Chelveston turbines will be visible and unacceptable cumulative impacts could arise. The current proposal at Bicton also brings with it additional concerns regarding cumulative impact from certain viewpoints although it is acknowledged at this time that this application remains under consideration.

7.96 The impact of the proposed associated infrastructure (such as the vehicular access, temporary mast and control building) is considered to be acceptable owing to their size, duration and location. Conditions with regard to the choice of materials and engineering details of the

access would though be necessary in order to control the impact upon the character and appearance of the local area.

- 7.97 Overall therefore the proposal fails to satisfy criteria a), b) and d) of the SPD and in each case there are significant and unacceptable impacts in relation to the impact upon landmark features, landscape character and visual amenity. The cumulative impact from the proposal could also be unacceptable owing to the existing and consented windfarms. The position regarding current applications will also need to be reviewed going forward.
- 7.98 The proposal is therefore in significant conflict with Policies En2, En5 and En9 of the Local Plan 1995, Policy LP31 of the Draft Local Plan to 2036: Stage 3 2013, the Wind Power SPD 2006 and the Huntingdonshire LDF Consultation Draft SPD: Landscape Sensitivity to Wind Turbine Development 2012.

Residential Amenity

- 7.99 An assessment in relation to this consideration encompasses shadow flicker, noise and visual impact. These are considered further below. However in seeking to establish the baseline position officers have agreed with the applicants and East Northamptonshire Council that one property to the west (in East Northamptonshire Council's jurisdiction) has been abandoned. Notwithstanding the landowners suggestion that this is to be brought back into use the residential use of that building has ceased and it would require planning permission if it were ever to be brought back into residential use. Until such time as permission were granted it is not necessary to consider whether the impact will have a positive or negative impact upon the amenity of that property as there is no residential amenity to assess.

Shadow Flicker

- 7.100 The extant Companion Guide to PPS22 sets out that shadow flicker has been proven to occur only within ten rotor diameters of a turbine. In this case a study area of 950 metres has been utilised and there are five residential dwellings within that distance. The submitted assessment identifies that the theoretical occurrence of shadow flicker will occur for 4.33 hours per year at one of those properties (Boundary House which is situated on the southern side of the A14 (to the north of Keyston)). As this is a theoretical calculation it represents a worse case scenario. The ES suggests that no mitigation of this impact would be required although a condition is suggested if deemed necessary. In officer's view it would be appropriate to attach a condition to any permission even though this property does have significant screening to the north (which is presumably used to screen noise from the A14) because the assessment shows a level of impact which would otherwise be unacceptable.
- 7.101 The impacts from shadow flicker are therefore, subject a condition referred to above, capable of being acceptable.

Noise

- 7.102 The Council's Environmental Protection Team Leader has carefully analysed the proposal and as part of that exercise additional information has been submitted. Despite views expressed in opposition to the proposal ETSU-R-95 remains the standard against which windfarm planning applications should be assessed. Additional guidance has been published and this does not alter the conclusion from the Environmental Protection Team Leader. It is therefore considered that the noise impacts from the proposal are acceptable and subject to suitable conditions (including a construction method statement, noise limits for named nearby dwellings, a scheme for noise monitoring, study timescale, timescales for the submission of noise data to the Council if a complaint is received, the Council's protocol for the assessment, details of an independent assessment and site data logging) the proposal is considered to be acceptable in this regard.
- 7.103 Requests by local objectors for an amplitude modulation condition are not considered to be reasonable owing to the conclusions reached by the Environmental Protection Team Leader.

Visual Impact

- 7.104 In relation to this part of the consideration of residential amenity the Council does not have any policy which places a zoning restriction between turbines and residential dwellings. The assessment here must have regard to relevant planning policy as well as the approaches taken at appeal and in particular the 'Lavender test' (named after a former Planning Inspector David Lavender). This test was first used at appeal at Enifer Downs in Kent and appears to have stood the test of time since such that it remains in widescale use to this day. The appeal at Burnt House farm near March, which was determined by the Secretary of State, confirmed that this approach was valid.
- 7.105 The test is stated in appeal decisions as being:
- In most cases, the outlook from a private property is a private interest, not a public one, and the public at large may attach very different valued judgements to the visual and other qualities of wind turbines than those who face living close to them. However when turbines are present in such number, size and proximity that they represent an unpleasantly overwhelming and unavoidable presence in main views from a house or garden, there is every likelihood that the property concerned would come to be widely regarded as an unattractive and thus unsatisfactory (but not necessarily uninhabitable) place in which to live. It is not in the public interest to create such living conditions where they did not exist before.
- 7.106 This test therefore enables an assessment of the impacts from multiple wind turbines. The applicant has undertaken an assessment based upon properties within 2km of any turbine. There are 245 properties within 2km. Their assessment was then the subject of a more detailed assessment of properties around and within 1 km from a turbine and concentrated on those where existing screening would not deflect views (their assessment therefore identified a total of 45 dwellings). Of those 12 properties were the subject of a more detailed analysis.

7.107 In EIA terms the impacts from the windfarm are assessed on each property. Where the impacts are assessed as 'Substantial' or 'Substantial/Moderate' the impact is considered to be significant for EIA purposes.

7.108 The applicant's assessment results in significant effects at:

- Pease Cottage, Molesworth – Substantial in winter only;
- The Lodge, Molesworth – Substantial;
- Turners Oak, Molesworth – Substantial for rear garden all year round and house (rear elevation) in winter only;
- Doyden Barn, Bythorn – Substantial for rear garden only;
- The Forge, Bythorn – Substantial for rear garden only;
- Ash Cottage, Bythorn – Substantial for house (rear and side elevations) and garden;
- Smiths Farmhouse, Bythorn – Substantial for house (rear elevation);
- Warren Grange, Bythorn – Substantial for house and garden;
- Byways, Bythorn – Substantial for house (rear elevation in winter only) and curtilage;
- Scotts Farmhouse, Bythorn – Substantial for garden only;
- Arlan House, Bythorn – Substantial for house (north elevation only) and rear garden;
- The Beeches, Keyston – Substantial for house (north elevation only);
- 1 Coales's Lodge, Thrapston – Substantial for curtilage and paddocks only;
- Foxholes Farm, Titchmarsh – Substantial for curtilage only;
- Crows Nest Cottage, Clopton – Substantial for house (south, east and west elevations only);
- Crows Nest Farm, Clopton – Substantial for house (south-west elevation only) and garden; and
- 23 Fayway, Clopton – Substantial for house (south elevation).

7.109 Following this EIA Assessment of impact upon the subject properties (be it the garden or inside the dwelling) in each case the applicants conclude that the impacts would not make the dwelling an unsatisfactory place to live (having regard to the Lavender test).

7.110 Officers accept the conclusions of the ES work undertaken having regard to the magnitude and significance of impacts for EIA purposes. However having regard to the application of the Lavender test officers consider that the threshold is exceeded at Warren Grange, Bythorn owing to the orientation of the dwelling and the number, size and proximity of the turbines which would represent an unpleasantly overwhelming and unavoidable presence in main views from the main living areas of the house and the main area which is used as a garden. Officers have visited this property on a number of occasions in arriving at this view. A detailed analysis is set out below.

7.111 Warren Grange is situated to the very north of Bythorn. Here the dwelling is within the following distance of turbines:

Property Address	Proximity to Nearest Turbine	Proximity to Second Nearest	Furthest Distance from Turbine

			Turbine	
Warren Grange, Warren Lane, Bythorn.	892m to T4		954m to T5	966m to T6

- 7.112 The property was clearly originally designed, and subsequently altered to make the most of the view to the north and north-east. The main living areas (lounge, kitchen and large conservatory) all face in the direction of the turbines with T1, T4, T2 and T6 particularly evident. The garden area is primarily used to the north and east of the property due to the relationship of the space to the doors from the house. Whilst views to the east and south-east would remain it would be inevitable that the appreciation of the garden space would be overwhelmed by the presence of the proposed turbines.
- 7.113 It would essentially require the entire living (indoor and outdoor) space to be fundamentally altered in order to result in the impacts from the proposal being such that they would not be unacceptable.
- 7.114 It is acknowledged, with regard to appeal decisions, that on occasion a single turbine within 450 metres of a turbine has been found to not create conditions where the Lavender test threshold is surpassed. However each case has to be assessed on its own merits and it is a combination here of the orientation of the house, the number, height and siting of the turbines which leads, in Officers views, to the turbines being present in such number, size and proximity that they represent an unpleasantly overwhelming and unavoidable presence in main views from the house and garden such that there is every likelihood that the property concerned would come to be widely regarded as an unattractive and thus unsatisfactory (but not necessarily uninhabitable) place in which to live. It is not in the public interest to create such living conditions.
- 7.115 In relation to the impact arising upon Warren Grange therefore the proposal is considered to fail the Lavender test and also significantly conflict with draft Policy LP15 of the Local Plan to 2036: Stage 3.
- 7.116 Officers also have concerns regarding the impacts upon the amenity space of Jolly Hills Farm, Doyden Barn, The Forge and Ash Cottage but in each case, whilst there is conflict with draft Policy LP15, the more stringent provisions of the Lavender test are not satisfied so a refusal in relation to impact upon the residential amenity of the occupiers of these properties could not be justified.

Economic Impacts

- 7.117 The application does not refer in any detail to the economic benefits arising from the proposal. However it is self evident that some employment opportunities would arise during construction and operation of the turbines. The production of green energy is also, for the reasons set out above, an economic public benefit arising from the proposal.
- 7.118 No weight can be given to the community benefit of £1,000 per MW per year (which could amount to £375,000 over the life of the development), as this is not necessary to make the development

acceptable in planning terms (a requirement referred to in paragraph 204 of the NPPF).

- 7.119 Some objectors refer to the potential negative impact upon tourism which could arise from the proposal. There is no substantive evidence to suggest that windfarms deter tourists from visiting areas and so this concern is not considered to hold weight against the proposal.

Ecology, Nature Conservation and Ornithology

- 7.120 The original and supplemental ES suggest that the proposal would have an acceptable impact in this regard. The consultation responses from Natural England and the RSPB both indicate the proposal is acceptable subject to suitable conditions and mitigation. RSPB's original suggestion regarding the removal of two turbines was superseded by their second set of comments.
- 7.121 The post-construction monitoring which has been requested by both consultees has been the subject of discussions at appeal in the past. The key consideration here is whether this requirement is necessary (given the contents of the ES). In Officers view such a condition is necessary given the particular circumstances of this case with regard to the Red Kites. It therefore appears to be information which would be of assistance to Natural England and the RSPB and is necessary to make the proposal acceptable.
- 7.122 Both Natural England, the RSPB and many local residents comment upon Red Kites, which were successfully re-introduced into north east Northamptonshire in and after 1995. Concerns are expressed about the anticipated level of fatalities of Red Kite given that a roost is situated only 450m away at Chequer Hill Coppice. It would therefore be necessary to ensure that the areas around the bases of the turbines were suitably discouraged as foraging habitats. This, and other necessary mitigation, would need to be the subject of a Habitat Management Plan should permission be granted. Subject to that condition the proposal is considered to be acceptable with regard to ecology and nature conservation matters. It therefore complies with Policies En22 and En23 of the Local Plan, Policy CS9 of the Core Strategy and draft Policies LP7, LP28 and LP29 of the Local Plan to 2036: Stage 3.

Hydrology, Hydrodeology and Geology

- 7.123 The site is situated, having regard to the Minerals and Waste Core Strategy for the County, within a Minerals Safeguarding Area. The ES outlines that the majority of the site is situated on Grade 2 (Very Good) agricultural land. The ES also states that there will be a slight adverse effect on the water quality of a number of watercourses. Overall the application opines that the EIA impact is not considered to be significant.
- 7.124 Having regard to planning policy there is conflict with the Minerals and Waste Core Strategy Policy CS26 unless certain criteria (listed above in the policy section) are satisfied. No such assessment is undertaken by the applicants and no justification is put forward. The only way in which the policy could be satisfied if there is an overriding

need for the development. This is discussed further within the planning balance.

- 7.125 The loss of agricultural land is not considered to be significant owing to the actual developable area and the reversibility of the proposal.
- 7.126 With the exception of the minerals matter referred to above, and subject to conditions requested by the Environment Agency, the proposal is considered to be acceptable in this regard.

Traffic, Transport and Access (including public rights of way)

- 7.127 The original and supplemental ES seek to demonstrate that the impacts in this regard would be acceptable. Consultation responses from the Highways Agency and the County Council (Highways and the Definitive Map Officer) indicate that the proposal would be acceptable. Northamptonshire County Council Highways also request a Routeing Agreement in relation to the turbine components (this would need to be the subject of a planning obligation).
- 7.128 The supplemental ES sets out two potential routes for the transportation of the turbine components; one from the east and one from the west. The route from the east would require the temporary strengthening of the Molesworth Bridge. Both routes would also require widening and other works to facilitate safe access. There would inevitably be disruption caused on the A14 and on local roads during construction but the consultee comments suggest that this is not an unacceptable impact subject to appropriate conditions being imposed.
- 7.129 With regard to the public rights of way the appreciation of these routes is relevant to the consideration of the impact upon the landscape character of the area. Many of the viewpoints provided are taken from such routes. The consideration of the impacts is therefore also discussed above.
- 7.130 In addition some concerns have been raised by the British Horse Society and a number of local residents with regard to the impacts upon the enjoyment and safe use of the bridleways and other public rights of way. However the guidance within the 200 metre set back distance within the Companion Guide to PPS22 has been followed such that, despite concerns raised by the County Council's Definitive Map Officer, an objection on this basis would not be justified. Again it is inevitable that the enjoyment of the routes would be altered although in previous appeal decisions it has been noted that different people have different opinions (positive and negative) upon wind turbines being located within the landscape. That said users of the routes, particularly bridleway 16 and public footpaths 30, 31 and 32 would, for a temporary time, feel as if they were within or extremely close to a windfarm. This is likely to deter the route to certain users who do not wish to be within such an environment.
- 7.131 With regard to the assessment of effects on strategic recreational routes (Nene Way and Three Shires Way) the analysis within the ES concentrates on the theoretical visibility of the development along a succession of stretches of each route. There is no indication of the magnitude of any potential effects or their significance, even though it

is acknowledged that users of the recreational routes will be high sensitivity receptors. There is likely to be some cumulative visual impact but notwithstanding a lack of evidence with regard to the current situation this is not considered to be unacceptable.

- 7.132 With regard to users of the A14 the ES identifies these as medium sensitivity receptors – but these will be large in number. Whilst the turbines would be visible from a number of locations along the A14 the users will be fast moving and concentrating on their journey. It is noted that the Highways Agency have not objected to the proposal with regard to safety considerations.

Infrastructure

- 7.133 The main consideration here is the grid connection. Many local residents have objected on the basis that information in this regard has not been adequately submitted as part of the application. At officers request the supplemental ES does provide some further information in this regard but ultimately the developer advises that the Distribution Network Operator would be responsible for establishing the network after it leaves the application site.
- 7.134 The applicants advise that the most likely option would involve a 33kV grid connection to the Brington Substation to the east which would be linked to the site via underground cabling within the highway corridor.
- 7.135 In relation to this proposal Officers consider that sufficient information has been submitted within the ES. Subject to a condition requiring that the cabling within the site be underground, in order to not harm visual amenity nor the character and appearance of the nearby Conservation Areas, the proposal is considered to be acceptable in this regard.

Community Involvement and Comments

- 7.136 The applicants have undertaken a number of public consultation events dating back to October 2010. Most recently, in early 2013, they undertook a public surgery over two days where members of the public were invited to discuss the proposal.
- 7.137 It is fair to say that the application has, and continues to raise, significant public interest. In terms of local comments (i.e. those within Bythorn, Keyston, Brington, Molesworth, Clopton, Titchmarsh and Catworth) one letter of support was received but this has now been withdrawn and replaced with an objection.
- 7.138 The Stop Molesworth Wind Farm Action Group's objections to the proposal are considered to encompass the vast majority of the issues which have been raised in opposition. The Action Group is to be a Rule 6 party and so will be a participant at the Inquiry.
- 7.139 This report is considered to encompass and assess all of the observations raised within the objections of the Action Group and also by local residents.
- 7.140 The reason listed in support of the proposal are also assessed within this report.

Personal circumstances and other considerations (including impact upon house prices)

- 7.141 Within the objections received to the application there have been a number of personal circumstances which have been identified which require consideration. These health considerations are in essence personal circumstances which require consideration although Officers are mindful that paragraph 21 of The Planning System: General Principles (2005) advises that personal circumstances will seldom outweigh the more general planning considerations.
- 7.142 The health impacts that have been put forward are not supported by any professional opinions as to the likely impacts that would arise. It is therefore difficult for officers to fully assess the impacts. The six individual cases may therefore warrant further consideration by the Planning Inspectorate at the Inquiry. Officers are though mindful that the health matters which have been raised are primarily from the occupiers of properties which are some distance from the windfarm and therefore are unlikely to face the turbines on a constant basis. The three notable exceptions from this are at The Meadows, Arlan House and Grove House (all in Bythorn) as these properties are closer to the turbines and in the case of the former the views would largely be unobscured. The situation at Briar House also warrants further consideration given those particular circumstances.
- 7.143 Overall Officers consider that the impact of the proposal upon the personal circumstances raised by objectors is, on the basis of the information submitted, unlikely to be such that a refusal reason should be presented by the Council to the Inquiry. However Officers are concerned about these impacts and would encourage the effected residents to discuss these matters further with the Council and the appellants prior to the Inquiry. In that regard officers intend to have further discussions with the appellant about how to consider these matters before the Inquiry commences.
- 7.144 It has been established in case law that the impact upon house prices is not a material consideration. Paragraph 29 of the 2005 document referred to above confirms that:
- 7.145 The planning system does not exist to protect the private interests of one person against the activities of another, although private interests may coincide with the public interest in some cases. It can be difficult to distinguish between public and private interests, but this may be necessary on occasion. The basic question is not whether owners and occupiers of neighbouring properties would experience financial or other loss from a particular development, but whether the proposal would unacceptably affect amenities and the existing use of land and buildings which ought to be protected in the public interest.
- 7.146 With regard to aviation matters no objections have been sustained by the Ministry of Defence or NATS and so the proposal is considered to be acceptable in this regard.
- 7.147 Lighting is required on top of each turbine for safety reasons. Despite objections raised against this it is not considered that the lighting

would unacceptably harm the character of the area. In any event the safety benefit would outweigh the impacts.

- 7.148 Concerns raised in relation to the impact upon digital television signal are noted and a condition would be required in this regard to rectify any issues. A condition would also be required in relation to ice throw given the proximity to public routes.
- 7.149 Concerns over the use of carbon fibre would fall under the re-mit of the Health & Safety Executive.
- 7.150 Concerns regarding health impacts which could arise from the proposal are not considered to be substantiated within any planning or governmental policy documents.
- 7.151 Views expressed in relation to the productivity of the turbines, subsidies or the suitability of the site for wind energy are not considered to hold any weight within the determination of this application. Paragraph 98 confirms that the “need” for renewable energy shall not need to be demonstrated by the applicants.

Planning Balance

- 7.152 Having undertaken an assessment of the likely impacts arising from the proposal it is now necessary to consider how to apply and balance the relevant planning policies and material considerations. It must be noted that the assessment of the ES is a separate requirement from the assessment of the merits of the planning application. In other words a significant change in ES terms does not automatically lead to a conflict with the relevant planning policies; the thresholds are different in each case.
- 7.153 The report considers the weight to be given to relevant planning policies.
- 7.154 The starting point, under section 38(6) of the Planning and Compulsory Purchase Act 2004, is the consideration of development plan policies. In this instance the relevant policies consist of the Core Strategy (2009), the Local Plan (1995) and the Waste and Minerals Core Strategy (2011). Officers have set out above the weight which can be apportioned to the relevant policies within these documents.
- 7.155 In terms of the remaining documents full weight can, in the view of Officers, be given to the NPPF, the Council’s adopted Wind Power SPD and the plethora of recent national and international documents which support action against climate change. Whilst not specifically relevant to this proposal, owing to the amount of energy to be generated, the National Policy Statement EN-1 (Overarching Energy) and EN-3 (Renewable Energy) are also relevant considerations which can be afforded significant weight as indicators of Government policy.
- 7.156 Moderate weight can be afforded to the draft Local Plan 2036: Stage 3 as this continues to progress towards examination and adoption.

- 7.157 Of the remaining considerations set out within the policies listed in this report these documents (including the PPS22 Companion Guide) can be given some weight as they precede the NPPF.
- 7.158 The NPPF advises that there should be a presumption in favour of sustainable development. To be sustainable development must, as noted in paragraph 6 of the NPPF, strike a satisfactory balance between the economic, the environmental and the social considerations. There was much discussion at the recent Public Inquiry at Southoe as to whether paragraph 93 of the NPPF indicated that windfarm development was a sustainable form of development. Whilst the decision on that appeal is awaited Officers consider that paragraph 93 (which states that the delivery of renewable energy is central to the three dimensions of sustainable development) supports and encourages it wherever the impacts are acceptable when judged against the NPPF policies as a whole. It is however necessary to assess all of the impacts when determining whether a proposal is sustainable.
- 7.159 In relation to this proposal the proposed wind turbines would result in benefits to:
- the provision of a significant amount (up to 15MW installed capacity) of a clean form of energy which would provide a valuable contribution towards tackling climate change, meeting the targets and aspirations for the UK's energy mix and closing the energy gap between supply and demand;
 - some jobs during construction, de-commissioning and the life of the turbines; and
 - making a significant contribution towards renewable energy provision in the district.
- 7.160 In relation to the impacts rising from shadow flicker, noise, ecology, nature conservation and wildlife and transport and access would all, subject to planning conditions or planning obligations be acceptable. These impacts would therefore be neutral as the conditions are necessary to off-set the impacts. It is acknowledged that no planning obligation has been submitted with this application,
- 7.161 The proposal would though create harm to the existing environment by virtue of the harm caused to:
- heritage assets (including Bythorn, Keyston and Molesworth Conservation Areas, the Scheduled Ancient Monument at Keyston and a number of Listed Buildings (including Scotts Farmhouse, Bythorn Church and Keyston Church) and potentially to archaeological interest;
 - the character of the landscape and amenity value of the local areas (particularly views which include heritage assets and views from within and towards Bythorn and Keyston);
 - residential amenity (by virtue of unacceptable impacts upon the visual amenity of Warren Grange);
 - the need to protect Mineral Safeguarding Areas;
 - the desirability of the recreational routes for some users of the bridleways and public footpaths

- 7.162 In relation to the latter two: the Mineral Safeguarding Area policy would though be satisfied as, in principle, there is a need for renewable energy as stipulated in paragraph 98 of the NPPF; and it is considered that there would be some harm to the enjoyment of those routes although the harm would not be such that they would feel unsafe. The separation distances which are provided are considered to be suitable and so the harm which is created is considered to be outweighed by the benefits arising from the scheme.
- 7.163 The impact upon personal circumstances is, at this stage, considered to be acceptable although further discussion is suggested on these matters prior to the Public Inquiry.
- 7.164 It is acknowledged that the harm which has been identified would be temporary as the development would need to be controlled such that the turbines were in place for a maximum of 25 years. However given the significance of the harm officers do not consider that this temporary harm, which in any event is a lengthy period and would last a generation, would be such that these areas where the proposal is unacceptable could be tolerated. Giving a temporary permission would not therefore sufficiently reduce the harm.
- 7.165 The proposal is not therefore considered to be sustainable development as it has not been possible to find that taking sustainability in the round the proposal can be considered to be acceptable. There is therefore, notwithstanding that renewable energy is supported in principle by the NPPF, no presumption in favour (having regard to paragraph 14 of the NPPF) for this proposed development.
- 7.166 The impacts therefore fall to be assessed having regard to a planning balance. Whilst the proposal rightfully enjoys support as it is capable of generating up to 15MW of installed capacity of renewable energy the development would create significant unacceptable impacts in relation to the heritage assets, landscape and residential amenity.
- 7.167 With regard to heritage assets Officers have been unable to demonstrate that the scheme has special regard to the special regard to the desirability of preserving the buildings or the settings or any features of special architectural or historic interest which it possesses. The public benefits, when weighed in the balance, are not considered to be such that this harm can be considered to be acceptable.
- 7.168 In the view of Officers cumulatively there are three significant aspects of harm (to heritage assets, landscape character and amenity and residential amenity) which significantly and demonstrably outweigh the public benefits arising from the proposal and accordingly, had an appeal not been lodged, then Officers would have recommended to the Panel that the proposal be refused planning permission for the reason set out below.

8. RECOMMENDATION - That the District Council resolves that it would, if it were the determining Authority, have refused planning permission for the following reason:

- 8.1 The proposal, being within the setting of a number of heritage assets, would result in harm to their significance (including

substantial harm to Bythorn Church and Bythorn Conservation Area) by virtue of the impacts upon views from and to these important assets. As such the Council is unable to find that the proposal has special regard to the setting of these Listed Buildings and finds that the proposal does not preserve the character and appearance of the affected Conservation Areas. The proposal is therefore in significant conflict with Policies En2, En5, En9 and En11 of the Local Plan, draft Policy LP31 of the Local Plan to 2036: Stage 3 and the National Planning Policy Framework.

It has not been demonstrated that the impact of the development on archaeological assets will be acceptable unless and until the Assistant Director of Environment, Growth and Planning is satisfied to the contrary (in which case this paragraph within the refusal reason would be retracted). The proposal is therefore in conflict with Policy En11 of the Local Plan.

The proposal would also lead to unacceptable impacts upon the character of the landscape and amenity of the area by virtue of the number, size and location of the proposed wind turbines. There could also be unacceptable cumulative impacts arising from the proposal. The proposal is therefore contrary to Policies En2, En5 and En9 of the Local Plan 1995, Policy LP31 of the Draft Local Plan to 2036: Stage 3 2013, the Wind Power SPD 2006, the Huntingdonshire LDF Consultation Draft SPD: Landscape Sensitivity to Wind Turbine Development 2012 and the National Planning Policy Framework.

The proposal would also unacceptably impact upon the amenity of the existing and future occupiers of Warren Grange such that, owing to the number, size and proximity of the turbines they would represent an unpleasantly overwhelming and unavoidable presence in main views from the main living areas of the house and the main area which is used as a garden. The impact is considered such that the property would be widely regarded as an unattractive and thus unsatisfactory place in which to live. The public interest would not be maintained if the development proceeded. There is also conflict with draft Policy LP15 of the Local Plan to 2036: Stage 3 and the National Planning Policy Framework.

These conflicts with policy cumulatively outweigh the support which the proposal enjoys from national guidance and policy and the resulting employment opportunities. The planning balance therefore does not weigh in favour of the proposal and so the proposal is therefore in significant conflict with Policy CS1 of the Core Strategy, draft Policy LP5 of the Local Plan to 2036: Stage 3, the Wind Power SPD 2006, the Huntingdonshire LDF Consultation Draft SPD: Landscape Sensitivity to Wind Turbine Development 2012 and the National Planning Policy Framework.

CONTACT OFFICER:

Enquiries about this report to **Mr Andy Brand Development Management Team Leader 01480 388490**

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August 2012

Ref: 1200967FUL – Erection of six three bladed wind turbines up to 126m in height and associated infrastructure on land South West of RAF Molesworth, Warren Lane, Bythorn.

We refer to the application for planning permission for the erection of 6 wind turbines on land forming a horseshoe surrounding the village of Bythorn on three sides – reference 1200967FUL. This application is very complex and challenging for non experts to analyse in detail, especially for those readers who are not experts in either planning policy or the technical details of the application. We note that there are some details missing from the application such as the height of the turbine and the dimensions of the blades. We expect that the Huntingdonshire District Council will review the application in detail including the provision of necessary experts.

As a Parish Council we have met with the developers, the local action group as well as members of the public. We have received letters from members of the public who have raised objections to the proposed development. No letters were received in favour of the planning permission application.

Following the public meeting held on July 23rd, Bythorn and Keyston Parish Council voted against supporting the application and the following is an outline of our objections :

1. Location

The erection of 6 wind turbines 126m high will dominate the historic villages of Bythorn, Molesworth and Clopton as well as severely impact the setting of other villages in the area such as Keyston, Brington, Titchmarsh, Catworth, etc. Bythorn and Molesworth are conservation areas and the introduction of dominating industrial structures will change the character of the individual villages and the whole area. Some of the structures are within 700-800m of houses. The turbines would be a significant modern intrusion in this highly sensitive historic environment. The turbines would result in a marked distracting and alien impact in an area of landscape quality.

2. Non Compliance to HDC's Planning Guidance

HDC has issued guidance that the Northern Wolds have restricted capacity to accommodate wind farms and they should be limited to one small scale group. Currently, there is an approved scheme at Wooley Hill for 4 large wind turbines which more than covers the limited capacity. Additionally, any wind farm should respect the site and setting of historic villages which characterise the Northern Wolds. Clearly, this application does not respect the site and setting of the historic villages. This is contrary to the planning guidelines.

3. Landscape Amenity

The two villages in the Parish have no public spaces of any size, nor any facilities and, therefore, the countryside around the villages is an essential part of the amenity for the population. The landscape around the villages has many byways and paths and they are well used by walkers, ramblers and horse riders. The applicant has not properly identified all footpaths in the area. An example of this is the footpath running to the north west from the bridleway connecting Toll Bar to Warren Lane, it starts at grid ref 505175 276475 and connects to the footpath running generally north to south at grid ref 504250 277325. The erection of the wind turbines to the West, North and East of Bythorn and the West of Molesworth will severely change the landscape amenity being used in these areas. This is a major loss which is compounded by the fact that the A14 runs to the South of Bythorn and consequently, if this application is permitted, Bythorn would have no landscape amenity at all. This is contrary to the planning guidelines.

4. Listed Building

In the local area, there are many listed buildings. The applicant has not addressed all of them and has not taken them into account within the application. An example of this is Peacock Cottage in Molesworth. The

impact of dominant modern industrial turbines on the character of Bythorn and Keyston and their churches is also considered to be highly significant. Keyston Church is Grade 1 listed. Bythorn Church is Grade 2 listed. Keyston has an important Conservation Area and this proposed development is not in keeping and consistent with HDC's Keyston Conservation Area Character statement. This is contrary to the planning guidelines.

5. Noise

Currently, the villages of Bythorn and Molesworth suffer from noise from the A14 when the wind blows from a southerly direction. This noise is reduced during night times when traffic densities fall. By erection of wind turbines to the East, North and West of Bythorn, it will mean that the villagers will no longer get any respite from noise, as happens today, when the wind blows from any other direction than South. Our understanding of the noise guidance is that the background noise levels will be increased above that of the current ambient level, especially at night where a higher noise level can be permitted by the guidance. We have also noted that some scientists, example - Dick Bowdler BSc CEng CPhys FIOA FCIBSE MCIArb, have questioned the validity about the standard ETSU-R-97. This standard has been incorporated into PPS22. The proposed development fails to minimise increases in ambient noise levels contrary to PPS22 Renewable Energy, Planning for Renewable Energy. This is therefore contrary to planning guidelines.

6. Warning Lights

We understand that the wind turbines will have flashing warning lights. This is a further industrial intrusion into a quiet rural area.

7. Wildlife

While we expect the HDC to investigate the wildlife issues with their experts, the contents of the application causes us some concern. Very close to the site is a major wildlife area - the Upper Nene Protection Area. Additionally, the wind turbine location is between this Upper Nene Protection Area - Grafham Water - Paxton Pits and therefore is likely to be on a major migratory route. Red Kite nesting projects and conditions related to bats also seem to be overlooked by the applicants. This is contrary to the planning guidelines.

8. Cumulative Impact

The cumulative impact of wind farms in the area has not been properly addressed by the applicant. There are several wind farms (approved or proposed) missed out of the applicant's list of wind farms in the 35Km

cumulative impact area. These are Hamerton, Southoe, Burton Wold South Extension, Cranford and Kelmarsh (Nasby battlefield site) in Northamptonshire. This cumulative impact is overwhelming for the Northern Wolds and this immediate area. This is contrary to the planning guidelines.

9. Local Benefits

In discussion with the applicant, a question was asked about what benefit the installation of the wind turbines would bring to the persons that live in the immediate area. The response was that of the low carbon argument which is a global issue and not a local issue. The applicant then mentioned that a fund would be set up to provide a limited amount of money to local communities over a period of 25 years. However, there were no specific scheme descriptions nor process on how the money would be distributed or to whom, other than a statement that the money would be provided to local charitable entity(ies). The limited amount which would be made available is unlikely to have a significant impact on the villages close to the proposed wind farm or the people living in the immediate area. Therefore, whilst we do not dispute the low carbon issues, we do not see any benefits for our local constituents in Bythorn and Keyston from this development.

10. Distribution of Electricity

There are statements in the application that all power cables will be underground. However, on questioning by the Parish Council it became clear that the applicant has not included an application for permission to place an underground cable from the proposed wind farm to the sub-station at Brington (if that is to be the final connection point to the National Grid). Therefore, we understand that this may be by overhead cable and perhaps going to another location, further disfiguring the landscape. Therefore, we urge HDC to ensure that this subject is properly addressed and covered in the application.

11. Traffic issues

We are concerned that the applicant intends to use Junction 16 of the A14 and then traverse the B663 with delivery vehicles during the stated one year construction period. This includes days where there will be a HGV movement every 5 minutes over very long days. This would mean that persons in Bythorn would be forced to use the dangerous Junction 15 which is not a grade separated junction with the A14. We do not think this is a realistic traffic plan.

12. Photomontages

The applicant has provided many photomontages from different locations. If the intention was to provide information about how the proposed wind farm will sit in the landscape and interact with the many listed buildings and the like, then this purpose has not been achieved. For instance, one photomontage in Bythorn is carefully positioned so that three separate wind turbines are hidden behind bushes, trees and fence posts. From a different aspect, mere centimetres to the left or right, then all three wind turbines become visible.

Local Opinion

The local action group provided the Parish Council with the results of a survey they have carried out in the villages of Bythorn and Keyston. The results stated are:

- Bythorn – 78 persons against, 1 in favour;
- Keyston – 23 persons against, 0 in favour.

These figures represent approximately 78% of households in Bythorn and 23% of households in Keyston.

Conclusion

As the Government has advised many times that local communities should have a strong voice in decisions which impact them, this is a clear case that the majority of the adult population of the Parish of Bythorn and Keyston have given their opinion that this proposal should be rejected. Therefore, the Parish Council of Bythorn and Keyston strongly object to this proposal and recommends rejection. We also expect that Huntingdonshire District Council to respect localism and the community and reject this proposal.



Andrew Ford
Chairman
Bythorn and Keyston Parish Council

Vanessa Littleboy

Sent:

10/08/2012 15:10

To:

mail@huntsdc.gov.uk

Cc:

Subject:

For immediate attention: Andy Brand

Application Number: 1200967FUL Case Officer: Mr Andy Brand

Proposal: Erection of six three bladed horizontal axis wind turbines up to 126m in height to blade tip, together with associated infrastructure including: new vehicular access, onsite access tracks, foundations, external transformers (if required), crane hardstanding areas, one permanent anemometry mast, one temporary anemometry mast, temporary construction compound, control building and compound and underground cabling.

Location: Land South West of RAF Molesworth Warren Lane Bythorn

Observations of Brington & Molesworth Parish Council.

We recommend refusal of this application and wish to have noted our observations and comments.

Following a comprehensive poll of villagers where 29% approved of and 53% disapproved of this scheme, we, Brington and Molesworth Parish Council as a consequence, recommend rejection of the Molesworth Wind-farm planning application.

It is appreciated and recognised that there is a countrywide need for renewable energy resources and that wind-farms are considered one of the methods in attaining them.

The issues that we would like to draw to HDC attention are:

- we believe the proposed wind-farm is contrary to HDC's own planning policy (core policy CS1)
- the proposed wind-farm is contrary to the Brington and Molesworth Parish plan which is in favour of domestic and community wind turbines but not industrial implementations
- the proposed wind-farm is considered too close to existing residences. All turbines proposed are within 2km of the village houses and some as close as 700m. The following issues are considered pertinent:
 - the expected noise, although claimed to fall below that of the A14, will be of a lower frequency and thus still of an intrusive and damaging nature
 - even with assurances of low noise levels there are still some residents who expressed their concerns about the constant noise that will be generated, especially with reference to health issues and the effect on children with Autism
 - the effect of flicker and shadow will be suffered by a number of residences
 - the turbine towers will impose significantly upon specific residences due to their close nature
- the scale of the proposal is out of proportion to the location, the proximity to housing and the local architecture, especially as Molesworth is a conservation area with many listed properties:
 - each turbine blade at its height will be 12 times higher than Molesworth church with the main body of the turbine being (estimated) 6-7 times higher
 - the spread of the 6 proposed turbines covers an area greater than that of Molesworth
- the visual impact to the local area will be significantly adverse:
 - the 6 proposed turbines will dominate the immediate landscape in an area that is already close to a number of other existing and proposed wind-farm sites

- the existing landscape is currently uncluttered with other eyesores
- we fear adverse impact on wildlife and amenities, in particular:
 - the exclusion of horse and rider from the currently used bridleways and bye-ways through these fields due to the turbines scaring the horses
 - bird flight and nesting in the local area being affected, particularly the local red kite that is currently abundant in this area

Further, the current application fails to detail the way that the collected power will be carried back to the grid. There are fears that the eventual method and routing will cause further more damaging impacts upon the area and local residences. The route to be followed by all associated cabling and the siting of any subsequently necessary collection and transmission buildings needs to be known before the full impact can be understood. This design needs to be part of the overall application. Specifically the application should include:

- the proximity to buildings and roads that any new cabling will take
 - this will inevitably come very close to existing residences - tens of metres rather than hundreds of metres. Overhead cabling will be unsightly, buried cabling will cause significant disruption to install
- the siting of any overhead cables and pylons
 - that will further damage the views

Further, following concerns raised regarding the findings of noise level readings versus ambient, we request that any consideration includes a Planning Condition to control "Excess Amplitude Modulated Noise"

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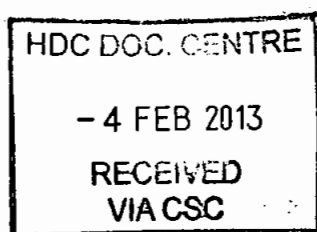
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**BYTHORN & KEYSTON
PARISH COUNCIL**

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Head of Planning Services
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4th February 2013

Ref: 1200967FUL – Erection of six three bladed wind turbines up to 126m in height and associated infrastructure on land South West of RAF Molesworth, Warren Lane, Bythorn.

We refer to the application for planning permission for the erection of 6 wind turbines on land forming a horseshoe surrounding the village of Bythorn on three sides – reference 1200967FUL and to our letter dated 2nd August 2012 commenting on the application. Since this letter was submitted, we have received a documentation pack from Huntingdonshire District Council dated 7th January, 2013. This documentation pack was produced by the applicants and was in response to various questions and comments by HDC.

As a Parish Council we have met with the developers again in a very brief meeting, however the answers we received to our questions were very unsatisfactory. We have reviewed the documentation pack in conjunction with our letter dated 2nd August and find that most of the issues raised by us have not been answered. Therefore, we continue to strongly object to this proposed development and recommend to HDC that the application be rejected.

While we consider our letter of 2nd August as being still valid for recording our objections, we outline the main reasons of objection.

1. Location

The erection of 6 wind turbines 126m high will dominate the historic villages of Bythorn, Molesworth and Clopton as well as severely impact the setting of other villages in the area such as Keyston, Brington, Titchmarsh, Catworth, etc. Bythorn and Molesworth are conservation areas and the introduction of dominating industrial structures will change the character of the individual villages and the whole area. Some of the structures are within 700-800m of houses. The turbines would be a significant modern intrusion in this highly sensitive historic environment. The turbines would result in a marked distracting and alien impact in an area of landscape quality.

2. Non Compliance to HDC's Planning Guidance

HDC has issued guidance that the Northern Wolds have restricted capacity to accommodate wind farms and they should be limited to one small scale group. Currently, there is an approved scheme at Wooley Hill for 4 large wind turbines which more than covers the limited capacity. Additionally, any wind farm should respect the site and setting of historic villages which characterise the Northern Wolds. Clearly, this application does not respect the site and setting of the historic villages. This is contrary to the planning guidelines.

3. Landscape Amenity

The two villages in the Parish have no public spaces of any size, nor any facilities and, therefore, the countryside around the villages is an essential part of the amenity for the population. The landscape around the villages has many byways and paths and they are well used by walkers, ramblers and horse riders. The erection of the wind turbines to the West, North and East of Bythorn and the West of Molesworth will severely change the landscape amenity being used in these areas. This is a major loss which is compounded by the fact that the A14 runs to the South of Bythorn and consequently, if this application is permitted, Bythorn would have no landscape amenity at all. This is contrary to the planning guidelines.

4. Amenity in General

While the subject of Landscape Amenity is addressed above, the applicant has not addressed the overall subject of residential amenity. Nowhere in the documentation is a complete description of the visual, noise and other impacts on the local residents. There are some individual pieces of information but the applicant has avoided bringing everything together in a logical impact statement.

5. Listed Building

In the local area, there are many listed buildings. The impact of dominant modern industrial turbines on the character of Bythorn and Keyston and their churches is also considered to be highly significant. Keyston Church is Grade 1 listed. Bythorn Church is Grade 2* listed. Keyston has an important Conservation Area and this proposed development is not in keeping and consistent with HDC's Keyston Conservation Area Character statement. This is contrary to the planning guidelines.

6. Noise

Currently, the villages of Bythorn and Molesworth suffer from noise from the A14 when the wind blows from a southerly direction. This noise is reduced during night times when traffic densities fall. By erection of wind turbines to the East, North and West of Bythorn, it will mean that the villagers will no longer get any respite from noise, as happens today, when the wind blows from any other direction than South. Our understanding of the noise guidance is that the background noise levels will be increased above that of the current ambient level, especially at night where a higher noise level can be permitted by the guidance. The proposed development fails to minimise increases in ambient noise levels contrary to PPS22 Renewable Energy, Planning for Renewable Energy. This is therefore contrary to planning guidelines.

7. Warning Lights

We understand that the wind turbines will have flashing warning lights. This is a further industrial intrusion into a quiet rural area.

8. Wildlife

While we expect the HDC to investigate the wildlife issues with their experts, the contents of the application causes us some concern. Very close to the site is a major wildlife area - the Upper Nene Protection Area. Additionally, the wind turbine location is between this Upper Nene Protection Area - Grafham Water - Paxton Pits and therefore is likely to be on a major migratory route. Red Kite nesting projects and conditions related to bats also seem to be overlooked by the applicants. This is contrary to the planning guidelines.

9. Cumulative Impact

The cumulative impact of wind farms in the is overwhelming for the Northern Wolds and this immediate area. This is contrary to the planning guidelines.

10. Local Benefits

We have not been made aware of any commitments given by the applicant on any benefits for our local constituents from this development.

11. Distribution of Electricity

There are statements in the application that all power cables will be underground. However, on questioning by the Parish Council it became clear that the applicant has not included an application for permission to place an underground cable from the proposed wind farm to the sub-station at Brington (if that is to be the final connection point to the National Grid). Therefore, we understand that this may be by overhead cable and perhaps going to another location, further disfiguring the landscape. Therefore, we urge HDC to ensure that this subject is properly addressed and covered in the application.

12. Traffic issues

We are concerned that the applicant intends to use Junction 16 of the A14 and then traverse the B663 with delivery vehicles during the stated one year construction period. This includes days where there will be a HGV movement every 5 minutes over very long days. This would mean that persons in Bythorn would be forced to use the dangerous Junction 15 which is not a grade separated junction with the A14. We do not think this is a realistic traffic plan.

13. Photomontages

New photomontages have been produced but they still suffer from the same problem. From our perspective, the detailed locations that have been selected are designed to minimise the view of the turbines. While we acknowledge that the rough locations were specified by HDC, the photographer has selected the view that hides the turbines. By moving a few centimetres, different aspects of the turbines can be seen. Clearly, the photomontages are not a true representation that villagers will see while going about their daily activities. We find that the applicant is being disingenuous in representing the views.

Local Opinion

Based on discussions with local residents, opinion is still very much against this development.

Conclusion

As the Government has advised many times that local communities should have a strong voice in decisions which impact them, this is a clear case that the majority of the adult population of the Parish of Bythorn and Keyston have given their opinion that this proposal should be rejected. Therefore, the Parish Council of Bythorn and Keyston strongly object to this proposal and recommends rejection. We also expect that Huntingdonshire District Council to respect localism and the community and reject this proposal.



AF
— Andrew Ford
Chairman
Bythorn and Keyston Parish Council

Development Management Panel



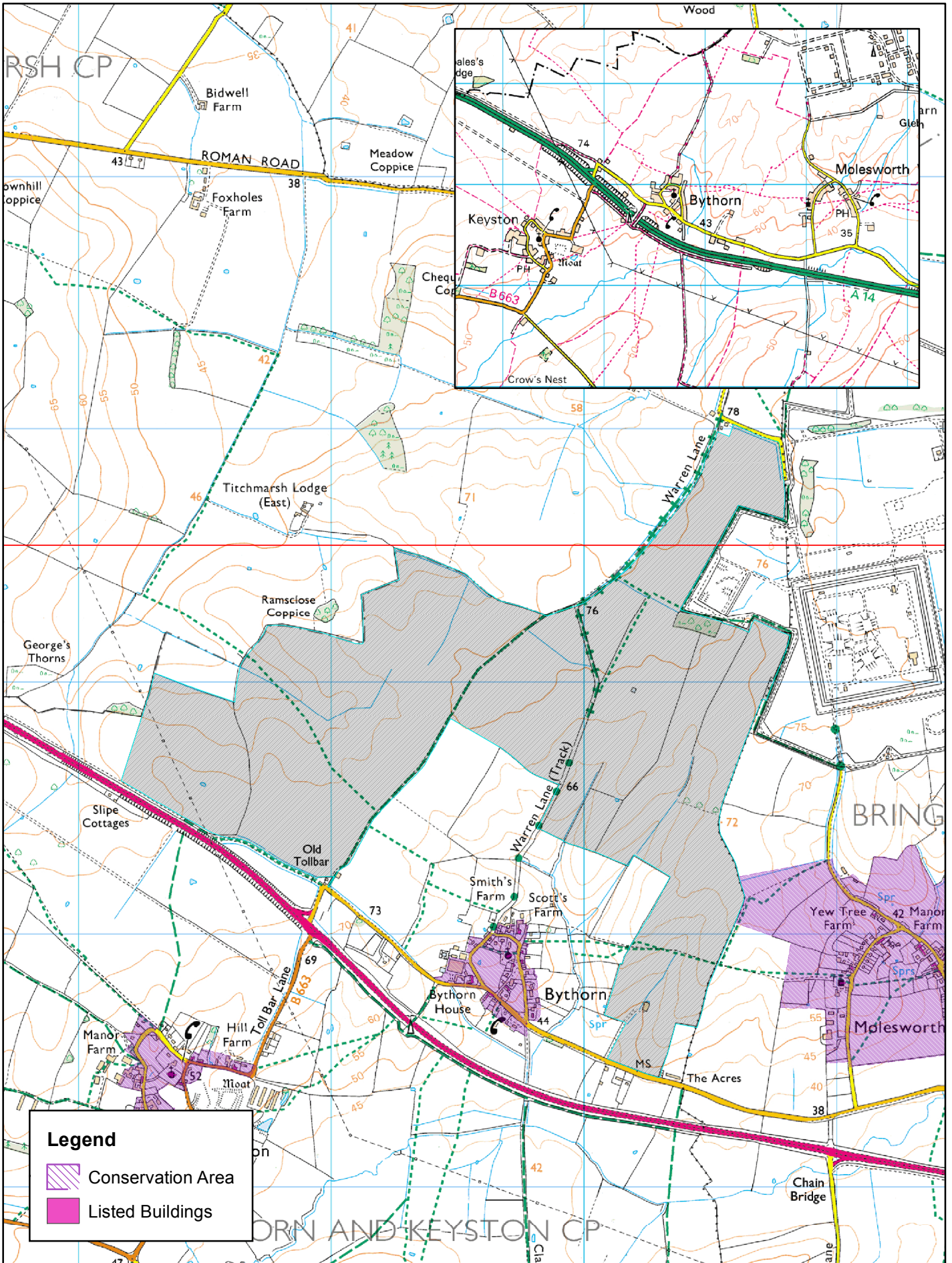
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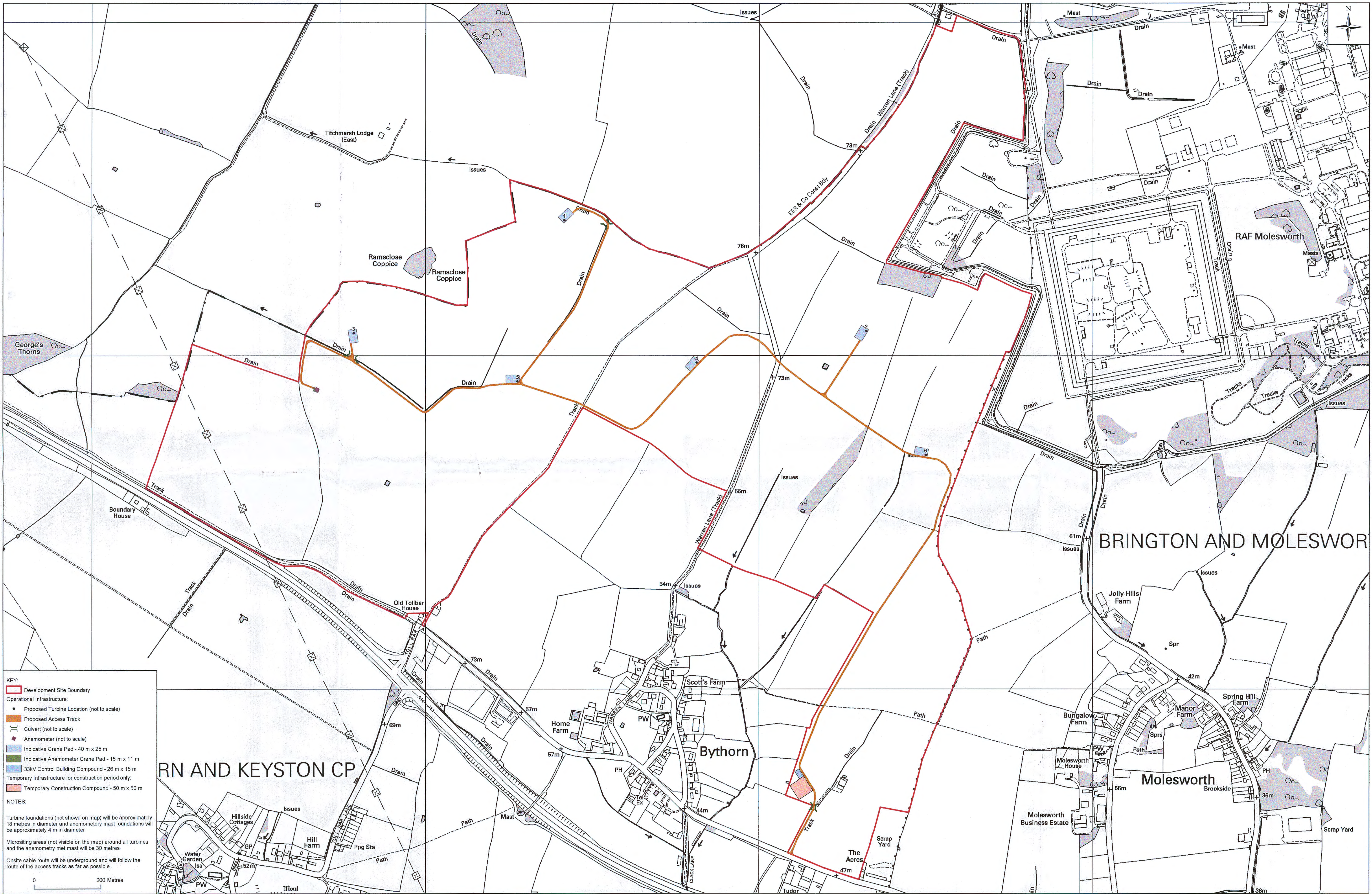
Application ref:1200967FUL

Date Created: 23/05/2013

Location: Bythorn and Keyston

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KEY:

- Development Site Boundary
- Operational Infrastructure:**
- Proposed Turbine Location (not to scale)
- Proposed Access Track
- Culvert (not to scale)
- Anemometer (not to scale)
- Indicative Crane Pad - 40 m x 25 m
- Indicative Anemometer Crane Pad - 15 m x 11 m
- 33kV Control Building Compound - 26 m x 15 m
- Temporary Infrastructure for construction period only:**
- Temporary Construction Compound - 50 m x 50 m

NOTES:

Turbine foundations (not shown on map) will be approximately 18 metres in diameter and anemometry mast foundations will be approximately 4 m in diameter.

Micrositing areas (not visible on the map) around all turbines and the anemometry met mast will be 30 metres.

Onsite cable route will be underground and will follow the route of the access tracks as far as possible.

Client: **RWE**
npower renewables

Project: **MOLESWORTH WIND FARM**

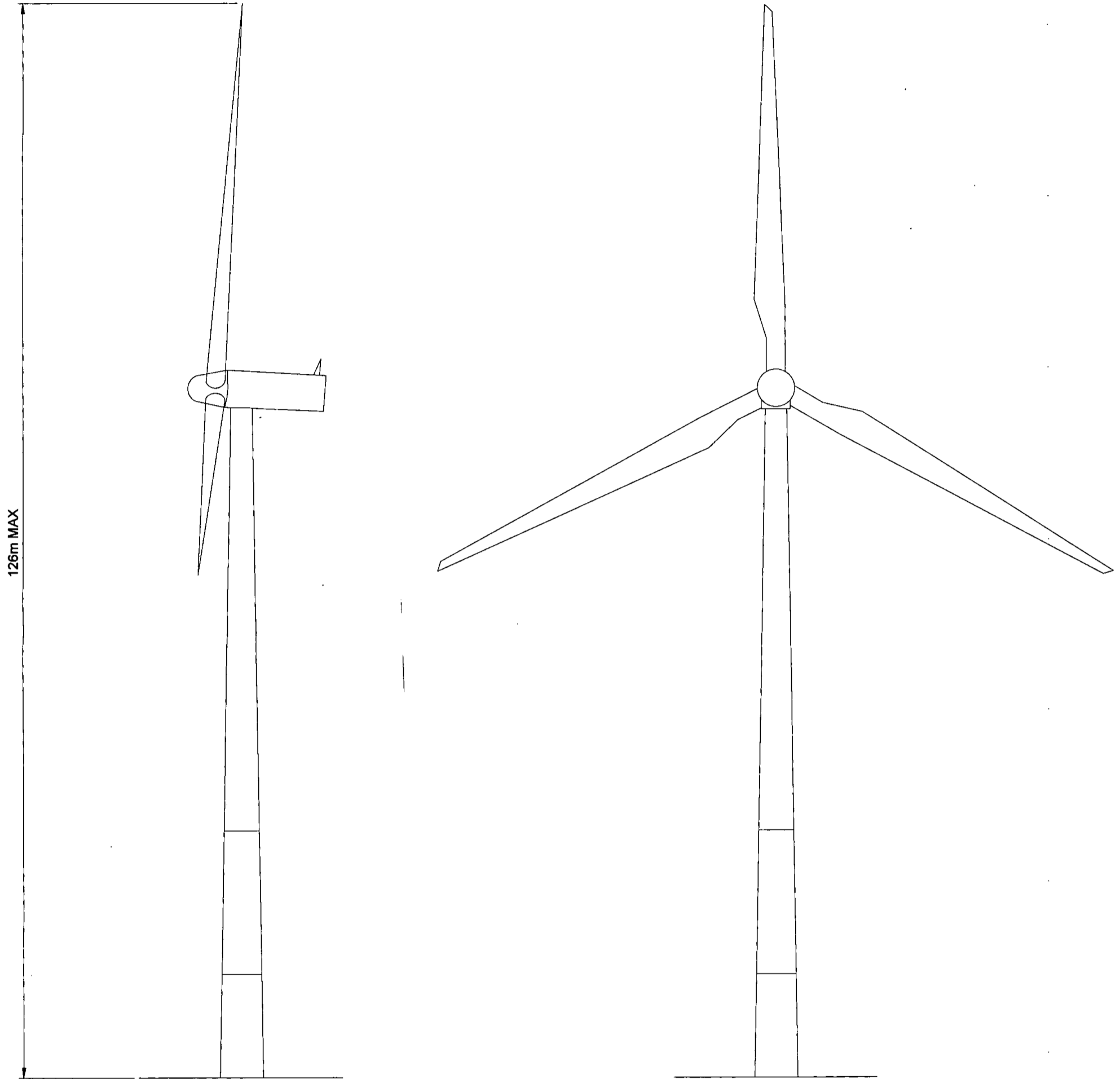
Title: **FIGURE 2 PROPOSED SITE LAYOUT PLAN**

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Design: LK	Drawn: LK
Chk'd: APR	App'd: JS
Date: DECEMBER 2011	Scale at A1: 1:5,000
Drawing Number: 60156409/FIGURE 2	A1



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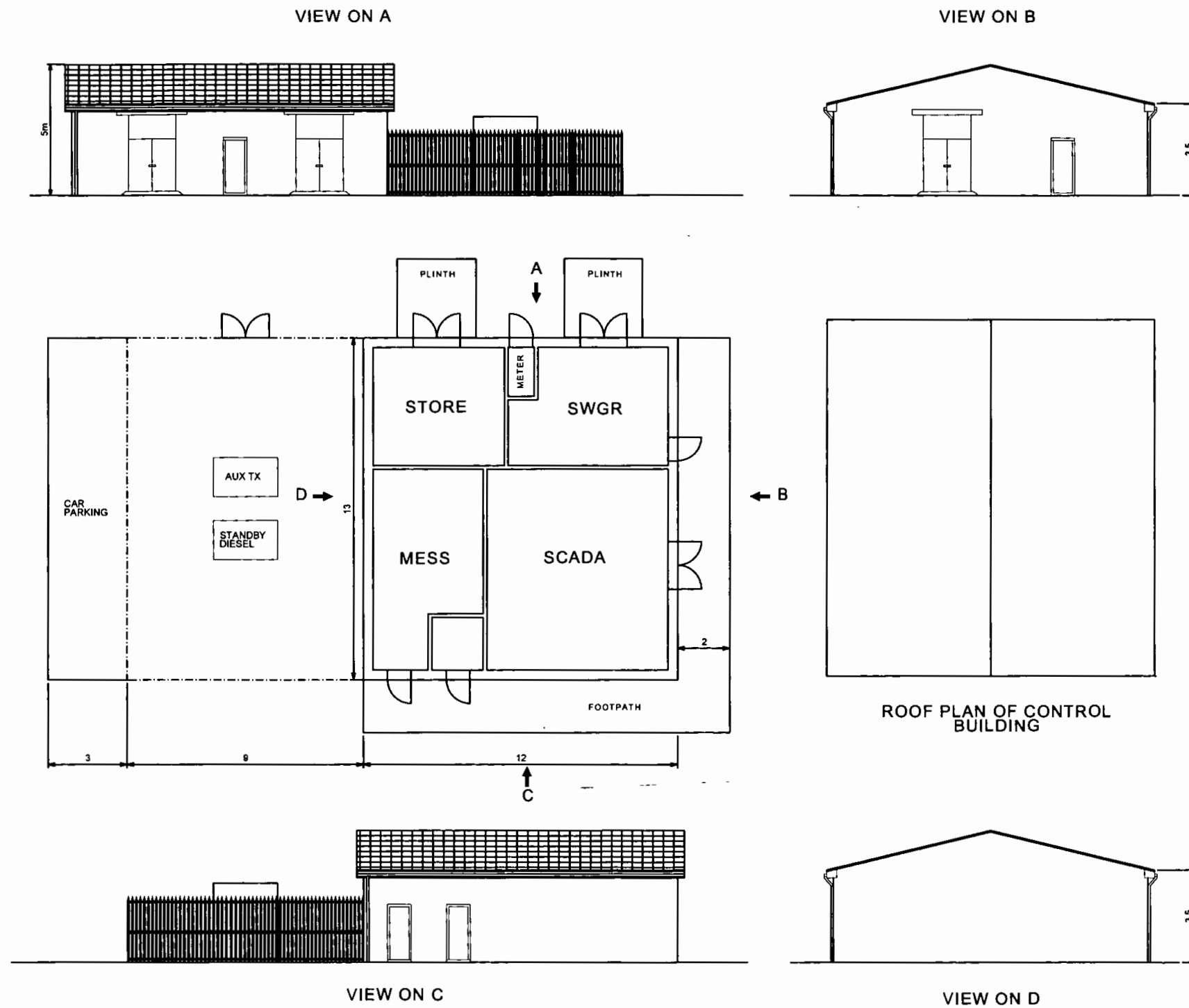
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Client: **RWE**
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Project: **MOLESWORTH WINDFARM**

Title: **FIGURE 4
INDICATIVE TURBINE ELEVATION**

Design: LK	CAD: LK
Chk'd: APR	App'd JS
Date: DECEMBER 2011	Scale at A3: 1:500
Drawing Number: 60156409/FIGURE 4	
A3	



NOTE: ALL DIMENSIONS SHOWN IN METERS

Client:	RWE npower renewables	Title:	FIGURE 6 INDICATIVE CONTROL BUILDING AND COMPOUND	AECOM	Design:	LK	CAD:	LK	
Project:	MOLESWORTH WIND FARM			1st Floor, 1 Trinity Gardens Broad Chare, Quayside Newcastle upon Tyne, NE1 2HF	Tel: +44 (0) 191 2246500 Fax: +44 (0) 191 2246599 www.aecom.com	Chk'd:	APR	App'd:	JS
						Date:	DECEMBER 2011	Scale:	1:200
						Drawing Number:	60145824/FIGURE 6		A3