

PLANNING & ENVIRONMENTAL PROTECTION
COMMITTEE

TUESDAY 4 FEBRUARY 2014 AT 5.30PM

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**UPDATE REPORT &
ADDITIONAL INFORMATION**

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PETERBOROUGH CITY COUNCIL

PUBLIC SPEAKING SCHEME - PLANNING APPLICATIONS

Procedural Notes

1. Planning Officer to introduce application.
2. Chairman to invite Ward Councillors, Parish Council, Town Council or Neighbourhood representatives to present their case.
3. Members' questions to Ward Councillors, Parish Council, Town Council or Neighbourhood representatives.
4. Chairman to invite objector(s) to present their case.
5. Members' questions to objectors.
6. Chairman to invite applicants, agent or any supporters to present their case.
7. Members' questions to applicants, agent or any supporters.
8. Officers to comment, if necessary, on any matters raised during stages 2 to 7 above.
9. Members to debate application and seek advice from Officers where appropriate.
10. Members to reach decision.

The total time for speeches from Ward Councillors, Parish Council, Town Council or Neighbourhood representatives shall not exceed ten minutes or such period as the Chairman may allow with the consent of the Committee.

MPs will be permitted to address Committee when they have been asked to represent their constituents. The total time allowed for speeches for MPs will not be more than five minutes unless the Committee decide on the day of the meeting to extend the time allowed due to unusual or exceptional circumstances.

The total time for speeches in respect of each of the following groups of speakers shall not exceed five minutes or such period as the Chairman may allow with the consent of the Committee.

1. Objectors.
2. Applicant or agent or supporters.

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PLANNING AND ENVIRONMENTAL PROTECTION COMMITTEE – 4 FEBRUARY 2014 AT 5.30PM
LIST OF PERSONS WISHING TO SPEAK

Agenda Item No.	Page No	Application	Name	Objector/Applicant/Agent/ Supporters/Parish Council/Town Council/Neighbourhood Representatives
4.1	25	13/00933/FUL – FRENCH FARM, FRENCH DROVE, THORNEY, PETERBOROUGH	<p>Councillor David Sanders</p> <p>Parish Councillor John Bartlett</p> <p>Mr Stewart Jackson MP</p> <p>Ms Helen Godber</p> <p>Mr Andrew Turner</p> <p>Mr Owen Seward and Mr Matt Partridge (REG Windpower Limited)</p> <p>Mr Anthony Harding (Turley Associates)</p> <p>Mr Richard Olive</p> <p>Mrs Caprio</p> <p>Dr Dorothy Ball</p>	<p>Ward Councillor</p> <p>Thorney Parish Councillor</p> <p>MP for Peterborough</p> <p>Objector</p> <p>Objector</p> <p>Applicant (on behalf of)</p> <p>Planning Consultant</p> <p>Supporter</p> <p>Supporter</p> <p>Supporter</p>

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BRIEFING UPDATE

P & EP Committee 4 February 2014

ITEM NO	APPLICATION NO	SITE/DESCRIPTION
1.	13/00933/FUL	French Farm, French Drove, Thorney, Peterborough, Construction of four additional wind turbines to a maximum height of 100 metres (to vertical blade tip) with ancillary infrastructure including temporary construction compound, access tracks and crane hardstandings.

Minor Amendments to published Committee Report

The following minor amendments are made to the report published:

3 Planning Policy

Planning and Compulsory Purchase Act 2004

Section 38(6) – Determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

Overarching National Policy Statement for Energy (EN-1) 2011

Paragraph 1.2.1: ‘...In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent, this NPS is a material consideration will be judged on a case by case basis.’

National Policy Statement for Renewable Energy Infrastructure (EN-3) 2011

National Planning Policy Framework (2012)

Section 12 - Conservation of Heritage Assets

Account should be taken of the desirability of sustaining/enhancing heritage assets; the positive contribution that they can make to sustainable communities including economic viability; and the desirability of new development making a positive contribution to local character and distinctiveness. When considering the impact of a new development great weight should be given to the asset’s conservation.

Planning permission should be refused for development which would lead to substantial harm to or total loss of significance unless this is necessary to achieve public benefits that outweigh the harm/loss. In such cases all reasonable steps should be taken to ensure the new development will proceed after the harm/ loss has occurred.

Where harm is considered to be less than substantial, this harm should be weighed against the public benefits of the proposal.

4 Consultations/Representations

Local Residents/Interested Parties

Round 2 responses

An objector has requested that it be clarified that the following objections have been raised by professional consultees from MAS Environmental:

- The development clearly struggles to meet the upper ETSU-R-97 limit, which suggests they are trying to squeeze on too many turbines.
- It is unusual to see wind turbine noise predicted according to wind directions.
- The request for additional information regarding the percentage of time that noise levels are exceeded is also worrying, as ETSU is a pass or fail standard.

5 Assessment of the planning issues

d) Landscape Character and Visual Impact

5.31 In terms of theoretical visibility, the submitted Zone of Theoretical Visibility indicates that, owing to the flat open landscape of the area, the entirety of the study area has theoretical visibility of at least one wind farm (taking account of the application proposal and those which are at planning application stage, consented or operational). However, it must be noted that this is theoretical only [my emphasis] and does not paint a true representation of the actual visibility owing which is affected by landscape or manmade features which can block views.

e) Cultural Heritage

5.83 Notwithstanding this, it is acknowledged that the Fens are rich in archaeological potential and therefore, to ensure that no harm results to buried remains which may still lay uncovered, a scheme of archaeological investigation by watching brief is still requested during the excavation of turbine foundations. This will ensure that no unacceptable harm results.

5.84 On the basis of the above, it is considered that whilst the proposal will result in some harm to the setting of Crowland Abbey (Grade I) and other local heritage assets, this harm is less than substantial (a view shared by EH). As such, and in accordance with paragraph 134 of the National Planning Policy Framework (2012), it is for the LPA to determine whether the public benefit arising from the turbines outweighs the harm caused.

5.85 As detailed in paragraph 98 of the NPPF, LPA's must recognise that any project for renewable/low carbon energy makes a valuable contribution to cutting greenhouse gas emissions. Whilst some harm would result to heritage assets, Officers do not consider that this harm is significantly above that which results from the two consented/implemented turbines. English Heritage has considered that the harm resulting is less than substantial and whilst this does not automatically mean that the proposal is acceptable, it highlights that the harm is not of a significant level. Accordingly, Officers consider that the benefit arising from the renewable energy generation from the application proposal, outweighs the level of harm caused. On this basis, the proposal is in accordance with paragraph 134 of the National Planning Policy Framework (2012).

Additional Consultations/Representations

Consultations

Ministry of Defence Safeguarding

Objection removed in respect of the ATC radar at RAF Coningsby, Waddington and Wittering. The submitted technical proposal to mitigate the unacceptable effects of the proposed development are accepted and may be secured by condition. The objection based on the unacceptable interference to the PAR at RAF Wittering is maintained however.

Representations

Following publication of the Committee Report, 10 additional letters of objection have been received (4 of whom have previously submitted representations). The following additional objections have been raised:

- I have personally planted hedges and trees around the boundary of our land, encouraging wildlife, birdlife and reducing our carbon footprint. This is a much more cost-effective way of enriching the environment and should be considered instead of wasting money on these schemes.
- The visual impact is not reflected in any photomontages as the turbines move.
- I am disillusioned with this so-called 'democracy' when the wishes of people are totally disregarded. When Central Government overrides the wishes of the local Council, there should be a good reason. Wind turbines are not a good enough reason.

- The Further Environmental Statement (December 2013) is not an archaeological statement, only an Auger Survey.
- No real archaeological determination can ever be reached using only 5 bore holes per turbine pad.
- No reference is made within the Auger Survey to the proposed cabling between each turbine or grid connection which will have an impact upon the archaeology of the area. At French Farm, its proximity to the scheduled monument at Flag Fen raises concerns that this known landscape is likely to be criss-crossed underground at undulating depths by a historically rich Bronze age landscape undetectable by geophysics and that channelling at depths between 1 and 2 metres for laying of cables and grid connections etc. will potentially destroy and confuse the archaeological record
- The Auger Test for Turbine 2 shows strong Rhisomorphic results (corded structures which absorb and transform bacteria to provide nutrient value to the earth) and Pseudomorphic residues (simple crystalline structures of minerals). At Turbine 3, there are high micro bacterial fibres, strong rhisomorphic and ostracod levels. Therefore the area is rich in micropalaeontology. As such, alternative siting should be planned for Turbine 2 and Turbine 3 should be abandoned.
- The Applicant was clearly asked to submit a geophysical survey with trial trenching by PCC Archaeology Services and English Heritage. There doesn't appear to be any record submitted to Planning Services or the general public showing that this has been undertaken.
- Charles French, Head of Division, Professor of Geoarchaeology at Cambridge University has said how important it was to carry out these investigations as part of the planning process and before any development decisions are made. I do not understand why the City Council is ignoring the advice of an expert in this field.

One of these objections is identical to the comments made during the first round of public consultation.

Two of these objections are provided below at the request of the objectors as they are unable to attend Committee in person (Appendix A).

In addition, 4 further letters of support have been submitted (one of whom has previously submitted representations). The following additional comments have been made:

- Putting up 6 turbines has relatively small impact compared to only 2, but will treble the power generated. It is estimated that over the 25 years they will save 975,000 tonnes of CO₂ generation.
- Turbines take up very little land area, as opposed to solar panels.
- The project will benefit the local community to the tune of £60,000.

Amended conditions

Following publication of the Committee Report, the following conditions are amended:

- C 9 Prior to the commencement of development, a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The Construction Method Statement shall include measures to secure:
- a) A Traffic Management Plan;
 - b) Formation of the construction compound, access tracks and any areas of hardstanding;
 - c) Dust management;
 - d) Cleaning of site entrances adjacent to the public highway;
 - e) Vehicle cleaning equipment and use;
 - f) Pollution control of: water courses, subsoil, bunding of fuel storage areas and sewage disposal;
 - g) Temporary site illumination (which shall be arranged so that no danger or inconvenience is caused to users of the adjoining public highway);
 - h) Details of the methods to be adopted to reduce the effects of noise occurring during the construction period to the lowest practicable level and in accordance with BS5228;

- i) Disposal of surplus materials;
- j) The construction of the access into the site and the creation of and retention of associated visibility splays;
- k) Construction crane pads;
- l) Carrying out of foundation works;
- m) Sheeting of all HGVs taking spoil or other loose materials to/from the site to prevent spillage or deposits on the public highway;
- n) Soils storage and handling;
- o) An environmental management plan to cover the construction period providing details of the means of avoidance and mitigation of any impacts on biodiversity recorded within the development site and pollution prevention measures; and
- p) Post-construction restoration and reinstatement of the working areas.

Development shall be carried out in accordance with the approved Construction Method Statement.

Reason: In order to prevent any harm occurring to neighbouring residents or the safety of the public highway during the construction, restoration and reinstatement period, in accordance with Policies CS11, CS14 and CS16 of the Peterborough Core Strategy DPD (2011) and Policies PP3 and PP12 of the Peterborough Planning Policies DPD (2012).

- C18 Ministry of Defence-accredited 25 candela omni-directional aviation lighting or infra-red aviation lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration shall be installed at the highest practicable point on the turbines. The turbines shall be erected with this lighting installed and the lighting shall remain operational until such time(s) as the wind turbines are decommissioned and removed from service.

Reason: In order to ensure safe and efficient flying for the military and commercial flights, in accordance with Policy CS11 of the Peterborough Core Strategy DPD (2011).

Appendix A

I am a resident of Dowsdale bank, property PL4 on the applicant's details which is located 861 metres from the nearest Wind Turbine. I have previously submitted a letter of objection but due to the fact the meeting is at 5.30pm and I unable to attend due to prior commitments I am writing to reiterate my feelings on the above proposal.

My family and I are currently building a property on the site which will be our family home for years to come, we have been instructed by our local council to construct the house in a traditional style with slate roof, red brick and wooden sash windows (at great expense to ourselves) to ensure that the property is in keeping with the local area and fits in with the local landscape all of which we have done. However we are now subject, (if the application is approved) to having views from our living room windows of wind turbines which are completely out of character with the local area and landscape!

I am also concerned about the noise aspect as the turbines are so close to our property and I have read a newspaper article about a family whose home was located over 1000 metres from a wind farm who were driven out of their home due to the unbearable noise, our property is only 861 metres from the nearest turbine and we are not in a financial position to relocate.

My daughter sat at her bedroom window today and watched a pair of nesting Swans who return to the dyke across the road from our house annually, with all the studies and surveys that have been undertaken with regard to this proposal there are no guarantees that the wildlife that currently inhabit the dyke and Spinney will not be affected.

I appreciate that energy needs are ever increasing, however the applicant has already gained permission for two Wind turbines on the site and feel this would be more than adequate for the location.

I hope that as a local resident my views will be taken into account when you make the decision regarding the proposal and respectfully ask that consideration is given to the lives of all local residents who will be affected if this proposal is granted and in our case according to the applicant will have a substantial effect on our property.

Yours Faithfully

Mrs H Hemsworth



Dear Miss George

With regards to the above, we strongly object to this application, as this area will be surrounded by these wind turbines, and the effect on this heritage village will be enormous.

WE ARE ALL WELL AWARE THAT HOUSES WILL BE UNABLE TO SELL WITH THESE MONSTROSITIES ALL AROUND US, BUT IF THIS SHOULD PESONALLY HAPPEN TO US, WE WILL HOLD THE COUNCIL RESPONSIBLE. So any reduction in our house price, will. It be taken lightly.

I have been fighting these applications for nearly twelve years, and here we are again, doing the same letters, and still you approve them. I despair.

Paula Millard

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French Farm Planning Committee 4 February

As TNLPG chairman and a local resident I am extremely concerned about this application. We must be absolutely certain that all the relevant information has been considered before granting it permission and REG should have provided all the evidence needed to demonstrate this. Before permission can be granted surely all questions relating to this application should be answered in full. Working on our behalf the planning dept should listen and act upon the advice and recommendations of in house experts, chosen consultees and should surely also welcome advice from other sources particularly those people who are experts in their fields. We are extremely concerned that all the necessary paperwork has not been done and that the planning department have not demanded enough reports for the committee to make their decision. Therefore approving this plan would set a dangerous precedent and potentially damage heritage assets and local wildlife. Full and proper tests should also be carried out which would ensure the safeguard of local residents.

Now that wind energy is a mature industry the EU has said subsidies should be phased out by the end of the decade and our govt has already started reducing subsidies. This could have a serious impact on this application.

Planning permission for the two consented turbines was given in 1993, a significant amount of time ago, yet they are still to be built. This application cannot therefore be considered urgent and surely this means that the decision should be refused/delayed until a proper assessment on heritage impact and archaeological digs are complete. The Council do not need to risk losing any potential heritage assets and attractiveness to tourists for this scheme by rushing into a decision. There is nothing to stop the applicants returning and resubmitting their plans once all the necessary safeguards are completed.

Visual/Heritage

The NPPF (the Framework) has a core principle at paragraph 17 that a good standard of amenity should always be sought for existing and future occupants of buildings. Paragraph 98 of the Framework makes it clear that it expects applications for energy development to be approved if its impacts are (or can be made) acceptable.

The Council's Landscape Architect's says the main conclusion is that whilst the effect of the additional 4 turbines will be significant up to 1km from the site, in overall terms the impact will be quite limited. However in the Treading appeal document it says within a radius of 2-3 km, the turbines would be prominent features when appreciating the local arable surroundings. As modern industrial structures they would have a significant visual impact.

English Heritage object as the proposal would cause further harm to designated heritage assets within the vicinity i.e. the setting of the Scheduled and Grade I listed Crowland Abbey, Grade I listed church of St Mary and St Botolph, the Grade I listed house known as Thorney Abbey, and the setting of Crowland Conservation Area. The application should be refused unless it can be demonstrated that the public benefits of the proposal outweigh the harm caused to the setting of these important heritage assets, in accordance with paragraph 134 of the Framework.

The Council's Conservation Officer ignores this advice claiming the development is unlikely to have an adverse impact on the setting of the Conservation Area of Thorney or key listed buildings and in the Committee Report fails to even mention Crowland Abbey at all.

At paragraph 5.67 it says that English Heritage considers that the impact of the proposed turbines upon heritage assets (and their settings) is less than substantial. However I have checked all 3 letters submitted by EH and cannot find a comment of this nature included in any of these letters - as already discussed above they say "we consider the application should be refused unless it can be demonstrated that the public benefits of the proposal would outweigh the harm caused".

Treading again says reflecting the Ministerial Statement, the Guidance states at paragraph 15 that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. It also states at paragraph 34 that, depending on their scale, design and prominence, a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset. Even though English Heritage confirms this the Council Conservation Officer does not agree but fails to offer any explanation as to why English Heritage has a differing opinion.

Paragraph 5.18 of the Committee Report says that the landscape character areas within which the site is located are all considered by the applicant to have a low sensitivity to wind farm development whilst neighbouring character areas, such as Thorney Island are considered to have a medium sensitivity and paragraph 5.21 says accordingly, the proposed turbines will have a moderately harmful impact upon the character of the application site and its immediate surrounds (up to 1 kilometre from the site) however, owing to the scale of the local Fen landscape, the overall impact upon the character areas would be negligible. The Treading Appeal however says "The Secretary of State has had regard to the Inspector's comment that the key characteristics of the fenland landscape are broad, open, flat drained arable fields with sporadic settlements (IR52). The Inspector reports that the main parties agree that the **effect of the proposed development on the landscape character is significant** (IR52). I would suggest the Secretary of State and Planning Inspector have provided a more impartial and honest view than the applicant or PCC in this instance!

At 5.28 we are told it is accepted that the turbines, within their immediate setting would have an impact upon the character of the landscape and that owing to the number of developments in the locality, there would be a change to the local landscape of several areas to the north of Thorney. Even though it is only the local landscape to the north impacted this small area should not be ignored and should be given proper weight in planning decisions. Local topography is an important factor in assessing whether wind turbines could have a damaging effect on landscape and should recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas.

Paragraph 5.33 says the key question in considering the proposal is whether it would have such a significantly detrimental effect on the locality more generally and on amenities of neighbouring residents that ought to, in the public interest, be protected. Turbines can (**owing to number, size and proximity**) present such an overwhelming presence to main views from properties, so as to render them unattractive and thus unsatisfactory places in which to live thereby resulting in a coincidence of public and private interests. This position has recently been set out in the Appeal decision relating to Treading Farm on the South Holland/Fenland border (Appeal Reference Nos: APP/D0515/A/12/2181777 and APP/A2525/A/12/2184954).

Planning Officers have chosen selected dwellings which they believe are representative of local properties. However they do not include photographs to back this up and they appear only to have viewed these properties from the public highway. We do not believe the properties chosen are representative of all relevant properties or that the view from these properties can be fully appreciated just from the road. I attach photographs taken both from the public highway and along the footpath that runs from Falls Bridge to Dowsdale (Dowsdale Bank). The position on the footpath was approximately 150m from T1 and photographs were taken from the same spot facing North and South. Photographs are attached at Annex A.

I also include photographs of Portsands Farm (approx. 700m from T4) where up to 18 horses graze in the fields at any one time. The turbines are known to have a serious effect on horses and paragraph 5.44 says **Portsand** and Grange Farms will have clear and uninterrupted views of the proposed and consented turbines.

In addition my property has a large field at the back which runs along the drain on French Drove opposite Falls Farm. We are not allowed to plant screening because the drainage digger needs access to dredge the drain every year. This field is used for recreational purposes – dog exercising & training, picnics, snowball fighting, fireworks and family gatherings etc. **This will cause unavoidable and frequently overwhelming presence**

when enjoying the outside areas. We also have views of turbines from the windows in my house and include photographs of the waterlogged fields at Falls Farm.

Third House Farm/Cottage is sited only 601 metres from the nearest proposed turbine. The photograph taken from Dowsdale close to T1 shows as described in the Committee Report that the turbines would be a conspicuous and dominant feature when viewed from the upper windows to the rear of these dwellings. However it also shows the hedge which is lower than suggested and does not provide screening as claimed. The turbines would prevent the enjoyment of main ground floor living and outside areas of these dwellings, and would render the properties wholly unattractive.

To the north-west, the property most significantly affected would be Hollies Farm (located 1273 metres from the nearest turbine). The Committee Report says that at present, views towards the application site from the gardens and ground level are filtered by deciduous hedgerows which form the southern boundary. However our photographs of this property from Falls Drove and Dowsdale Bank clearly show that this hedgerow is no more than a 1 metre in height and does not obscure the views from the windows or the garden. The turbines would have an overwhelming presence to main views from this property.

Grange Farm Cottage on Cox's Drove (approx. 1000m from the nearest turbine) faces the turbines and does not have any vegetation to screen or restrict its views. This property has not been considered by PCC but it can be seen from the photographs we have taken at Dowsdale Bank that the views of the turbines will be unobstructed. This property can be seen all the way from French Drove but due to the distance we were unable to take a photograph with enough clarity.

Other properties photographed with unrestricted views include 26 and 27 French Drove and Poplar Farm Cottage on Falls Drove are included at Annex A.

Officers do not consider that the proposal would result in such significant harm as to render properties unsuitable for occupation, nor would the harm that results not be outweighed by the benefit created however we believe the photographs we have provided demonstrate that this is not the case and the wind farm would be a conspicuous and dominant feature and for the occupants of these properties there would be an unavoidable and frequently overwhelming presence both inside and when enjoying the outside areas.

We have identified serious harm in respect of cultural heritage, the interests of horse riders, and the visual amenity of the area generally within 3km of the development, landscape impact and visual amenity of individual properties. The proposals conflict with national policy set out in the Framework taken as a whole.

The Secretary of State, in his Ministerial Statement, is clear that protecting the local environment should properly be considered alongside the broader issues of protecting the global environment. If there is a level of harm to the local environment from these proposals there is a clear case to dismiss the application.

Archaeology

I emailed PCC about my concerns that the supplementary report only features results of an Auger Survey which is very restrictive in delivering results. The applicant has been clearly asked to submit a geophysical survey with trial trenching to satisfy English Heritage. Also importantly **Charles French, Head of Division, Professor at Cambridge University** said "Given these very important considerations, it is imperative that proper and thorough hydrological, palaeo-environmental and archaeological investigations are designed, commissioned and conducted as part of the planning process and before any development decisions are made."

Upon querying the auger results and the need for a full survey I received a response from Mr Harding informing me that the desk top assessment indicated that there was little potential for significant archaeology to be present on site. Even though English Heritage expressed the view that they wished to see pre-determination trial trenching take place this appeared not to be justified due to the lack of certainty that finds

would be present. **A meeting was held between the City Council archaeologist, English Heritage and the applicant's archaeologist. English Heritage listened to the case that suggested that it would not be reasonable to undertake trial trenching and it was partially accepted.** I do not understand why the PCC archaeologist was assisting the applicant's archaeologist in putting this case forward as surely full tests would not cause harm and provide certainty in this matter.

I contacted Sarah Poppy at English Heritage to ask her my questions relating to the Augering and need for full surveys. She advised that English Heritage could not get involved in the "nitty gritty" and that these questions would be best answered by PCC Archaeologist.

However I was told by Mr Harding that the findings were reported to English Heritage and the City Council's archaeologist and both concluded that there was no evidence to justify any further pre-determination archaeological investigation/evaluation taking place and that English Heritage HAD therefore been involved in the 'nitty gritty'. He said the decision not to require further archaeological work was reached entirely in accordance with national planning advice and archaeological best practice and is not contrary to the views of Cambridge University and yet EH have been unable to reassure me and answer my questions.

EH did advise full surveys should be carried out and only partially accepted the case presented to it by PCC and the applicant's archaeologist. The augering only provides an indication and I believe the only way we can be sure is to carry out these surveys before approval as recommended by EH and Charles French. A decision can then be made when we are in possession of all the facts.

My comments and queries that I believe need answering concerning archaeology can be found at Annex B and are yet to be answered.

I do not understand why the council is ignoring the advice of EH and a Cambridge Professor who is clearly an expert in this field. I'm sure he would be happy to comment or assist if given the opportunity as it is obviously something he considers to be of immense importance and if the information I have received is correct then serious damage could be done if this application is approved.

Wildlife

The Committee Report says in relation to bats that "At Fall's Farm, one dilapidated brick building and the farm house were deemed to be of high potential. A thorough site inspection was undertaken at all buildings within the survey area and no evidence of roosts was found." However I have informed the council that we have bats roosting in our house/garage and my house is located across the road from Falls Farm just a few 100 yards away.

Paragraph 5.13 of the Committee report says The assessment undertaken within the ES follows accepted best practice set out in a number of documents and yet 5.108 says Whilst it is accepted that some surveys undertaken have not accorded with established best practice, no objections have been received from relevant consultees. Even though paragraph 5.89 says that The RSPB raised concerns that the surveys undertaken and that important information about the approach to surveys had not been presented. Accordingly, the Developer submitted further ecological information within the Further Environmental Information Statement (December 2013) (referred to as FEIS2) which was then revised in January 2014 following yet more errors within the submitted figures of associated Appendix B. Paragraph 5.90 then goes on to say in response to consultation on this FEIS2, the RSPB has again highlighted that the further information does not fully resolve their original concerns over the reliability of the survey information/assessment.

I do not understand how paragraph 5.92 can possibly claim - As such, notwithstanding Dr Reed's professional opinion, Officers consider that the methodology undertaken to inform the baseline and therefore the conclusions as to the likely effects of the proposal upon ecology and ornithology, are sound. The RSPB also have concerns about the surveys and yet paragraph 5.131 says whilst it is accepted that the bird surveys undertaken have not accorded with established best practice, no objections have been received from any

relevant consultees (City Council's Wildlife Officer, Natural England or the RSPB) and consequently, it is accepted that these surveys are sufficient from which to consider the likely significant environmental impacts upon bird populations (even though the RSPB are not happy with the surveys).

How can non-qualified people claim the application site is not significantly sensitive in terms of ecology and ornithology and it is not considered that the surveys undertaken have led to a significant under calculation with regards to bird populations? Accordingly, Officers accept that these surveys are a sufficient basis from which to consider the likely significant environmental impacts of the proposed development. The proposal would not pose any unacceptable risk to important ecology within/surrounding the site and the turbines would not result in any significant environmental impact. I do not believe the planning officers have the necessary qualifications that are needed to ignore better qualified experts than themselves.

At paragraph 5.118 it says the observed sightings of barn owls were below rotor blade height and from studies undertaken of the species elsewhere in the country, the birds are known to fly below this height. However the PCC Wildlife Officer (13 May 2013 as consultee for Gores Wind Farm application) said; "Regarding barn owls, I consider the collision risk to have been under-estimated; recent research (C.Shawyer, pers.comm.) indicates that nocturnal flights are more likely to involve owls flying at risk height."

These two differing views are given by the same person (PCC Wildlife Officer) and were relating to sites both in this area!

Noise

We obtained a Noise Assessment from MAS Environmental (Noise consultants involved in the Treading appeal) and forwarded it to the council in November 2013 a copy of the report has been made available to the committee and is included at Annex C. Unfortunately this was not passed on to any of the consultees or even the pollution officer for comment/consideration but was treated as if it were an objection letter from a member of the public with no skill or knowledge in this field.

In summary it says that REG are trying to squeeze too many turbines in of a noise level /power generation that is too high. The background noise monitoring locations are not ideal as French Farm is a working farm and its proxy locations are not – this is clearly advised against in the recent IoA good practice guide.

The methodology used is different from the consented turbines and allows more noise than the approach used for Nuts Grove and Wrydecroft (carried out 10 years ago) and that used about 3-4 years ago, which is more compliant with the original intents of ETSU-R-97 and still they are struggling to meet the upper limit. A revised assessment should be made with 10m measured wind speeds as this is what the consented assessment is based on. If the approval of this application results in one application with noise conditions set to 10m measured wind speeds and the other set to 10m standardised wind speeds enforcement of unacceptable noise, will be virtually impossible.

Turbine noise is predicted according to numerous different wind directions. This implies that if using the normal method (which is worst case and shows noise emitting from all turbines in all directions) they cannot meet even the upper limits. As such this again raises concerns about the true level of impact that REG are seeking to approve.

Assessment for the potential of amplitude modulation noise impact (AM, 'thumping' type noise) is extremely limited and based on outdated information which has been widely criticised and there are serious concerns that AM could be extremely intrusive. As you may be aware, the location of the wind farm is not too far from the Deeping St Nicholas Wind Farm which is widely known to have caused serious noise issues. Some approved applications (Den Brook condition) have AM limits included as conditions.

The Council appear to have requested additional information regarding the % of time that noise levels are exceeded. ETSU-R-97 is a pass or fail standard. It already allows for a certain level of adverse impact due to

the need for renewable energy. This is clear within the discussion of the guidance. Acceptability of wind development should not be based upon % of time that levels are exceeded and a clear pass or fail approach should be adopted.

Unfortunately if approved I would expect the development to generate high levels of noise, excess impact and there to be little hope of effective controls (at least unless 10m measured wind speed noise conditions and a condition to control for AM are approved).

MAS Env. advised that the next step would be to proceed with writing a formal detailed report outlining the various problems – but said “I would suggest that this is not vital in this case as impact is so clearly excessive without additional analysis.”

Paragraph 5.146 is misleading as it says “Some local residents consider that the alteration of the turbine positions from the original Scoping stage result in the background noise survey positions and results being inaccurate and not fit for purpose.”

It is not the change in location of the turbines that create the problem but the assumption that a working farm is representative of many properties in this area that are not working farms and have very little background noise (as per IoA good practice).

Notwithstanding this, the City Council’s Pollution Control Officer has advised that these positions remain the most appropriate locations from which to undertake background surveys despite IoA clearly advised against in the recent good practice guide. Further, the results produced accord with other representative examples of background noise surveys within the locality.

It is noted that there is a comparable development (Nuts Grove/Wrydecroft) within the PCC administrative area that has received permission through the Planning Inspectorate but the methodology used is the same as the 2 approved turbines at French Farm and as already discussed these tests differ from the current application, are not comparable and were completed around 10 years ago.

An extract from the Treading Appeal identifies properties with “consistent very low noise levels at night of around 20-22 dB LA90 even, on one night, when wind speeds were recorded at around 5-7 metres per second” and “it is likely that turbine noise would be noticeable and at times intrusive because although falling within (just) the ETSU limit, it would frequently exceed the prevailing background noise level by a substantial margin.

I consider that the combination of prevailing wind direction, low safety margins, very low background night time noise levels and sound reflection from the house wall amounts to a noise impact that significantly reinforces the overbearing visual impact on living conditions for the occupiers.”

Yet PCC say at paragraph 5.163 “It is accepted that this limit at certain wind speeds (4-6m.s-1) would still result in turbine noise being noticeable to neighbouring residents as it would frequently exceed the prevailing background noise level by a substantial margin. However, it is considered that this limit would not result in an unacceptable or significant environment impact.”

This is in direct contrast to the Inspector at the Treading Appeal and MAS Env who make it clear that ETSU-R-97 is pass or fail only. Furthermore without carrying out sound tests at other properties and using the same methodology as that used for the approved turbines the LPA cannot possibly say with any certainty that properties near French Farm (that is similar in area to Treading) do not have similar background noise levels unless they carry out the appropriate tests. The Wryde Croft and Nuts Grove tests were carried out in 2003 with different methodology and are less likely to be representative than the Treading tests.

Transport

PP12 – The Transport Implications of Development

Permission will only be granted if appropriate provision has been made for safe access by all user groups and there would not be any unacceptable impact on the transportation network including highway safety. We do not believe the applicant satisfied the LPA and Committee Members beyond reasonable doubt that the proposed vehicular navigation to and from the site conform to HSE Regulations, regarding health and safety law on the public highway, negating all potential danger to the travelling public and pedestrians should there be a possible fatality on the adopted highway due to the extra and abnormally large vehicular movements.

Surveys of the local roads have not been carried out and the changes due to the A16 opening and the restrictions placed on the Eye Green Road have resulted in higher volumes of traffic especially HGV's using Falls Drove and French Drove as shortcuts to/from the A16 and A47. Falls Drove is a narrow road in poor condition with no place to pull over and dykes and drains on either side. Large vehicles including HGVs and farm traffic use this road as well as it being a main access route for local residents. Most vehicles drive along the middle of the road and this is also recommended in the road survey in Chapter 10 of the ES. The road is not wide enough for HGV's and large vehicles to pass safely when travelling in opposite directions. The increased traffic using this road especially as Wryde Croft and Nuts Grove will also be under construction will have an unacceptable impact on safety.

The whole of Chapter 10 had to be resubmitted due to the preferred route being incorrectly stated. This was identified along with many other errors by a member of the public and was initially described as a "Typo" by the planning dept!

All Highway Authorities are required by law to ensure that their roads are designed, constructed and maintained so that they are safe and fit for purpose. Around 70% of fatal accidents in the UK occur on rural roads

Shadow Flicker

We are told that two properties would be significantly affected by shadow flicker – a property at Empsons Farm, Falls Drove and Pumping Station House, Green Drove. However there is another property next to Empsons Farm that does not appear to have been considered. Surely this house will also be affected. At Pumping Station House, the maximum level of shadow flicker predicted (i.e. not taking in to account turbine position according to wind direction, weather and cloud cover) is 18.5 hours per year. Whilst the property at Empsons Farm is predicted to experience up to 33 hours of shadow flicker per. Given that this is only a model (and models are potentially inaccurate) and the variance of the turbine position may be +/- 40 m, these figures are of real concern. Shadow flicker would impact residents' amenity particularly in their gardens.

There is no published guidance in England on the maximum number of hours per year that is acceptable for a residence to be affected by shadow flicker either inside their property or in their outside space. REG Windpower have quoted 30 hours as an acceptable limit as a "number of European countries, including Northern Ireland, have advised that 30 hours is an acceptable level". PCC do not have to adopt this limit and in any case at least one property and probably two could be affected by shadow flicker for a period greater than 30 hours.

Flooding

The Environment Agency said "Your Authority must decide whether or not the proposals satisfies the other part of the Exception Test that the development provides wider sustainability benefits to the community that outweigh flood risk."

5.140 With regards to increased flood risk elsewhere, it is considered that the submitted FRA adequately demonstrates that the development would not result in increased surface water run-off or increased flood risk off-site. The proposed turbines would have negligible impact in terms of increased run-off and the tracks, crane pads and construction compound are all proposed to be constructed of porous materials. To ensure that surface water drainage is adequately managed, the City Council's Drainage Engineer and NLIDB has

requested that details of surface water drainage (detailed design) be submitted prior to commencement of development. This may be reasonably secured by condition as no objections have been raised in principle.

I have taken photographs of the field opposite my house at Falls Farm with huge “lakes” of water clearly visible. Did the planners fail to notice this on any of their recent visits?

Errors

The Environmental Statement (ES) submitted by REG Windpower appears to be full of, errors, omissions and incomplete information. So much so that the PCC Planning Officer explained at a public meeting, held in the Bedford Hall in Thorney on the 8th of August, that these errors and omissions were due to “typos”. In fact the whole of the Transport Chapter, chapter 10, has been resubmitted due to these “typos”. One of the conditions given in the public inquiry report for the two approved turbines (APP/J0540/A/09/2116682/NWF dated 7th September 2010) is that construction hours are from 07.30 to 19.00 on Mondays to Fridays and the Construction Method Statement for these two turbines uses the same hours. However, the first mention of construction hours in the ES, (para 2.25) for the proposed extension is from 07.00 to 19.00 on Mondays to Fridays. Is this another mistake or will these 4 additional turbines be treated differently to the two already approved?

Paragraph 2.34 mentions a slight revision to the turbine layout between October and November 2011 but does not highlight the later more significant changes to the locations of the proposed turbines when Falls Farm was included in the proposed location. Thorney Lodge is not included in chapter 5 of the ES even though it is the nearest listed building. Wildlife surveys have not been completed or only partially completed for some species. No assessment of Amplitude Modulation noise has been included. But what concerns me is the fact that a member of the public has identified all these anomalies in REG Windpower’s ES when nobody else from Peterborough City Council or its consultees had even noticed.

The land at French Farm and Falls Farm is designated as Grade 1 arable land, however this is not mentioned at all by REG Windpower in the ES. This use of Grade 1 arable land should be considered only after all other options on brownfield or industrial sites have been exhausted. This land will be lost for crop cultivation forever, even when decommissioned. We cannot afford to lose anymore Grade 1 arable land in this agricultural area.

There are now additional errors that have been found and are referred to in the Committee Report in relation to the additional information provided regarding bird surveys etc. and even in this document the turbines were shown at the wrong locations.

How can we be sure that the technical information provided by REG does not also contain numerous errors? Members of the public do not have the technical expertise to identify these and if detailed surveys and tests are not completed to ensure the data provided stands up to scrutiny then the application should not be approved.

General

At paragraph 5.9 of the council’s assessment of the planning it says “In addition, the UK is committed to reducing greenhouse gas emissions by 80% from 1990 levels by 2050, and at least 34% by 2020 as set out in the Climate Change Act (2008).”

However in the Treading Appeal documents it says

“The Secretary of State notes that there are more recent statements of energy policy and that there is no **legal** commitment to obtain 30% of electricity from renewable resources by 2020.”

Paragraph 5.9 is misleading and UK Renewable Energy Roadmap (July 2011) says our evidence shows that: Even though we are starting from a low level, the UK can meet the target to deliver 15% of the UK’s energy consumption from renewable sources by 2020 which is its legally binding target (EU Directive 2009/28/EC) and it should be noted that this focusses on 8 technologies not just wind.

5.12 Chapter 4 of the submitted Environmental Statement (ES) details the likely significant effects of the proposed development upon the landscape and visual receptors within an identified study area of 25km. Established guidance generally sets a radius for study areas of 35km however this is identified on a case-by-case basis and accordingly at Scoping Opinion stage, the LPA agreed a lesser study area owing to the intrinsic flat nature of the Fenland landscape within which the proposal would be sited. However this is not in agreement with comments made by Eric Pickles

Annex A

Visual - Photographs to show views of local properties



View of Hollies Farm showing 1m high hedge between the house and the wind turbines. No windows or garden obscured by hedge.



Photo taken near to T1 showing landscape to the north east with unobstructed views of Hollies Farm on the right, Poplar Farm Cottage in the centre and Hollies Farm Cottage on the left. The hedge at Hollies Farm is no higher than 1m.



Photo taken near to T1 showing Third House Farm low hedge to the south.



View of 26 French Drove and unobstructed view of T1-T3 postions



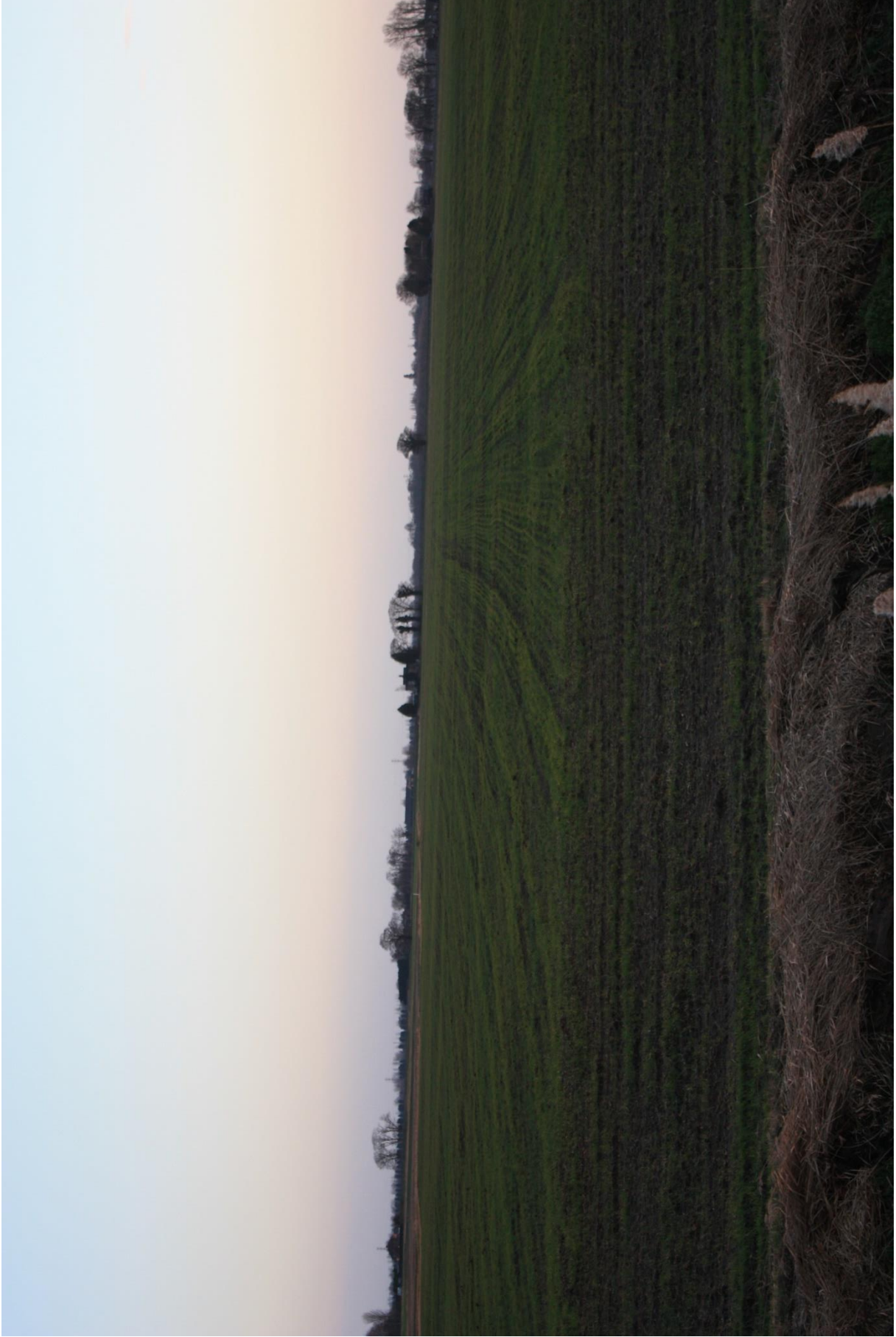
Unobstructed view from Portsands Farm with horses grazing towards development.



Unobstructed view from Bluebell House paddock of development.



View of Grange Farm Cottage from Dowsdale bank by T1



View of development from Dowsdale bank by T1 (same position but 180° from picture above)

Annex B

Archaeology – Unanswered Questions

In the introduction to the Turley report page 2 item 2.2 states: “An additional request for further information was made by English Heritage on the 5th September 2013 in a consultation response to the Local Planning Authority requesting;

A staged programme of archaeological assessment (likely to include geophysical survey and trial trenching) should be undertaken to understand the significance of the assets and inform the suitability of the proposals. This is in accordance with policies 128 and 129 of the NPPF. This should be agreed in consultation with the Peterborough City Archaeologist. “

The report 'Further Environmental Information Statement' by Turley Associates is detailed and doesn't really say anything I wouldn't expect from a fenland location such as French Drove. It indicates that the turbine pad areas have all been archaeologically checked but... This report is **not an Archaeological statement at all** it is only an Auger Survey! (unless a more thorough archaeological report does exist to which I am not aware)

In this case each turbine pad has had 5 auger interventions reaching depths of 2 metres and this report details what they have found. I understand that no real archaeological determination can ever be reached using just 5 bore holes per pad.

However in paragraph 5.82 we are told it is accepted that the site is unlikely to contain any significant undiscovered buried heritage assets and as such, there are no significant environmental effects in this respect based on the Auger Survey. This position is accepted by both EH and PCC Archaeology who have raised no objections in respect of buried archaeology.

There is no reference to the cabling between each turbine or their grid connection. What about the cable runs and the potential damage they will place on the landscape as I would expect a thorough archaeological report to be submitted to planners showing full consideration has been made in cable direction?

At French Farm, its proximity to the scheduled monument at Flag Fen raises concerns that this known landscape is likely to be criss-crossed underground at undulating depths by a historically rich Bronze age landscape undetectable by geophysics and that channelling at depths between 1 and 2 metres for laying of cables and grid connections etc. will potentially destroy and confuse the archaeological record.

I shall refer to turbine pads as T1, T2, T3 & T4

Although Iron and Manganese deposits are commonplace in wetland locations T2 does have an unduly high reading for both, it shows a strong Iron reading increasing at depth along with Manganese, which is micro-laminated with pseudomorphs and bacterial micro organics. This is in an area where ground water seepage is very slow.

A second Auger test in T2 shows strong Rhisomorphic results (these are corded structures like Fungi which live underground and absorb and transform bacteria to provide strong nutrient value to the earth. There is a strong Pseudomorphic residue too (these are simple crystalline structures of minerals).

T3 has high micro bacterial fibres, strong rhisomorphic and ostracod levels, the area is rich in micropalaeontology and for this reason I would strongly recommend that T3 is abandoned as a potential turbine site.

Surely an alternative siting for T2 should be considered given such strong biologically rich auger test results and careful trial trenching to evaluate the area in greater detail before passing any planning. I would advise that no trial trenching should be allowed on T3 due to the sensitive nature of its strong micro-palaeontology, and importantly with the landscape riddled with ancient track ways and 'islands' the cable runs and grid connection archaeological analysis needs to be carefully monitored before any planning is approved.

As I said earlier the report only features results of an Auger Survey which is very restrictive in delivering results. The applicant has been clearly asked to submit a geophysical survey with trial trenching to satisfy English Heritage.

Annex C

Noise – Report received from MAS Environmental

From: Sarah Large

Sent: 07 November 2013 12:37

To: Julie Turner

Subject: Re: French Farm, French Drove 13/00933/FUL

Dear Julie,

Apologies for the delay in getting back to you. We do receive a high number of wind farm application queries and so it can sometimes take a little while for us to process all the information.

I have had a look through the noise impact assessment and associated appendices, including the recent submission by Turley Associates. In summary I do have serious concerns with the application and the level and extent of impact. Clearly the proposed development (consented and extension) is struggling to meet the upper ETSU-R-97 limits, which suggests from the outset that they are trying to squeeze too many turbines in of a noise level / power generation that is too high.

The background noise monitoring locations are not ideal - field locations, as used for French Farm and so all of its proxy locations, are clearly advised against in the recent IoA good practice guide. I assume that French Farm is probably a working farm and as you state is unlikely to be representative of many locations where farming equipment and machinery is not a regular feature of the background noise. Whilst the location at Spinney Lodge is better, it does still look fairly exposed and there appear to be a number of other nearby locations that could have provided more suitable locations. Nevertheless background noise levels do not appear too high or significantly affected by extraneous noise.

The main problem is the level of noise predicted. As noted above, even the assessment provided in the applicant's report struggles to meet the upper limits. This is excluding the fact that they are using both prediction methodology and assessment methodology that allows more noise than the approach used about 3-4 years ago and which is more compliant with the original intents of ETSU-R-97. Essentially, if the assessment were redone with a stricter prediction methodology (hard ground assumption of $G=0.0$ rather than the $G=0.5$ used) and using 10m measured wind speeds rather than 10m standardised wind speeds I would expect to see a much higher number of exceedances. Arguably the revised assessment should be made with 10m measured wind speeds as this is what the consented assessment is based on. If the approval of this application results in one application with noise conditions set to 10m measured wind speeds and the other set to 10m standardised wind speeds enforcement of unacceptable noise, without resorting to noise nuisance action, will be virtually impossible. Even if the consented application's noise condition is revised to use standardised wind speeds, the ability to enforce a standardised condition is extremely difficult and they rarely indicate a breach despite excess noise.

It is also unusual to see turbine noise predicted according to numerous different wind directions. This implies that if using the normal method (which is worst case and shows noise emitting from all turbines in all directions) they cannot meet even the upper limits. As such this again raises concerns about the true level of impact that they are seeking to approve.

Assessment for the potential of amplitude modulation noise impact (AM, 'thumping' type noise) is extremely limited and based on outdated information which has been widely criticised. With the number of turbines, location of the turbines and already excess noise levels predicted I have serious concerns that AM could be extremely intrusive. As you may be aware, the location of the wind farm is not too far from the Deeping St Nicholas Wind Farm which is widely known to have caused serious noise issues.

The Council appear to have requested additional information regarding the % of time that noise levels are exceeded. This is also a worrying approach. ETSU-R-97 is a pass or fail standard. It already allows for a certain level of adverse impact due to the need for renewable energy. This is clear within the discussion of the guidance. Acceptability of wind development should not be based upon % of time that levels are exceeded and a clear pass or fail approach should be adopted.

I hope that the above is of some help and not too pessimistic. Unfortunately if approved I would expect the development to generate high levels of noise, excess impact and there to be little hope of effective controls (at least unless 10m measured wind speed noise conditions and a condition to control for AM are approved). As the next step we would usually proceed with writing a formal report outlining the various problems, expanding on the points discussed above. If access to the raw data can be gained, i.e. the measured background noise levels and meteorological data, then we can undertake our own assessment looking at a more reliable and robust assessment methodology and predicted noise levels. I would suggest that this is not vital in this case as impact is so clearly excessive without additional analysis. The cost of drafting this report is likely to be in the region of £ [REDACTED].

Finally, I should note that whilst the impact from the wind farm is clearly high and struggling to meet appropriate limits, many Councils are under pressure to approve applications and could take the approach that as long as it can be shown to comply with the upper limits of ETSU-R-97, despite uncertainties, potential inaccuracies, restricted modes etc, the noise impact is acceptable. In the last couple of years despite strong evidence showing noise issues, many decision makers have ignored these issues and continued to approve developments based on the assertions of the applicant's acoustic consultant. Having said this, some more recent decisions have shown that some decision makes (inspectors and local authorities) are aware of the potential and serious nature of noise issues.

If you do have any further queries regarding any of the above then please do not hesitate to contact me, preferably via email,

Kind regards,

Sarah

Sarah Large
MAS Environmental

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To: Planning Services, Stuart House East Wing, St John's Street, Peterborough PE1 5DD

Re: Your Ref: 13/00933/FUL

Construction of four additional wind turbines to a maximum height of 100 metres (to vertical blade tip) with ancillary infrastructure including temporary construction compound, access tracks and crane hardstandings at French Farm, Thorney

The Peterborough & Fenland Green Party warmly supports this proposal and recommends the council to approve.

Our members and supporters are conscious that Peterborough has no serious wind energy infrastructure at the moment (despite its considerable geographic, commercial and industrial potential) and we would be delighted to see this put right.

We believe this proposal is worthy of the council's support.

Yours faithfully
Fiona Radic

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Attention of Miss Gemma George,

Just to say that we are unable to be present at the meeting at the Town Hall on 4th February but would be grateful if you could bear in mind the copy below of a letter I wrote originally regarding this Planning Application for French Farm and why we strongly oppose the application.

Many thanks, Sue Browne

Ref Planning Application 13/00933, French Farm, French Drove Thorney

I wish to place on record my strong objection to the proposed wind farm at French Farm, French Drove, Thorney. Some of my reasons for objection are as follows:

Visual Impact:

With over 140 wind turbines being planned in this area there is a real and serious threat to destroying the historic landscape of the area and archaeology which predates the Bronze Age. The turbines will be oppressive, overbearing and totally out of scale and architectural character with the current surroundings and unique Fenland landscape. Shadow Flicker and Reflection will also be unacceptable.

Heritage:

The 'Development' and its close proximity to Thorney will have a negative impact on the character and setting of historic listed buildings around the Conservation Village and views will be impacted to and from the internationally important ancient monument of Flag Fen. Thorney is set in the Fens, which are known as the 'Holy Land of the English' because of the churches and cathedrals of Ely, Ramsey, Crowland, Thorney and Peterborough. Thorney Abbey is a former Benedictine Abbey and has been a site for Christian worship for over 1000 years and formed part of the agricultural estate of the Dukes of Bedford. Thorney still has its water tower and Heritage Centre. It is a quiet, unique and truly English village, one that this country should be proud of.

Noise:

Turbines will create noise pollution and vibration to a currently quiet setting, especially with the village being located on the receiving side of the generally prevailing south westerly wind. Furthermore the resonant noises associated with such development is bound to have an adverse effect on wildlife and local residents and more representative testing should take place to ensure the impact of ALL the turbines will not pose a real risk to health. Lincolnshire County Council has voted to advise local planning authorities in the area to restrict further wind development. The authority's leader, Martin Hill, said that the county has 75 operating turbines and hundreds more in the planning pipeline and he does not want to see the county covered by a forest of wind turbines. Lincolnshire joins up with us!

Drainage/Flooding

Most of the Fenland lies within a few metres of sea level and originally consisted of salt-water wetlands which have been artificially drained and continue to be protected from floods. Land drainage was begun in earnest in the early 1630s and then the 1650s but not very successfully as by the end of the 17th century the fens were under water again. The major part of the draining of the fens was effected in the late 18th and early 19th century. The fens today are protected by 60 miles of embankments defending against the sea and 96 miles of river embankments and eleven internal drainage board groups are involved. As a result of this work, the land around and in Thorney is very rich arable land carefully looked after by the local farmers and there are estimated to be 4000 farms employing 27,000 people in full time and seasonal jobs. In turn they support around 250 businesses involved in food and drink manufacturing and distribution employing around 17,500 people. However the concrete poured into top grade fenland farmland to support these turbines will further displace water from the water table and reduce drainage through the soil causing disruption and increase flooding. This plan will take top grade fenland farmland out of production and put pressure on our roads.

Ecology & Ornithology

Over 70% of the Fens is involved in environmental stewardship schemes under which 270 miles of hedgerow and 1,780 miles of ditches are managed, providing large wildlife corridors and habitats for endangered animals, one being the vole.

Of course with the disturbance caused by these excessively large wind turbines, all wildlife will suffer; birds, bats, owls can be killed; along with numerous swans in this area also. The turbines will be in close proximity and a threat to the **Nene Wash's SSSI** and associated local conservation areas - a site of international importance for many very rare, threatened and protected species.

The application will affect transportation, i.e. the developer has proposed a route transversing a Grade II listed narrow bridge along French Drove. The cumulative impact damage to roads already unsuitable for heavy vehicles would make these roads dangerous to other road users.

Official data shows turbines are failing to deliver.

The Renewable Energy Foundation has published a new study, 'The Performance of Wind Farms in the United Kingdom and Denmark', showing that the economic life of onshore wind turbines is between **10 and 15 years, not the 20 to 25 years projected by the wind industry and used for government projections** and indeed as stated by **West Coast Energy** when they visited Thorney recently. The declining performance means that it is rarely economical to operate wind farms for more than twelve to fifteen years. After this period they must be replaced with new machines, a finding that has profound consequences for investment for investors and government alike. If required, the REF study can be downloaded in full.

In conclusion the impact of this proposal far outweighs the benefits. As the Rt Hon Eric Pickles, Minister for Communities and Local Government states . . . 'The need for renewable energy does not automatically override environmental protections and the

planning concerns of local communities and that local topography should be a factor in assessing whether wind turbines have a damaging impact on the landscape.'

Incidentally there is brown land available in and around Peterborough.

Yours faithfully

Susan M Browne

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