

Langford Parish Council's response to the proposal for 10 turbines

23 AUG 2010

Langford Parish Council

Central Bedfordshire Council

Development Management

Priory House Monks Walk

Chicksands

Bedfordshire SG17 5TQ

Attention of David Lamb and Kate Phillips

19/8/2010

Reference Application MB/09/00118 FULL

Dear Sirs,

The Parish Councils response to the above is enclosed, an additional copy on CD is also provided.

Please acknowledge receipt by return.

Due to the serious nature of this proposal the Parish Council has carried out as thorough an evaluation as we can in the time available and within our limited resources. We have consulted widely throughout the village and believe our response reflects and has the full support of our community to rigorously object to this proposal. This is supported by,

1 A petition of 1,281 names. This was undertaken by residents and businesses of the village.

As this represents over 50% of the electorate our Parish Clerk will now commence the process of having this petition received by the full council of Central Bedfordshire.

2 Letters of objection sent directly to you by residents.

We believe the issues raised in our response are serious and worrying enough to warrant a detailed reply from you before any further steps are taken.

Furthermore, we believe the Parish Council should be made aware of other consultations that have taken place as we only have the developer's input. Within our response we have invoked the Freedom of Information Act requesting additional data in certain areas.

We will shortly distribute the Executive Summary to

Our M.P Alastair Burt,

The Chief executive of Central Bedfordshire Council

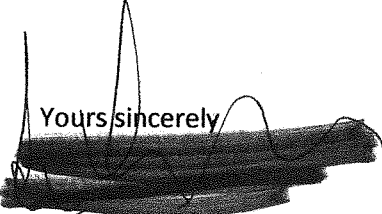
The Leader of Central Bedfordshire Council

Our neighbouring Parish and Town Council's

All members of Central Bedfordshire's Planning Committee.

We are doing this to ensure the view from our community is understood as widely as possible.

If you require any clarification please do not hesitate to contact the undersigned.

Yours sincerely


Tony Fisher, Councillor Langford Parish Council Planning Committee

Tele: 

Mob 

Email 

c.c. E.P.Rutt Clerk to Langford Parish Council

A.S.Spencer Chairman Langford Parish Council

B. Marsden Chairman Langford Parish Council Planning Committee

J. Clarke Ward Councillor

Langford Parish Council



Planning Committee

Response to Planning Application 09/00118/FULL

Proposed Wind Farm Langford-Biggleswade



Version 1.4

16/8/2010

Status Definitive

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Approved by the Parish Council 16/08/2010

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Section 1

Process followed by the Parish Council

Following receipt of the application from the District Councils Planning Department the Parish Council facilitated the following.

- 1 An open joint discussion with the lead officer and representatives from Biggleswade Town Council. This was held at Biggleswade Town Hall on the 19th. February 2009 to understand better the timetable and process all parties would have to undertake.

- 2 Arranged for the plans to be displayed at Biggleswade Market with Councillors in attendance.

- 3 Arranged a public display of all the planning data in Langford. This was held on 14th March 2009 in the church hall with Councillors and the Developers in attendance.

Over 300 hundred residents attended this event.

- 4 To formally gauge village opinion after the plans display a Public Meeting was held on the 28th March 2009 in Langford Village Hall. The meeting format was for the Developer to deliver a short summary of their proposal

and a panel to respond to public questions. The panel was chaired by M.P. Alastair Burt and comprised of

A.W Spencer Chairman Langford Parish Council

E.P.Rutt Clerk to the Parish Council

T.Rogers Bedfordshire County Councillor

J.A.E. Clarke Mid Beds District Councillor

R.Jackson The Cooperarative Group

P.Hindsent The Cooperative Group

E.Watts The Cooperative Group

Upwards of 300 local government electors attended participating in lively debate for two hours.

The following resolution was adopted with +293 votes for it, 5 against with 2 abstentions.

“That it will not be in the best interests of the village for the wind farm to be constructed”

- 5 **At the April Parish Council meeting it was formally recorded to oppose the application and encourage residents to write, email their responses to the Planning Dept. To date over 200 have done so expressing their opposition to the proposal.**

Updated July 2010

Following receipt of the revised application on the 11/6/2010 the Parish Council entered into a new consultation process throughout the village to determine whether the level of opposition to the proposal had changed. From this it was very clear that **opinion had hardened significantly** and whilst residents who had been contacted directly would voice their personal opinion the community as a whole wished their objection to be galvanised within this response.

To facilitate this the Parish Council Planning Committee undertook the following

- 1 Councillors attended the village fete 3/7/2010 to explain the new proposals.
- 2 Posters and flyers were distributed encouraging residents to become involved.
- 3 The revised plans were put on public display in the Church Hall on Saturday 10/7/2010 with over 200 residents attending.
- 4 An open petition was organised and delivered around the village by committed residents the results of which are summarised in para 8 below
- 5 Update the Parish Council's response from 2009 to reflect all of the new input.
- 6 Seek an extension from Central Bedfordshire Planners to 30/9/2010 to allow for holidays ect and enable the work to be completed fully.
- 7 Subsequently an extension was granted to 20/8/2010, however no further letters were sent to effected residents extending their timescale and this remained at 31/7/2010.

8 Petition Summary

As at 16/8/2010

1281 electors have signed the petition objecting to this proposal. This represents over 50% of the electorate of Langford.

Our Parish Clerk will now formally invoke the process to have this presented to the next Central Bedfordshire full council meeting.

Section 2

Langford Parish Councils Response to Planning Application 09/00118/FULL

Executive Summary

The Parish Council has consulted widely and conscientiously with its residents, neighbours and stakeholders and unanimously and rigorously objects to this proposal.

Construction on this scale will destroy the village landscape forever and adversely impact the lives of those 4000 people who reside there. It is in total conflict with the area development plan and is a proposal without merit or precedent that must be put aside without any further waste of public resources.

Our detailed response is contained in section 3 of this document.

Update July 2010

The revised application does nothing to change our community's total rejection of this proposal. This view has hardened considerably as more and more data becomes available on the risks of such enormous structures being placed so near to where we live and where our children grow up.

We supported all the work put in by the local authority to formulate the LDF and have worked hard in partnership to achieve the best for our village. Indeed we have two significant projects (new cemetery and sports field extension) which are dependent on the Inspectorate review in early 2011 and fail to understand how an undertaking such as the proposed Wind farm has not figured throughout that process at all.

This requires and deserves a full explanation.

Furthermore, despite repeated questioning we still fail to understand why our rural village has been selected as THE U.K test case for such an imposing installation given the developers section on Planning Policy is so conflicting.

1 It reports European Policy but fails to mention the accepted distances that operate there (usually 2.0-2.5km).

2 It fails to acknowledge the bill currently before the House of Lords which seeks to apply these restrictions to England.

3 It has reduced the quantity of machines but removed those furthest away.

The DMP referred to in section 2.5.4 of the ES is however very clear on what impacts are to be considered for any scheme.

For this proposal each criteria fails significantly and it should be put aside now without any further waste of public resources and funds.

Apart from the Proximity and Precedent issues dealt with above equally serious concerns exist regarding the impact on Health from noise both audio and low frequency. We have gone to lengths in our detailed response to outline our fears and the evidence that's supports it.

Furthermore, we question how the local authority will validate the measurements provided given that the models used are recognised as in need of updating and are the subject of a review by DEFRA.

We are proud of our rural landscape and the tranquillity it provides to our wildlife that resides there. Industrialisation on such a scale will destroy that forever.

We question what investigations have taken place to determine the impact of large-scale construction on the village drainage systems. Local people have pointed out the existence of limestone caverns in the proposed vicinity. We ask what work has been undertaken to investigate. We have invoked the FOI act to ensure this data is made available to us.

The risks to Community safety should not be underestimated as this is exacerbated by proximity to residences, schools and the major transport links.

We cannot see what consultations have taken place with other agencies and have requested more detail under the FOI act in our detailed response that follows.

We are concerned over the conflict of interest that exists where the Local Authority is taking decisions on a proposal which will generate them income.

Finally we believe that without doubt the dynamics of the village will change for the worse should this scheme go ahead, there will be outward movement of people and a reduced level of investment in schools and amenities.

There is no direct benefit of this scheme to the village, ongoing employment is two only, the construction will be tendered, specialist resources brought in from abroad and no re-investment will be made here.

Our detailed responses have been updated in section 3

Section 3 Detailed Response to the application

Precedent

There is no precedent for a development on this scale so near to a community as this one and there is no earthly reason or support for Langford to become a test case. The planning refusals at South Cambs, N. Herts Weston and Belvoir bear this out. In fact the N Herts DC Planning Officers Brief to committee 23/4/2009 said that it is unlikely there should be any consideration given to wind farm development south of a line Bedford-Cambridge.

We trust Central Bedfordshire will take input from both authorities, in addition we also note the developer was asked through the Public Meeting on 28/3/2009 to provide examples but has declined to do so.

Update July 2010

The questions raised of the developer from our public meeting in March 2009 remain un-answered and in the latest submission the Co-operative have chosen to ignore this meeting ever took place as part of their consultative process.it is conveniently excluded from their NTS (see section Public perception). The factual results of that meeting as recorded by the Parish Council's Clerk are included in section 1.above and are the exact opposite of those as portrayed by the developer.

The developers continually draw a comparison to their other Wind farm site at Coldham nr March Cambridgeshire, but the sites could not be more different, Coldham is a very large established farming estate 2km from any significant occupations.

The Langford proposal brings this directly into a large village to within 1km

In addition we understand that there are two court cases pending where residents of Cambridgeshire are suing the operators due to the background noise being experienced in their homes situated some 2km away from the site.

We are unaware of the outcome but recommend the Local Authority investigates and responds.

Proximity

This huge development sited so close to the settlement boundary is totally inappropriate to our village and its people.It is also totally at odds with the published LDF bringing as it does an industrial scale development right into the heart of the community.

Although it is not yet part of UK planning regulation policy it is widely accepted that the safest distance of turbines to residences should be 2km minimum. This has already been adopted in many European countries and there is currently a petition to UK Prime Minister that is gathering pace to implement that policy here.

In this proposal all 16 turbines will be within 1-1.5km of the nearest residences and schools with 4 being less than 1km away.

This has to be totally unacceptable.

Update July 2010

The reduction to 10 turbines does not change this. All of the machines remain within a radius of 0.77km-1.13km which is totally unacceptable given the guideline is a minimum of 2km which operates by law in Europe and Scotland.

As far as England is concerned a bill to limit the distances between wind farms and residences came before the House of Lords and had its first reading on 26/7/2010. This bill once enacted will nullify this proposal.

From a detailed perspective the developer constantly refers to this site as "The Biggleswade Windfarm" it is not in Biggleswade at all but is sited within the Langford Village boundaries. We raised this directly with the developer early in the process but nothing has been changed and we suspect their motives for doing so are nothing but a poorly veiled attempt to diminish the impact over a wider area. **For example, the table in section 4.5.A totally excludes the village it most impacts and scores a "moderate only" impact when it should be "major" as per section 4 of the ES.**

This is supported by table 4.7.A where the viewpoints analysis totally excludes the main roads of East Road, Church Street and High Street where we have significant population, our School, Church, Church Hall, Village Hall and

recreation ground. All of these will be within 1.0km of the proposed site which has to be unacceptable.

Many further inaccuracies exist throughout both the NT Summary and ES documents which further support our view. Examples are

Section "The Application Site" NTS where distance is measured from Biggleswade at 3km but Langford barely has a mention.

Similarly Statement 3.6.2A ES and Table 17.1A ES both give a totally wrong impression of exactly where this site is and whom it really affects.

Landscape and Visual Impact

. The developer, in Para 6 of the ES classifies their proposal as having a Major/Moderate Adverse effect on those residents within 2km and a moderately adverse effect for those over 2km. This is a totally arbitrary split. In truth the majority of the village will come into the major category the impact of which is to affect the outlook of everyone who resides there.

We are a rural village taking pride in our natural assets. The introduction of intrusive industrialised installations over 300ft high into our rural area will without doubt have a **significant adverse impact** on the historic landscape patterns that currently exist and destroy the visual environment for ever.

This is just not acceptable and in this respect alone the visual impact on the location would be so prominent and harmful to the view of the surrounding area as to outweigh any of those benefits proposed by the developer.

Update July 2010

Our statement above is now confirmed in that the **visual impact measure under EIA Regulation is significant (see para's 4.5.13, 4.7.10 of the ES)** It is however disappointing that the supporting tables in the submission fail to record this.

In addition we have referred to the flawed viewpoint analysis in our section on Proximity above but specifically here we question the validity of the whole of section 4.5 as the central village areas have been excluded, thus giving a totally wrong impression. Furthermore this section makes repetitive reference to the "cluttered horizon "which will diminish the visual impact.This is nonsense the clutter referred to are the railway gantries which are 50ft high not over 300ft.

The other mitigation statements are equally shambolic e.g. fencing, hedging and trees,none of which will do anything to mitigate the proposed structures. This document padding is unhelpful.

Update July 2010

Listed Buildings (new category)

Further research has shown the statements in section 4.7.15 to be incorrect as the following listed buildings have not been considered. All reside directly in full view of the proposed installation.

Grade1 St Andrews Church Church Street

Grade 2 1 and 3 Mill Lane Timber framed houses

101 Church Street Timber framed house

115 and 117 Church Street

2 High Street

Outbuilding at 40 High Street

The impact here needs re- evaluation .

Update July 2010

Conflict of Interests (new category)

As a landowner Central Bedfordshire Council will benefit financially from this scheme gaining approval. This must raise doubts on the validity of the approval process.

This position needs urgent clarification and review.

Noise

Noise is a major concern from both mechanical and low frequency perspectives? We understand the existing policies but they are some 13 yrs out of date and do not reflect the real impact on people. (Measure ETSU-R-97) There is now however a wealth of research in the public domain that must be taken account for example Infrasound's (low frequency) are a particularly intrusive and harmful consequence when generated in close proximity to a community culminating in a real risk to public health. We have some recorded data from the developers Coldham site that demonstrates this concern. A copy is included in section 4.

Update July 2010

The current methods of noise measurement prior to installation are now accepted by government as being misleading and inaccurate. This has resulted in ONE out of every SIX sites causing irritation and stress to those people who live in the vicinity. Examples are provided at



Noisy wind farms face crackdown - Telegraph (3).url

http://www.windturbinehealthhumanrights.com/wtnhhr_june2007.pdf

DEFRA has now been commissioned to review and provide better guidance to local authorities

We have reviewed the **Hoare Lea Environmental Impact Assessment** assisted by two engineers from our community. It is true to say the very precise technical sections have been difficult to analyse but we have found enough anomalies and queries within it to question a number of its key conclusions.

This extensive document relies predominantly on the interpretation of ETSU-R-97 which is neither included nor forms any part of the report. This standard has already been called for review as it fails to fully represent the low frequency elements of the noise spectrum (this was acknowledged by N Herts Dc in April 2009 when consideration was being given to the propose Wind farm at Weston. That application was refused by the local authority.

The measures undertaken are very questionable and look to have been prepared in a manner more appropriate to land based installations in sparsely populated area's not close to a village such as Langford.

The process of filtering out the existing noise levels to determine what is acceptable assumes that an additional level of noise is acceptable. This is nonsense.

We have included in section 4 the full reports which we would recommend are reviewed and responded to by the local authority's independent noise consultant.

We also have very serious concerns regarding low frequency infra sound noise from a health perspective. The evidence is now credible with a number of documented case studies and academic papers established in the public domain.

We have provided more extensive references in the Health section.

Safety

The area has several small airfields hosting private aircraft and micro- lights in addition to the large MOD presence and the commercial airports of Luton and Stansted. The risk of interruption to communication and directional radar operations must be a significant risk to the operators, pilots and those people over which they fly. Not to mention passengers on commercial flights.

ROW and bridleways cross the proposed site , walkers, cyclists who use them will be subject to the risk of debris collision either through ice release in winter or blade fracture at any time. It is accepted that risk is difficult to quantify but is one that just should not be taken when the community is so near.

The Equine Agencies also recommend turbines placement to be + 400m away from bridleways and grazing sites to prevent distress to horses, sheep ect. There are several fields and stables adjoining the proposed site that would be well inside such a safety zone.

All of these issues have been ignored in the proposal.

Update July 2010

The above is still valid as no changes have been made in the re-submission.

Additional comments are

We would question what risks the Mod, National Rail and public and private, Airports Authorities must have put forward and how they have been responded to. The documentation available to us fails to record this consultation.

Turbine blades are susceptible to ice build up and lightning strike, thus blade loss is a risk to users of the ROW, bridle Paths, railway, highways and immediate properties. There are many examples of this happening in the UK BUT FORTUNATLEY they have occurred at sites situated over 2k from any conurbation.

Data on accidents is now being independently tracked and can be viewed at

<http://www.caithnesswindfarms.co.uk/page4.htm>

The increase in accidents rises steeply in line with the proliferation of turbine installations, thus the closer these are placed to communities the greater the risk.

What thought if any has been given to Public Safety issues in the event the site experiences or causes an accident or derailment?.

Who has prime responsibility for disaster management in this event and what insurance cover has been proposed.?

These are risks that should not be entered into with a community so close to the perpetration.

Health

The impact from the variety of noise sources is covered above but this becomes a real health risk to those residents of a sensitive disposition, resulting in insomnia and sleep loss.

There is now a considerable body of evidence to support concerns about the audible modulation of aerodynamic noise (swishing) on the health and welfare of those living within 2.4 km to the nearest turbine. In the U.K. the research findings of Dr.Amanda Barry on the adverse health effects and sleeplessness caused to many of her patients are now well known and we draw your attention to her