

Dear Councillors and Planners

Application CB/10/03034/FULL

Central Bedfordshire Council's attitude to government guidance on Climate change

- 1) What is Central Bedfordshire's policy towards renewable energy or will Central Bedfordshire stand out as the county that does the least to reduce its carbon emissions in contradiction of its stated vision of sustainable communities in the emerging Core Strategy? Central Bedfordshire is unusual in that there are presently no wind turbines and there is permission for only one turbine at Marston Vale.
- 2) At present there are very few renewable energy projects in Central Bedfordshire that will allow Central Bedfordshire to play its role in the UK's legal commitment to cutting CO2 emissions by 32% by 2020. I have attached a letter from Greg Barker, Conservative minister for the department of Energy and Climate Change which states the government's commitment to reducing CO2 and the government's commitment to onshore wind energy.
- 3) The officer states this turbine will play a significant role "It is agreed that the proposed turbine will generate a significant amount of renewable energy, and displace a similarly significant amount of CO2"
- 4) It is unclear how Central Bedfordshire will meet its commitments to reducing CO2, or how the reasons for refusal of this application will not contradict the emerging CS11 which demand the code level 6 of Sustainable homes. This level of the code requires renewable energy as well as insulation. The question then is how is the renewable energy produced and this seems undecided by Central Bedfordshire. If wind turbines are not allowed in the Green Belt then it is difficult to see how the code level 6 can be delivered.
- 5) The Parsons Brinkerhoff report "Central Bedfordshire and Luton Borough Councils Joint Committee Sustainable Development and Adaptation and Mitigation of Climate Change Study" which has been submitted to the Public Inquiry for the Core Strategy by Central Bedfordshire Council sees biomass as the main renewable energy source for the Strategic Site Specific Allocations. However enough biomass supply for these urban extensions will mean a huge importation of biomass from across the country and probably imported and probably mainly by road, so the overall carbon footprint could be questioned as well as the security of the resource and whether insisting on biomass only will actually fulfil PPS1 the supplement on climate change.
- 6) This leaves a very worrying gap or question mark in the future policy for Central Bedfordshire and raises questions of is Central Bedfordshire not complying with the supplement to PPS1. "To deliver sustainable development, and in doing so a full and appropriate response on climate change, regional planning bodies and **all planning authorities should prepare, and manage the delivery of, spatial strategies that:**

- 7) **make a full contribution to delivering the Government's Climate Change Programme and energy policies, and in doing so contribute to global sustainability;"**
- 8) Nor does Central Bedfordshire seem to be following the emerging core strategy objective of SO8 "To require sustainable development and design quality, including maximising opportunities to use renewable and decentralised energy, in order to help minimise the area's carbon footprint and to mitigate and adapt to climate change."
- 9) Because this wind turbine will be helping reduce CO2 emissions Central Bedfordshire should consider the guidance of PPS1 supplement on climate change. In determining the planning application, the supplement to PPS1 states "An applicant for planning permission to develop a proposal that will contribute to the delivery of the Key Planning Objectives set out in this PPS **should expect expeditious and sympathetic handling of the planning application."**

The balance seems to be for Central Bedfordshire to be the openness of the greenbelt and the need for renewable energy as set out in PPS22.

- 10) 'when located in the green belt, elements of many renewable energy projects will comprise inappropriate development, which may impact on the openness of the green belt. Careful consideration will therefore need to be given to the visual impact of projects, and developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of inappropriateness and any other harm if projects are to proceed. **Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources'**
- 11) **We have argued that the wider environmental limits create special circumstances and this is reinforced by the lack of renewable energy project coming forward in Central Bedfordshire**

The value set on the green belt and the Landscape Officers report; Green belt, but industrial

- 12) The area beside Double Arches is quarry land with large pits and with large steel structures. The view from the A5 is of an industrialised and scarred landscape. Sand pits and pylons in the distance. It cannot be described as the Landscape officer wrote as "a farmed landscape"
- 13) The Landscape officer quotes the Regional Landscape Guidance: The regional study 'Placing Renewables in the East of England' (2008) aimed to review the potential for green energy across the region and define broad areas of greatest potential. In terms of landscape sensitivity most of the region was evaluated as medium sensitivity, but the

- 14) Greensand Ridge is evaluated as having medium high sensitivity. However the Landscape officer omits the crucial piece from the Regional Landscape guidance which recommends the Greensand ridge as able to accommodate two or three wind turbines; page 94 (Page D12) of the document which states that the Greensand Ridge is capable of 2 – 3 wind turbines, with an estimated maximum capacity of 10MW. <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/renewable-energy-studies>
- 15) The landscape officer has stated that the development is contrary to CS9, however I do not see the relevance as CS9 is an employment policy and the Landscape officer should be commenting on landscape.

16) Consistency over protection of the Green Belt

- 17) The Green belt has been abandoned in some areas for housing provision which will impact severely on the landscape.
- 18) The emerging Core Strategy has placed the plans for a large dual carriageway the Luton Northern Bypass through the greenbelt, through an area of Outstanding Natural Beauty. I believe that there has to be consistency for the development within the Green Belt, and if a wind turbine will impact on the openness of the green belt at Double Arches then a road through an AONB where the hills afford wide views of the countryside will impact far more severely. I am presuming that Development Management committee will not go against the emerging core strategy approved by the council.
- 19) The Officer argues that The Parsons Brinkerhoff report also show some suggested areas for wind turbines, which are also in open areas of the green belt, however PS22 does not have a sequential test nor insist upon the examination of alternatives. These alternatives might be a long way away or impossible in terms of ownership and planning terms

Openness of Green Belt policy leads to contradiction of PPS22 key principle 1. (iii)

- 20) Most of South Bedfordshire unless it is in an urban area, is in the green belt although some parts of the green belt have been reallocated for housing need. If the policy of the openness of the Green Belt is used then by default Central Bedfordshire Council has created planning policy which will severely limit renewable energy especially wind energy and this is contrary to PPS22 Key Principles 1. (iii) **Planning policies that rule out or place constraints on the development of all, or specific types of, renewable energy technologies should not be included in regional spatial strategies or local development documents without sufficient reasoned justification.** The Government may intervene in the plan making process where it considers that the constraints being proposed by local authorities are too great or have been poorly justified.

Attitudes towards wind energy and questions of impartiality.

21) Several Councillors on this committee, Councillors Spur, Hopkins and Cllr Bowater have expressed their belief that wind turbines are inefficient and only produce a minimal amount of electricity. Cllr Bowater appears from conversation in public to believe that a wind turbine only operates at a 20-35% capacity of the time when the wind is blowing and therefore the energy produced is very insignificant which is inaccurate. This view which is possibly shared by many more councillors raises concerns about impartiality of the councillors on the development management committee in assessing a wind turbine application.

Wind Energy : effectiveness

- 22) The reality of the effectiveness of Onshore Wind energy is not only backed by Greg Barker in the attached letter but can be seen clearly in the metered readings that OFGEM have on their website of the actual kilowatt hours produced by identified wind farms. These are necessary to gain the Renewable Obligation Certificates.
- 23) Coldham Wind farm in Cambridgeshire which consists of 8 2 MW wind turbines between Apr 2009 - Mar 2010 produced over the year 28,668 Megawatt hours of electricity which is enough to power nearly 7000 homes (each home annually consumes approx 4.1Megawatt Hours.) This was in the least windy year for seven years.
- 24) The Burton Wold Wind Farm near Kettering consists of 8 2 MW turbines, in 2009 April to March 2010 it produced 33,374 Megawatt Hours which is enough to power 8140 houses.
- 25) Westmill Wind farm near Swindon consists of 5 1.3MW wind turbines and produced between April 2009 and March 2010 10,243 Megawatts
- 26) No one assumes that future energy supply will be from one source alone, Dr David Mackay, the energy Advisor to DECC explains in his book Sustainable Energy without the hot air, the various scenarios of renewable energy mixes. At present the UK relies on a mixture of gas, coal nuclear and some renewables. There is a wide range of technologies so that if there is failure then there are other sources.
- 27) Energy from Wind turbines goes into the national grid and the overall energy mix, so that if it is not windy on that particular day it does not matter, it means for example that more biomass would be used, but on a windy day then less biomass for example would be used.

Noise

- 28) The request for further information from MAS consulting is very typical of the style of MAS. In the Den Brook Case the argument that more information was needed was rejected by the Inspector and the Inspector's decision was upheld in the High Court. Last December in the successful appeal over Coton Farm in St Neots the Inspector rejected MAS consulting request for further information.
- 29) IN an FOI request put in at Christmas tide, Central Bedfordshire Council stated that MAS had approved this application on noise grounds. This is now part of the an internal review procedure as it does not appear to myself that the Procurement guidelines were followed in relation to the contracting of MAS.

Letters Missing.

It is stated in the officers report that as well as the four organisation listed there were only two letters. I believe that there were at least six or seven letters in support as well as the organisations.

We strongly support this application and urge the councillors to support it.

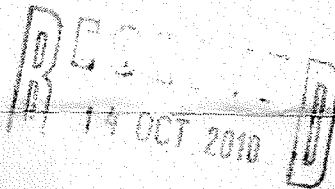
Victoria Harvey
South Bedfordshire Friends of the Earth
3 Creran Walk
Leighton Buzzard
LU7 2YP

Andrew Selous Esq MP
House of Commons
London
SW1A 0AA

Gregory Barker MP
Minister of State
Department of Energy & Climate Change
3 Whitehall Place
London
SW1A 2AW
www.decc.gov.uk

Our ref: MC2010/06944/JH

8 October 2010



Dear Andrew,

Thank you for your letter of 20 September to Charles Hendry, enclosing correspondence from your constituent, Mrs J A Taylor of 7 Croxley Court, Leighton Buzzard LU7 1YX, about increasing the amount of onshore wind turbines in the UK. I am replying as Duty Minister while Parliament is in recess.

The Government is committed to the development of wind energy in the UK. As an island nation we have outstanding wind resources and wind energy is an indigenous source of energy which is needed to meet our renewable energy and climate change goals. The wind industry can be a key player in creating the investment, exports and jobs we need to bring back economic prosperity, and the UK is already a world leader in offshore wind.

The Coalition Programme made clear this Government's commitment to Renewable Energy. We have formally asked the Climate Change Committee to review our target for energy from renewable sources, and depending on the advice of the Committee, we will seek to increase this target.

Wind will be a key component in meeting the UK's 2020 target for energy from renewable sources and onshore wind could deliver around 15% of the required total. However, the precise breakdown between technologies will depend on how investors respond to the incentives put in place.¹ Renewable generating technologies more widely could provide around 30% of our electricity (compared to around 6.5% today), with some two-thirds of this coming from onshore and offshore wind.

Onshore wind capacity has grown by 80% in the last two years and we have around 7GW of onshore wind currently in the planning system.

¹ http://decc.gov.uk/en/content/cms/what_we_do/uk_supply/energy_mix/renewable/res/res.aspx

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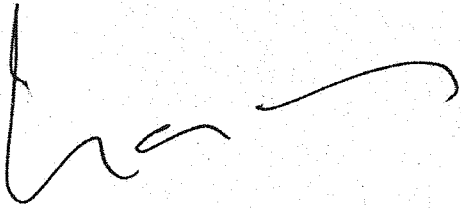
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The Office for Renewable Energy Deployment (ORED) was set up in October 2008 in order to catalyse deployment of renewable energy to deliver the UK's 2020 target. More information about ORED is available from:

[www.decc.gov.uk/en/content/cms/what we do/uk supply/energy mix/renewable/ored/ored.aspx](http://www.decc.gov.uk/en/content/cms/what_we_do/uk_supply/energy_mix/renewable/ored/ored.aspx).

Yours ever,

A handwritten signature in black ink, appearing to be 'L. H.', written in a cursive style.

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