



Campaign to Protect
Rural England

CPRE Bedfordshire

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Dear Sirs,

Application Nos: 09/00137/MAF **Bedfordshire**
WP/2008/0603FEIA **Northamptonshire**
08/02118/FULEIS/AM **Buckinghamshire**

Proposal: Construct a Windfarm of 12 Turbines with height of 125m to blade tip,
Etc

Location: Nun Wood Farm between Bozeat, Lavendon and Harrold

Note: This is a joint response by CPRE Beds/Northants/Bucks

Decision: CPRE Bedfordshire, Buckinghamshire and Northamptonshire recommend
refusal of this application

1.0 As you are aware, this application replaces a previous application for 16 turbines - subsequently withdrawn. The height of the turbines remains the same as for the previous application. However the proposed positions of the turbines appears to have changed considerably with two clusters of turbines – one at the northern end of the application site containing 5 turbines and the other at the southern end containing 7 turbines. As before the position of the proposed turbines would place them in three shire counties and within three regional authorities and three local planning departments. However the current layout proposes a greater proportion of turbines in Bedfordshire than in the previous application and far fewer in Northamptonshire. This redistribution of turbines is in response to the acknowledged adverse visual impact that the layout in the previous application would create when viewed from the Castle Ashby. However we are reliably informed that Castle Ashby has also raised objections to the current scheme for similar reasons.

2.0 Setting of the Application Site

2.1 Landscape Quality:

2.1.1 **Bedfordshire:** The proposed 6 turbines in Bedfordshire would be on land above the settlement of Harrold running up to the Three Shires Way which forms the county boundary between Bedfordshire, Northamptonshire and Buckinghamshire.

2.1.2 The turbine site is within a landscape previously designated as an Area of Great Landscape Value (AGLV) in County and Bedford Borough planning policy. In the

more recent County/Bedford Borough Council Landscape Character Assessment Study (LCA) the area is described as lying within the Hinwick Wooded Wolds

- 2.1.3 The overall character of this area is judged to be of one of “**high sensitivity to change**”.
- 2.1.4 As stated in the Hinwick Wooded Wolds Landscape Character Assessment at 2A.17: “*The areas with highest visual sensitivity are the slopes rising above the valley of the Great Ouse which provides a rural backdrop to the valley floor*”.
- 2.1.5 In terms of landscape quality this area is arguably one of the finest in North Bedfordshire.
- 2.1.6 **Northamptonshire:** Of the 3 proposed turbines to be sited in Northamptonshire, 2 would be positioned at the northwest end of the application site and 1 at the southern end of the site close to the border with Buckinghamshire.
- 2.1.7 Both positions are close to the Three Shires Way and the edge of the plateau overlooking the Hinwick Wooded Wolds. This plateau extends westwards and consists of very open farmland with no natural screening.
- 2.1.8 This landscape area (6C in the Northamptonshire Landscape Assessment) is described as the ‘Bozeat claylands’.
- 2.1.9 In the assessment the landform is described as possessing: *Wide panoramic views across elevated areas, although the undulating landform creates more contained and intimate areas. The shallow valleys are generally not perceptible below the more open, elevated areas and interfluves, resulting in expansive views and wide horizons.*
- 2.1.10 The conservation and enhancement recommendations of the landscape plan include:
- 2.1.10.1 *Conserve wide panoramic views across the landscape from elevated areas. Enhance the contrast between open elevated areas and more intimate and visually contained areas along shallow valleys by appropriate land management regimes and development planning.*
- 2.1.10.2 *New development, change and land management practices should be controlled or encouraged to conserve the simplicity and the limited palette of characteristics that define this generally quiet and settled rural landscape. Intrusion of development onto the more elevated sections and interfluves within the Undulating Claylands should be resisted to retain the open and unobstructed views to the wider landscape.*
- 2.1.11 **Buckinghamshire:** The 3 turbines proposed for Buckinghamshire would be at the southern end of the site immediately to the west of woodland at the edge of the plateau and running eastwards down the escarpment in the direction of Harrold.
- 2.1.12 The area is said to lie outside but very adjacent to an ‘Area of Attractive Landscape’ (AAL) in the Milton Keynes planning authority designations. CPRE has not been able to substantiate this. Landscape assessment maps consulted by CPRE suggest this area is within the AAL.
- 2.1.13 In the Buckinghamshire Landscape Plan this landscape area (‘Whittlewood Ridge’) is described as: ‘a slightly undulating plateau which retains remnants of woodlands, including ancient woodlands, within a largely agricultural landscape on heavy clay soils. The areas of woodland and lack of settlement evoke an earlier (historic) landscape.’

- 2.1.14 A major aim of the Landscape Plan is: *to maintain a productive and sustainable rural landscape retaining its essential character, local distinctiveness and quality.*
- 2.1.15 All three county areas possess landscape elements of historic value, i.e. vestiges of ancient woodland, hedgerows etc.
- 2.1.16 The extent of these features will be comprehensively recorded by the County Record Offices of each shire.

3.0 Settlements:

- 3.1 The site is surrounded by village settlements:
- 3.2 Harrold (population: 3220) to the east (approx. 2.5km from nearest turbine)
- 3.3 Bozeat (population 2000) to north-west (approx. 1.3 km to nearest turbine)
- 3.4 Lavendon (population 1500) to the south (approx. 2.0km to the nearest turbine).
- 3.5 There are also several isolated dwellings positioned closer to the proposed turbines.
- 3.6 Both Harrold and Bozeat are described in the Domesday Survey of 1085 and have preserved elements of their distinctive and individual character to this day. All three settlements possess some historic built environment. Harrold and Lavendon have established Conservation Areas, while Bozeat is in the process of establishing one.

4.0 Ecology: The turbine site possesses a considerable level of biodiversity, particularly associated with the five County Wildlife Sites within the development area.

- 4.1 CPRE does not possess the level of ecological expertise to make a valid assessment of the impact on the wildlife character of the application site area and its environs. Therefore we are to a degree dependent on the impact assessment made by the applicant which we assume would be based on best practice for conducting such exercises.
- 4.2 However CPRE has learnt that Natural England, which does have the relevant expertise, has expressed itself unhappy with the methodology employed by the applicant to the degree that it is currently recommending that the application should be refused.

5.0 Access: The area is served by a network of footpaths and bridleways with 'The Three Shires Way' forming a major recreational route across the landscape.

6.0 Amenity Value: The area is used by a considerable portion of the population, both local and from nearby larger settlements, for recreational purposes such as walking, horse riding, wildlife study etc.

- 6.1 CPRE believes that the proposed development would severely impact on the enjoyment of these activities by introducing large, moving industrial structures that would emit noise and visually dominate the area.

7.0 Development Impact

- 7.1 **Visual:** By virtue of their height (126 metres max.) the proposed turbines would be very visible features in the landscape over a wide area. These would appear as disproportionate, unnatural, man-made structures in an otherwise natural setting which is unable to absorb them. Some natural screening will be afforded to an observer by trees and bushes close at hand, though this will be haphazard and intermittent and will be reduced further in wintertime. A high degree of adverse visual impact would be unavoidable – a fact readily admitted by the applicant.
- 7.2 In addition the creation of approx.13km of service trackway would bring a considerable industrial element to the landscape, further devaluing its natural character.
- 7.3 By way of mitigation the applicant claims that the visual threshold value of the landscape has already been lowered by the presence of electricity pylons.
- 7.4 However CPRE believes this is no argument for justifying further loss of landscape value.
- 7.5 **Cumulative Impact:** PPS22 requires that cumulative impact should be taken into account. The PPS22 Companion Guide contains the following:
Cumulative effects may arise where two or more of the same type of renewable energy development are visible from the same point, or are visible shortly after each other along the same journey. Hence, it should not be assumed that, just because no other sites are visible from the proposed development site, the proposal will not create any cumulative effects.
- 7.6 The PPS22 Companion Guide further states:
sequential effects on visibility occur when an observer moves through a landscape and sees two or more schemes. Common routes through a landscape (e.g. major roads; long distance paths or cycle routes) should be identified, as 'journey scenarios' appropriate for assessment;
- 7.7 The proposed development would have direct intervisibility with many other existing, approved or proposed large scale wind developments. It would also be susceptible to sequential effects both when travelling on the north – south route the A509 and A6003 and the Three Shires Way long distance bridleway.
- 7.8 In terms of existing and approved applications, the proposed development would have intervisibility with the existing Burton Wold windfarm, its extension and the Milton Keynes windfarm at Petsoe Manor – effectively linking these two isolated developments to create the appearance of a windfarm landscape – particularly to travellers on the A509 between Milton Keynes and Kettering.
- 7.9 In terms of all known sites that could be seen when travelling south to north through the landscape between Milton Keynes and Corby the traveller could encounter the Stoke Park windfarm (proposed), the Milton Keynes windfarm (approved), the southern cluster of the Nun Wood windfarm, the northern cluster of the Nun Wood windfarm, the Podington windfarm (awaiting a decision), the Chelveston Energy Park (proposed), the Burton Wold windfarm (existing) and its extension (under construction), the Great Cransley windfarm (proposed), the Rushton windfarm (proposed), the Sudborough windfarm (proposed). There could also be more distant views of the windfarms at Brixworth (proposed), Harrington (awaiting a decision), Kelmarsh (proposed), Yelvertoft (awaiting a decision) and Lilbourne (proposed).
- 7.10 When travelling the Three Shires Way bridleway walkers and riders would encounter the Stoke Heights windfarm (proposed), Milton Keynes windfarm (approved), the two Nun Wood clusters, the Podington windfarm (awaiting a

decision), the Chelveston Energy Park (proposed) and the Catworth windfarm (proposed).

- 7.11 The fact that the Nun Wood proposal is divided into two separate clusters exacerbates the problems of cumulative impact by appearing to be two separate windfarms.
- 7.12 CPRE believes that even when only considering existing and approved windfarms, there are considerable concerns regarding the extent of cumulative impact for this development.
- 7.13 **Noise:** It is accepted that the noise of turning turbine blades can over time have a detrimental affect on the health of a nearby listener. This normally occurs when there are occupied dwellings very adjacent to the turbines.
- 7.14 In this case, there are only a small number of dwellings close to turbines. Such effects would therefore be restricted to a few local inhabitants. Nevertheless this disbenefit could prove to be a problem.
- 7.15 It is noted that the noise levels at the nearest occupied residential dwellings are on the limits of those acceptable under the ETSU-R-97 noise model and that the measurements taken at the main receptor used as representative of background noise levels are compromised. It is of concern that this data may not be sufficiently accurate to be used in these circumstances.
- 7.16 Furthermore, there is the possibility of turbine noise affecting horses on nearby bridledways (see below).
- 7.17 **Shadow and Flicker:** While this can have a distracting affect upon humans, it is of greater concern in relation to bridledways and the affect on horses.
- 7.18 Currently (2007) The British Horse Society (BHS) recommends that when bridledways are used by experienced riders the distance of the turbines from bridledways should be no less than three times the height of the turbines, which in this case would be about 375 metres. Furthermore, if inexperienced riders, or those unfamiliar with the local terrain, are likely to use the bridledways the BHS recommends that this safe distance be extended to four times the height of the turbine (500 metres).
- 7.19 Despite these recommendations by the BHS, the applicant is currently adhering to the superseded 200 metre separation standard. Some turbines are on the very limit of this separation distance and it is important that the 50 metre flexibility for micro-siting should not be used to move the turbines any nearer to the bridledway.
- 7.20 **Trackways:** The applicant indicates that in order to install and service the 12 turbines about 13 km of access trackway would be required. This would be 5 metres in width with additional width at corners and at passing places, and would require an installed surface layer of 425mm of aggregate.
- 7.21 The widening of existing tracks, the creation of considerable additional trackway plus the removal and/or disturbance of natural cover could have an adverse impact on wildlife populations.
- 7.22 This concern has been expressed by Natural England
- 8.0 Planning policies relating to renewable energy production and its impact on the environment.**

- 8.1 National Government *Planning Policy Statements* address the need to accommodate on-shore renewable energy development, accept that this may have an adverse impact on the landscape, particularly in the case of wind, but intimates that this impact of itself should not necessarily provide grounds for refusal of applications. This supports the argument that landscape quality must be of a highly designated standard to provide sufficient grounds for challenging such development.
- 8.2 This, in CPRE's view, is a badly constructed argument.
- 8.3 The landscape exists and has an established value.
- 8.4 Renewable energy development is being introduced into this natural environment and must, in CPRE's opinion, qualify in terms of energy production benefit to earn acceptance.
- 8.5 In certain situations this benefit may be of a level that makes the argument against acceptance difficult to justify in the light of the world need for carbon-free energy.
- 8.6 It is this level of output that CPRE believes should be the value by which such development is judged.
- 8.7 Trying to establish renewable energy installations in inappropriate areas where production levels are limited by natural resources leads to wasteful investment and ineffective energy production while having an unacceptable adverse impact on the landscape. This is particularly true in the case of wind power.
- 8.8 In CPRE's view Government planning guidance has the wrong emphasis and is unhelpful in developing a comprehensive renewable strategy.
- 8.9 It also presents local planning authorities with a dilemma, since they are expected to accept the applicant's technical assessment of the potential benefits without question leaving them to deal with applications without a full understanding of the arguments used by the applicant to justify proposals.
- 8.10 This policy uncertainty is also reflected at both regional strategy and county structure plan level where renewable energy policy seems to yaw across the whole spectrum of stances sometimes with contradictory results.
- 8.11 National government appears to attach great importance to empowering local communities, respecting their opinion regarding how they wish their locality to develop and encouraging involvement in the planning process.
- 8.12 Local government must also take account of this community opinion, and in most cases it is the local authority that has to interpret this community view against the background of planning guidance and democratically achieved local plan policy.
- 8.13 However if cascading guidance is inadequate local planning decisions are constrained by conflicting policy principles.
- 8.14 More positive guidance based on realistic energy output levels would, in CPRE's view, provide a better basis for determining the contribution benefit to an overall renewable energy strategy that a development application would provide, and how this compares with the value of the community amenity which would be lost.

9.0 Decommissioning

- 9.1 The applicant is seeking to install and maintain the turbines for a period of 25 years (a generation in human terms).
- 9.2 This is described as ‘temporary’, and is advanced as means of mitigating the impact.
- 9.3 PPS22 supports this concept by stating:*and that these impacts may be temporary if conditions are attached to planning permissions which require the future decommissioning of turbines.*
- 9.4 This appears to suppose that by the end of the operational period the need for renewable energy will have abated – which seems highly unlikely unless ‘nuclear fusion’ generation has become a reality.
- 9.5 In addition if, as we suggest, the level of turbine energy output is found to be unacceptably low the damage in terms of adverse landscape impact will have been done. There will be no form of recourse to reverse the process - unless a condition relating to performance is attached to any permission.
- 9.6 In the interim the existence of the turbines serve - as the existence of power pylons is being used by the applicant as a means of making the turbines more acceptable – to raise the threshold of ‘visual pollution’ which could be exploited by future development applicants.
- 9.7 CPRE is of the view therefore that ‘decommissioning’ and the so-called ‘temporary’ nature of such proposals is inadmissible as a means of reducing potential impact.

10.0 Local Landscape Protection Policy

10.1 Bedfordshire:

- 10.2 In the Bedford Borough’s recently adopted (April 2008) Core Strategy & Rural Issues Plan the following are relevant to this application:
- 10.3 Policy CP23 – *Heritage* which states that: *Development will be required to protect and where appropriate enhance:*
- 10.3.1 *the character of conservation areas, scheduled ancient monuments (SAM), historic parks and gardens, listed buildings and other important historic or archaeological features.*
- 10.3.2 *the borough’s cultural assets, including its landscape, in order to underpin sense of place, cultural identity and promote quality of life*
- 10.4 CPRE believes the proposed development would be totally contrary to the aims of the policy expressed at 11.2.2. As previously stated, CPRE views this area of North Bedfordshire as a highly important public amenity, and one which exemplifies all aspects of this policy, and, as will be explained later, is of the view that, in terms of the level energy creation benefit likely to be achieved by the proposals, is insufficient to warrant such a degree of landscape sacrifice.
- 10.5 **Policy CP 24 – Landscape protection and enhancement.**
- an extract from the subtext supporting this policy states that:
Landscape enhancement is an important issue in the rural area of the borough where there are smaller villages and the impact of development could have a detrimental impact on the landscape if not appropriately controlled. It is therefore

important to consider the impact of development on the landscape at both the macro and micro scale by considering views, the need for screening and the impact on existing landscape features.

This informs the following policy statements:

- 10.5.1 *The landscape and character of the borough will be conserved and where appropriate enhanced.*
- 10.5.2 *New development should protect and where appropriate enhance the quality and character of the landscape. The nature and scale of development should be appropriate within the wider landscape. (CPRE underlining)*
- 10.6 CPRE believes that the proposed development would be totally at odds with every aspect of these policies for the reasons expressed earlier.

10.7 Northamptonshire:

10.8 Policy G6 of the Wellingborough Local Plan states that: *Development in the open countryside will not be granted planning permission unless:*

10.8.1 *it involves no more than a limited number of buildings or structures and these are small scale;*

10.8.2 *it includes landscape screening, as appropriate, and all buildings and structures are designed, sited and of materials to minimise adverse impact upon the intrinsic character of the countryside;*

10.8.3 In terms of protecting the countryside amenity, the proposals fail to comply with the policy principles at 11.8.1

10.8.4 In terms of the policy principles at 11.8.2 the proposals fail to comply since: *the structures are **not** designed to minimise adverse impact upon the intrinsic character of the countryside;*

10.9 Furthermore within the sub-text defining this policy it is stated that:

10.9.1 *In recognition of the value and vulnerability of the local countryside, development is to be severely restrained.*

10.9.2 *In the open countryside permission will be limited to development which will not have a significant adverse or widespread environmental impact.*

10.10 Buckinghamshire:

10.11 Policy S10 of the Milton Keynes Local Plan states that: *The open countryside is defined as all land outside the development boundaries defined on the Proposals Map. In the open countryside, planning permission will only be given for development that is essential for agriculture, forestry, countryside recreation or other development which is wholly appropriate to a rural area and cannot be located within a settlement.*

10.12 CPRE acknowledges that industrial scale wind turbines can not be located within a settlement but this in itself does not fulfill the requirements of this policy. Not only would the proposed development not be *essential for agriculture or forestry* it would be detrimental to *countryside recreation* and cannot be considered *wholly appropriate to a rural area*.

- 10.13 Policy S11 of the Milton Keynes Local Plan states that: *The following areas are defined on the Proposals Map as Areas of Attractive Landscape:*
- 1 *The Brickhills*
 - 2 *The Ouse Valley, north and west of Newport Pagnell*
- Within these areas, development should:*
- (i) *not damage the special character of the area*
 - (ii) *Enhance important landscape features where possible*
 - (iii) *Protect and enhance features of nature conservation value*
 - (iv) *Retain and improve public access and opportunities for countryside recreation;*
- 10.14 As previously stated, CPRE has been unable to definitively ascertain whether the Buckinghamshire portion of the site lies within or adjacent to the Ouse Valley AAL. CPRE take the view that in either case, such large, moving industrial structures would visually intrude into this landscape and so *damage the special character of the area.*
- 10.15 If the site does lie within the AAL, CPRE believe that this proposal would be contrary to all aspects of this policy.
- 10.16 Policy D1 Impact of Development Proposals on Locality of the Milton Keynes Local Plan states that: *Planning permission will be refused for development that would be harmful for any of the following reasons:*
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- (iii) *An unacceptable visual intrusion or loss of privacy, sunlight and daylight*
 - (iv) *Unacceptable pollution by noise, smell, light or other emission to air, water or land*
- 10.17 CPRE believes the proposed development would pose *an unacceptable visual intrusion* and that there is insufficient reassurance from the information supplied in the Environmental Statement that it will not cause *unacceptable pollution by noise.*
- 10.18 Policy D5 Renewable Energy of the Milton Keynes Local Plan states that: *Planning permission will be granted for proposals to develop renewable energy resources unless there would be:*
- (i) *significant harm to the amenity of residential areas, due to noise, traffic, pollution or odour;*
 - (ii) *significant harm to a wildlife species or habitat;*
 - (iii) *unacceptable visual impact on the landscape.*
- Wind turbines should, in addition, avoid unacceptable shadow flicker and electro-magnetic interference and be sited at least 350m from any dwellings.*
- 10.19 CPRE believes that the Environmental Statement for the proposed development contains insufficient information to ensure that clauses (i) and (ii) above will not be breached.
- 10.20 CPRE believes that the development will cause *an unacceptable visual impact on the landscape.*
- 10.21 CPRE believes that the BHS has raised concerns that the development will cause *unacceptable shadow flicker* on the Three Shires Way and, as a result, pose a danger to horse riders.

11.0 Balance between Renewable Energy Production and Public Amenity Loss

- 11.1 CPRE is fully aware of the need to conserve energy, reduce carbon emissions and to develop renewable sources of energy generation.
- 11.2 In principle it supports a policy which aims to bring about an increase in renewable energy generation which is efficient in terms of carbon saving and investment cost.
- 11.3 CPRE has a duty on behalf of the whole nation to ensure that any loss of countryside amenity due to development which has an adverse environmental impact is proportionate to the level of community benefit derived from such development.
- 11.4 It is of great importance to the nation – and the wider world - that renewable energy sources give the highest possible level of energy production.
- 11.5 In the case of wind generation this aim is directly related to siting and associated wind speed values.
- 11.6 The maximum wind energy output can, at best, only be achieved for 50% of the time.
- 11.7 Percentage output against time is referred to as 'load factor'.
- 11.8 To achieve the greatest load factor, sites have to be positioned in areas of the high wind speed.
- 11.9 These are predominantly off-shore, in wind-swept coastal areas or high level open sites.
- 11.10 By comparison inland lowland sites deliver much lower levels of production.
- 11.11 Evidence derived from European wind speed maps indicates that Bedfordshire and the East Midlands lie within an area of relatively low wind speed, which seriously constrains energy output.
- 11.12 The Burton Wold wind farm, which lies only 20 kilometres (12.5 miles) north-east of the current application site, has a load factor of 22% (derived from Offgem data) and CPRE is reliably informed that the Podington airfield site is also unlikely to achieve a load factor which is significantly higher than this.
- 11.13 To encourage energy companies to invest in renewable energy, National government has introduced a system of Renewable Obligation Certificates which provides a commercially viable income return to companies investing in wind farm development.
- 11.14 This level of financial return is in fact paid for by the energy consumer and can therefore be seen as a form of public subsidy.
- 11.15 It is a measure of the marginal level of generating capacity in the Bedfordshire/East Midlands area that in a 2008 BBC documentary broadcast on 'Wind Energy' a spokesman for an energy company involved in wind generation stated that "without this 'subsidy' it would not be financially viable to apply for sites in these areas of low wind speeds".

- 11.16 Furthermore, the former chairman of the energy company Nuon, Ludo van Halderen, said only last year:

While the mechanisms of a single European market are well understood and widely adopted in the agricultural sector, policymakers find it difficult to apply the same concept of making optimal use of each country's natural resources when it comes to fuel mixes. Europe is still dragging its feet on adopting a single energy market for renewables, in which wind energy would be developed where it makes sense instead of seeing wind farms receiving substantial national subsidies in countries where they run for barely a fifth of the year (i.e. those with a load factor of 20 – 25%)

12.0 Conclusion

- 12.1 From all of the above it becomes apparent that attempting to generate wind energy in areas such as that currently proposed is highly wasteful of resources, would take a considerable time to offset its carbon footprint, while adversely affecting the quality of the landscape amenity.

- 12.2 The question must therefore be asked:

Is the contribution to renewable energy supply and the reduction of global warming sufficient to sacrifice the landscape amenity in this area?

- 12.3 CPRE strongly believes it is not. Much better resource investment returns can be achieved elsewhere, as explained, and it is vital, if we are to reach government targets for carbon emission reduction, that the nation - and indeed the world - concentrates its drive to achieve high levels of renewable energy output in areas where this is attainable, and avoids inefficient developments which provide meagre results, waste public money and damage public amenity.

13.0 Further Issues:

- 13.1 The application for three turbines at Podington, of the same height as those proposed at Nun Wood, is in the process of being determined

- 13.2 The distance between these two application sites is at most 6 kilometres

- 13.3 The outcome of either the Podington or Nun Wood application could have a bearing on each other in two respects:

- 13.3.1 Since the landscape character of the area surrounding the Podington site is similar to the area of the current application site, particularly on the Bedfordshire side of the border, this could serve as a precedent for determination in either case.

- 13.3.2 Since the distance between the two sites is relatively small there is a danger that an adverse 'cumulative impact' would be created.

- 13.4 Furthermore, approval of the current application would also act as a precedent for additional applications for further turbines in the area in general, as has been the case at Burton Wold – despite the fact that turbines there have achieved a very low energy return.

- 13.5 Because of considerations of cumulative impact, only a few of the many proposals to which reference is made at **7.8, 7.9, 7.10 & 7.11** should be approved.

- 13.6 Given that there are so many proposals to choose from, it would seem perverse to choose a site that is in a designated landscape

14.0 Summary

- 14.1 CPRE strongly recommends refusal of this application.
- 14.2 Refusal will not – as supporters might have us believe – seriously reverse the attack on global warming and the renewable energy element of that attack.
- 14.3 On the contrary, it would serve to concentrate minds to ensure that a more comprehensive and effective approach to the problem is addressed, and that limited resources are employed wisely and to maximum effect rather than wasted on projects with such marginal benefits - all of which reiterates the opinions of Nuon's Chairman reproduced above.

Yours faithfully,

Peter Scott,
on behalf of CPRE Bedfordshire, Buckinghamshire and Northamptonshire.