AECOM Design + Planning

The University of Nottingham

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GROVE FARM WIND ENERGY PROJECT

PLANNING, DESIGN & ACCESS STATEMENT

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INTRODUCTION

This Planning, Design & Access Statement (PDAS) has been prepared on behalf of the University of Nottingham in support of a planning application to Broxtowe Borough Council (BBC) for a wind farm development at Grove Farm that would form part of a larger development known as the Grove Farm Wind Energy Project.

The Grove Farm Wind Energy Project is the subject of an Environmental Impact Assessment (EIA) under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended). This process involves gathering environmental information about the site over a period of time and constantly revising and improving the project design to avoid or reduce environmental impacts wherever possible.

This PDAS has been produced with reference to the 2006, Commission for Architecture and the Built Environment's (CABE) guide: "Design and Access Statements, How to Write, Read and Use Them" and describes the iterative design process that has been followed in the light of this guidance.

The application seeks full planning permission for the construction of a single wind turbine with a maximum height of 126.5m, and maximum output of 2.5MW, with associated foundation and access track. Two further turbines and their associated infrastructure are the subject of a parallel planning application to Nottingham City Council.

The scheme is intended to generate electricity for 25 years after which time it will either be decommissioned or an application made to extend the duration of operation.

This PDAS forms part of a suite of documents and should be read in conjunction with the submitted Application Forms, Schedules, planning application drawings and the Environmental Impact Assessment comprising the following Chapters:

- Landscape and Visual Amenity
- Ecology
- Ornithology
- Geology, Soils, Hydrogeology and Hydrology
- Archaeology and Cultural Heritage
- Traffic and Transport
- People & Settlements
- Noise
- Shadow Flicker
- Electromagnetic Interference & Utilities
- Aviation

Structure of this document

This PDAS is intended to provide guidance to the application documents and is set out in the following way:

Section One: Introduction: This provides an overview of the content of the planning application.

Section Two: Description of Development, Design & Access: This describes the approach for devising the scheme for which permission is sought.

Section Three: Planning Policy Context: This section sets out the relevant planning policies at National, Regional and Local levels.

Section Four: Policy Analysis and Planning Consideration: This section provides an analysis and responds to the key issues relevant to the consideration of this development.

Section Five: Stakeholder Consultation: This section sets out the form, content and responses to the consultation event.

Section Six: Conclusion.

Site Location

The application site extends across two local authority planning boundaries; Nottingham City Council (NCC) and Broxtowe Borough Council (BBC) LPA's. It is bound to the north east by the Riverside Golf Centre, and to the north west, by Thane Road and the Beeston Canal. To the south west lies playing fields and to the south east, the site is bounded by the River Trent. The site location is shown on drawing no. 60149761-01-PLA-002.

Approximately 20% of the planning application (red line boundary) site area lies within the administrative boundary of Broxtowe Borough Council (BBC). This area lies to the south west of the Nottingham City Council authority boundary and the planning application site area, some 0.27 hectares, is shown of drawing no. 60149761-01-PLA-004.

The area of the application site that lies within Nottingham City Council lies to the north east of the Broxtowe Borough Council authority boundary. The application site boundary is approximately 1.8 hectares and this is shown on drawing no. 60149761-01-PLA-003.

This part of the site comprises open playing fields. There are no buildings or structures on this part of the site, apart from an electricity pylon located along the north western side of the site.

The application site is designated as protected open space and lies within the Green Belt as designated in the Broxtowe Local Plan. It is also identified as an area of high flood risk.

Adjoining Land Uses

To the north west of the Beeston Canal and Thane Road lies an industrial site known as the 'Boots' Campus. The campus is located south west of Nottingham City, east of Broxtowe and consists of 279 acres of mixed-use land. There are currently three principal land uses in operation on the site, manufacturing, logistics and commercial activities. The mix of land use on-site reflects Boots' single occupation of the site since 1927, being the location for its head office functions as well as pharmaceutical manufacturing. This site has recently been designated a candidate 'Enterprise Zone'.

The Boots Campus site is largely severed from its surrounding area, being bound to the north by the Midland Mainline railway and to the south by the Beeston Canal, beyond which is the application site. To the north of the railway line is Nottingham University Park, comprising of a range of outdoor sports pitches within an established landscape setting and further to the north is the University of Nottingham campus.

To the east of this site (north west of the application site) is an established industrial area, based along Harrimans Lane, Redfield Road and Bull Close Road. Heavy industries operate from this area including car breakers yards and the British American Tobacco (BAT) factory which is directly to the east of the site.

To the west of this site lies the Severn Trent sewerage works, which divides the Boots Campus from the Beeston Rylands residential community comprising predominantly 1930's suburban two storey semi-detached houses. The residential properties on Canal Side, forming part of the Rylands residential estate, are separated from the application site by the Beeston Canal.

The River Trent forms the south eastern boundary of the application site. It is the third longest river in England, after the Thames and the Severn, covering 270 kilometres from its source in North Staffordshire to the Humber Estuary at Trent Falls south of Hull.

To the south east of the River Trent lies Clifton Grove Woods. These woods are part of a series of woodlands that run for several miles along the River Trent. Beyond lies the Nottingham Trent University campus, and to the north east of this site lies a suburban residential estate forming part of Clifton.

Site Selection

The selection of a suitable site is a crucial consideration for a renewable energy development. Assessments involve reference to national guidance and local development plan policy provisions as well as a range of environmental, technical and operational issues.

National planning policy in relation to location of renewable developments is summarised in the Key Principles of Planning Policy Statement 22 (PPS 22) Renewable Energy. PPS 22 states:

'Renewable energy developments should be capable of being accommodated throughout England in locations

where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily'

As a result areas protected through national or international legislation are less likely to be appropriate for development than those with no designation, or more locally designated status.

The University of Nottingham undertook a basic Geographical Information System (GIS) search of all of its land holdings as a first step towards identifying areas of land with the potential to accommodate wind farm development.

The search included consideration of sites designated by statutory agencies and excluded land inside preliminary buffer distances to known physical constraints. Following a desk top feasibility assessment and comprehensive consultation exercise, the site at Grove Farm was assessed to have minimal environmental constraints and was considered suitable for a wind turbine development.

Further information relating to the detailed assessment of these aspects is considered in each of the technical assessments within the supporting documents.

DESCRIPTION OF DEVELOPMENT, DESIGN & ACCESS

This section addresses the six design principles that are required to be addressed within a Design and Access Statement. These are:

Use - what the development will be used for;

Amount – how much development is proposed, which is closely related to the capacity of the site;

Layout – the general arrangement and orientation of the development and any individual components, and how it fits with the surrounding environment;

Scale – the size and extent of the development and any individual components;

Landscaping – treatment of private and public land through hard and soft landscaping techniques to enhance or protect the amenity of the development site and surrounding environment; and

Appearance – measures incorporated into the design of built elements that determines the impression it makes, including its built form, choice of materials, lighting, colour and texture.

This section also addresses movement (Access) to and through the site and its structures.

USE

In accordance with international obligations, the UK Government has committed to reduce emissions of greenhouse gases to combat the effects of climate change. In November 2008, the Climate Change Act was published, which creates a new legal framework for the UK to achieve a mandatory 80% cut in the UK's CO_2 emissions and other greenhouse emissions by 2050 (compared to 1990 levels). When Royal Assent was granted, the UK became the first country in the world to set such a long-term and significant carbon reduction target into law.

In 2002, the UK Government placed a 'Renewables Obligation' on all UK licensed electricity suppliers to provide 10% of their electricity from renewable sources by 2010 and 15% by 2015.

This calls on all licensed electricity suppliers in England and Wales to supply a specified and growing proportion of their electricity sold from a choice of eligible renewable sources.

The Department of Energy and Climate Change (DECC) Digest of UK Energy Statistics 2009 states that, in 2008, 393 tonnes of CO_2 were released each gigawatt hour (GWh) when generating electricity from gas; this increased to 910 tonnes per GWh when generating from coal. The average CO_2 release from the fossil fuel mix, which also includes oil, was 605 tonnes per GWh.

On this basis the Grove Farm Wind project, would displace a minimum of 6,203 tonnes of CO_2 per year or 155,085 tonnes of CO_2 in its 25 year life cycle, generating wider environmental benefits over this life cycle.

AMOUNT & LAYOUT

Turbines

In all, the wind farm proposal involves the installation of 3 wind turbines and associated structures as shown on drawing no. 60149761-01-ENG-301. Wind turbine 1 would be located within Broxtowe and is the subject of this application, while wind turbines 2 and 3 would be located within Nottingham City.

The final choice of the type/specification/model of the turbine will be subject to a competitive tendering process, however, the turbine will not exceed a maximum height to blade tip of 126.5m. Elevational details of the wind turbine are shown on drawing no: 60149761-01-ENG-310.

The proposed turbine will be centrally positioned within the playing field and is some 120m from the borough boundary with NCC, 265m from the Beeston Canal, and 265m from the River Trent.

Access to this turbine will be from a new access track some 5m wide leading from the main site in NCC.

The turbine is proposed to be coloured light grey or white with a semi-matt finish to reduce their contrast with the background sky and to minimise reflections. It will be uniform in colour and will not contain any company logo or advertisements.

Whilst the turbine will be a three bladed, horizontal axis, upwind design, there are subtle variations in terms of

detail such as the shape of the nacelle[1], the taper of the tower sections etc which vary across manufacturers and turbine models. It is not possible to provide these specific details at this time. Therefore, we would recommend a suitable planning condition requiring details and final design of the wind turbine to be submitted prior to installation.

A temporary hardstanding area is proposed adjacent to the turbine siting to accommodate the crane and to provide an assembly area that will be used to construct and lift the turbine into place.

Turbine Foundations

The turbine foundation will comprise a reinforced concrete slab measuring approximately 16 m x 16 m, 2m deep, with a tapering cross section. A typical foundation design is shown on drawing no: 60149761-01-ENG-310.

The detailed design of the foundations will be undertaken following the final selection of the turbine model to be installed at the site. The requirement to use piled foundations is not expected. However depending on the final choice of turbine and the local geotechnical conditions, shallow 'micro-piles' may be used.

The foundations will be laid at sufficient depth to ensure the top of the foundation is flush with the surrounding ground level. In order to excavate a safe working area in which to locate and construct the foundation, it is necessary to excavate an area of approximately 19m x 19m in plan and up to 2.6m in depth to ensure the slopes at the edge of the excavated area are stable and allow safe access for plant, material and the workforce.

Much of the excavated material will be reinstated following construction. It is envisaged that any surplus material will be disposed off site to prevent any loss of flood storage capacity of the site. All necessary consents will be obtained for removal of material from the site.

All imported material will be inert and will be from a local batching plant.

[1] The nacelle is the turbine housing at the top of the mast.

SCALE

Two aspects of scale are considered in the design of a wind farm. The first of these is the extent of the wind farm i.e. the number of turbines that can be accommodated on the development site. This has generally been covered in the preceding sections of this statement.

The second aspect of scale that must be considered is the height of the turbine proposed. This has also been discussed in the preceding section on Amount & Layout. However, it was considered whether there would be any substantial benefits gained from any feasible reduction of turbine height (i.e. within the range of approximately 100m to 126m to blade tip). In the context of the final adopted layout and key identified views, it was concluded that any reduction in turbine height would be of limited landscape and visual benefit.

The scale of the development in relation to its visual context is illustrated in the computer generated photomontages contained in the LVIA section of the EIA which accompanies the planning application. These photomontages indicate that the scale of the turbines can be accommodated within the development site.

LANDSCAPING

New tree and hedgerow planting measures are often incorporated into a new development, partly to compensate for the removal of any existing vegetation but also to help screen the development from the surrounding area, so reducing its landscape and visual impact.

In the case of wind farm developments, new planting is not a particular requirement since loss of vegetation is generally minimised by the small footprint occupied by the turbines, control building and access tracks. Additionally, any new planting will be largely ineffectual at screening the turbines.

The Grove Farm Wind Project is located within an area of open playing fields. Vegetation such as woodlands, trees and hedgerows are absent from the immediate surrounding areas of the wind farm site. Therefore, in order to maintain a similar landscape, there are no proposals to introduce new tree and hedgerow planting

as part of the wind farm development on this part of the site.

APPEARANCE

The appearance of wind farm developments, and particularly the arrangement of turbines, is of great importance due to their generally high visibility from surrounding areas. The principles followed in the process of design for appearance are described below:

- The development should have a cohesive appearance, which in this case is based on a pattern of a three turbine cluster. Within this cluster, the turbines are evenly and regularly spaced, with no outlying turbines that stand apart from the rest of the site.
- Abrupt contrasts of scale between the turbines within the clusters, where some turbines appear very large while others are small, should be avoided as this can emphasise the extent and scale of the Development.
- The development layout should appear to relate to the landform on which it stands.

These principles are followed in the appearance of the proposed development as far as applicable within the constraints of the site. As it is not possible to ensure that all of the principles are followed in all views over the site, key viewpoints located in local residential areas and from historic buildings/monuments have been given priority as these are considered to be the most sensitive views.

While the turbine constitutes the most apparent visible feature of the proposed development, the appearance of the site infrastructure is also considered in the design of the development.

The access track that enters the site and links the turbine has been carefully positioned as to avoid the loss of playing fields. The track materials are addressed in the Access section below. The track will be re-graded to the existing ground levels to minimise the visual impact, and an indicative track visual is shown on drawing no. 60149761-01-ENG-308.

ACCESS

Traffic and Transport issues are addressed at Section 10 of the ES. Essentially, the proposed access route for abnormal delivery vehicles (vehicles in excess of 44 tonnes and over 40 metres in length) is from Junction 24 of the M1 southbound. From here vehicles will travel eastbound along the A453, through Clifton onto the A52 Crossing over the River Trent. The delivery vehicles will leave the A52 at the A453 off-slip onto the Queen Drive roundabout and head north-west onto Lenton Lane and Thane Road towards the development site, accessing the site via a new access junction from Thane Road. Construction vehicles will initially utilise an existing access into the site from Thane Road at Power League while the new access junction is constructed.

The new Thane Road access will be used for construction deliveries. During the operation phase, it will service all 3 wind turbine sites. The existing Lenton Lane access will also be used by construction vehicles and then revert to its current access/use requirements; that being to service the playing fields and Grove Farm buildings.

The proposed on-site track layout is shown on drawing no. 60149761-01-ENG-308. It is approximately 1.9km in length and will be between 5m and 13m wide. It is expected that traditional track construction will be used. This system will consist of either 1 or 2 layers of stone depending on the load bearing capacity of base layer. Where the underlying layer is not rock, a minimum of 2 layers of stone will be used; the capping layer(s) and the running layer. In areas where the load bearing layer is rock, the capping layer may be omitted, and the running layer is installed directly onto the rock surface.

The structural make-up of the track will consist of a compacted stone structure which is to be installed in accordance with the Highways Agency Specification for Highway Works 1998 (SHW) inc. latest revisions. All stone used within the structure will be graded in accordance with the SHW and will be of Type 6F2 specification or similar approved for capping layers and of Type 3 specification or similar approved for the running layer.

Planning Policy Context

Statutory Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.

The Statutory Development Plan covering Grove Farm comprises:

- East Midlands Regional Plan (2009)
- Saved policies of the Broxtowe Local Plan (2004)

East Midlands Regional Plan (EMRP) (2009)

The Regional Strategy (RS) for the area is the East Midlands Regional Plan published in March 2009 covering the period to 2026. Although the legislation to abolish Regional Strategies is currently before Parliament, the EMRP remains a statutory development plan which provides a broad development strategy for the region to 2026, and which identifies the scale and distribution of new housing and priorities for the environment, transport, infrastructure, economic development, agriculture, energy, minerals, and waste treatment and disposal.

A number of polices are relevant to this proposed wind energy project.

Policy 2: Promoting Better Design – The layout, design and construction of new development should be continuously improved, including in terms of reducing CO2 emissions and providing resilience to future climate change.

Policy 26: Protecting and Enhancing the Regions Natural and Cultural Heritage – Sustainable development should ensure the protection, appropriate management and enhancement of the Region's natural and cultural heritage.

Policy 28: Regional Priorities for Environmental and Green Infrastructure – Local Authorities, statutory environmental bodies and developers should work with the voluntary sector, landowners and local communities to ensure the delivery, protection and enhancement of Environmental Infrastructure across the Region. Such infrastructure should contribute to a high quality natural and built environment and to the delivery of sustainable communities.

Policy 35: A Regional Approach to Managing Flood Risk – sets out measures to prevent flooding and mitigate flood risk.

Policy 40: Regional Priorities for Low Carbon Energy Generation – Sets the criteria for onshore wind energy that Local Planning Authorities should give particular consideration to:

- landscape and visual impact, informed by local Landscape Character Assessments;
- the effect on the natural and cultural environment (including biodiversity, the integrity of designated nature conservation sites of international importance, and historic assets and their settings);
- the effect on the built environment (including noise intrusion);
- the number and size of turbines proposed;
- the cumulative impact of wind generation projects, including 'intervisibility';
- the contribution of wind generation projects to the regional renewable target; and
- the contribution of wind generation projects to national and international Environmental objectives on climate change.

Further to this regional policy Broxtowe Borough Council is currently working alongside Ashfield, Erewash, Gedling, Nottingham City and Rushcliffe Councils and Derbyshire and Nottinghamshire County councils to prepare a new aligned and consistent planning strategy for Greater Nottingham - The Greater Nottingham Aligned Core Strategies (Option for Consultation 2010) (Nottingham City Council 2010). The Option for Consultation report describes where the new homes, jobs and infrastructure will go; how development will be made to be as sustainable as possible and how the growth may benefit existing communities.

Broxtowe Local Plan (Broxtowe Borough Council 2004)

The BBC Local Plan Adopted in 2004 contains a number of pertinent saved policies until the emerging core strategy within the LDF is completed.

E3: Development within Conservation Areas – Planning permission will only be granted for

development within or in the vicinity of a conservation area which preserves or enhances the character and appearance of the area having regard to its location, scale, design and materials.

E8: Development in the Green Belt – Planning permission will not be granted for development in the Green Belt except where it constitutes appropriate development.

E16: Sites of Importance for Nature Conservation – Planning permission will not be granted for development on or adjoining local nature reserves or Sites of Importance for Nature Conservation, which would damage or devalue their interest, unless there are special reasons which outweigh the recognised value of the sites. Where it is accepted that there are special reasons for development which outweigh the local value of the site, the applicant shall minimise harm to the site's features. Compensation for the loss of the site's features of interest will be required, secured by planning conditions or negotiated planning obligations. Wherever opportunities arise, appropriate measures should be taken to enable the improvement or creation of Sites of Importance for Nature Conservation.

E19 : Other Nature Conservation Areas – On development sites of 0.5 hectares or more, wherever opportunities arise, the Council will seek, as appropriate, the enhancement of existing nature conservation resources and the provision of new resources.

E24: Trees, Hedgerows, and Tree Preservation orders – Development that would adversely affect important trees and hedgerows will not be permitted.

E25: Renewable Energy Development – Planning permission will be granted for developments which incorporate renewable energy techniques, provided they would not cause harm to: Residential amenity; Landscape quality and character; The character and appearance of buildings; or Nature conservation interests.

E34: Control of Noise Nuisance – Planning permission will not be granted for housing and other noise-sensitive development if the occupants, even with appropriate mitigation measures, would experience significant noise disturbance.

RC5 Protection of Open Spaces
The development of open spaces shown on the Proposals Map and listed in Appendix 9 will not be permitted unless:

a) no local deficiency of open space will result; or

b) where such a deficiency will result, either an equivalent and equally accessible area is laid out and made available by the applicant for the same open space purpose, or it is demonstrated that redevelopment of a small part of the site will result in substantially enhanced sports or recreation facilities on the remainder of the site; or

c) the development relates to the improvement of the recreational potential of the land or provides ancillary facilities; and

d) In all of the above cases, the development will not detract from the open character, environmental and landscape value of the land.

Statement of Development Principles' (SoDP)

Nottingham City Council and Broxtowe Borough Council have jointly prepared a **'Statement of Development Principles'** (SoDP) for the Boots campus site that sits in close proximity to that of Grove Farm. It is the purpose of the SoDP to inform Local Development Documents (LDDs) throughout the preparation of the emerging LDF facilitating the creation of a 'sustainable and vibrant mixed use environment in a high quality landscape setting.' It is also intended that the SoDP will be used as interim policy to guide development control decisions until an appropriate Local Development Document can be adopted.

National Government Policies

In addition to the statutory development plan Central Government advice in the form of Planning Policy Guidance, Statements and Advice Notes, are also

material planning considerations in respect of the development set out in this application. These include:

Planning Policy Statement 1: Delivering Sustainable Development (January 2005) – Requires good quality design in new development which positively contributes to making places more sustainable. It also recognises the importance of and need for the provision of essential infrastructure to support new and existing development and housing.

Planning and Climate Change - Supplement to Planning Policy Statement 1 (December 2007) – Sets out how planning should contribute to the reduction of harmful emissions whilst taking into account the unavoidable consequences.

Planning Policy Guidance 2: Green Belts (January 1995 and amended 2001) – Outlines the purpose of Green Belts and how the land under designation is protected, land-use objectives are set out along with the presumption against inappropriate development.

Planning Policy Statement 4: Planning for Sustainable Economic Growth (December 2009) – Sets out the Government's comprehensive policy framework for planning for sustainable economic development in urban and rural areas.

Planning Policy Statement 5: Planning for the Historic Environment (March 2010) – Sets out the Government's planning policies on the conservation of the historic environment. The main aim of PPS5 is that the historic environment and its heritage assets should be conserved.

Planning Policy Statement 9: Biodiversity and Geological Conservation (August 2005) – This sets out planning policies on protection of biodiversity and geological conservation through the planning system. The Government's objectives are to promote sustainable development, to conserve, enhance and restore the diversity of England's wildlife and geology, and to contribute to rural renewal and urban renaissance by enhancing biodiversity.

Planning Policy Guidance 17 Planning for Open Space, Sport and Recreation (July 2002) – Sets out the governments requirements in planning for Open Space, Sport and Recreation and the importance these amenities play in the delivery of broader governmental objectives.

Planning Policy Statement 22: Renewable Energy (August 2004) – sets out the Government's policies for renewable energy, it acknowledges that increased development of renewable energy sources is vital in contributing towards the Government's targets on renewable energy and climate change.

Planning Policy Statement 23: Planning and Pollution Control (November 2004) – provides guidance on the relationship between planning law, Government policies and pollution control. It is relevant to the proposed wind energy development in so far as pollution could be caused during the construction of the proposed wind energy development.

Planning Policy Guidance 24: Planning and Noise (October 1994, revised 1999) – provides guidance to local authorities in England on the use of their planning powers to minimise the adverse impact of noise

Planning Policy Statement 25: Development and Flood Risk (December 2006) – sets out Government policy on development and flood risk. It aims to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.

Advice Notes:

Wind Energy and the Historic Environment: English Heritage (October 2005) – This guidance is intended for developers of wind energy projects which may affect any aspect of the historic environment. It is also aimed at those, including local authority planners and their historic environment advisors, involved in strategic planning for renewable energy and the determination of project specific applications.

Conservation Principles, Policies and Guidance: English Heritage (April 2008) –This is intended to offer guidance to local authorities, property owners, developers and professional advisers. It sets out a method for thinking systematically and consistently about the heritage values that can be ascribed to a place. The guidance contained in the document also includes a recommended approach to assessing significance and

advice on how to apply the principles and policies in practice.

***Spatial Planning Advice Note: SP 12/09: Planning Applications for Wind Turbines sited near to trunk roads: Highways Agency (December 2009)* –** This advice note sets out the key aspects that the Highways Agency would seek to be addressed under a planning application. Details such as Structural Collapse, Icing, Visual Distraction and site access during construction will all need to be considered and appropriate mitigation proposed.

Policy Analysis and Planning Consideration

This section analysis the proposed development against National, Regional and Local Plan policies and provides a justification for the proposal.

The policies have been assessed against what are considered to be the main planning issues. These are:

- Appropriateness of the Development in the Green Belt and Renewable Energy (EMRP ; 28; 40: BLP E8 & E25)
- Landscape and Visual Amenity (EMRP 2, E25)
- Ecology, Biodiversity and Habitat (including Ornithology) (BLP E3, E8, E16, E19, E24; RC5)
- People & Settlement (BLP E34)
- Flood Risk (EMRP 35; BLP E16; E19; E24)
- Archaeology and Cultural Heritage (EMRP 26: BLP E3)
- Traffic and Transport

Appropriateness of the Development in the Green Belt and Renewable Energy

The application site lies within the Green Belt. The proposed wind turbine project does not fall within the acceptable uses/developments allowed within the Green Belt as set out in paragraph 3.4 of the Planning Policy Guidance Note 2: Green Belts and policy E8 of the BBC Local Plan.

National policy on renewable energy is set out in PPS22. Paragraph 13 suggests that if located within the Green Belt, many renewable energy projects can constitute inappropriate development which may impact on the openness of the Green Belt. It goes on to say that *"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."*

Further PPG2 sets out how, by definition, inappropriate development causes harm to the Green Belt. When considering development that is inappropriate and in meaningfully undertaking the balancing exercise as required in PPG2, it is necessary to attempt to quantify the degree of harm that may arise to the Green Belt within the circumstances of the scheme in question, as is discussed throughout this policy response.

Wind Turbines characteristically have small development footprints and are visually permeable by virtue of their layout on the landscape. In addition, the current land use in place on the proposed development site will be retained during the operation of the turbines. In this regard, PPG2 also indicates that in principle any form of development consistent with the principles of the Green Belt – retaining the open character of the landscape – may be considered appropriate and it is therefore argued that the proposed turbines do not conflict with the objectives of the Green Belt. Nevertheless for completeness, we have assessed the proposal as if it were inappropriate development.

The visual impact of the proposed development is addressed in the Landscape and Visual Impact Assessment which accompanies this planning application. In regards to the appropriateness of the Green Belt, there are powerful "other factors" in terms of the benefits of the development. The proposal will result in environmental benefits associated with increased production of energy from a renewable source. In particular, the project will: -

(i) meet the UK Government commitment to tackle climate change and deploy cleaner sources of energy;

(ii) make a major contribution to meet the University of Nottingham's' carbon reduction targets; and

(iii) will enable BBC to play its part in meeting the national and local targets on carbon reduction and low or zero carbon energy generation.

The long term environmental benefits that the Grove Farm Wind Energy Project will deliver are considered to outweigh any harm to the Green Belt by reason of inappropriateness. Climate change, a global phenomenon, is widely regarded as one of the planet's most serious issues. Increasing carbon emissions and greenhouse gases, particularly carbon dioxide, in the earth's atmosphere is leading to a rapid change in the

earth's core temperature. Consequences identified by the Intergovernmental Panel on Climate Change (IPCC) include changes in arctic temperatures and ice, widespread changes in precipitation amounts, ocean salinity, wind patterns and aspects of extreme weather including droughts, heavy precipitation, heat waves and the intensity of tropical cyclones. There is considerable evidence that anthropogenic, or human-led, activities account for this rapid change (in addition to 'natural' climate changes).

The Economics of Climate Change Review undertaken by Nicholas Stern in 2006 examined the economic consequences of unmitigated climate change. Several conclusions were made, including a) action should be taken immediately; b) not taking action will cause considerable environmental, social and political consequences; and c) those least able to mitigate against change, poorer people and poorer countries, will be most affected. The following quotation provides a good summary:

"The scientific evidence is now overwhelming: climate change presents very serious global risks, and it demands an urgent global response... Climate change is global in its causes and consequences, and international collective action will be critical in driving an effective, efficient and equitable response. Mitigation - taking strong action to reduce emissions - must be viewed as an investment, a cost incurred now and in the coming few decades to avoid the risks of very severe consequences in the future. If these investments are made wisely, the costs will be manageable, and there will be a wide range of opportunities for growth and development along the way in the scale required."

In response, the UK Government has taken one of the most proactive stances in the developed world. It aims to cut 1990 carbon emissions levels by 26-32% by 2020 and 60% by 2050 (Energy White Paper, 2007). To do this, the 2007 Energy white paper set out that the UK's transition to a low carbon economy requires us to: save energy, develop cleaner energy supplies and secure reliable energy supplies set in competitive markets. With regard to renewable energy, the paper identified these as being "key to our strategy to tackle climate change and deploy cleaner sources of energy. We have a target that aims to see renewable grow as a proportion of our electricity supplies to 10% by 2010, with an aspiration for this level to double by 2020. The Renewables Obligation (RO) is the main mechanism for incentivising this growth."

The Energy Act 2008 put these targets into legislation, and provided mechanisms (i.e. the Renewables Obligation and feed-in tariffs) for meeting them. The Department of Energy and Climate Change (DECC) used powers in the Energy Act 2008 to introduce feed-in tariffs to incentivise small scale (less than 5MW), low carbon electricity generation in April 2010. The DECC hopes to encourage deployment of additional low carbon electricity generation, particularly by organisations, businesses, communities and individuals who are not traditionally engaged in the electricity market. This "clean energy cashback" will allow many people to invest in small scale low carbon electricity, in return for a guaranteed payment both for the electricity they generate and export. Feed-in Tariffs (FiT) are guaranteed for 25 years. It is not a government subsidy as they are paid for via the electricity companies.

The University of Nottingham's aim is to utilise this Government incentive to meet its funding commitments. The University of Nottingham, described by The Sunday Times University Guide 2011 as 'the embodiment of the modern international university', has award-winning campuses in the United Kingdom, China and Malaysia. It is ranked in the UK's Top 10 and the World's Top 75 universities by the Shanghai Jiao Tong (SJTU) and the QS World University Rankings. It was named 'Europe's greenest university' in the UI GreenMetric World University Ranking, a league table of the world's most environmentally-friendly higher education institutions, which ranked Nottingham second in the world overall.

The University is committed to providing a truly international education for its 40,000 students, producing world-leading research and benefiting the communities around its campuses in the UK and Asia.

More than 90 per cent of research at The University is of international quality, according to the most recent Research Assessment Exercise, with almost 60 per cent of all research defined as 'world-leading' or 'internationally excellent'. Research Fortnight analysis of RAE 2008 ranked the University 7th in the UK by research power.

Further to these aspirations the University, by virtue of the funding it receives from the Higher Education Funding Council of England (HEFCE), is obliged to produce a Carbon Management Plan (CMP) outlining their carbon reduction targets and the mechanisms through which they will be achieved.

As part of the CMP, the University has committed to a 20% reduction in CO_2 emissions from 2009/2010 levels by 2015; a reduction which would equate to a 13% reduction on the 2005/06 baseline. The University of Nottingham already ensures that all the development it undertakes is rated as BREEAM excellent as a minimum.

Extending their ambitions, the University is targeting a 40% reduction of 2009/10 CO_2 emissions by 2020 which would equate to a 34% reduction over the 2005/06 baseline. The University's vision is to be recognised around the world for its signature contributions, especially in global food security, energy & sustainability, and health.

The use of wind turbines to generate electricity has expanded rapidly since the energy crises in the 1970s when it first became evident that reliance on fossil fuels was unsustainable. Wind turbines are the most established form of renewable energy technology, with other technologies (such as tidal, wave and solar) lagging behind in generating potential and commercial terms.

The UK is the windiest country in Europe, with over 40% of the available resource. Advances and improvements in technology have resulted in the financial cost of wind power falling close to those of conventional sources of electricity. In addition, the life cycle carbon cost of wind power is significantly smaller than that of other forms of conventional and renewable energy production (BWEA, 2008).

Furthermore, in addition to their environmental benefits, wind turbines offer other important advantages. Firstly, they contribute to a reduction in our dependence on the finite reserves of fossil fuels, which are being rapidly depleted and the costs of which are rapidly escalating. Secondly, they reduce our dependence on oil and gas imports and increase our self-sufficiency in energy production. Wind turbine developments are also reversible. This key feature allows a site to be decommissioned to the extent that no visible trace of the wind energy development is apparent.

Capable of generating enough electricity to satisfy the needs of approximately 3,127 households, the Grove Farm Wind Energy Project will offset 6,203 tonnes of CO_2 per year or 155,085 tonnes of CO_2 in its 25 year life cycle, generating wider environmental benefits over this life cycle.

In conclusion, when considering the appropriateness of a wind energy proposal, a wide range of factors need to be considered – and if deemed to be inappropriate – then the degree to which such a scheme might adversely impact upon the Green Belt must be ascertained. We have set out above the overwhelming benefits that this proposal will bring. In terms of the physical characteristics, we consider that the proposed wind turbines are appropriate to mitigate against any potential harm for the following reasons:

- Little overall physical change to the site on which the turbines are located will occur – save the foundation footprints and access track – with the primary function of open space and sports facilities remaining.
- The number and proposed layout of the turbines provides for a visually permeable scheme and retains the openness of the landscape and views beyond.
- By their very nature, wind turbine developments are temporary and once decommissioned, the Green Belt can be fully restored to its original condition.

Overall, we consider that the overwhelming environmental benefits that will come from this project and reasons set out above, demonstrate very special circumstances which outweigh any harm by reason of inappropriateness and any other harm.

Landscape and Visual Amenity

The Landscape Visual Impact Assessment (LVIA) outlines the design strategy and conscientious approach that was taken to ensure that the proposed development has a minimal negative impact on its surroundings.

The wind turbines will have a simple form, clearly illustrating their function as a generator of renewable energy. The turbines have been positioned across the site so as to ensure they are in balance with the landscape and skyline taking account of the various identified constraints.

The visual impact of the scheme is discussed further in the LVIA which accompanies this application. In summary, it has assessed a total of:

- 27 Viewpoints within a 35km radius of the application site;
- 10 Townscape Character Areas;
- 17 Landscape Character Areas; and
- 60 Registered Landscapes (Parks and Gardens)

The LVIA concludes that significant visual impacts are likely to be contained within 5km of the development, and be very limited over 15km. Physical impacts, comprising the access tracks, the turbine foundations, laydown areas and substation, have been assessed as having a minimal impact on the landscape. Furthermore these will be located within the recreational grounds minimising vegetation loss.

Nottingham City Centre presents the only 'high' sensitivity Townscape Character Area; however, there is an 'extremely limited' window of visibility due to the high buildings and dense indicative urban form. Further information can be found within the LVIA, including details of all townscape character areas assessed.

Across the different landscape elements assessed, the Trent Valley was the only area within 15km to display signs of a 'large' impact. The areas of Landscape Designation assessed showed that over 50% had 'no theoretical visibility' and their broader underlying character would not be compromised.

As discussed in the previous section (Appropriateness of the Development in the Green Belt and Renewable Energy'), the development exhibits 'very special circumstances' including a very small physical footprint, a visually permeable scheme which will not significantly impinge on the views of the surrounding landscape and a temporary installation. Furthermore the application site will retain its current use as an area of open space and sport recreation, whilst contributing to Nottingham's and the UK's carbon reduction targets through the production of clean renewable energy. As such it is considered that, in respect of policy E25 and notwithstanding the conclusions within the LVIA, the proposed scheme's positive attributes outweigh any perceived impacts on its surroundings.

It is noted that the southern part of the Boots site has been identified for future residential development in the Masterplan which forms part of the 'Statement of Development Principles' jointly prepared by NCC and BCC. This potential residential site lies immediately north west of the Beeston Canal. It is not considered that the proposed turbines will prejudice the future development of this site, as the turbines will be some distance away and that any future residential development on this site can be designed so as to minimise the impact on future occupiers, thereby creating a satisfactory residential environment.

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Ecology, Biodiversity and Habitat (including Ornithology)

Designated as a Site of Importance for Nature conservation and Protected Open Space within the Broxtowe BC Local Plan (2004) as well as constituting part of the Green Belt, the application site is covered by policies E3, E8, E16, E19, E24 and RC5. Throughout the evolution of the scheme every effort has been made to mitigate against any potential impact from the proposed development.

The proposals do not require the removal of any hedgerows and whilst it has been noted that there are a range of protected floral and faunal species present on the site, the majority of the land in which the turbine will be sited is considered to be of low 'parish' and 'sub-parish' value. The specific location of the turbine consists of short mown amenity grassland and arable fields which are regularly managed and of little faunal or floral value.

Given the expanse of land available in the immediate vicinity, it is not considered that there will be any significant negative impacts. The wind turbine has been purposely sited away from any water courses in order to

ensure there is minimal impact on marine wildlife and consideration has also been given to any residual impact that might occur on the local bat population. In line with current best practice guidance, the turbine has been located away from any identified foraging sites.

Further to this and in line with policies E16 and E19, it is proposed that new habitats will be created along both the hedgerow boundaries of the site and the river corridor, having a direct positive impact in compensation for the loss of habitat on site.

Although not situated within a Site of Special Scientific Interest (SSSI), a designated site is located approximately 2km to the south west of the site. Given the distance from the site and the nature of the proposed development – providing clean, environmentally friendly renewable energy – it is not considered that there will be any adverse impact on this area.

The majority of bird species found within the boundary of the application site were observed to be common farmland species including breeding skylark and dunnock as well as species of conservation concern. Certain 'target species' including buzzards, sparrowhawk, cormorant, heron, mallard and mute swan were observed to constitute a small number of collision risk flights between 35m and 125m.

Mitigation will be targeted in various areas:-

(i) the wind turbines themselves will be painted light grey or white, making them highly visible to birds;

(ii) vegetation removal will be carried out outside of breeding season and be preceded by a bird survey; and

(iii) any hedgerow or trees that are permanently removed will be replaced on a two-for-one basis i.e. one removed tree will be replaced by two;

(iv) additional long grass/wild flower margins will be created;

(v) bird nest boxes will be situated around the site to provide a range of suitable habitats; and

(vi) a minimum area of 50mx50m beneath each wind turbine will be sown with grass seed and short-mown to specifically discourage them from nesting in these areas.

People & Settlement

The proposed development site is located within an area of land currently occupied by the Poplars Sports Ground and Riverside Ground. Assessments carried out have demonstrated that there will be minimal impact from the wind turbines.

As discussed in the environmental statement, extensive noise testing was carried out at several locations surrounding the proposed development, including the closest existing residential properties.

Testing carried out in line with current best practice guidance suggests that worst case assumptions should be considered precautionary. Any potential adverse impacts will be mitigated through the imposition of a condition ensuring that noise levels produced from the wind turbine does not exceed a pre-prescribed threshold above background noise at any time. From a visual perspective, the scheme has been designed to be visually permeable, with the turbines carefully spaced, thus reducing their perceived dominance on the landscape. Furthermore, the hours of operation during which the wind turbine will be producing noise will be restricted and agreed prior to development with the local authority. These accord with local plan policies E25 and E34, and that contained within PPS22: Renewable Energy.

Analysis of shadow flicker caused by the proposed wind turbines was carried out in 14 dwelling clusters within 920m of the development site. Results conclude that the frequency at which flicker is likely to occur is well outside the range that has the potential to induce photosensitive epilepsy. Furthermore, as detailed in the Environmental Statement, any potential impact on residential amenity due to shadow flicker will be eliminated through a considered and comprehensive mitigation strategy, including the pre-programmed and automatic shutdown of the turbines within set parameter.

Flood Risk

As highlighted in the Flood Risk Assessment (FRA) accompanying this submission, the site area sits within the 'Functional Floodplain' of the River Trent, with an expected flood occurrence of 1 in 20 years (5%) or greater. Of this floodplain the development would result in the loss of approximately 0.1% of the total volume. The turbines and all associated above ground structures have been designed so as to ensure that all essential components are above the 1 in 100 year plus climate change flood level.

Given the small surface area the development will cover in comparison to the surrounding floodplain extent, net loss of such conveyance is negligible and there is not expected to be any material impact on surface water drainage rates or the hydraulics of the wider catchment. The FRA provides sound evidence that, as per policy NE10, the proposed development will not increase the risk of flooding.

Archaeology and Cultural Heritage

The archaeological and cultural heritage assessment collated data from the Nottinghamshire Historic Environment Record, the National Monuments Record, aerial photographs and cartographic and documentary sources. Borehole investigations were also undertaken to enhance and augment this baseline data and to develop a subsurface terrain model.

Full details of the assessment are set out in Chapter 9 of the EIA, however, within the site boundary, four sites are identified and additional palaeoenvironmental evidence has been recorded in the form of palaeochannels bisecting the site. 1 site is located within BBC with the others within NCC. The earliest evidence comprises Neolithic or Bronze Age activity along the present-day course of the River Trent. Cropmark sites of a probable Iron Age enclosure and house, a second circular enclosure of likely prehistoric date and a linear feature of probable modern origin comprise the rest of the known archaeological assets within the site boundary.

It is recommended that further archaeological investigations are conducted to establish the subsurface potential within the proposed development boundary. This should follow a phased approach to allow for modification of the methodology used to target any results. This further investigation can be secured by way of a suitable planning condition.

The assessment has also identified five sites within or near the application boundary which will be impacted upon during the construction of the development. These sites are an Iron Age enclosure cropmark, Linear crop marks and Palaeochannels within the site boundary; and Listed Buildings within the Boots Site, Clifton Hall and Registered Park and Gardens, nearby. These impacts will consist of both visual and physical impacts during the construction phase and visual impacts during the operational phase. Whilst it is accepted that there will be a visual impact on surrounding cultural heritage assets, it should be noted that the development proposed is temporary in nature. When coupled with the wider environmental benefits brought about through the generation of renewable energy it is considered that such factors outweigh any perceived impacts.

Traffic and Transport

During the operational life of the turbine, there will be minimal traffic generation through required maintenance. After an initial 3 month check up, visits can be as infrequent as every 2-5 years, unless a situation occurs which requires more immediate attention. As such the development will not lead to a noticeable increase in traffic generation over its operational lifespan.

With regards to construction traffic, along the local highway network, swept path analysis was undertaken in order to assess the potential obstacles in accessing the site during the construction phase. The analysis was modelled on the likely size of those vehicles required to transport the wind turbines and associated structures. This has led to the identification of potential 'bottlenecks' and an evaluation of possible carriageway widening and temporary impacts on street furniture. This assessment has illustrated that with minor temporary highways modifications concentrated at the site entrance and junction of Thane Road and the Bypass, those vehicles

required in the construction of the proposed development can access the site unhindered. It is proposed that any necessary highways works will be implemented and carried out in association and agreement with the appropriate highways agency.

The permanent site access track will be constructed of un-surfaced aggregate laid on top of a geotextile layer. The track will be laid flush with the existing ground surface with the exception of the new access ramp to Thane Road.

During construction it is not thought that the maximum frequency of vehicle movement as a result of the works will be more than 4 an hour expect for three days during which the concrete foundations for the turbines will be put down. During this time frequency is expected to increase to a maximum of one every six minutes. Our assessment concludes that the impact of the increased traffic flow has been deemed not to be significant in relation to delays to the public, accidents and safety amongst other categories. A Construction Traffic Management Plan will further assess the specific requirements within the construction phase.

During the preparation of the planning submission and the design of the proposed scheme, consultation was undertaken with a number of aviation stakeholders including East Midland Airport, Nottingham City Airport, NATS and CAA. Out of those contacted. East Midlands Airport were the only consultee to raise any concerns or objections, details of which can be found within the ES. When assessing the unmitigated impact of the proposed scheme and its significance, they were found to be ‘Small’ and ‘Minor’ respectively. The results of the ES conclude that the residual impacts of the proposal are manageable and the significance of aviation issues is ‘Minor or Negligible.’

Stakeholder Consultation

This Statement of Participation describes the pre-application consultation process that supports the planning application for the Grove Farm Wind Energy project.

One of the principles of sustainable development is to involve the community in enabling and empowering local people to take an active part in the planning process. As part of a new transparent and accessible planning system opportunities for public participation, in all its guises, have become an inherent part of the planning process and the development of the Grove Farm proposals.

Role of the Statement of Participation

This Statement of Participation provides an overview of the views expressed by the local community, Council officers and Council members in response to the plans for Grove Farm Wind Energy Project. It is intended to support the planning application and explains:

- The policy context for the consultation process
- The methodology applied to the pre-application consultation process
- Summary findings from the key events held
- The broad approach to future consultation

Policy Context

The **Planning and Compensation Act 2004** emphasises the importance of involvement with the local community and stakeholders in the planning process.

National planning guidance **PPS12 Local Spatial Planning (2004)** sets out the Government's policy on local spatial planning and consultation. PPS12 makes it clear that the broad procedure for consulting on planning applications should be set out in the local planning authority's Statement of Community Involvement, both of which are reviewed below. **PPS12 Companion Guide: Plan Making Manual (2008)** states that development proposals that may give rise to controversy may require community consultation. Pre-submission consultation is encouraged, and has been undertaken during the preparation of this planning application accordingly.

The PPS12 Companion Guide also confirms that the local planning authority cannot refuse to accept an application should they disagree with the way in which an applicant has consulted the community pre-application. However, failure to involve the community may lead to objections which would be material to the determination of the planning application.

In planning for high quality and inclusive design, planning authorities must review all applications against good practice in community involvement. National planning guidance **PPS1 Delivering Sustainable Development (2005)** states that: "Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities."

PPS1 encourages local planning authorities and developers to engage the local community in bringing forward development proposals. This is to help identify issues and problems at an early stage and to allow a dialogue and discussion of the options before proposals become increasingly advanced.

It sets out that pre-application discussions with local planning authorities are beneficial in that they ensure both parties understand the objectives and constraints that exist. This then enables proposals to be amended to ensure they better reflect community aspirations. The policy also states that pre-application discussions assist in the preparation of complete applications thereby assisting determination is delivered in an expedient manner.

Community Involvement in Planning: The Government's Objectives (2004) was published alongside PPS1 and outlines the Government's aim to build on the opportunities that local people have for participation in the key decisions affecting their area. The guidance states that such involvement should enable the local community to say what sort of places they want to live in at a stage when this can make a difference.

The Nottingham City Council Statement of Community Involvement (SCI) (2007) sets out how local people, organisations and key stakeholders will be involved in the planning process. The Council is required

to conform to this document in undertaking its statutory planning functions

The SCI sets out the Council's expectations with respect to pre-application consultation and community involvement. With regards to planning applications of this scale, the Council encourages developers to enter into pre-application discussions with statutory consultees as this can help to ensure that applications are complete, address all the relevant issues / site constraints and result in a better quality development. This pre-application discussion and community involvement will allow issues to be discussed and solutions to be found at the earliest possible time – helping to reduce conflict and possible delays once such an application has been formally submitted.

The type and extent of consultation will depend on the scale and nature of the development but the SCI encourages pre-application consultation with the community and stakeholder to be undertaken for large schemes which may be sensitive to local issues. The consultation process should inform developer's proposals and final plans. Furthermore, the scope and results of the consultation should be submitted with the application through the applicant's Statement of Participation as it is a requirement of the SCI that all planning application for major development are accompanied by a statement explaining who was consulted, when the outcome of the exercise and how comments were taken on board.

The SCI makes it clear that where applicants intend to engage in community involvement, Nottingham City Council would expect them to firstly seek pre-application advice from the Council's Planning Officers. This ensures that development proposals are realistic in terms of planning policy and guidance before they are consulted upon with local communities and stakeholders. This approach will help to avoid causing concern or raising community expectations unnecessarily.

Similarly, **the Broxtowe Borough Council Revision Statement of Community Involvement (2009)** encourages developers to seek pre-application advice with the Council on their proposals, in order to provide an opportunity for the applicant to address any initial issues or problems before a formal application is submitted.

The following chapters provide details of the consultation approach and findings that have been undertaken prior to the submission of the application. This process is in full accordance with the Government's aspirations for pre-application community involvement in major planning applications.

Consultation Methodology

This section outlines the approach that the applicant team took for the pre-application consultation. The consultation process followed two workstreams:

- Local Authority involvement
- Community involvement

Findings from the below events are detailed later in this section.

Local Authority involvement

To inform the proposals, the applicant team held a series of meetings and exchanged correspondence with both Local Authorities.

Before undertaking any consultation with residents, significant discussions with Planning Officers were undertaken to understand the key issues. Meetings and discussions with Council Officers and Members have been held on various dates over the past year. It is envisaged that this dialogue will continue through the determination period and beyond.

Nottingham City Council:

- Council officers

  15th July 2010
  7th September 2010
  4th November 2010

- Ward Councillors

  24th September 2010
  8th October 2010

- Area Committees

  10th November 2010
  30th November 2010

Broxtowe Borough Council:

- Planning officers, Ward Councillors and Council Leader

  16th September 2010

Community involvement

The applicant team has made considerable efforts to raise public awareness of the proposals. Various communication methods have been used to publicise the proposals and invite comments from the community. The applicant team genuinely seek as much community buy-in to the process as possible and have therefore held additional consultation events to reflect the concerns raised. These include additional meetings with Nottingham City Council Area Committees, a free public visit to a similar completed scheme, and the creation of a dedicated website that responds to the concerns raised. The applicant has also responded to all letters and emails sent from members of the public.

Due to the nature of the proposal, the team have ensured consultation is comprehensive and tailored to community demands. Consultation with the community is listed below and detailed later in this chapter.

Public Meetings:

All public events were advertised with flyers in the local area, which are shown in Appendix A.

- Public meeting, Beeston Rylands Community Centre

  22nd November 2010

- Public meeting, Clifton Cornerstone Centre

  Wednesday 20th April 2011, 6.30-7.45pm

- Public meeting, Beeston Library

  Thursday 21st April 2011, 11.15am-12.45pm

Visit to similar development:

- Coach Trip to Lindhurst Farm Wind Farm

  22nd March 2011

Public Exhibitions:

- Public exhibition, Clifton Cornerstone Centre

  Saturday 16th April to Thursday 21st April 2011
  Feedback forms were also provided, see Appendix A

- Public exhibition, Beeston Library

  Saturday 16th April to Thursday 21st April 2011
  Feedback forms were also provided, see Appendix A

Media Coverage:

The following announcements and interviews with the applicant team took place:

Radio coverage:

- BBC Radio Nottingham

  28th October 2010, news update
  28th November 2010, news update
  5th April 2011, news update and invitation to public exhibitions

- BBC Radio Leicester

  28th November 2010, news update

- BBC Radio Derby

  28th November 2010, news update

TV coverage:

- BBC1, East Midlands Today

  28th October 2010, news update
  22nd November 2010, news update and notification of public meeting

- ITV1, Central News

  28th October 2010, news update

News agency print/online coverage:

- Beeston Express newspaper

  26th November 2010
  1st April 2011
  15th April 2011
  29th April 2011

- Nottingham Post (formerly Evening Post) newspaper

  10th October 2010 (2 articles)
  12th November 2010
  23rd November 2010
  12th January 2011
  23rd April 2011

- BBC News online

  30th October 2010
  11th April 2011

The proposals were also covered in the following publications, although copies are not available in the appendix: Nottingham Recorder; Nottingham Trent Valley Journal; Utility Exchange; The Engineer.

Dedicated website:

Information has been made available by the applicant team on the following dedicated website:

http://nottingham.ac.uk/renewableenergyproject/index.aspx

Specific events at the University of Nottingham

- University of Nottingham May Fest Community Open Day

  Self contained display showing River Trent wind turbines, 7th May 2011

- University of Nottingham Student's Union survey

  What do you think about the University's plans for 3 wind turbines near Clifton Bridge to supply electricity to University Park?

Consultation Details

Local Authority involvement

Individual meetings, July – November 2010:

During the development of the project a number of meetings were held with the two local planning authorities. These meetings were organised University of Nottingham, and with support from AECOM presented draft versions of the proposed development or outlined the work to date.

Nottingham City Council – A series of meetings were held over 5 dates with Planning Officers, Ward Councillors, including the Portfolio Holder for the Environment and Climate Change, and the Council's Energy Manager.

Meeting 1 - Introductory meeting with Nottingham City Council planning officers. This involved an indicative scheme presentation comprising project summary, details of background technical studies, methodology and indicative timeframes. 15th July 2010.

Meeting 2 - Follow up meeting with planning officers with Portfolio Holder for the Environment and Climate Change in attendance. 7th September 2010.

Meeting 3 - Presentation of proposals to Local Ward Councillors. 24th September 2010.

Meeting 4 - Subsequent presentation of latest proposals to Local Ward Councillors. A key output of this meeting was the agreement to increase our level of consultation to also include the Area Committees. This additional consultation allowed the applicant team to receive further responses before going out to full public consultation. 8th October 2010.

Meeting 5 - Meeting and presentation of scheme overview to council Energy Manager. This allowed the team to go public with the proposals with full confidence that all necessary Council departments were aware of the scheme. 4th November 2010.

Broxtowe Borough Council – A key meeting was held with the Council's Planning Officers, local Councillor's

and the Council Leader. During this session the applicant and consultant team provided an overview of the proposal, details of background technical studies, methodology and indicative timeframes. This session allowed the team to go public with the proposals in full compliance with the local Statement of Community Involvement. 16th September 2010.

Group meetings, November 2010

Nottingham City Council Areas 8 and 9 Committee meetings:

The applicant presented to both Area 8 and Area 9 committees in relation to the proposals as agreed with the Council. The applicant presented to Committee members and other parties present, and then took questions. This approach allowed the applicant to further consult on the proposal before formal public consultation commenced and was additional to the originally envisioned strategy. This shows the applicants willingness to ensure that pre-application consultation was meaningful and comprehensive. The committee meetings are public events and therefore a small number of local residents also attended.

The specific findings from the events covered a range of concerns including: scale; location; predicted noise level; consultation process and local benefits. The applicant explained the proposals, referencing the technical studies that provide an evidenced-based and considered basis for the proposals in their current form. At this point the team also explained in more detail the proposed approach to pre-application consultation.

Community involvement:

Visit to similar development, 22nd March 2011

Early response from members of the public and liaison with both Local Authorities highlighted the importance of providing members of the public with an opportunity to visit a completed wind turbine scheme of similar scale to understand its relationship with the surrounding area. The applicant team held this additional consultation event to try and dispel public concerns which are often based on secondary beliefs rather than direct experience.

The University therefore organised a coach trip to visit the nearby Lindhurst Farm Wind Farm, a five turbine scheme of similar scale located near Rainworth, Nottinghamshire.

A 52-seat coach was provided, which took local residents from the Clifton and Beeston Rylands area to the site with three representatives from the university also present (Prof Alan Dodson PVC for Infrastructure, Mr Chris Jagger Chief Facilities and Estates Officer, Mr Richard Wigginton Capital Projects Officer). The tour party were on site for approximately one hour, with the land owner allowing access around the development. This included walking up to and under turbines and viewing them from distances equitable to the university development.

Local area officers and councillors assisted in the publicity for the visit which was publicised in the local media, with a leaflet drop (see Appendix A) and via the dedicated website.

Comments included concerns over noise, scale and financial gain at the expense of residents. The views ranged from strong objections, with a smaller number seemingly undecided or in favour of the concept in the proposed site. The applicant team feel that the site visit demonstrated to a significant number of residents that wind turbines are less audible than they previously feared.

Public meetings

Three meetings were held with the public as part of the pre-application process. The first of these was held in November 2010, in advance of the above coach trip and alongside the Area Committee meetings. This early meeting ensured that residents from both Council areas had equal opportunity to respond to the pre-application plans at the earliest stage.

Initial consultation meeting - Beeston Rylands Community Centre, 22nd November 2010:

The applicant team presented the same information to members of the public as was shown during the Area

Committee meetings. Approximately 30 members of the public attended the meeting.

The areas of concern raised during the Committee meetings were also raised here. In addition, concerns regarding potential negative impacts on local ecology and house prices were raised and the applicant responded to dispel these myths using independent research and case studies.

Public meetings 1 and 2 - Clifton Cornerstone Centre, 20th April 2011 and Beeston Library, 21st April 2011

Public meetings were held in two locations to maximise access for local residents. They were attended by representatives from the university and chaired by Mr Chris Jagger (Chief Facilities and Estates Officer). Local Councillors and a planning officer also attended. The planning officer remained impartial and took questions during one meeting on the application process only. It is anticipated that public attendance at these event exceeded 130 people, although it is likely that some residents attended both events.

Mr Jagger began by outlining the proposal to date and then set out the University's obligations in respect of carbon reduction. He then took questions for approximately an hour during both meetings.

In the applicants view, the majority of respondents opposed the proposals. They focussed their concern on potential adverse effects on existing views, current noise levels and local property values. The atmosphere at these meetings was at times tense and clearly a number of attendees were particularly opposed to the proposals and were vocal in their opinions accordingly. Their views are important to this process and the applicant team therefore worked to answer questions, collate opinions and clarify areas of confusion. It is fair to conclude though that the nature of some negative opinions expressed were likely to have discouraged potential supporters from articulating their views to an unreceptive crowd.

It is important to note that other areas of concern, albeit less prevalent, were raised: effect on ecology, reduction in traffic safety, potential to harm public health, landowner financial gain at the expense of residents, respect to local heritage, use of rare materials.

Public exhibitions

Saturday 16th April – Thursday 21st April 2011 - Exhibition

Alongside the public meetings, public exhibitions of the current proposals were also held at the Clifton Cornerstone Centre and Beeston Library. The applicant team did not feel it was necessary to staff the exhibitions as the information was set out in plain English with illustrations and feedback forms were provided. The public meetings also allowed the public to meet with the applicant team and discuss the application. A total of 28 feedback forms were completed. Of these 25 objected and 3 broadly supported the scheme. The response level to these forms was low, however attendance at the public meetings was high which we believe mitigates this.

Other engagement with members of the public:

A dedicated website was created and publicised along with the above events, which allowed the applicant team to provide simple public access to details of the project, alongside background information that responds directly to their concerns. A key document has been 'Top 7 Wind Farm Myths Dispelled' by renewableUK (June 2010), which dispels in plain English myths about wind farms that they: reduce nearby house prices; are noisy; need back-up capacity; use more energy than they generate; have a negative effect on tourism; rely on Government subsidies; are no longer in production in Denmark.

Furthermore, the website includes a Frequently Asked Questions (FAQs) page that specifically responded to concerns raised by members of the public. The FAQs and responses are set out in Appendix A.

The results of the survey undertaken by the University's Student Union provide interesting results that contradict the findings from the wider public. They show that 76% of the 154 random sample students questioned believe that the proposals are 'a good idea', with 8% of these having some concerns about the potential environmental

impact. 18% of respondents had no opinion on the scheme and less than 6% rejected the proposals as ‘a bad idea’.

Alongside the public events noted in this section, the applicant also disseminated a number of press releases to encourage media coverage of the event and attract public interest. This was particularly successful, encouraging press coverage across Nottingham and the wider region.

Furthermore, the applicant team also responded by email or letter to all individual correspondence received from members of the public with specific responses and information relating to the comments made.

Future Consultation Approach

When an application is submitted the second stage of consultation will be carried out. The application will be advertised by way of site notices, a press notice in the Nottingham Post and by letters sent to residents within the locality.

Conclusion

Planning Policy Statement 1 (Sustainable Development) and 22 (Renewable Energy) both identify a fundamental importance to tackling climate change. Key Principle (ii) of PPS 1 states:

"Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change4 – through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development."

PPS22 states that applicants do not need to demonstrate the need for renewable energy development. However, Key principle 1 (iv) of PPS22 states: "The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission." Part (viii) states "Development proposals should demonstrate any environmental, economic and social benefits as well as how any environmental and social impacts have been minimised through careful consideration of location, scale, design and other measures."

The Grove Farm Wind Energy Project will go some way to meeting national and local government commitments to mitigate climate change. The context set out in the aforementioned sections of this document clearly demonstrates that the proposed development will be a positive contribution.

In all planning decisions there may be balancing judgements that have to be made and that is especially the case where the type of development that is proposed has the potential to create conflicts with a number of development plan policy areas. Against this potential for conflict it is necessary to weigh the Government's energy policy requirements and the advice at national level that flows from this. The balancing exercise has been undertaken for a large number of wind farm proposals in the past and the evidence that it has on many occasions come down in favour of the wind farm proposal is shown by the fact that there are now well over 150 onshore wind farm sites across the United Kingdom, involving nearly 2500 machines, quite apart from another 140 sites with 1500 machines that have been consented and not yet built, making a significant contribution to the overall targets that the Government has set.

The process of assessing the weight to be given to the national energy policy in this case is very much simplified by the assessment of the individual topics that has been undertaken, provided in the ES and reviewed in this PDAS. On the issue of the appropriateness of the development in the Green Belt, we do not consider that this scheme constitutes inappropriate development, Notwithstanding this, we have demonstrated 'very special circumstances' and on landscape and visual impacts, the proposal will not harm unacceptably the visual amenities and character of the area. The proposal is fully compliant with the aforementioned national guidance and local development plans.

It is therefore considered that it is not necessary to seek to argue that there is such weight from the national energy and planning policies in favour of the development that it should over-ride conflict with the local policy framework - there is in this case no such conflict. In the event, however, that there are claims of a policy conflict, then the significant weight to be attached to the Government's national energy policy has to be brought into the balance and is a compelling factor supporting an approval.

Furthermore, as already discussed within the policy response section of this statement, there are a series of factors which, when considering the presumption against inappropriate development in PPG2, come together to provide considerable weight in support of 'very special circumstances'.

The small physical footprint of the turbines and access tracks required to service them, coupled with the carefully considered design leading to a visually permeable development and the continuation of the sites existing use; notwithstanding the temporality of the scheme and subsequent reinstatement of the landscape,

all contribute towards a set of very special circumstances in favour of development.

Based on the planning assessment that has been undertaken in this statement, it is concluded that this proposal is one that does not conflict with the aims and objectives of the development plans, and is consistent with Green Belt national planning and energy advice on making the best use of renewable energy resources wherever they are economically attractive and environmentally acceptable. Accordingly, Nottingham City Council is invited to approve the application.