

**PROPOSED WINDFARM AT SPRING FARM RIDGE, HELMDON/GREATWORTH,  
NORTHAMPTONSHIRE (SOUTH NORTHANTS COUNCIL PLANNING APPLICATION  
S/2010/1437/MAF)**

**PUBLIC INQUIRY INTO APPEAL AGAINST REFUSAL OF PLANNING PERMISSION  
APP/Z2830/A/11/2165035/NWF**

**COMMENTS UPON APPENDIX 6 (HIGHWAYS TECHNICAL NOTE) TO Mr BELL'S  
PROOF OF EVIDENCE FOR BROADVIEW ENERGY LIMITED**

**BY COLIN WOOTTON ON BEHALF OF  
SULGRAVE PARISH COUNCIL**

As set out in Appendix 4 to my statement submitted to the Planning Inspectorate in May last entitled "Traffic Implications for Sulgrave Residents", the Parish Council has grave concerns as to the increased dangers likely to be experienced by users of the B4525 road consequent upon the wind farm proposal.

I thought it would be useful to set out the views of the Parish Council in respect of Appendix 6 of Mr Bell's Proof of Evidence (Highways Technical Note) in advance of the inquiry.

At 4.4 of the Technical Note, WSP state: *"When considering driver distraction, it is considered that the site location does not present a safety concern when considering the parameters to be assessed as identified by the DfT."*

These parameters are set out in the Department for Transport's February 2013 policy document: *"The Strategic Road Network and the Delivery of Sustainable Development"*. At 3.14 WSP summarise the the DfT's criteria relating to the location of wind turbines as follows: *"The issues to be considered within this document are to seek to ensure continuous views of the wind turbines, that turbines should not be provided where drivers need to pay attention to a particular driving task, and that an analysis of road accidents within the vicinity of the site should be undertaken."*

However, it is useful to examine the relevant paragraphs of the DfT document in full, as follows:

*A.11 In order to mitigate the risks to the safety of road users arising from structural or mechanical failure, the Highways Agency will seek a setback from the highway boundary of height + 10% is necessary for micro and small turbines. For Commercial turbines a set back distance equal to their height + 50 metres will be sought.*

*A.14 Any potential for visual distraction should be minimised by the provision of a clear, continuous view of the wind turbine(s) that develops over the maximum possible length of approach carriageway.*

*A. 15 Wind turbines should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists.*

*A.16 The existing road accident record nearing the vicinity of the proposed wind turbine(s) should be analysed with particular attention given to accident types. Locations with a history of rear end shunt accidents should be treated with particular caution.*

Considering these paragraphs in turn:

#### **A.11. Setback from Highway Boundary.**

DfT policy is to seek a setback from the highway boundary of height + 50 metres. In the case of the turbines proposed for Spring Farm Ridge, this setback can be calculated as 175 metres. Turbine No 1 fails to meet this criterion since it would be no more than 160 metres from the highway boundary. It should be noted that this turbine would also be no more than 84.2m from footpath AN9, that is, well under fall over distance. (See Mr Hall's Proof of Evidence in respect of Public Rights of Way).

#### **A.14. Clear, continuous view of wind turbines.**

At Paragraph 3.15 of the WSP Appendix, it states: *"In the context of views of the site, drivers will have sight of the turbines from both directions. It is considered that wind farms are not an unusual sight within the landscape and that drivers would not be distracted by their presence. Clearly the Highways Agency does not preclude them from locations adjacent to motorways where there are far higher levels of vehicular traffic travelling at far higher speeds.* This is not a careful assessment of the situation as it exists on B4525 near to the proposed windfarm site but rather a very vague dismissal of any distraction ever being caused by wind turbines anywhere. This is clearly not the case, as set out by the recent DfT policy quoted above, there are places where wind turbines should simply not be located. There is no reference in the WSP Appendix to the unknown author having driven along the B4525. The reality is that when driving alongside the site there would be sudden views of turbines and their moving blades through gaps in tall hedgerows and they will be very close to the road. The statement that the Highways Agency does not object to them alongside motorways with traffic travelling much faster is irrelevant because their visibility on such roads is likely to be more continuous and unlikely to surprise. In the context of comparisons between wind turbines alongside motorways and minor rural roads it is worth noting that in the year 2010, 60.4% of road accident fatalities occurred on rural roads against 6.5% on motorways, the remainder being in urban areas (2011 Report on Rural Road Safety by the Royal Society for the Prevention of Accidents).

#### **A. 15. Particular Attention to the Driving Task.**

The B4525 is a direct link between the M40 at Banbury and the A43 at Syresham and therefore constitutes a much used short cut. It carries a lethal mixture of heavy goods vehicles, cars frequently travelling well above the speed limit despite two speed cameras in its relatively short length, large agricultural vehicles and occasional cyclists, horse riders and pedestrians. Many drivers clearly fail to moderate their speeds after leaving either of the two fast roads which it links. The B4525 is substandard in vertical and horizontal alignment with many known danger points, especially at road junctions with poor visibility and crossing points for horse riders and pedestrians. Roadside verges are narrow and carriageway edges often precipitous. The effective width is therefore less than at first apparent. A good deal of concentration is necessary to

negotiate it without mishap and the presence of a row of tall randomly moving objects close to it could cause a potentially disastrous lapse in attention. This is very clearly a situation in which: *“...wind turbines should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of road junctions, sharp or unexpected bends and crossings for pedestrians and cyclists.”*

#### A.16. Road Accident Records

The WSP Appendix makes reference to the *“Red Route Study”* undertaken by the local highway authority, Northamptonshire County Council. The study identifies and reviews the accidents that have occurred along the B4525 between its junction with A422 to the west and the village of Crowfield to the east between 2009 and 2012. The report is not attached to the WSP Appendix but various general references are made to it. I would comment on these as follows:

WSP *“The study considers that the number of accidents that have occurred along this section of road is above the national average for the this type of road.”* The full statement on this in the Red route Report reads *“The accident severity ratio for the study length is 52.94% which is above the national average of 18.63% for Rural roads (Non A Rural roads) (Road Casualties Great Britain 2009).”*

WSP *“..whilst it is evident that there has been a higher than average number of accidents along this route as a whole, there are no specific locations or junctions that would be considered an accident problem or 'black spot'. Clearly if this was the case then remedial measures would have been proposed.”* This statement indicates the author's failure to grasp the significance of the distribution of the recorded accidents in assessing the potential for driver distraction. It is simply not a question of remedial measures at one or two locations but rather the character of the road in the vicinity of the site. Indeed, the Red Route Report concludes that: *“... there are no perceived engineering improvements that can be made along this study route”* indicating that there is no way of mitigating the potential driver distraction clearly inherent in the windfarm proposal.

WSP *“...whilst there are a number of side road junctions or accesses along this stretch of the B4525, the accident records do not highlight a safety issue which might otherwise be exacerbated by the presence of the windfarm.”* On the contrary, I think that the unusually high number of accidents at the locations closest to the site indicates that the section of B4525 alongside the windfarm site comes into the Highways Agency definition of a situation where *“... turbines should not be provided where drivers need to pay attention to a particular driving task.”* I therefore attach at Appendix 1, the Red Route Report, at Appendix 2 an extract from the map in the Report showing the accident locations closest to the site and at Appendix 3 an extract from the report describing the relevant accidents with comments thereon.

The Red Route Report covers the period July 1<sup>st</sup> 2009 to July 1<sup>st</sup> 2012. Northamptonshire County Council has supplied more recent accident statistics for the period 1<sup>st</sup> October 2012 to 30<sup>th</sup> June 2013. One of these accidents was rated serious and another led to a fatality.

I have noted the location of 5 of these further accidents on the map in Appendix 2 with descriptions of the accidents at Appendix 4.

The documents supplied by the County Council containing these statistics are attached at Appendices 5 and 6.

I would submit that a careful consideration of the potential conflict of the proposed wind farm with the relevant DfT criteria set out above, coupled with a similarly careful analysis of the accident statistics given in the appendices will indicate that this is a location where “...*turbines should not be provided..*” in terms of latest Department for Transport advice.

I would further submit that this conclusion would be endorsed by driving the relevant section of the B4525 at a variety of times and visiting on foot the junctions with other roads, footpaths and byways.

Finally, I note that in her decision letter following the previous inquiry, Inspector Fieldhouse had this to say about the B4525:

*“..While I do not underestimate the concerns of local residents, the local highway authority raised no objection in principle and did not consider distraction to be a cause for concern. I have regard to the accident statistics submitted but no substantive reason is found to take a different view to the County Highway Authority regarding possible distraction to drivers.”*

In coming to this conclusion, Inspector Fieldhouse did not have the benefit of the Red Route Study, published in September 2012. Furthermore, the Northamptonshire County Council as highway authority have now objected to the proposal in principle, in a letter to the Planning Inspectorate dated 21<sup>st</sup> May 2013, as follows:

*“We fully support the views of the local residents who are against this proposal due to amenity and environmental impact and are pleased to note the representations previously made by this Council's Rights of Way Officer about the proposal's impact on Byway AM36 and thus on horses, riders and walkers.*

*We also share the concerns of the local residents about the potential for distraction from this proposal to drivers using the Welsh Lane. The B4525 is used as a key route between Northampton and Banbury and, from close inspection on site, has a relatively high number of vehicles travelling at speed on a road with many junctions in the vicinity of the site. This red route, which has an unfortunate record of a number of accidents, some of which have been fatal, is not a route where any encouragement should be permitted in terms of distractions to road users.”*

Quite apart from this telling decision to object on highway grounds by the local highway authority, the endorsement by the County Council of objections to the wind farm by local communities, Parish Councils and the District Council must be seen to weigh heavily against the proposal in the context of the government's commitment to a localism agenda, as stated by Energy Minister, Michael Fallon in June last, who said:

*“Today, we are putting local people at the heart of decision making on onshore wind....we are changing the balance to ensure that they are consulted earlier and have more say against poorly sited or inadequately justified turbines.”*

One of the key functions of a public local inquiry is to assess the legitimate views of the locally affected people. I would respectfully urge the Inspector take on board the wealth of local experience in respect of the inherent dangers related to the B4525 and to attach considerable weight to it in coming to a decision.

Colin Wootton (on behalf of Sulgrave Parish Council) September 2013