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PL32 9YF
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Re Planning Application 2008/01432

**ADJACENT LAND TO THE SOUTHWEST, DAVIDSTOW WOOD,
DAVIDSTOW**

Dear Tara Dickenson

I write, as Chairman of STINC, to firmly request the calling in of the decision by Cornwall Council Strategic Planning Committee to approve the above planning application. We believe that the Strategic Planning Committee have acted on false and misleading information, that the RSPB objection involves a lot more survey work to be done before they can assess the proposed mitigation, and the local planning approval procedure has been overruled.

1. False and unproven claim for displacement of 113,000 tonnes of CO₂ by wind generation per annum.

The reason for the need for wind turbines is that CO₂ is produced by conventional fossil-fuelled power stations and CO₂ is a greenhouse gas that is said to be causing global warming. The government is committed to reducing our dependence on fossil fuels and has set targets for use of renewable energy.

- Community Windpower Ltd state unequivocally that 113,000 tonnes of CO₂ will be displaced annually by the generation of electricity by the windfarm at Davidstow. The figure of 113,000 tonnes is exactly double the figure of 56,502 tonnes derived from using the BWEA¹ method of calculation which is itself theoretical and totally unproven.
- That “green” energy is going into the national grid is not in dispute but conventional power stations have to continue to operate to cope with the irregularities produced by the vagaries of the wind and have to be prepared to take over generation as the wind drops; the continued running on stand-by of the conventional power stations offsets that theoretical displacement of CO₂ by an indeterminate amount. In fact, the consensus of opinion in Germany and Denmark, where wind power forms a large part of their generating capacity, is that very little, if any, CO₂ is displaced by wind power. Flemming Nissen, the head of development at West Danish generating company ELSAM (one of Denmark’s largest energy utilities) tells us that “wind turbines do not reduce carbon dioxide emissions.” The German experience is no different. Der Spiegel reports that “Germany’s CO₂ emissions haven’t been reduced by even a single gram.”²

1. The British Wind Energy Association which represents the wind industry as a whole.

2. Financial Post, Comment 8 April 2009 (<http://network.nationalpost.com/np/blogs/fpcomment/archive/2009/04/08/wind-power-is-a-complete-disaster.aspx>)

- The planning officers have been duped into thinking that they are helping to reduce CO₂ emissions and save the planet by approving this 'green' power station.. It is a cruel irony that Cornwall's beautiful landscape and the safety of its precious birds and bats (amongst many other factors) would be sacrificed on the altar of saving the planet when in fact nothing of the kind was being achieved.

2. Unreliable data in Environmental Impact Statement (ES)

Starling roost.

- The very woods into which the windfarm is to be built has been the site of a huge starling roost for many years. When the Environmental Impact Statement (ES) was published in May 2008 (V1) it was considered by the local ornithological community to be incomplete and under-represent the presence of starlings during the winter months.
- A new version of the ES was issued in June 2009 (V2) in which substantial alterations had been made to the data for birds. These alterations comprised considerable increases to many of the records of bird numbers (for instance the numbers of starlings given for November 2006 and January 2007 had increased by about five times) and numbers originally given in 100s and 1000s appear in precise units e.g. starling numbers for Jan 2007 changed from 2500+ to 8765 and for Feb 2007 from 10,000+ to 12808, but the calculations of collision risk continued to be based on the original sets of figures.
- No explanation was given for these alterations which suggest that a hand neither familiar with carrying out bird surveys nor the mathematics involved had altered the figures to influence the planning decision.
- The percentage avoidance rate deemed appropriate for calculation of collision risk was also changed without any comment as to why. In V1 it was 99.5% and in V2 it was reduced to 98%. This increased the number of birds thought likely to be killed by a factor of four. So the expected starling fatalities were given in V1 as 4149 but in V2 as 16599. People who scrutinised and commented on the original ES would not have expected the data to change and so are quite likely to have missed this increase in possible fatalities.
- Mitigation of this large number of possible starling fatalities was neither proposed nor is possible.
- Were the Strategic Planning Committee aware that the number of starlings calculated to be killed every year had risen by a factor of four and was now 16599? Did they consider such a slaughter acceptable? Such mortality would be unacceptable for any species, let alone a bird on the Red List of Birds of Conservation Concern.
- My own estimation of the starling population, as an experienced bird surveyor, results in the possible starling mortality being nine times greater than that given. This would give rise to a potential collision rate of 145,776 p.a.
- I have been in contact with the author of the bird report in the ES and Cornwall Environmental Consultants Ltd and no explanation has been offered as to the change of data. I can only suggest to the Secretary of State that the alteration of data after

the original publication of the ES was intended to influence the planning process by the fraudulent use of imaginary figures.

- Would the Secretary of State investigate this alteration of the data to establish whether Community Windpower Ltd has been wittingly massaging the data to reduce criticism of the survey and fraudulently influence the planning decision?

Golden plover and gulls

- The validity of the ES is further called into question in that important areas frequently used by golden plover within 500m of turbines have not been identified and this in turn calls into question any conclusions that have been based upon that ES.
- Added to this, the survey visits having been only at dawn and dusk have resulted in many bird movements on the site being unrecorded. In particular, large numbers of golden plover may be seen in the air around the site and coming in to feed during the day (the shooting of golden plover on and around the site only takes place during the day).
- Likewise large movements of herring gulls (now placed on the Red list of birds of Conservation Concern) have been totally overlooked. The black-headed, lesser black-backed gull and greater black-backed gull likewise use the reservoir and fly to and fro during the day across the site (only the black-headed gull was noticed in the survey); these three species are all on the Amber list of Birds of Conservation Concern.
- It should be known that there is a conflict of interest in that the originator of the bird data in the ES is also warden of the Maer Lake reserve which has been offered money to purchase additional land to extend the reserve, purportedly to provide mitigation for the loss to the golden plover population of suitable feeding land by the development and operation of the proposed windfarm.

3. Deceptive minimisation of landscape impact

- The impact of the turbines on the landscape has been deceptively minimised by the unprofessional, distorted and completely inadequate photomontage visualisations presented by Community Windpower Ltd. The images submitted do not conform to the guidelines for such images as requested by the council nor with widely accepted and established conventions within the wind power industry. They completely fail to give any true sense of scale and imposition in the landscape in such close proximity to Roughtor, Brown Willy and the moors and surrounding rural landscape in general.
- Would the Secretary of State ensure that the applicant provides simple single frame images at A4 or A3 at 50mm and 70/75mm focal length, in line with the draft Highland Council Standards before further consideration is given to this application.

4. RSPB objection

- The RSPB have criticised the planning application not only on the potential adverse effects on golden plover, but also on the validity of the mitigation proposed by Community Windpower Ltd. They do not see the designation of a few fields that will not be shot over in the future as any valid provision of mitigation. They have indicated that much wider surveys will need to be carried out on the present

occupation of areas by golden plover and on the proposed areas both by day and by night throughout the winter before any proposals can be made to mitigate the intrusion on those areas that the windfarm would introduce. They have also indicated that new or increased use of the areas set aside and managed for mitigation would need to be established before such areas could be viewed as in any way providing mitigation to the presence of the windfarm.

- On the date of this letter, 1000 golden plover were seen using some of the Roughtor farm fields, such fields cannot therefore be viewed as providing new areas for mitigation.

5. Planning procedure and renewable energy alternatives.

- The local residents and their representatives, the local councils, as guardians of the environs in which they are set, have, along with all advisory bodies interested in the area, ruled against this imposition of a huge industrial development in an area with such a unique landscape and particular importance to wildlife on a regional and national scale. Why have out-of-area councillors been allowed to overturn it?

- Whatever the pros and cons of meeting non-fossil fuel energy generation obligations using wind turbines it is clear that many people – both those who are opposed to wind turbines in general and those who favour them to various degrees - are generally of one voice that the scale and location of what Community Windpower Ltd are proposing at Davidstow is completely unacceptable given the AONB status and cultural heritage character and social and tourist values of the surrounding landscape.

- Such valuable landscape and cultural assets should not be squandered to such massive industrial intrusion until all other alternative locations and technological solutions have been fully explored and utilized. Have Cornwall Council explored all other alternatives?

As Chairman of Stop Turbines In North Cornwall, I ask you, on behalf of our members and those many people who share our opposition to wind turbines in this particular location, to fully implement the ‘Call In’ procedure and take it to a final conclusion of unequivocal and outright refusal.

Yours sincerely

Arthur Boyt
Chairman, Stop Turbines In North Cornwall