



9 March 2015



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**Submitted by post and e-mail to:**  
[chair@ndp.chelveston.org.uk](mailto:chair@ndp.chelveston.org.uk)

Dear Mr Seaman,

## **DRAFT CHELVESTON-CUM-CALDECOTT NEIGHBOURHOOD PLAN (JANUARY 2015)**

We write on behalf of Chelveston Renewable Energy Ltd in response to the draft Chelveston-Cum-Caldecott Neighbourhood Plan consultation (January 2015). This letter sets out our clients' formal objections to/representations concerning the draft Plan.

### **1. The Site**

As you will be well aware, Chelveston Renewable Energy Park occupies the site of the former Chelveston Airfield, which was established in 1941 as a gunnery school, then used as a heavy bomber airfield with long runways during World War II, and adapted to accommodate nuclear bombers and use by the US Airforce thereafter. In 1977 the site was adapted to use as a radio transmitter site, with many tall radio aerials being constructed. In 2005 the Ministry of Defence (MOD) sold the site to Chelveston Renewable Energy Ltd.

The former Airfield site now accommodates the highly successful Chelveston Renewable Energy Park, which comprises operations for large scale renewable energy generation, including nine wind turbines and approximately 250,000 solar panels. The site has planning permission for an anaerobic digestion plant for the processing of food waste, and for three bio-diesel generators, located in buildings at the centre of the site. The digestion plant building and some of the other buildings are currently used by the District Council's contractors as a base for waste collection services. Chelveston Renewable Energy Park generates significant amounts of renewable energy, which feed into the grid, resulting in major reductions in CO<sub>2</sub> emissions in line with the aspirations of Central Government policy.

In addition, a specialised training facility for Northamptonshire Fire and Rescue Service is located on the site. There are a number of buildings associated with the site's historic uses, and some of the land is used for grazing. Trees along the northern and south-eastern boundaries of the site screen views into it from these directions. Tree planting has also taken place to provide additional screening along the western boundary. A number of public rights of way cross the site.



The south-western part of the site was previously developed with military barracks. Many of the buildings have been demolished in recent years, but the former officer accommodation at Chelston Rise remains, now in separate ownership.

## 2. National and Local Planning Policy Context

The National Planning Policy Framework (NPPF) (2012) places a strong emphasis upon renewable energy generation. **Para. 17** states that core land-use planning principles which should underpin both plan-making and decision-taking include:

- Neighbourhood plans to set out a positive vision for the future of their area; and
- Support for the transition to a low carbon future in a changing climate; and encouragement of the use of renewable resources, for example, by the development of renewable energy.

**Para. 93** states that the delivery of renewable and low carbon energy and associated infrastructure is central to the economic, social and environmental dimensions of sustainable development. **Para. 97** states that planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. It seeks for policies to maximise renewable and low carbon energy development; consider identifying suitable areas for renewable and low carbon energy sources; and support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.

**Para. 98** further states that when determining planning applications, local planning authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy.

With regard to local planning policy relating to the eastern part of the site, **Policy CP26** of the adopted Bedford Development Framework (2008) seeks for the supply of at least 10% of energy consumed in new developments to be provided from renewable sources. With regard to the western part of the site, **Policy 14** of the adopted North Northamptonshire Core Spatial Strategy (2008) is of relevance. This replicates BBC's **Policy CP26** and further states that, across North Northamptonshire, which includes the administrative areas of East Northamptonshire (within which the western part of the site falls), Corby, Kettering and Wellingborough, at least 30% of the demand for energy will be met through renewable sources.

We further note that **Policy 26** of the draft North Northamptonshire Joint Core Strategy (JCS) Pre-Submission Plan (January 2015), which is currently out for consultation, supports proposals for renewable and low carbon energy generation. Please note that we have also submitted representations to the draft JCS on behalf of Chelveston Renewable Energy Ltd.

## 3. Previous Representations

Chelveston Renewable Energy Ltd submitted representations to the previous draft of the CPC Neighbourhood Plan to promote provision for additional renewable energy development at Chelveston Energy Park, and to request that the Renewable Energy Site designation cover the whole of the former airfield.

This was on the grounds that: the site is well suited to such operations; there is potential for a further increase in renewable energy generation on the site in accordance with the aspirations of national government policy;



and channelling additional renewable energy into the grid will result in significant benefits to society, through reductions in CO<sub>2</sub> emissions.

The representations also sought the allocation of the land adjacent to Chelston Rise for employment and/or residential development to meet local employment and housing needs.

#### 4. Response to Draft Neighbourhood Plan (January 2015)

We provide our clients' representations in response to the draft CPC Neighbourhood Plan (January 2015) consultation document below.

They welcome the in-principle support expressed in Policy REN for the generation of electricity from renewable resources.

They **object** to the delineation of the Renewable Energy Site on the map at page 79, on the basis that there is no reason why the Site should not cover the whole of the brownfield land comprising the former airfield, and that the exclusion of some of this land could have the effect of limiting the potential of the Renewable Energy Park, which is an asset of national as well as local importance. In particular, while they welcome the abandonment of the sterilisation zone shown in the previous draft of the plan adjacent to Chelston Rise, the land south-west of footpath MM16 is still implicitly given a special status which is not properly explained and is not in our opinion justified. This objection embraces the second sub-para iii in Policy REN, and Policy REN1 H.

They **object** to the treatment of the former airfield as greenfield land, as per paras A, B and C of Policy REN1. The former airfield is plainly brownfield in nature, due to partly to its historical use, of which various evidence remains to be seen; and partly to the fact that the site is occupied by many modern structures. The fact that many of the modern structures are conditioned to be removed after 25 years does not make the site a greenfield site (even if the historical use is disregarded); at the very least, these structures are causing the site to appear 'brown' rather than 'green' to a generation of people, and the future of the site in 25 years time can only be a matter for conjecture. We regard this proposed categorisation of the site as legally challengeable.

They welcome the opportunity to work with the Parish Council to protect/enhance the rights of way network, and propose that the Plan should make specific provision for BWY18 to be made safer and more amenable for pedestrians, equestrians and cyclists by their route being physically segregated from the parallel route used by motor vehicles.

They **object** to REN1 E insofar as we consider the Plan should make provision for employment and commercial activities which support the Renewable Energy Park, and thus help to maximise the contribution it is able to make to achieving national and local objectives.

They **object** to REN1 Gi and ii. The development management system will ensure that any proposed new buildings/structures will necessarily be examined as to their effect on the rural landscape. It is unnecessarily prescriptive and restrictive to impose a ban on new buildings and an arbitrary height limit on new structures.

With regard to land adjacent to Chelston Rise, we note that draft **Policy H4i** seeks for development at Chelston Rise to be strictly controlled to preserve the *"unique character of the site"* and that new



developments will only be permitted within the Chelston Rise settlement boundary i.e. on the brownfield land currently occupied by the former officer accommodation, as defined in **Policy H1a**.

By way of justification, the supporting text on page 47 considers that the:

*“Clean separation of Chelston Rise from the surrounding landscape is an important characteristic of the site, reflecting the historical need for it to be well guarded during the Cold War and post 9/11 under American occupation ... The properties are potentially “sensitive receptors” for ... the renewable energy facilities on the former Chelveston Airfield ... Development on green-field or naturalised green-field sites around Chelston Rise... will therefore be resisted, unless it can be demonstrated that the impact on the amenity of residents can be effectively mitigated ... it is ... appropriate to provide a buffer of agricultural land around the settlement.”*

Our clients **object** to the approach taken in the draft plan, and request that it be reviewed. There is no valid planning reason why Chelston Rise should be separated from other compatible development, and the enlargement of the settlement would have the positive planning benefit of making the settlement more sustainable by creating a catchment population better able to support local services, and potentially by accommodating living and working places within the same settlement. Such development would also assist in meeting local housing and employment needs in accordance with the requirements of local and national planning policy. The obvious direction for further development is south-eastwards, onto the brownfield land that until relatively recently was occupied by barracks.

Although not part of policy, our clients also **object** to the reference to maintaining a buffer of agricultural land around Chelston Rise. We accept that Chelston Rise is as sensitive a receptor as any residential area, and that any potential adverse impact upon amenity should be mitigated, but there is no valid planning justification for implying that this housing area is especially sensitive as a receptor, or for stating that a buffer of agricultural land should be maintained.

## 5. Conclusion

Overall, Chelveston Renewable Energy Ltd welcome the draft Neighbourhood Plan's general support for renewable energy generation at Chelveston Renewable Energy Park. However, we consider that in order to comply with national and local planning policy, it is essential for the above policy changes to be made to ensure that renewable energy generation is optimised and not overly constrained.

We trust that this letter clearly sets out our response and **objections** to the draft Neighbourhood Plan consultation. Please feel free to contact either myself or my colleague Roger Hepher, on 020 3320 8270 or at [rhepher@savills.com](mailto:rhepher@savills.com), should you wish to discuss.

Yours faithfully

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Senior Planner

cc. David Wykes, Chelveston Renewable Energy Ltd