



Clean Earth Energy
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Dear Stephen,

I am writing to formally request a modification to the planning application for the repowering of Bears Down Wind Farm (Ref: PA23/10324).

The request seeks to reduce the number of proposed wind turbines from five to four – with the specific removal of Turbine T1. This change reflects our commitment to balancing renewable energy development with the interests of the local community, environment and technical considerations.

This letter provides a summary of the reports referenced above and outlines the benefits of the proposed modification.

In support of the modification, CE will submit the following information, appended to this covering letter.

- Appendix 1- Revised site layout plan.
- Appendix 2- Landscape statement, including full suite of revised visuals.
- Appendix 3- Revised ecological impact assessment, including revised BNG.
- Appendix 4- Heritage supporting statement.
- Appendix 5- Operational noise supporting statement.
- Appendix 6- Revised flood risk assessment and SuDS design.
- Appendix 7- Revised construction traffic management plan (CTMP)
- Appendix 8- Revised shadow flicker assessment.

A revised Environmental Statement (ES) will be resubmitted for completeness.

The modification will be notified to the five local parish councils (St Ervan, St Mawgan, St Eval, St Issey and St Columb Major) and the residents that were originally consulted as part of the initial planning application consultation efforts.

The notification will be achieved through a letter drop to households within a 1.5 km radius of the proposed turbines, as well as the attendance at parish council meetings.



1. The Proposed Modification

The proposed modification seeks to reduce the proposed development from five wind turbines to four wind turbines. The wind turbine to be removed is referred to as Turbine 1 (T1) – which is the most westerly sited wind turbine.

The proposed wind turbines are centred on the National Grid References listed below – no modification these coordinates is being proposed. Please note that the original turbine numbering has been retained for the remaining four wind turbines.

Turbine	Easting	Northing
Turbine 2 (T2)	190085	067724
Turbine 3 (T3)	190317	067396
Turbine 4 (T4)	190482	067727
Turbine 5 (T5)	190670	067470

The existing Bears Down wind farm generates approximately 19,000MWh per year¹, powering the equivalent of 4,200 Cornish homes². The modified proposed scheme will generate approximately 68,000MWh per year – the equivalent of powering 15,000 Cornish homes².

The modified proposal represents a more than 250% increase in renewable energy generation within the site, which will contribute significantly to Cornwall's renewable energy transition targets. Additionally, the scheme is expected to offset around 550,000 metric tonnes of carbon emissions over its operational life.

The revised proposal will retain the same entrance point, construction compound and access tracks, with no changes to the red line boundary. The modification only relates to the removal of turbine T1 and its associated infrastructure. The modification is reflected on the location plan in **Appendix 1**.

2. Landscape and Visual Impact

The modified proposal has been reviewed by Amalgam Landscapes to assess the anticipated improvements to landscape and visual impact as a result of the removal of Turbine T1.

All associated landscape material has been updated to reflect the revised scheme – see **Appendix 2**. The updated material demonstrates a reduction in turbine visibility, particularly from the western views assessed.

¹ <https://ref.org.uk/generators/view.php?id=R00052RQEN>

² <https://www.gov.uk/government/statistics/regional-and-local-authority-electricity-consumption-statistics>

An addendum to the original Landscape and Visual Impact Assessment (LVIA) supports the modified proposal and provides a detailed comparative analysis of the visual and landscape effects between the original and revised scheme. The addendum can be found in **Appendix 2**.

In summary, the reduction in turbine numbers is expected to result in a notable improvement in landscape and visual impact. The removal of the westernmost turbine will make the proposed development more ‘compact’ thereby reducing its influence on the surrounding landscape.

3. Ecology

Western Ecology have assessed the modified proposal and provided updated associated material for consideration. The Ecological Impact Assessment (EclA) and associated reports, including the Biodiversity Net Gain (BNG) will support the proposal - see **Appendix 3**.

The original EclA concluded that residual impacts on valued ecological receptors during both construction and operational phases would be minimal, with no significant effects identified. This conclusion remains unchanged, with no significant ecological effects anticipated by virtue of the modified proposal.

The reduction in turbine numbers has led to a decrease in anticipated collision risk on site. For most target species, the estimated collision risk is now fewer than one individual per annum, which is considered a negligible impact on local populations.

4. Heritage

Southwest Archaeology Ltd has reviewed the modified proposal to confirm the conclusions of the original Heritage Impact Assessment (HIA), along with its subsequent addendums, remains valid.

The review determined that while the visual impact of four turbines on surrounding heritage assets would be broadly like the original scheme, the reduced spread of the proposed wind farm offers a modest overall benefit. This benefit is most pronounced for heritage asset’s location closest to the site.

From an archaeological standpoint, the reduction in the number of turbines, and consequently associated infrastructure, effectively eliminates the minor risk of accidental disturbance to the two scheduled monuments situated within the same agricultural field as T1.

The full review, including ZTV analysis and interpretation of geophysical survey data, is provided in **Appendix 4**.

5. Operational Noise

TNEI Services Ltd have conducted a review of the modified proposal. Noise predictions at all receptors and supporting statement can be found in **Appendix 5**.

The modified proposal results in lower predicted noise levels compared to the original proposed scheme. The most significant reductions, of up to 4db, are observed at receptors to the west of the site (NAL1 and NAL2).

6. Flood Risk Assessment

Engineering and Development Solutions have provided an updated Flood Risk Assessment (FRA) to reflect the modified proposal.

The revised design confirms that there will be no increase in surface water runoff or flood risk to surrounding areas. See relevant reports in **Appendix 6**.

The conclusions of the updated assessment are clear: there is an improvement to the conclusions of the residual flood risk assessment associated with the proposed development, and no adverse effects are anticipated on local watercourses or neighbouring land.

7. Construction Traffic

The original proposal was assessed for potential construction traffic impacts and was not considered to result in any significant effects - minor impacts identified were expected to be limited to a short, localised period.

The modified proposal does not seek to change the construction traffic or abnormal load delivery routes. However, due to the reduction in the number of turbines and associated infrastructure, there is an anticipated decrease in the amount of abnormal load deliveries required.

The modified scheme represents an improvement in terms of traffic impact. See full report in **Appendix 7**.

8. Shadow Flicker

A revised shadow flicker assessment has been prepared to support the proposed modification.

The removal of Turbine 1 (T1) has significantly reduced the potential shadow flicker impact zone, eliminating 186 properties from the theoretical area of effect. The updated assessment now identifies 24 residential properties within the revised study area.

As previously explained, the proposed turbines will be equipped with software that enables automatic shutdown during specific times of day, should a valid shadow flicker complaint be received – ensuring that any potential shadow flicker effects can be fully mitigated.

The revised assessment and associated methodology can be found in **Appendix 8**.

Conclusion

In summary, the modified proposal represents a balanced and carefully considered response to technical assessments and community feedback received during the planning process.



The revised proposal results in an improvement to - and reduction of - landscape, visual and noise impacts associated with the scheme.

The modified scheme continues to make a significant contribution to Cornwall's renewable energy targets, with a substantial increase in clean energy generation associated with the existing development site.

We trust that the enclosed documentation provides a comprehensive justification for the proposed modification.

Kind Regards,

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