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**ELECTRICITY ACT 1989 (SECTION 36 AND SCHEDULE 8)
TOWN AND COUNTRY PLANNING ACT 1990 (SECTION 90)
THE ELECTRICITY GENERATING STATIONS AND OVERHEAD LINES (INQUIRIES
PROCEDURE) (ENGLAND AND WALES) RULES 2007**

**PUBLIC INQUIRY TO CONSIDER SECTION 36 ELECTRICITY ACT 1989
APPLICATION BY NPOWER RENEWABLES LIMITED FOR CONSENT AND DEEMED
PLANNING PERMISSION TO CONSTRUCT AND OPERATE A WIND FARM AT
NORTH CHARLTON, ALNWICK, NORTHUMBERLAND (KNOWN AS MIDDLEMOOR)**

Rebuttal Evidence of

Donald Paul Bennett

**BSc(Hons) CEng MICE MIHT
Mouchel Parkman**

(Re-Robert JF Thorp evidence)

on behalf of
Npower Renewables

BERR REFERENCE: GDBC/001/00245C

ALNWICK COUNCIL REFERENCE: ELEC/2005/0004

16 OCTOBER 2007 FOR INQUIRY COMMENCING 13 NOVEMBER 2007



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1 Rebuttal

1.1 Introduction

- 1.1.1 I have read the evidence of Robert J F Thorp and note that at paragraph 9 he states:

“Road Safety is a subject of concern and EIS statistics are minimal. The Inspector should have more long term details including the death of six people in 1993 and three more in May 2000. At 200 yards north of Charlton Moor directly in site of the proposed turbines.”

- 1.1.2 In the paragraphs that follow I address these points raised by Mr Thorp. Other aspects of Mr Thorp’s evidence will be addressed by other witnesses.

1.2 Accident Statistics

- 1.2.1 Road traffic accidents are considered a random event by their very nature and therefore exhibit fluctuations of incidence and type. It is normal practice in accident investigation to use a 3- or 5-year period in order to minimise the effect of these random fluctuations. An appropriate source for direction for Accident Analysis is the DfT’s Road Safety Good Practice Guide¹ which advises at paragraph 18:

“18 If accident numbers are high (hundreds or thousands) then one year’s data may be sufficient. However, if numbers are small and the data are broken down further into small groups by type of accident, for example, then the data will vary too much between years or sites for meaningful comparisons to be made and may be misleading. Much more than three to five years’ data will lead to a tendency for changes in flow and significant changes in the network to affect the accident picture.”

- 1.2.2 My evidence sets out the results of my review of personal injury accidents on the A1(T) 10km either side of the site - the section of the A1(T) where the wind farm or parts of it may be visible to drivers over a 5 year period – 2002 to 2007.
- 1.2.3 Accident and traffic flow data was obtained from the Highways Agency, which showed that a total of 46 accidents were recorded in the period 2002-07. The average accident rate is lower than the national average for similar road types. There have been no accidents at the North Charlton junction within the 5-year study period.

¹ DfT Road Safety Good Practice Guide: <http://www.dft.gov.uk/pgr/roadsafety/lguidance/roadsafetygoodpracticeguide>

1.2.4 I therefore do not consider that roads in the vicinity of the site to be particularly hazardous. After detailed consideration of the proposals, neither the HA nor NCC has objected to the proposed wind farm.

1.3 Conclusion

1.3.1 Mr Thorp puts forward 2 incidents that occurred in 1993 and 2000, inferring that this section of A1 is particularly hazardous and that the proposed wind farm would exacerbate the alleged problem. He does this without any consideration of the cause of the accidents or the possible changes in highway layout, signing and traffic densities that may have occurred in the intervening period.

1.3.2 My own detailed investigation of accident records, covering a 5-year period and a 20km section of the A1, demonstrates that there are no particular road safety concerns with the A1 in the vicinity of the proposed wind farm.