

BULLINGTON CROSS WIND FARM

**A RESPONSE TO SUPPLEMENTARY
ENVIRONMENTAL INFORMATION FROM EDF**

BY

KEEP HAMPSHIRE GREEN

**Winchester City Council Reference: 13/00800/FUL
Basingstoke and Deane Borough Council: 13/00046/FUL
Test Valley Borough Council: 13/000753/FULN**

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1 Introduction

- 1.1 EDF Energy Renewables (EDF) supplied further Supplementary Environmental Information (SEI) at the end of November 2013 in support of their original planning applications for the construction of a wind farm of 14 turbines on land to the north-east of the Bullington Cross interchange, adjacent to the A34 and the A303. This SEI was produced in response to issues raised by both statutory consultees, non-statutory consultees and other interested parties.
- 1.2 This response by Keep Hampshire Green is solely related to the contents of the SEI. It does not replace the original objection document submitted by KHG in June 2013 and should be read alongside that document. The original arguments raised by KHG in that submission remain valid, except where identified in this response, and are not in any way superseded by this further response which has only been produced as a direct result of EDF's submission of the SEI.
- 1.3 The sections in the SEI on landscape and visual impact and ecology have been reviewed by the independent consultants who produced the sections in KHG's original objection. Reports have been produced by these consultants which are attached as appendices to this document and should be read in full.

2 Planning Policy

Planning Practice Guidance for Renewable and Low Carbon Energy (July 2013)

- 2.1 At the time of the initial KHG objection this guidance had not been issued but ministerial statements had said that it would be issued imminently.

Thus Eric Pickles, Secretary of State for Communities and Local Government, said:

“We want to give local communities a greater say on planning, to give greater weight to the protection of landscape, heritage and local amenity.”

- 2.2 This is a major shift in policy and puts the opinions of local communities right at the forefront of determining the acceptability of any onshore wind turbine planning application. The guidance¹ was subsequently issued at the end of July and replaces the Companion Guide to PPS 22.
- 2.3 The guidance reinforces the issue that there is no overriding need for renewable energy, saying²:

¹ Planning Practice Guidance for Renewable and Low Carbon Energy ; DCLG

² Ibid - Para 5

The NPPF explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities. As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them.

This represents a major change in planning policy reinforcing the primacy of the local development plan and increasing the weight that should be given to the opinions of the local people directly affected by any proposed development.

- 2.4 The situation has moved on since KHG's previous objection and it is instructive to consider the situation post the guidance.
- 2.5 In a written ministerial statement in October 2013 the Secretary of State for Communities and Local Government announced that for a period of six months he was revising the appeals recovery criteria to enable him to understand how the new guidance was being implemented. The Ministerial Statement said:

My Department published new planning practice guidance in the summer to help ensure the planning concerns raised by local communities are given proper weight in planning decisions on onshore renewable energy. The National Planning Policy Framework includes strong protections for the natural and historic environment. Yet, some local communities have genuine concerns that when it comes to developments such as wind turbines and solar farms insufficient weight is being given to local environmental considerations like landscape, heritage and local amenity. The new guidance makes it clear that the need for renewable energy does not automatically override environmental protections and the views of local communities should be listened to.

I want to give particular scrutiny to planning appeals involving renewable energy developments so that I can consider the extent to which the new practice guidance is meeting the Government's intentions. To this end, I am hereby revising the appeals recovery criteria and will consider for recovery appeals for renewable energy developments.

This is clear recognition that the new planning guidance should have a significant impact and directly affect decisions. The decisions of the Secretary of State in these recovered appeals will be the clearest indication of how the new guidance should be applied.

- 2.6 One of the first decisions³ by the SoS in a recovered renewable energy appeal was for a proposed 24MW solar farm which was an increase in capacity of 10MW of an already approved scheme. The Inspector

³ APP/T3535/A/13/2193543

recommended approval of the appeal considering that the scheme would create no significant harm. The SoS whilst agreeing with the Inspector in all his conclusions regarding the limited harm nevertheless refused the appeal. The decision notice states in its conclusions⁴:

Bearing in mind his conclusions that the local environmental benefits of the appeal scheme are comparable to those provided by the permitted scheme, and the economic benefits are limited, the Secretary of State considers there to be two key differences between the appeal scheme and permitted proposals.

Firstly, he recognises that the appeal scheme would generate a larger amount of renewable energy, although he has also taken into consideration that this should not automatically override environmental protections and the planning concerns of local communities, as set out in paragraph 5 of the Guidance.

Secondly, the Secretary of State recognises that the limited harm caused by the appeal scheme is greater than the very limited harm that would be caused by the permitted scheme, and, in addition, would include harm to the character and appearance of the HTCLA, which policy DM27 of the development plan seeks to protect. He is aware that the impact on the character and appearance of the area, in particular the HTCLA, was commonly referred to in the representations of local residents and, in line with paragraphs 5 and 8 of the Guidance, he has regard to these concerns.

Overall, the Secretary of State considers that, in this case, the increase in the amount of renewable energy generated by the appeal scheme does not outweigh the additional harm caused to the character and appearance of the area, including the additional harm caused to the character and appearance of the HTCLA, which is protected by development plan policy. Given this and the concerns of local residents, he considers this harm to be unacceptable

- 2.7 There can be no clearer evidence that the new guidance had a major impact in the way that the SoS weighed up the planning balance. The references in the conclusions to the concerns of the local residents show that these are a material issue and did indeed alter the planning balance. If a renewable energy scheme with an incremental installed capacity of 10MW but with no significant harm caused should be refused then this scheme with the significant harm in many areas, identified in our original objection must also be refused.
- 2.8 With an Inspector approving an appeal, even taking into account the new planning guidance, and then being overruled by the SoS on the basis of the Government's intentions for the guidance, even after admitting that there would be no significant harm caused, it is absolutely clear that the new planning guidance does alter the planning balance as we have argued. The

⁴ Paras - 29/30

conclusions of the Secretary of State have greater importance than those of individual Inspectors.

- 2.9 It should also be noted that the recent 5% reduction in onshore tariffs in favour of offshore wind reflects the Government's response to mounting public concern about the proliferation of onshore wind turbines. The impact of the recently issued Electricity Market Reform Delivery Plan is discussed below in the section on need.

Basingstoke & Deane Local Plan Pre-Submission Draft Document

- 2.10 In our original objection we referred to the fact that the Basingstoke and Deane Borough Council's LDF Core Strategy had been quashed in the courts. Since then a new Pre-Submission Local Plan has been published and has gone through an initial public consultation prior to its submission to the Secretary of State and its Examination in Public. Given the early stage in its progress to adoption this document can be given little weight. It does, however, represent the latest thinking of the Council and indicates a proposed direction of travel for the district.
- 2.11 In Section 6 - Environmental Management and Climate Change - the first paragraph⁵ reinforces the overall ambition of the Local Plan to protect the existing environment whilst meeting the area's social and economic needs. It states that the high quality built and natural environment contributes towards the quality of life and wellbeing of the borough's residents and that consultation highlights the importance that local residents attach to protecting such assets and minimising the impact of change.
- 2.12 This underlying principle is expressed in Policy EM1:

Development will be permitted only where it can be demonstrated, through an appropriate assessment, that the proposals are sympathetic to the character and visual quality of the area concerned. Development proposals must respect, enhance and not be detrimental to the landscape likely to be affected, paying particular regard to:

a) The particular qualities identified within the current landscape character assessment and any subsequent updates or relevant guidance;

b) The visual amenity and scenic quality

c) The setting of a settlement, including important views to, across, within and out of settlements

d) The local character of buildings and settlements, including important open areas;

e) Trees, hedgerows, water features such as rivers, ancient woodland and

⁵ BDBC - Pre-Submission Local Plan - Para 6.2

other landscape elements and features;

f) Historic landscapes, parks and gardens and features; and

g) The character of the borough's rivers and tributaries, including the River Loddon and Test, which should be safeguarded.

Development proposals must also respect the sense of place, sense of tranquillity or remoteness, and the quiet enjoyment of the landscape from public rights of way. Development proposals will not be accepted unless they maintain the integrity of existing settlements and prevent their coalescence...

Designation of the North Wessex Downs Area of Outstanding Natural Beauty reflects the national importance of that landscape and its setting. Development proposals in the AONB will also be determined in accordance with national planning policy and criteria set out in the North Wessex Downs AONB Management Plan.

- 2.13 It is clear from the wording of this policy and the supporting text, which stresses⁶ that attractive environments are essential to the Borough's tourism industry and to the wider economic objectives as well as the health and wellbeing of its residents, that the conservation and indeed enhancement of the landscape is crucial. The policy specifically refers to the sense of space, sense of tranquillity or remoteness and the quiet enjoyment of the landscape from the public rights of way.. A fourteen turbine wind farm stretching over a considerable distance will degrade the landscape, tranquillity and sense of remoteness and will be in conflict with Policy EM1
- 2.14 Policy EM4 on biodiversity and nature conservation states that development proposals will only be permitted where it can be clearly demonstrated that there will be no significant impact on the conservation status of key species.
- 2.15 There is a specific policy EM8 relating to renewable and low carbon energy generation which states that such proposals will be permitted unless there are adverse environmental, social and economic impacts, including long-term and cumulative adverse impacts which are not outweighed by the benefits. So this policy is compatible with the NPPF containing as it does the necessary balancing exercise. We have shown in our previous objection that this balancing exercise is weighted overwhelmingly in favour of rejection.
- 2.16 Policy EM10 on delivering high quality development requires development proposals to respect the local environment and amenities of neighbouring properties.
- 2.17 Policy EM11 on the historic environment says that all development must preserve or enhance the quality of the borough's historic environment

⁶ BDBC - Pre-Submission Local plan - Para 6.9

3 Need for the Development

- 3.1 The SEI states⁷ that the need for the development is explained in the Updated Planning Statement and this section remains the same as in the original ES.
- 3.2 The main argument used in the SEI against KHG's contention that onshore wind is well on its way to achieving its part in the 2020 targets is that the figure of 13GW of capacity for onshore wind by 2020 is not an absolute limit and that KHG have misunderstood this. KHG agree that the 13GW is not an absolute limit and represents the projected requirement as at December 2012 to meet the UK renewable energy target for 2020, as we stated in our original objection. However, there is a limit placed on the amount of renewable electricity that can be generated through the Levy Control Framework (LCF) included as part of the Electricity Market Reform Delivery Plan.
- 3.3 The LCF allows Government to control public expenditure paid for through consumers' energy bills, and reflects the importance Government places on monitoring and controlling spending on levy schemes that are funded in this way. Commercial scale onshore wind farms, such as this one, fall under the LCF which limits spending to £7.6bn in 2020/2021 (in real 2011/2012 prices). To control the overall spending Government sets CfD strike prices for each renewable energy technology and these have been published for 2014/15 to 2018/19. Onshore wind reduces from £95/MWh to £90/MWh over this period.
- 3.4 These strike prices are used to model⁸, together with expected deployment rates, the contribution of renewable energy to the electricity system by 2020. The central forecast for renewable energy generation shows an increase from 32% to around 33% of total generation. The contribution of onshore wind is 11-13GW, a reduction from the 10-19GW which lead to the adoption of the 13GW figure. Thus the 13GW figure now represents the top end of the range of estimates rather than towards the bottom end.
- 3.5 The SEI then says⁹ that *comments that suggest that the national targets for onshore will be reached by 2020 are highly optimistic* referring to the need for a compounded increase every year. It appears to justify this by saying that in the final two years up to 2020 the UK must produce an increase in its energy from renewables which is greater than the total amount which is being generated from all renewable sources at the present time.
- 3.6 This is not surprising and is totally in line with the current rate of progress. The 2013 UK Renewable Energy Roadmap Update 2013, which is the most up to date analysis of the situation being issued in November 2013, says in the Ministerial Foreword:

⁷ SEI - Vol1 - Para 4.6

⁸ Electricity Market Reform Delivery Plan - Dec 2013 - Paras 64-77

⁹ SEI - Paras 4.8/9

Since the publication of the last Update in 2012, the UK has made very good progress towards our challenging 2020 renewables targets, to deliver 15% of our energy demand from renewable sources. We are fully committed to achieving this target and have seen a significant amount of deployment to date, particularly in the renewable electricity sector. This was demonstrated in 2012 when more than 4% of the UK's energy came from renewable sources - above our interim target. We will continue to monitor our progress towards the target, ensuring that we have measures in place to reach our goal.

We are continuing to make excellent progress in the deployment of renewable electricity across the UK. In Quarter 2 of 2013, renewables accounted for a record 15.5% of all electricity generated. Overall capacity has grown by 38% over the period July 2012 to June 2013 and now stands at 19.5GW.

*We recognise that some individuals and communities are concerned about the siting of particular renewable energy projects. An important part of this Update concerns our plans for community energy and the work we are doing to strengthen engagement, enhance local benefits, and promote community ownership. **We are clear that if renewable energy is to be truly successful it must be truly sustainable, not only economically and environmentally, but also socially.***

The 2013 Roadmap Update¹⁰ shows that there is currently 16.1GW of onshore wind farm capacity in the planning system, well above the 13GW requirement.

- 3.7 It is interesting to note that in their litany of potential problems EDF made no mention of the rapid growth of solar (70% in the last year) even though KHG highlighted its increasing usage and its lower environmental impacts. This is particularly pertinent in the south of the country where the load factor for solar farms will be greater. The three Councils will be aware of schemes already granted as well as the pipeline of applications and the considerably reduced visual impact that such schemes have in areas of very sensitive landscapes.
- 3.8 KHG stands by its argument that there is no need for this massive wind farm and that, with 2020 renewable energy requirements likely to be exceeded and a limit on funding, it is more important than ever to ensure that inappropriate schemes, driven by commercial pressure rather than the selection of the best sites, are not approved merely to because 'we need to do something'.
- 3.9 The overall cost of renewable energy has been recognised recently by the EC and the 2030 Framework for Climate and Energy Policies published on January 22nd removes from 2020 the legally binding national renewable

¹⁰ UK Renewable Energy Roadmap Update 2013 - Figure 16

energy targets.

4 Benefits

- 4.1 As KHG outlined in its original objection document the only significant benefit of the scheme will be the renewable electricity generated. With no anemometer mast and hence, as the SEI admits no site specific wind data, the amount of electricity generated cannot be assessed. The SEI provides no further evidence and merely states¹¹ that the use of proprietary software and data predicts a mean hub height wind speed of 7.1m and hence a capacity factor of around 30%. There is no factual information surrounding the data or the assumptions used in the calculations. Without such evidence this proposed capacity factor can be given no weight. KHG continue to assert that a more likely capacity factor would be 15-20%.
- 4.2 If EDF wish any weight to be given to their exaggerated claim then they must provide verifiable data and a clear explanation of how they have arrived at their figures.

5 Landscape Resource and Visual Amenity

- 5.1 In KHG's original objection the critique of the landscape and visual amenity chapters was carried out by the independent landscape consultants, The Landscape Partnership (TLP). KHG have instructed TLP to carry out a further review of the relevant information in the SEI submitted by EDF. Their report is shown in full in Appendix 1. The comments in this section are merely a brief summary of the conclusions of this report and KHG ask that the report is read in full to gain a complete of the arguments and information contained within the report.
- 5.2 Part of the SEI chapter on landscape resource and visual amenity relates to the objections submitted by the South Downs National Park Authority and the North Wessex Downs AONB. KHG has not commented on these sections assuming that if a response is required then the relevant statutory consultees will provide this. We would, however, reaffirm our conclusions in our original objection that there would be extensive and adverse impacts from a number of high sensitivity locations within the designated landscapes. KHG continues to argue that the negative impacts on these highly designated landscapes is a sufficient reason for refusal of this planning application and that objections from the relevant authorities must be given significant weight in line with the great protection provided to these nationally designated areas.
- 5.3 TLP's conclusions on the SEI information are:

TLP and EDF agree that the effects on landscape character would result in significant effects on five landscape character areas in the study area. TLP consider this extends to 3-4km to the north west and south and 2.5km to the

¹¹ SEI - Para 4.4

south. This is a major significant adverse effect for an area of landscape extending in total c. 10km from north to south and 8.5km from east to west (after allowing for the disposition of the turbines themselves). TLP still consider there would be a greater effect on Landscape Character Area 12 Test and Bourne Valley to the north of the site than identified in the ES and SEI.

TLP consider that the effect on the local landscape character is particularly harmful as there are no other similar types or scale of impact and would be located in a landscape with few detracting features. This would equate to significant harm to landscape character.

The ES (para 6.139) indicates that of the 32 viewpoints ten would experience significant effects (classed as major or moderate to major). This includes significant effects both with the AONB (viewpoint 16) and National Park (viewpoint 31) The SEI has not changed these findings. TLP considered in their June 2013 report that there would be significant effects on 18 of the 32 viewpoints locations i.e. at 8 more than in the ES. TLP also consider that the locations where there are moderate adverse effects should be considered in the planning balance.

The SEI includes a number of winter views. It should be noted that there are a number of locations where winter views have not been included but these will still experience significant adverse effects as already noted in the ES for the summer situation.

TLP have looked again at the information in the ES and SEI and viewed the new winter images in the field. We still find significant effects over and above those recorded in the SEI namely at ES Viewpoints 1, 6, 8, 12, 18, 24, and 25. In addition we find a new significant effect on Viewpoint 21 at Upper Bullington. However, there would not be a significant effect at Viewpoint 10 Stoke Charity based on the evidence of winter vegetation cover. The reason for this continued variation in the level of assessed effects is based on the different professional judgements by TLP compared with the assessor in the ES. TLP have still used the criteria and definitions in the ES to inform their judgements.

TLP still consider that there is limited coverage of representative viewpoints from a number of locations most notably to the east around Micheldever Road (TLP June 2013 views L, M and X), public locations within the site (TLP June 2013 views N, O and P) and views to the south on elevated ground (TLP June 2013 views Q, R, C, D and E). The current distribution of representative viewpoints underplays the range and number of likely significant effects.

The SEI has not produced any wireframe overlays or photomontages from any of the closest residential properties stating that such images are not helpful. TLP disagree with this opinion and consider that they are very helpful to appreciate the likely effects on residential amenity for those most significantly affected. TLP still consider that images should be produced by

EDF to appreciate the likely effects.

TLP accept that the photomontages in the ES and SEI have been produced in accordance with current guidance. Nonetheless, TLP consider that the images under represent the existing context and likely scale of the turbines when viewed in the field using the stated viewing distances.

The impacts from the construction of access tracks including the effect on trees and hedges along the access routes has not been included in the landscape section of the ES or SEI. This should be established prior to determination to ensure if any losses/impacts are acceptable as part of the planning balance.

- 5.5 With regard to residential amenity it is impossible to determine whether any properties fail the ‘Lavender Test’ without proper photomontages from the properties themselves. KHG in its original objection made this point firmly and the response from EDF that photomontages add little cannot be accepted. If EDF are unwilling to produce the necessary photomontages they should say so rather than arguing that they would add little value.
- 5.6 In summary the SEI produced little new information and, as can be seen above, the conclusions of TLP remain largely unaltered. KHG continue to argue that the significant adverse harm to landscape character across five landscape character areas is in conflict with national and local planning policy and is sufficient to warrant refusal of this application in its own right.

6 Cultural Heritage

- 6.1 TLP also reviewed the cultural heritage section of the SEI. The SEI contained an additional assessment of heritage assets some of which were highlighted by KHG in its original objection. The review by TLP is contained in their report shown in Appendix 1 which again should read in full to obtain the complete arguments and conclusions.

- 6.2 The conclusions of the TLP report state:

The SEI has responded to a range of comments made during the consultation process and addressed each in turn. Some of this work has involved fuller assessment of heritage assets compared to the ES following access to most of the assets not previously visited. The only exception is Hurstbourne Park which was not visited although proxies were taken from the closest available area. TLP visited a number of the additional assets in January 2014 to inform their assessment and opinion.

The SEI considers that none of the effects are ‘major’ using the methodology set out in the ES and SEI. TLP would agree with this conclusion.

The SEI considers that effects that are assessed as moderate or below these

should be weighed against the public benefit of the development. It is therefore clear that all adverse effects of moderate and minor should be considered in the planning balance. The SEI identifies a number of minor effects on some heritage assets. TLP consider that a number of the effects are greater and up to at moderate significance.

The SEI identifies a minor effect on Laverstoke Park and House. TLP consider the impacts are likely to reach to moderate for a number of views from the house and parkland to the south west. While views of the turbines are relatively limited the presence of blade movement from the turbine blades will adversely affect the setting and tranquillity of the house and parkland. There would also be more open views from the edge of the Laverstoke and Freefolk Conservation Area including ES Viewpoint 18 located to the west and SEI Heritage Viewpoint 7 on Laverstoke Road.

The SEI considers there would be a minor effect on Hurstbourne Park. While much of the park is well wooded and internal avenue do not align to the turbines there are also extensive open elevated views from the east of the Registered Park and Garden over the Test valley towards the turbines. There is also a view from the Conservation Area to the Listed Bee House which was originally understood to be a gazebo and is located at the corner of the Park. Turbine 4 would be seen in close association with Bee House being set directly behind the building. In both these prospects TLP consider there would be a medium magnitude effect and moderate adverse effect on the heritage assets.

The SEI includes a heritage assessment on Winchester cathedral in respect of views from St Catherine's Hill and finds a minor adverse effect mainly due to the distance. However, TLP consider the effect on setting from St Catherine's Hill would be moderate adverse in clear visibility due to the close proximity of turbines and cathedral in the same field of view.

The SEI considers the effects on Bullington House would be minor however but does not consider the effects from the garden to the house or from upper floors. TLP consider that the combined effect on Bullington House as seen from the gardens to the south and from first floor windows is likely to result in a moderate adverse effect.

The SEI considers the effects on Tufton Warren Farm to be minor adverse but notes they could be of medium magnitude. TLP consider that the effects on the locally listed buildings at Tufton Warren Farm would include some high magnitude and moderate adverse significant effects.

- 6.3 There is nothing in the further analysis in the SEI that alters KHG's view that the adverse impacts on cultural heritage, whilst not sufficient to be a reason for refusal in their own right, must be considered in the overall planning balance.

7 Noise

- 7.1 The SEI states that further background noise measurements are being undertaken at Tufton Warren and Upper Norton Farm and that these were due to be completed in December 2013. Given that the results of these measurements are not included in the SEI KHG can make no further comment at this time. KHG ask that as soon as the results are available that they are provided to KHG for comment.

8 Aviation

- 8.1 Aviation is covered in Chapter 13 of the SEI - Electromagnetic Interference, Infrastructure and Safeguarding. There is no additional information provided with regard to the MOD objection on three fronts. However, there is a reiteration in 13.7 that because potential mitigation technologies may become available within the 25 years permission this provides a justification for a suspensive condition. KHG strongly reject this contention for the reasons clearly outlined in its original objection.

- 8.2 The SEI does provide a further report, authored by the recently retired Squadron Leader Mike Hale rather than the original EDF aviation consultant, on the impact on Popham and Roundwood Airfields. We understand that Squadron Leader Mike Hale in his service career was involved with the MOD's response to wind farm applications. Thus during the time that consultations were taking place with the MOD over this application he may well have been involved in the decision to object. The people who fully understand the potential impact of the proposed wind farm on the commercial operation of Popham are the operators of that airfield. We have seen their response to the SEI and can add no further comments as our concerns are aligned with theirs. The conclusions of their response says:

In conclusion, we are really disappointed to read Mike Hale's review of the Charles Church Spitfires Ltd formal objection to the Bullington Cross wind farm, written by such a very experienced pilot and well-qualified former RAF officer, because we as the owners and safe operators of Popham Airfield for many years, are also very well aware of all the same Rules of the Air and other aviation regulations which he summarises in his attempt to indicate that there is no scope for any hazard to aviation from the wind farm proposed by EDF, who it should be remembered are his employers in this context. As the owners of Popham Airfield we are better placed to understand the local problems of the very congested airspace around Popham, and know from our direct experience of hosting flying schools at Popham that the proximity of the proposed wind farm at Bullington Cross would have severe implications for our operations and would reduce air safety for all the users of this very busy airspace. Mike Hale writes his review from the perspective of a highly professional military pilot, assuming that other professional military pilots will be able to successfully overcome any of the problems which might be associated with flying aircraft near to

the proposed wind farm, but the reality of the situation near Popham Airfield is that the airspace is shared by many civilian and military pilots of all levels of experience and ability, and if the presence of this wind farm makes it unsafe for the less experienced pilots in the most vulnerable types of aircraft, then the safety of all the pilots who use this airspace is significantly and unacceptably reduced.

Maintaining air safety has always been, and still is our main concern in opposing this Planning Application for the Bullington Cross wind farm submitted by EDF, and the latest amendments submitted by EDF to the Local Planning Authorities in December 2013 have not changed our view that this wind farm would be in a highly inappropriate location, with very adverse consequences for air safety in this part of Hampshire.

- 8.3 KHG maintains its stance that the increased risk to aircraft safety and the threat to the ongoing commercial viability of Popham Airfield from this proposed wind farm is a clear reason for refusal in its own right.

9 Traffic and Access

- 9.1 There is no response to the concerns raised by KHG regarding the lack of any environmental assessment of the alternative options shown for the access onto the unclassified road leading to Upper Norton Farm. As KHG stated in its original objection no determination can be made on this application until such a survey has been carried and its conclusions reviewed.

10 Ornithology / Ecology

- 10.1 The SEI chapters 8 & 9 relating to ecology and ornithology respectively have been reviewed by the same Principal Ecologist of TLP as provided the report on the original ES. TLP's latest report is provided as Appendix 2 and again KHG ask that it is read in full as only the conclusions are shown here.
- 10.2 The conclusions of the report state:

We found that the supplementary environmental information did not wholly consist of additional information, but included a significant number of assertions that the Environmental Statement was satisfactory. Many of our previously expressed opinions and questions have not been satisfactorily answered. For example, the opportunity to expand on the hedgerow survey methodology was not taken, and faulty results for hedgerow measurement were defended rather than considered. This does not provide confidence in other survey measurements (see Section 2.1, comments on SEI para 8.20 – 8.25)

Our views on the need for additional and better surveys to be carried out did not result in those surveys being carried out, as we had hoped, to better inform the decision-making process. The impact assessment and mitigation,

which follows on from the surveys undertaken, cannot be accepted, as it is based on inadequate survey information.

The Supplementary Environmental Information did respond helpfully to some of our responses, and our questions are answered satisfactorily including for

- *Survey of bats and potential building roosts*
- *Impact assessment on trees known to have high bat roost potential*
- *Lighting impact on bats requiring construction-phase mitigation*
- *Inclusion of specific enhancements*

A summary of our views for outstanding issues with the ES and SEI is

- *Reptile and great crested newt survey remains necessary*
- *Insufficient bat activity survey visits were made and data is out of date*
- *Dormouse survey may have had an inadequate extent and is out of date*
- *We have not seen the badger information despite a request in our previous response*
- *Arable plants require survey for the whole extent of the habitat affected and for a time period which would enable the population, if present, to be identified*
- *Further survey of trees for bat roosts is advocated in the SEI. It is noted that all relevant survey information should be available prior to determination of planning permission*
- *Impact assessment treats all impacts at Parish level as insignificant, which is not consistent with guidelines or practice elsewhere*
- *Impact assessment is made on poor survey information so is not reliable*
- *Mitigation is based on some incomplete or poor survey information so is not reliable*
- *Monitoring proposals omit many necessary topics and have no reporting process*

Ornithology

- *The SEI has answered some of our earlier points but has not resolved the issue of bird surveys being out of date or methodology varying significantly from the standard guidance.*
- *Only one season of stone-curlew survey was carried out, rather than the two seasons carried out for commoner bird species.*
- *Impact assessment on red kite, lapwing and golden plover needs some further work*

10.3 It is clear that, given the lack of additional survey work, there is insufficient evidence to show that there will not be significant adverse impacts on either

ecology or ornithology and, in the absence of such evidence, KHG argue that the application cannot be determined and if it is then the precautionary principle must be applied and the application refused.

11 Socio-Economic

- 11.1 In 14.9-14.12 of the SEI there is discussion of the potential impact on the Tufton Farm Clock Barn wedding venue. The argument put forward that there would be no significant impact on this local business is solely based upon market research in general terms which has no relevance to this particular situation. As KHG made clear in its original objection a wedding is a particularly sensitive and emotional occasion, completely different to visiting a normal tourist attraction. The SEI also claims that mitigation through removing the nearest turbines has already been carried out. However, if mitigation is insufficient to reduce the harm to an insignificant level then the fact that it has been done does not alter the fact that significant harm will be caused.
- 11.2 There is no new evidence in the SEI, such as further photomontages to show the potential impact in more detail, and irrelevant market research can be given no weight. KHG reiterate its contention that the proposed wind farm will cause significant socio-economic harm both to the Tufton Warren venue itself and the many ancillary businesses that supply it. Many couples looking for a perfect wedding venue will consider the presence of fourteen wind turbines in the immediate vicinity a deal breaker irrespective of generic attitudes to tourism.

12 Grid Connection

- 12.1 The SEI provides no further information on the potential grid connection, continuing to state that it is likely to be at the 33kV substation at Barton Stacey. It does not say whether the connection will be below or above ground and the concerns raised by KHG in its original objection about whether the local grid can accommodate the 28MW of new capacity have not been considered. If there are issues concerning an upgrade to the local network then this must be assessed and considered as part of this application.
- 12.2 The only additional information in the SEI is the fact that the Barton Stacey substation is connected by a 6.6km pole overhead line to the Andover East substation. There is no information as to what effect this will have on the capacity of the line or the need for upgrades.

13 Planning Balance

13.1 KHG in its original assessed the planning balance and concluded:

When balancing the significant harm caused against the unknown, but limited by wind speed, electricity generated by these proposed turbines KHG conclude that the harm significantly and demonstrably outweighs the benefits and there is an overwhelming case for refusal. Accordingly the three Councils are invited to refuse their respective applications.

13.2 There was a limited amount of new information provided in the SEI, which appeared largely to be a defensive rather than open-minded document. Having considered carefully the additional information and arguments raised by EDF KHG still consider that, when considering the planning balance, it is still overwhelmingly tilted in favour of refusal. KHG stands by its conclusion above.