

BULLINGTON CROSS WIND FARM

AN OBJECTION BY

KEEP HAMPSHIRE GREEN

**Winchester City Council Reference: 13/00800/FUL
Basingstoke and Deane Borough Council: 13/00046/FUL
Test Valley Borough Council: 13/00753/FULLN**

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[pdf 1: Forward and Section 1]

TABLE OF CONTENTS

Foreword	1
1 Summary and Conclusions.....	3
2 Planning Policy Framework.....	8
3 Need for the Development.....	19
4 Landscape Character.....	22
5 Visual	26
6 Cultural Heritage.....	32
7 Noise.....	33
8 Aviation.....	45
9 Traffic and Access.....	52
10 Ornithology / Ecology.....	53
11 Benefits.....	58
12 Public Opinion.....	62
13 Socio-Economic.....	64
14 Grid Connection.....	67
15 Decommissioning Bond.....	68
16 Planning Balance.....	68
 Appendices	
1 Review of Landscape and Cultural heritage Chapters of ES - The Landscape Partnership	
2 South Downs National Park Authority Report	
3 Popham Airfield Objection	
4 Review of Ecology & Ornithology Chapters of ES - The Landscape Partnership	
5 Objection from Country House Wedding Venues	

We came upon the Downs to the north of Winchester... There are not many finer spots in England... Here are hill, dell, water, meadows, woods, cornfields, downs; and all of them very fine and beautifully disposed... We had, when we got upon the downs, after leaving Winchester, this sort of country all the way to Whitchurch.

William Cobbett, Rural Rides, 1830



View west across A303 towards windfarm site. (picture taken from 510 432)

Foreword

This objection document is submitted by the Keep Hampshire Green Action Group (KHG) with assistance from external consultants to provide expert assessments in the areas of wind energy, planning, landscape character, cultural heritage, residential amenity, ecology and ornithology.

This document contains the detail of KHG's objections, objections supported by ten parishes neighbouring the site, namely Wonston, Whitchurch, Hurstbourne Priors, Barton Stacey, Bullington, Micheldever, South Wonston, Laverstoke, Steventon and Overton, representing the thousands of local residents, who oppose this particular industrial wind turbine application on this site. The importance of this overwhelming local opposition has been massively reinforced by the recent announcement of new Governmental planning guidance which will significantly change the planning balance by increasing the weight in any determination that should be given both to local public opinion and also the harm caused by such large wind farms, such as the one proposed here.

In the following sections KHG presents the detail of its objections to this proposed development and shows that the significant adverse impacts completely outweigh the benefits and hence, under the Development Plan and national planning policies, planning permission should be refused.

This scheme is so large that it spans the administrative areas of three different Councils, all of whom will determine an element of the scheme. Out of the overall fourteen turbines seven lie within Winchester City Council, four in Basingstoke and Deane Borough Council and three in Test Valley Borough Council. To avoid unnecessary duplication this objection document looks at the scheme in totality but considers the conclusions against the different Local Plans.

Since a wind farm was mooted KHG have engaged fully in the consultation process, holding public meetings, launching a website and communicating with all three councils and the applicant. This objection document focuses on the planning issues and results from considerable research, professional opinion and local expertise. We are particularly grateful to Mike Barnard, wind farm consultant, for his assistance in preparing this report.

KHG show clearly the planning reasons why this application should be refused.

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1 Summary and Conclusions

- 1.1 Any commercial scale wind turbine located in a rural area will, by its very size, alien nature in a rural setting and rotating blades, cause significant harm. This is accepted by all wind turbine developers and the ES acknowledges the significant harm that these fourteen 126m tall turbines will cause in a number of areas. Whilst national planning policy includes a presumption in favour of sustainable development it also accepts that where the harm caused by a proposed development outweighs the benefits then planning permission should be refused. Therefore the determination of any wind turbine planning application is based on assessing the 'planning balance' between benefits and harm. The perceived need for renewable energy does not over-ride environmental protections. Indeed it is self-evident that any development where the harm outweighs the benefit cannot be a sustainable development, particularly for onshore wind where the wind resource is universal and hence there is no inherent restriction on where such developments can be situated.
- 1.2 The recent announcement of new planning guidance reinforces this principle and gives greater say to the views of local communities regarding the siting of wind turbine development in their locality. It increases the weight to be given to the planning concerns of local communities and landscape and visual impacts. It is a **major** factor to be included in the determination of this application as it completely changes the weight to be applied to each side of the planning balance. With the complete rejection of this application ten neighbouring parishes there can be no doubt that the view of the local community is that this is an inappropriate development in this location and should be refused planning permission. This view now has to be given great weight in the determination of this application.
- 1.3 It is obviously important that both sides of the planning balance should be assessed with the same degree of rigour to enable the decision maker to arrive at a decision based on all the facts. However, there is a complete lack of any credible analysis of the amount of electricity that will be produced in the ES. The applicant has not installed an anemometer mast and thus there is no site specific wind data. This means that any estimate of the amount of electricity generated is purely illustrative.
- 1.4 The ES claims a 25% capacity factor which is surprising as the site is in the bottom 5% of wind farm wind speeds in the country and the five year average capacity factor for UK wind farms is only 25.6%. An analysis of the NOABL database shows that a more likely capacity factor would be from around minimum 15 -20%, a reduction of up to 40% in the amount of electricity generated and hence the benefits of the scheme. The electricity likely to be generated is equivalent to 0.016% of the UK national renewable energy target for 2020.
- 1.5 Even if there was an argument to be made about a contribution towards the national renewable energy targets, KHG shows that the national 2020 targets can be met and probably exceeded by wind farm schemes already in the

planning system. Thus the focus on the need for this scheme within the ES is nullified and limited weight can be attached to this justification. At the end of the day this wind farm, because it is located in a low wind speed area, will produce relatively little electricity and no other significant socio-economic benefit to set against the significant harm outlined below.

- 1.6 A previous scheme on this site apparently attracted MOD objections and was withdrawn. In spite of this the applicant has submitted a planning application without any agreement on how to overcome this problem. Unsurprisingly the MOD has objected again on three grounds, two relating to radar and one to low flying. This is in addition to the strong objection from the well-used Popham Airfield whose expert objection shows clearly that the commercial viability of its business will be compromised and there would be increased risk to safety both in the air and on the ground.

In its own right these aviation objections provide grounds for refusing this application, as all such aviation issues under policy guidance should be fully mitigated prior to submission of an application. Indeed KHG argue that the LPAs have a legal requirement to protect the safety of people on the ground and should refuse permission.

- 1.7 KHG commissioned The Landscape Partnership (TLP) to review the potential impacts of the wind farm in a number of areas such as landscape character, cultural heritage, residential and recreational amenity and ecology. Their reports are provided as appendices to this objection document and should be read in full.
- 1.8 TLP concluded on landscape character:

The effects on landscape character would result in significant effects extending to 3-4km to the northwest and south and 2.5km to the south. This spreads across five landscape character areas, affecting one for the majority of the area. This is a major significant effect for an area of landscape extending in total c.10km from north to south and 8.5km from east to west. This effect on the local landscape character is particularly noteworthy 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.

- 1.9 The site sits within 35km of six AONBs/National Parks a very sensitive area to site one of the largest wind farms in the south of England. A report from the Director of Planning for the South Downs National Park Authority recommends refusal due to the unacceptable impact upon the landscape character and Special Qualities of the National Park and its setting.
- 1.10 The effects on visual amenity would give rise to significant and extensive adverse effects. These would be largely be within 7-8km of the site but locally extend c.12-15km from a few high sensitivity locations at Beacon Hill, South Downs Way and St Catherine's Hill. TLP consider that there would be significant effects on 18 of the 32 viewpoint locations, 8 more than

identified in the ES. An additional 20 viewpoints were identified by TLP of which 16 are considered to experience significant effects.

- 1.11 There will be significant harm caused to the residential amenity of a number of neighbouring dwellings and two could potentially be dominated so badly that they become unattractive places to live. There is a lack of suitable visualisations in the ES to enable proper judgements to be made.
- 1.12 The enjoyment of the countryside is one of the key amenities for people and the area of the proposed wind farm is well served by an extensive and well used network of lanes, byways, bridleways and footpaths. Fourteen massive turbines will degrade the appreciation of a large area, through visual intrusion, noise and shadow flicker. The scale of the impact is shown by an objection from the Countryside Access Team of Hampshire County Council. There is very little assessment of the effect on rights of way in the ES which has largely ignored this area. TLP assert that there would be harm caused to a large number of rights of way in the immediate vicinity and extending to more distant sensitive locations.
- 1.13 The TLP report considers the impact on cultural heritage assets. The ES identifies a number of effects that although less than ‘substantial harm’ in NPPF terms need to be balanced against the benefits of the scheme. However, The TLP report identifies a number of heritage assets where the harm could be of greater significance. These are:
- Laverstoke House and Registered Park and Garden
 - Hurstbourne Priors Park and Bee House
 - Hurstbourne Priors Conservation Area
 - Laverstoke Conservation Area
 - Stoke Charity Conservation Area and Parish Church
 - Bullington House
 - Tidbury Hillfort
 - Winchester Cathedral

There is a flaw in the ES that in a number of these cases access has not been gained to the property nor has a wireframe been produced. This lack of assessment in the field undermines the credibility of the exercise and to fully evaluate the potential impact additional photomontages and a more direct field visit are needed.

- 1.14 The noise environment surrounding the site is very complex with the dominant background noise coming from the A303 and A34 and it is this background noise that drives the noise limits that will be used in any

planning conditions. This makes the wind direction crucial in the background noise impact assessment. There is a lack of data relating to wind direction in the ES which reduces the reliance that can be placed on the conclusion that there will be no significant noise impacts on nearby dwellings. The fact that compliance with ETSU-R-97 does not equate to no noise problems has been proved in many instances. Noise from wind turbines is uniquely intrusive and annoying and the failings of the noise impact assessment do not provide the necessary reassurance that there will not be noise problems leading to potential health issues from sleep deprivation.

1.15 Whilst the route to the turnoff from the A303 appears to be acceptable there is no assessment of the harm cause at this turning with land-take and the felling of trees required. The lack of any ecological assessment of the harm caused by these works is unacceptable.

1.16 TLP have produced a report on the ecological issues raised by the wind farm. It concludes that there are serious deficiencies in the survey work carried out and concludes that before the LPAs can determine this application they must require the applicant to carry out new robust surveys for Phase 1 Habitats, hedgerows, bats, dormice, great crested newts, reptiles, birds and rare arable plants. Impact assessments need to be based on these robust surveys and accurate evaluations of importance, and need to include impacts at scales below County level. Mitigation should be realistic, detailed and based on sound impact assessments.

1.17 A number businesses will be impacted to such an extent that their commercial viability may be compromised. Popham Airfield hosts a wide range of aviation activities with a particular focus on light craft such as microlights. It hosts the busiest microlight training centre in the country. With the turbines directly upwind of the prevailing wind direction the ability to continue to function effectively is jeopardised.

Tufton Warren, the nearest non-financially involved property, hosts a wedding business that generates £3m for the local economy. Its main selling point is the attractive location with stunning views over unspoilt countryside. If the development went ahead then this countryside would be filled with wind turbines and the likelihood couples getting married there would be dramatically reduced.

1.18 There is overwhelming opposition to the proposal with ten parishes representing over 16,000 people registering objections. The recent changes to planning policy guidance is aimed at giving the people living in the immediate vicinity a greater say in determining whether they want onshore wind farm developments. It is clear that here they do not and their voice should be heard.

1.19 There is limited assessment of whether the local grid can cope with the output of the wind farm and no mention of any kind of decommissioning bond to provide reassurance that the turbines will be removed at the end of

their 25 year life.

1.20 The ES does not carry out the necessary balancing exercise as required by the NPPF. KHG has shown that there will be significant harm caused to aviation safety, landscape character (including the integrity of the South Downs National Park), amenity of people and horse riders using the extensive public rights of way, residential amenity of a number of nearby dwellings and the economic viability of local businesses. In addition there are areas where the survey work and information provided in the ES are missing or inadequate leading to situations where it is impossible to fully evaluate the potential harm. In these situations the LPAs determining these applications can either take the precautionary principle and refuse permission or require the applicant to provide the necessary supplementary information to enable a fully informed decision to be made.

1.21 In terms of planning policy the proposal conflicts with:

National Planning Policy Framework

Winchester City Council

Local Plan Policies: DP3/4, HE1, CE10/11

Joint Core Strategy: CP12

Test Valley Borough Council

Local Plan Policies: ESN32, SET03, ENV 01/05/17, DES 01/06/08/09

Core Strategy: E1/2/5/9

Basingstoke and Deane Borough Council

Local Plan Policies: A6, E2,E3,E6,E7

Not all of these policies have the balancing exercise required by the NPPF but they do reflect adopted local policy and should be given some weight.

1.22 When balancing the significant harm caused against the unknown, but limited by low 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.