

# **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**

**June 2013**

**[pdf 3: Sections 3 & 4]**

### 3 Need For Development

- 3.1 The ES<sup>1</sup> states clearly that the need for the development is material to the determination of this application and that the benefits to be applied within the ‘planning balance’ relate primarily to the amount of electricity generated by the turbines. The need for this wind farm is directly related to the performance of the country as a whole against the targets set by the Government in its energy policy, given that the regional targets in the South East Plan are no longer material in this determination. If there is clear guidance from Government that the 2020 energy targets are likely to be met then there will be no pressing need for this scheme and the weight that can be given to the limited benefits that will accrue will be reduced.
- 3.2 This is clearly accepted in the ES as it derives the weight to be allocated to the benefit side of the planning balance directly from a perceived significant shortfall in the achievement against these targets.
- 3.3 The ES outlines the different stages of the development of the Government energy policy and it is not proposed to repeat that here. However, the analysis of progress to date contained in the ES is dated as is the fact that the latest Government position is ignored. Both of these omissions undermine the factual basis on which the conclusions are drawn.
- 3.4 The UK approach towards achieving its target of 15% of all energy to be derived from renewable resources is set out in the UK Renewable Energy Roadmap which was published by DECC in July 2011. It identifies that, to achieve the overall 15% target, electricity generation from renewable resources will need to reach 30% and it reviews progress to date.

In the Executive Summary it says:

*Even though we are starting from a low level, the UK can meet the target to deliver 15% of the UK’s energy consumption from renewable sources by 2020. Recent ‘bottom-up’ analysis tested with industry, suggests that there is a significant upside potential as well as a downside risk to deployment.*

*Renewable electricity has become well established. The existing pipeline of large-scale projects is strong, and allowing for historic dropout rates, has*

---

<sup>1</sup> ES - Section 5 - Paras 5.19-5.28

*the potential to put us on track to deliver a total of 29GW of operational capacity by 2020.*

The requirement for onshore wind to meet the overall 15% target is seen to be 13GW of installed capacity.

3.5 In the section on onshore wind the Roadmap says<sup>2</sup>:

*The UK has more than 4GW of installed onshore wind capacity in operation*

*The central range for deployment indicates that onshore wind could contribute up to around 13GW by 2020. Achieving this level of capacity equates to an annual growth rate of 13%.*

*The existing pipeline for onshore wind contains an additional 11GW. When taken together with the existing operational capacity, this could contribute a significant proportion of the central range for 2020 given the historic approval rates although there are concerns with the pace at which capacity can be brought through.*

3.6 In paragraph 3.7 it states that achieving the 13GW would require an annual growth rate of 13%, This is less than the growth rate experienced between 2009-2010. In other words the required 2020 targets can be achieved with the current pipeline of schemes already in planning seven years ahead of 2020.

3.7 However, the situation has moved even further ahead since mid-2011. On March 8<sup>th</sup> 2012 there was an exchange between Chris Heaton-Harris MP and the Rt Hon Ed Davey MP, Secretary of State for Energy and Climate Change:

*Chris Heaton-Harris: Can the Secretary of State confirm that if we add the number of existing turbines to those going through the planning system, we have enough in place to hit his Department's 2020 targets? If that is the case, does this not suggest that the level of subsidy for these things is too high?*

*Mr Davey: I thank my hon. Friend for his question. He and I may disagree about the significance of onshore wind, but I appreciate the measured way in which he has engaged with me and the Prime Minister on this issue. I can tell him that 5GW of onshore wind power generation has already been built, that there is planning consent for a further 6GW and that planning permission is being sought for 7GW-worth of projects, only some of which will be approved. Given that the ambition was for 13GW, most of the development that the country needs is indeed already on the table. As for subsidy, the subsidy levels go down as costs go down, and we are proposing a 10% reduction in subsidies for onshore wind.*

---

<sup>2</sup> UK Renewable Energy Roadmap - July 2011 - Page 30

- 3.8 Comparing the capacity figures for onshore wind in March 2012 of 18GW of operational, consented and in planning capacity with the equivalent 15GW in mid-2011 shows the increasing rate of expansion of onshore wind capacity. If the Roadmap concluded that with 15GW there was significant upside potential then with another 20% of capacity entering the system this upside has increased dramatically and it can be assumed that the 2020 targets will be met and in all probability significantly exceeded.
- 3.9 If this is the case nationally then the pressing need, which constitutes the main plank of the ES's argument for the need for this development, is incorrect and has disappeared completely. This is reinforced by comments made by John Hayes MP, whilst Minister of Energy, calling for a moratorium on further onshore wind farm applications.
- 3.10 This strong performance is continued in the most recent Government figures contained within the 2012 Roadmap update, published in December 2012, which says:

*There was an increase of 1.3GW in operational capacity between January 2011 and end of June 2012. Deployment analysis indicates that there is a healthy pipeline of projects that have entered the formal planning system for development. As of August 2012, there was over 18.2GW of onshore capacity in the pipeline although not everything in the pipeline will be consented, and not everything consented will be built. Based on historic consenting rates, at least 2.7GW could be lost from the pipeline at the planning stage.*

*While we cannot be certain which projects will go forward, the current pipeline is likely to represent the appropriate quantity of deployment to fulfil the central estimated range in the 2011 Renewable Energy Roadmap for onshore wind deployment (around 10-13GW).*

It should be noted that this analysis was carried out before this application was lodged and hence does not include this scheme in the planning pipeline.

- 3.11 Even losing 2.7GW from the pipeline still leaves a probable 15.5GW, a 20% contingency versus the top end of what is expected to be required.
- 3.12 Given the national picture it can be argued that the regional picture is irrelevant given that it does not matter how the national target is achieved. The ES attempts to argue that because there is a limited uptake of onshore wind capacity in Hampshire then this somehow means that greater weight should be applied to the benefit side of the planning balance. This is patently incorrect. An unacceptable scheme does not become acceptable merely because there is a local shortfall, particularly when overall targets will be exceeded. It is clear that different parts of the country will deliver renewable energy capacity through a different mix of renewable technologies and that large scale wind farms will be less acceptable in more sensitive areas. This is just such an area, surrounded as it is by Areas of Outstanding Natural Beauty, and with the growth of solar energy schemes coming forward in the area such a large wind farm is not required. Wind is a universal resource capable of being harvested anywhere provided, as the Government makes clear in its planning

policy, the harm does not outweigh the benefit. There is no underlying reason why this site is needed,

- 3.13 Indeed one of the unique features of wind energy is that the amount of electricity produced is proportional to the cube of the wind speed so moving from a site with an average wind speed of 6m/s to one of 8m/s doubles the amount of electricity produced. So in a situation where targets are likely to be exceeded then utilising the windiest sites is the most obvious way of mitigating the adverse harm from wind turbines as the same amount of electricity can be generated by fewer or smaller turbines. We show in Section 11 that the proposed site is situated in a **very low** wind speed area and the reduced electricity that will be generated compared to windier sites further swings the planning balance against granting permission.
- 3.14 It is abundantly clear that both the national and regional onshore 2020 targets will be achieved utilising schemes already in planning with a good chance of significant exceedance. In these circumstances the drive in national energy policy behind new renewable energy schemes is reduced as has been shown by the statements of the Ministers responsible for this policy. It must be concluded that there is little need for this scheme to support the UK's legally binding commitment to deliver 15% of its energy needs from renewable sources by 2020. Thus the weight that can be given to the benefit of renewable electricity from the turbine is also reduced.

## **4 Landscape Character**

- 4.1 KHG commissioned Jonathan Billingsley of The Landscape Partnership to advise on the acceptability of the development relating to the topics of landscape and cultural heritage. His report and accompanying file of photographs are attached to this document as Appendix 1. It is not the intention to duplicate this report here and in the following relevant chapters and only the key conclusions will be mentioned. KHG ask that the report is read in full to totally understand the detail of his analysis and conclusions.
- 4.2 The objectives of his report were to:
- Review the methodology used in the ES
  - Assess whether the ES contained the full baseline information
  - Review the judgements made about the effects on landscape, visual and cultural heritage aspects
  - Identify further work that should be undertaken by the applicant
- 4.3 As has been mentioned before, subsequent to the preparation of the ES the Secretary of State issued a letter on 6<sup>th</sup> June 2013 indicating a rebalancing of the decision process for onshore wind turbine proposals to reflect the voice and concerns of local communities particularly where there is an effect on the local environment. The statement particularly refers to impacts on the landscape, local amenity, local topography and views to heritage assets. This rebalancing will not have been accounted for within the ES which will have

undertaken the balancing exercise on the basis of previous guidance. Thus its conclusions will not reflect the current position with regard to planning guidance.

4.4 It is accepted that the direct effects on the landscape fabric within the site are likely to be limited, mainly affecting the locations in arable fields where the turbines are located. However, a significant omission is that there is no mention in the ES of the effect of locating the substantial lengths of access track to construct and maintain the turbines. This will add 7km of track and will be a notable new addition to the landscape. There is also no detail regarding the vegetation clearance and tree felling that will be required to achieve a width of 6m and height of 5m for the length of these tracks.

4.5 JB's report states<sup>3</sup>:

*Para 6.134 - 137 (of the ES) summarise the effect on landscape character. A detailed assessment is provided at Appendix 6.7 for each of the District Scale Landscape Character Areas (LCAs) in each of the three authorities. It is agreed that this is the best scale to review the effects. The ES identifies a significant effect on five character areas: 12 Test and Bourne Valley, 13 South Test Down, 10E Drayton Chalk Downlands, 5 Dever Valley and 6 North Dever Downs.*

*It also states that in the ES that that there are no significant effects across any entire LCA. However, this is not unusual given the scale of some LCAs and should not be considered a determining factor in assessing the application. However, the effect on LCA 13 South Test Down is noted to cover the majority of the area. The effect on each LCA and also the combined effect on all areas as a whole should be assessed.*

*The ES summarises that in these five LCAs the turbines would be 'a recognised component of landscape character'. However, in our opinion the turbines would not only be 'recognisable' but clearly new alien features causing a dominant effect on large parts of the LCAs and the locality. The ES states at para 6.137 that the extent of effects is determined by their visual prominence in a setting where the presence of 'such tall engineering structures are almost absent'. This is a misleading statement as there are clearly no other existing structures of a similar scale (even pylons). Rather it is the lack of detracting features in the landscape that is one of the defining characteristics of the local area. The main transport routes of the A34 and A303 and associated traffic are the main engineering features in the area. However, these routes are only variably visible due to the undulating landform, local presence of cuttings and woodland cover. The moving traffic on the route would also typically be under 2m and at a maximum of 5m for HGVs. The turbines would introduce a completely new scale and type of feature into the landscape.*

*The extent of significant effect is recorded as extending to 3-4km to the north*

---

<sup>3</sup> Review of Landscape and Cultural Heritage Chapters of the ES - Para 4.1.3-7

*west and 2.5km to the south. It should be underlined that this is a significant effect for an area of c.10km from north to south and 8.5km from east to west. This is a very notable effect on the local landscape character that has no other similar types or scales of impact and that in the main is a landscape with few detracting features. **This would equate to significant harm to landscape character.***

*Areas where TLP consider the landscape effects to be greater than recorded in the ES are at LCA: 12 Test and Bourne Valley. Here there would locally be a high magnitude impact on the character of the valley around Whitchurch and in particular from cross valley views e.g. ES views 14 and 18 and TLP views I and S where the turbines would adversely affect the peaceful valley setting and views to the south.*

4.6 The report concludes:

*The effects on landscape character would result in significant effects extending to 3-4km to the northwest 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.*

4.7 This is a particularly attractive stretch of countryside that has been valued for centuries as is shown by the quote from William Cobbett's Rural Rides published in 1830, shown at the beginning of this document. It is completely unspoilt by any tall structures, of the same size as these turbines, whether natural or man-made. This proposal is not for turbines of a size that is in keeping with their surroundings, it is for 126.5m high massive industrial structures. It is also not for a small number, it is for fourteen turbine spread over a large area. Finally these turbines have massive rotating blades each sweeping out an area the size of a football pitch in the sky. Moving objects attract the eye and these turbines will be massively more visually intrusive than a stationary object of the same size, if there were any of them.

4.8 The significant harm to landscape character is in conflict with national and local planning policies and must be given great weight in the planning balance.

**AONB**

4.9 The location of the site, as shown in Figure 6.1 of the ES is situated within 35km of six nationally designated landscapes, namely:

- North Wessex Downs AONB
- South Downs National Park
- Surrey Hills AONB

- Chilterns AONB
- Cranborne Chase and West Wiltshire Downs AONB
- New Forest National Park

It is unusual to site one of the largest wind farms in the south of England right in the middle of such a sensitive landscape.

4.10 JB's report identifies that the effects on visual amenity will extend some 12-15km from a few high sensitivity locations such as Beacon Hill, South Downs Way and St Catherine's Hill at all of whose locations he concludes there would be significant and extensive adverse effects.

4.11 The impact of the wind farm on the South Downs National Park can be seen in a report to the Planning Committee of the South Downs National Park Authority (Appendix 2) which states as an executive summary:

*The SDNPA has been consulted by Winchester City Council as the application site is located approximately 15km from the National Park and, as such, may have an impact upon the landscape character or special qualities of the National park.*

*It is considered that the proposal would have an unacceptable impact upon the landscape character of the National Park and its setting. In particular there would be an impact upon the far reaching views from Cheesefoot Head on the A272 to the east of Winchester and views from St Catherine's Hill on Winchester's east side.*

*Accordingly it is recommended that the SDNPA informs Winchester City Council that it objects to the application.*

4.12 An AONB is the most protected landscape in the country, specifically designated for its natural beauty. The NPPF<sup>4</sup> is clear that:

*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest protection in relation to landscape and scenic beauty.*

4.13 The report from the landscape officer supporting this recommendation (Appendix 2) identifies clearly that large scale development outside, but close to, the Park may have an impact on the integrity of the Park itself:

*Landscape character is considered to be continuous (at national scale) between the proposed windfarm site and the National Park. There are extensive views over the Hampshire Downs NCA from elevated viewpoint locations within the National Park. The National Park boundary is not apparent to the viewer of the landscape. Views which include landscape beyond the National Park boundary ( of which there are many) include this 'borrowed' landscape as a continuous feature and are likewise affected by*

---

<sup>4</sup> NPPF - Para 115

*changes to landscape character and quality.*

- 4.14 Great weight must be placed within the planning balance on the views of the South Downs National Park Authority.

#### **Cumulative Impact**

- 4.15 Whilst there is not a current planning application for a wind farm at Woodmancott this is expected imminently. The ES does consider the cumulative impact and a cumulative ZTV is shown in Fig 6.13 of the ES. The Woodmancott turbines would only be 7km apart from this proposal and the ZTV shows that within 5km there would be almost universal dual visibility and a high % within 10km.
- 4.16 The conclusion in the ES that, because they are 7km apart and there is woodland in between, there would be no significant cumulative impact is not justified in any way. There are no cumulative viewpoint wireframes and no evidence to back up these conclusions.
- 4.17 There can be no question that there will be cumulative impact from two wind farms so close together and in the absence of any visualisations then a worst case scenario needs to be taken and an assumption of some significant cumulative impact taken. Interestingly in the South Downs National Park report it states that the cumulative impact does not appear to be addressed in **sufficient detail in relation to the Special Qualities of the National Park or** the South Downs Integrated Landscape Character Assessment.