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 6: Sections 11-16]

11 Benefits

11.1 KHG believes that the benefits produced from renewable energy installations and developments must be clearly shown to outweigh any harm to the surrounding area and the quality of life and residential amenity of those residents living nearby.

11.2 In the determination of any onshore wind turbine planning application there is a balance that needs to be weighed up by the decision maker between the benefits and adverse impacts. The ES spends hundreds of pages assessing the impacts and justifying the admitted harm. Yet the benefits are hardly discussed at all.

11.3 The decision that the three councils have to make when determining this application is whether the potential benefits of the scheme outweigh the adverse impacts. Given this, it is very disappointing to see that there is no information specific to this site within the ES quantifying the benefits. Without this it is difficult to come to a considered judgement. In order for the planning balance to be both rational and open to public scrutiny it is important that any gross benefits arising from a development should be clearly stated and put in context so that their scale can be understood. Once the gross benefits are clearly identified then the determining authorities can weigh these against the harms and arrive at a judgement of the net benefit of the proposal that will underpin their decision.

11.4 The output of electricity from a wind turbine is proportional to the cube of the wind speed and variations in the available wind speed at any site due to topography, vegetation and built structures will therefore make a large difference in electrical output and hence the benefits that can be claimed. The specific wind profile of a site determines the amount of the installed capacity of the wind turbine that can be "harvested". This site is surrounded by numerous woods and shelter belts which will significantly reduce the amount of electricity generated.

11.5 A graphic example of just what a difference topography can make is shown by the performance of two similar sized schemes a few kilometres apart near Workington. In 2011 the Siddick wind turbine had a capacity factor of 15.9% whilst the Lowca wind turbine achieved 33.8%. One is on a ridge and the other on the coastal plain. The turbine here is on flat farmland.

11.6 The only way of obtaining the actual wind profile is to erect an anemometer mast on the site and collect wind data for at least 12 months. This is done as standard by most wind turbine developers and, importantly, generally at least twelve months in advance of any application. There has been no attempt to erect an anemometer mast ahead of this application. This is very unusual, particularly for a large company such as EDF.

11.7 The applicant needs to explain the reasoning behind the decision not to erect an anemometer mast. The result has been to deny the determining authorities

with the necessary information about one half of the planning balance, thus making their decision more difficult as they do not have access to all the necessary data. All that is available is an illustrative estimate based on speculation. It may well be that the applicant knew that the site they have selected is in a very low wind speed area and that any analysis was unlikely to show the electricity generation in any kind of favourable light.

11.8 It is completely the responsibility of the applicant that there is no site specific wind data available to the councils to validate any claims by the applicant. Without an anemometer mast and the resulting wind data at different heights it is impossible to calculate an accurate capacity factor for the site. The lack of an anemometer mast also has implications for calculation of wind shear which will have significant effects on the perceived noise at nearby residences, as explained in the noise section.

11.9 There has also been no attempt to use any local meteorological measurement stations to provide a local assessment. Indeed the claimed 25% capacity factor (% of installed capacity that is actually generated in any year) has no evidence to substantiate its selection. It is just a convenient round number.

11.10 In the absence of any site specific wind speed data the only information that can be used is the NOABL database produced by the Government which breaks the country into 1km squares and provides a value for average wind speed at 45m height. This site has a wind speed of 5.9m/s from the NOABL database.

11.11 It is possible to use this wind speed to validate the claimed 25% capacity factor. During the five years from 2006 to 2010, the UK national on-shore wind farm capacity factor averaged 25.6% and in 2010 was actually 21.7%[1].

11.12 So to achieve a 25% capacity factor it would be expected that this site would have an average wind speed close to the average for all the UK wind farm sites. This can be checked using the NOABL database. An analysis[2] of all mainland on-shore wind farms in the UK shows that the average wind speed at 45m is 7.6 m/s. This site's average wind speed of 5.9m/s places it in the **bottom 5%** of all on-shore wind farms in mainland UK. Indeed this wind speed is lower than most wind farm developers consider worthwhile. An ES by Ecotricity for the North Dover Wind Farm when talking about potential sites stated:

"The majority of these areas coincide with the areas of wind speed <6.4m/s, thus effectively sterilising these areas (from wind farm development)*."*

11.13 Given the cubed relationship between wind speed and energy output if you move from an average wind speed of 6m/s to 8m/s then the amount of electricity generated is doubled[3]. So moving from this site (5.9m/s)to the

[1] Digest of UK Energy Statistics
[2] Based on co-ordinates sourced from Renewables UK website database of all mainland on-shore wind farms overlaid with wind speed data from the DTI 45m wind speed database as at November 2011.
[3] Companion Guide to PPS 22

average mainland site (7.6m/s) will produce 114% more electricity and a corresponding increase in capacity factor. As the UK 5-year average capacity factor for onshore wind farms is 25.6% then the expected capacity factor for this turbine would be around 12%. So the claim in the ER that the capacity factor will be 25% must be a significant exaggeration. Whilst this calculation can only be a rough estimate, some of the earlier wind turbines have hub heights smaller than 45m, it casts considerable doubt on the claimed electricity generation. To be conservative it is assumed that the wind farm would generate a capacity factor of 15%-20%, equating to up to a 40% reduction in the claimed electricity generated. For comparison the 126m Green Park turbine at Reading has achieved a 16.3% capacity factor since its installation.

11.14 Overall there is an almost total lack of any robust data relating to the benefits of this wind turbine that needs to be set against the large adverse impacts the scheme will have on the surrounding countryside, heritage assets and the people living, working or travelling through the area. There is no data on energy production specific to the site purely because the applicant did not employ an anemometer mast, for which no explanation is given. There will be minimal other socio-economic benefits to the area. The contracts for construction will go to specialist companies who will not be based in the immediate area and the turbines will be manufactured overseas.

11.15 It is useful to take a more macro look at the amount of electricity potentially generated in the context of the UK national targets. DECC's *National Renewable Energy Action Plan* (NREAP) for the UK tells us that the overall target is for 20.5m tonnes of oil equivalent from renewables in 2020[4]. This is equivalent to 234,344,500 MWhs[5]. Thus the calculation of how this wind farm will contribute to the national target is:

28MW x 365 x 24 x 0.15 (capacity factor) = 36792MWh (annual wind farm output)

36792MWh (annual turbine output)/234,000,000MWhs (UK renewable target 2020) = 0.016%

So the turbine will generate annually sixteen thousandths of one per cent of the total UK renewable energy target. The ES mentions the closure of the Didcot power station and yet this wind farm will produce less than 1.5% of Didcot's current output.

11.16 It will provide enough electricity for only around 7828 house equivalents and will save a mere 15,820 tonnes of CO_2.

[4] Table 4a in DECC, *National Renewable Energy Action Plan for the United Kingdom* (2009), 13. See: http://www.decc.gov.uk/assets/decc/what%20we%20do/uk%20energy%20supply/energy%20mix/renewable%20energy/ored/25-nat-ren-energy-action-plan.pdf.

[5] Assuming 11.63 MWhs per tonne of oil equivalent, a standard conversion factor.

11.17 Another issue not considered in the ES concerns the wear out of the turbines themselves. The Renewable Energy Foundation has recently published seminal work on the economic lifetimes of wind turbines. The author, Professor Gordon Hughes of the University of Edinburgh, used econometric techniques to analyze empirical performance data from wind turbines in the United Kingdom and in Denmark to assess the decline in the performance over time.[6]

Professor Hughes found that the decline in performance in the UK was highly significant, with the implication that the economic lifetime of the wind turbines was much shorter than the 25 years sometimes claimed by the industry. Indeed, the study found that the economic lifetime was between ten and fifteen years, after which time it would no longer be economic to repair the machines in order to maintain load factor.

11.18 Professor Hughes writes:

The normalized load factor for UK onshore wind farms declines from a peak of about 24% at age 1 to 15% at age 10 and 11% at age 15. (Hughes, *The Performance of Wind Turbines in the United Kingdom and Denmark* (2012), 7.)

This complex study is the first of its kind, and unlikely to be the last word on the subject. However, it is important to realize when assessing the benefits of a wind turbine proposal that 80–90% of its total energy output is likely to be concentrated into the first ten to fifteen years of the twenty five year lifetime of the application, even assuming that the operator is willing to spend the money needed to maintain the machine in reasonable order.

Thus, it would be naïve to assume that the lifetime output of the Bullington Cross wind farm proposal is twenty times the estimated annual output of 36.8 GWhs (i.e. 736 GWhs). Indeed, it is probable that it would produce something over half that quantity, say 441GWhs.

11.19 **In conclusion there can be no doubt that the electricity generation from this turbine is a material issue. However, the applicant, by virtue of not installing an anemometer mast, has been unable to provide more than an illustrative estimate of the only significant benefits from the wind farm. We have shown this is likely to be a major over-estimation and the actual electricity generated will be around 40% less and over the lifetime of the scheme will be nearer a quarter of that claimed in the ES. With this reduction in benefits there can be no doubt that the adverse impacts totally outweigh the limited and over exaggerated benefits and this leads to the inevitable conclusion that this application should be rejected.**

[6] Gordon Hughes, *Performance of Wind Turbines in the United Kingdom and Denmark* (REF: London, 2012). See www.ref.org.uk.

12 Public Opinion

12.1 The ES[7] claim that the majority of people are in favour of wind energy and uses this fact to attempt to justify the fact that public opinion is in favour of a particular scheme. This patently does not follow and general support of renewable energy, and wind farms in particular, has no relevance when discussing the particular factors and planning balance of an individual proposal. It then uses a MORI study in Scotland to argue that when wind farms are built then people become keener on them. This report by MORI for the Scottish Executive in 2003 looked at the opinions of residents living within 20km of ten Scottish wind farms. The most interesting conclusions are generally not made clear.

Details of the size of the turbines at these wind farms is shown in the table below together with the number of people living within 5km:

Wind Farm	Hub Height (m)	Rotor Length (m)	Total height (m)	Households within 5km
Beinn an Tuirc	40	23.5	63.5	42
Windy Standard	35	18.5	53.5	0
Novar	35	20.5	55.5	31
Hagshaw Hill	35	20.5	55.5	1510
Dun law	40	23.5	63.5	195
Bowbeat Hill	46	30	76	159
Harehill	40	23.5	63.5	1279
Tangy	40	26	66	95
Beinn Ghlas	35	22	57	48
Deucheran Hill	46/60	33	79/93	58

The data shows that these are small turbine wind farms situated in remote areas with minimal populations within 5km. If one studies the individual maps of the sites shown in the report you can see that there will be virtually no one living within 3km of the turbines. Therefore the results relating to people living within 5km and expressing positive opinions about the wind farms will actually be from people living over 3km away from the nearest small turbine and more likely 5km away.

12.2 A study carried out by the DTI in 2006 (Renewable Energy Awareness and Attitudes Research - URN 06/1256) said in its conclusions:

"It may be worth noting that, although over a half of all respondents strongly agree that they are in support of renewable energy and favour the use of wind power, only a third (32% strongly agree) would actually be happy to live within 5km of a wind power development, indicating that

[7] ES - Planning Statement - Section 8 - Public Reaction to Wind Farms

renewable energy is often deemed a good thing as long as it does not have a direct impact on ones standard of living."

12.3 This appears to be a much more credible position for most people and confirms that a majority would be of the opinion that the introduction of large wind turbines into a rural area would have an adverse impact on their lives.

12.4 Each planning application has its own balance of specific benefits and negatives and its acceptability can only be determined by a careful consideration of these local issues. The people who are in the best position to fully understand the overall, balance of a scheme are those who live in the area and fully appreciate the values attached to the local amenity.

12.5 This is confirmed by the fact that ten of the parishes neighbouring the application site, representing over 16,400 local residents, have submitted strong objections and have recommended refusal of this planning application:

Parish	Residents[8]
Wonston	1480
Whitchurch	4907
Hurstbourne Priors	338
Barton Stacey	932
Bullington	104
Micheldever	1346
South Wonston	2596
Laverstoke	373
Overton	4181
Steventon	216
Total	**16473**

12.6 Wonston Parish held a poll with 80% against, 5% neutral and only 15% in favour.

12.7 There can be no doubt that there is overwhelming local opposition to this proposed scheme**.**

12.8 This has achieved much greater significance following the announcement on the 6th June 2013 by the Department of Communities and Local Government that new planning guidance for onshore wind farms was to be issued discussed earlier in this document. **If this guidance is to be followed then the weight of public opinion against this scheme shows that it is not wanted and given that the acknowledged significant harm outweighs the benefits then together there is a cast iron case for refusal**. The main thrust of the new planning guidance will be for the opinions of local communities to be given much greater weight. The press release accompanying the announcement says:

[8] Mid 2010

Communities will have a greater say over the siting of onshore wind farms, and reap increased benefits from hosting developments that do proceed, as a result of changes announced today.

The package of measures will include a five-fold increase in the value of community benefits paid for by developers, and proposals will require communities to be consulted earlier in the application process.

Current planning decisions on onshore wind are not always reflecting a locally-led planning system. New planning guidance supporting the planning framework from DCLG will make clear that the need for renewable energy does not automatically override environmental protections and the planning concerns.

13 Socio-Economic

13.1 There will be significant socio-economic effects in the locality if this wind farm is built in the location proposed with the potential loss of jobs and local businesses' commercial viability being threatened.

Clock Barn Wedding Venue

13.2 The nearest, non-financially involved, property to the wind farm will be Tufton Warren Farm. This will be only some 800m from the nearest turbine with the wind farm occupying some 90^{o} of the view. The turbines will be a dominating visual presence and the noise and shadow flicker will add to the intrusion of the turbines on the amenity of the location.

13.3 Tufton Warren is the home of a major wedding venue business. The website can be found at www.clockbarn-weddings.co.uk. It is marketed through Country House Wedding Venues and their objection letter is shown in Appendix 5.

13.4 One of the main attractions which complements the attractive building itself is the setting in which it is located. This is made very clear in the websites:

Clock Barn is a wonderful rustic barn wedding venue in Hampshire that lies at the end of a very long scenic drive surrounded by farmland and countryside. The historic thatched clock at its entrance is distinctive and its original beamed interior adds character and style to any wedding theme. (Country house wedding venues)

To provide a beautiful & unique wedding venue in the breathtaking surroundings of the Hampshire countryside.

Situated in beautiful surroundings in the heart of rural Hampshire, this impressive barn, refurbished in 2002, is a truly wonderful venue.
The venue could be a million miles from anywhere, yet is only five minutes

from the A34 and fifteen minutes from both Winchester and Newbury. (Clock barn)

Sweeping views of unspoilt Hampshire countryside – a feature of Clock Barn wedding venue

13.5 It also comes out in the testimonials from clients:

The Clock Barn looked absolutely stunning and although we were helped by the weather, nothing could take away from the surrounding countryside being amazing in its own right.
Mr & Mrs Hughes

Nearly a month on we are still receiving rave reviews about the venue and how stunning the barn is and its location. We chose it for these reasons alone.
Natalie and Andy

13.6 Thus it is clear that the countryside and the views from the venue are an integral part of the selling proposition of Clock Barn and anything that undermines their attractiveness represents a serious threat to the on-going commercial viability of a well-established local business. A wedding day is a very emotional occasion and expectations are high and anything that could be perceived as a potential negative can swing any decision as to which venue to choose. Fourteen 126m wind turbines in a landscape with no other high vertical structures will appear alien and there can be no doubt that prospective brides and grooms will view them as such. In a market where there is a wide range of options why would anyone choose a location dominated by wind turbines?

The dominance of the turbines is particularly intrusive in the long drive

specially created as a grand entrance to the venue. This is shown in Viewpoint J in the landscape report by the Landscape Partnership. The turbines would be directly ahead and to the side and all would be in view. As the key first impression for all guests this will create a significant adverse impression.

13.7 The ES is clear that[9] for this property:

It is predicted that the closer turbines (nos 2,4,5,6,7 &8) would remain prominent. The change in view would be large in magnitude.

13.8 This is not a small business as is made clear in the Country House Wedding Venues objection. This states that the Clock Barn at Tufton Warren Farm is one of the leading wedding venues in Hampshire and fulfils many of the requirements that modern couples consider essential when choosing their wedding venue, including that its setting is in beautiful unspoilt, open countryside with wide-ranging views.

13.9 Clock Barn currently hosts 60 weddings a year and with an average cost of a wedding of £18,500 then this equates to a total spend of c.£1.1m. In addition it is estimated that a wedding guest spends an average of £250 and with 120 guests per wedding then this is an additional £1.8m. A lot of this will support other local businesses including photographers, entertainment, accommodation, restaurants and pubs, taxis, hairdressers, wedding cars, beauticians, church fees, cake makers, wedding dress, florists etc..

13.10 Thus weddings at Clock Barn will generate close to £3m for the local economy. It also generates new jobs and safeguards many existing jobs. Over 50 people will be working on average supporting any wedding at Clock Barn.

13.11 The introduction of a massive wind farm very close to Tufton Warren Farm will jeopardise the substantial wedding business at Clock Barn and this harm needs to be given serious consideration in the planning balance.

Norton Livery

13.12 Norton Livery is a stable yard based at Lower Norton Farm, approximately 1km south of the proposed site. It was established in 2001 and has spaces for up to 20 horses. The yard provides a full livery service for horse riders from the surrounding area and provides employment for three local people on a full time basis.

13.13 Due to the proximity of the A303 and A34 it is crucial to the success of this livery yard and for the safety and welfare of the horses and riders that access to the existing extensive and well used bridle path network is maintained. There is an underpass under the A303. The area where the turbines would be located offers a series of circular routes largely avoiding the road network

[9] ES - Statement of Residential Amenity - Page 9

and where roads are used they are very quiet lanes with limited traffic.

13.14 Whilst the applicant has included a 200m separation distance from the bridleways this is significantly less than the British Horse Society preferred three times tip height, which in this case would be 380m. Horses are notoriously sensitive to moving structures and the number of turbines and their large geographical spread means that their disturbing presence will be pervasive over a large area and length of the bridle path network in a previously unspoilt landscape. This will effectively render the whole area inaccessible to the majority of horses and riders particularly the more nervous horses and inexperienced riders.

13.15 With a large choice of alternative stables this will jeopardise the continuing commercial viability of the yard as clients are unlikely to continue to keep their horses in an area where their ability to enjoy risk free riding in attractive countryside has been severely restricted.

Popham Airfield

13.16 We have already discussed the strong objection by Popham Airfield to this proposal in Section 8 on aviation. This is a thriving airfield offering a valued amenity to fliers both local and from further afield. It is particularly popular with microlight and other light craft fliers with the busiest microlight training school in the UK. Their objection letter outlines clearly the safety issues that would result from the construction of this wind farm and also the reduction in the attractiveness of the Airfield to many of its current users. Such airfields are not hugely profitable concerns and any significant reduction in income will place the commercial viability of the airfield in jeopardy.

13.17 **Wind is a universal resource and can be harvested anywhere. The businesses considered above cannot move and have built up a market over many years. This wind farm will place their viability in jeopardy and risk the loss of many jobs. This serious socio-economic harm must be given significant weight when considering the planning balance for this proposal.**

14 Grid Connection

14.1 National Planning Policy Statement EN1 clearly states that the grid connection should be considered as part of this application and if it is not then clear reasons should be given. The ES[10] states that the grid connection will be to a 33kV substation at Barton Stacey with the cable being taken underground via the public highway. It is accepted that this will cause minimal environmental harm but what is not clear is whether agreement has been reached with the statutory undertaker, Scottish and Southern Energy, as to the ability of the grid network to accommodate the whole output of the 28MW capacity of the turbines without any upgrade to the local network. If

[10] ES - Para 1.5

there is a capacity problem then this needs to be identified together with a plan of works needed to rectify the situation. Such a report also needs to assess the implications of connecting such a significant generator to the grid network on the ability to accommodate future renewable energy projects.

14.2 Without a comprehensive assessment of the grid connection this application is in conflict with NPS EN1.

15 Decommissioning

15.1 Whilst the ES talks about the process of decommissioning there is limited reassurance about whether this will actually take place once there is no commercial value left in the permission at the end of the life of the planning permission.

15.2 If the applicant is serious in removing one of the concerns of local residents then they should have no objection to providing a decommissioning bond as has been done by numerous developers in the past.

16 Planning Balance

16.1 This proposal is for a fourteen turbine wind farm with 126m wind turbines, one of the biggest in the South of England, located in an attractive rural landscape rural area and surrounded by six nationally designated National Parks or AONBs within 35km. This is not a small wind farm which can be more easily be accommodated within the countryside, it is a major intrusion spreading over some 8 square kilometres. Such a proposal will by its very size, alien nature in a rural setting and rotating blades cause significant harm. This is accepted by the ES which acknowledges the significant harm that this wind farm 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.

16.2 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. It post-dates the ES and will not have been taken into account in the conclusions drawn within the ES.

16.3 Interestingly the ES does not appear to have undertaken any balancing exercise at all. The ES Volume 2 which is the main text does not perform such a balancing exercise. Its final Section 15 merely lists all the impacts of the scheme but does not judge how these weigh against the benefits. This may well be because there is virtually no consideration given to the only significant socio-economic benefit of the scheme, namely the amount of renewable electricity that will be generated. The lack of an anemometer mast means that there is no site specific wind data and hence the estimate of electricity generation is merely an illustrative example with no basis in reality. We have shown that this estimate is likely to be a significant over-estimation given that the site chosen is in one of the lowest wind speed areas in the country.

16.4 In the absence of any balancing exercise in the main body of the ES the only other place where it might be found is in the Planning Statement. The final Section 10 is headed 'Conclusions on the Policy Issues' and in para 10.1 it quotes the NPPF and the presumption in favour of sustainable development unless any harm that has been identified significantly and demonstrably outweighs the wider benefits.

16.5 In 10.2 - 7 it then covers the planning balance, which are discussed below:

10.2 *The assessment that has been carried out shows that quite apart from the issue of the level of need for more delivery at an accelerating rate in the coming years, this is a proposal that meets the tests in the NPPF as well as any proposal might have been expected to do. This is where the need for the full balancing exercise comes to the fore. Cumulative landscape and visual impacts are not assessed in the ES as being a matter of specific concern for this project since there are no consented wind farms anywhere close to the site, although the relationship with the proposed wind farm at Woodmancott near the M3 is assessed. Indeed it can also be noted that the ES has not identified any significant effects in EIA terms on a range of other criteria, including cultural heritage assets and the full range of nature conservation habitats and species.*

We show clearly that there is not a need for an increasing rate of delivery as actually the 2020 targets will be met with the current pipeline of schemes excluding this one.

It is not acceptable for the proposal to meet the tests in the NPPF 'as well as any proposal might have been expected to do'. Either it meets the tests or it does not. We show clearly that it does not.

This section majors on cumulative impact and the statement that the ES has not identified any significant effects is just plain wrong. It does and no fourteen turbine wind farm could be erected without significant effects. That is precisely why you need the balancing exercise.

16.6 10.3 The fact that the site lies within an area identified in the renewable energy studies carried out for both Winchester District (sic) Council and

Basingstoke Borough Council (sic) is clearly a factor in its favour, since the process of identifying such areas involved an assessment of the relative merits of different parts of the Council's areas so as to identify those areas least likely to carry significant constraints to wind energy development.

All such studies are carried out on the premise that they should not be given any weight in the determination of a specific planning application. They are general studies. Proposals in areas of potential still have to prove they are acceptable and certainly a fourteen turbine wind farm would not have been considered in the studies mentioned. As a study of relative merits it may still be the case that onshore wind development with 126m high turbines may not be suitable anywhere in Hampshire.

16.7 *10.4 The proposal can clearly gain considerable support from the shortfall in delivery which has occurred against the overall regional targets for 2010 and this is being endorsed by appeal decisions such as those at Crook Hill in Calderdale/Rochdale, Grange in North Lincolnshire and the raft of recent appeal cases in East Riding and the East Midlands. The issues that have been addressed in the ES cover the full range of matters which need to be assessed on any wind farm proposal, such as the landscape and visual impact, national designations, nature conservation, cultural heritage, noise, residential amenity, and highway safety. As far as effects on rights of way are concerned, there are no direct effects on the rights of way network during the operational phase and adequate separation from these and particularly horse-riding routes. There is no evidence from any part of the country that there has been a damaging effect on tourism from wind farm developments.*

The Crook Hill and the Grange decisions were delivered in July 2009 and April 2010 respectively. They have no relevance as the situation has changed dramatically in the three years since these decisions. Our analysis uses the most up to date data as at 2012 and shows that there is no pressing need. This paragraph reflects the attempt by the ES to only paint a picture that supports its arguments in that out of date information is put forward. The ES does cover the full range of matters but we show that the survey work, analysis and conclusions in many instances are omitted, not up to standard and wrong. Interesting to note that here there is no mention of the significant harm that the ES admits. Our evidence shows that there is clear harm caused to a much greater extent than shown in the ES.

16.8 *10.5 In all planning decisions on wind energy developments there are balancing judgements that have to be made and that is especially the case where the type of development that is proposed has the potential to create conflicts with a number of development policy plan areas. Against this potential for conflict it is necessary to weigh the Government's energy policy requirements and the advice at national level that flows from this. The balancing exercise has been undertaken for a large number of wind farm proposals in the past and the evidence that it has come down in favour of the wind farm proposal is shown by the fact that there now well over 150 onshore wind farm sites across the United Kingdom, involving nearly 2500*

machines, quite apart from another 170 sites with around 2200 machines that have been consented and not yet built, making a significant contribution to the overall targets that the Government has set.

This is completely irrelevant. No decision on one site can be applied to another which has its own unique set of local issues. This is acknowledged in every appeal decision. If the ES wishes to make this argument then they should have mentioned that more wind farm proposals are turned down than are approved which rather undermines their case.

16.9 *10.6 The process of assessing the weight to be given to the national energy policy is very much simplified by the assessment of the individual topics that has been undertaken, provided in the ES and reviewed in this Planning Statement.*

How can the weight to be given to national energy policy be simplified by assessing ecology for example. This statement is meaningless. The weight that can be given to this scheme with regard to national energy policy is totally dependent on the amount of electricity generated which contributes to the targets set by national energy policy. The ES does not discuss this at all. We show that with a wind farm in one of the least windy locations in the country even the low estimates in the ES are significantly exaggerated.

16.10 *10.7 In the event that there are claims of a development plan policy conflict, then the significant weight to be attached to the Government's national energy policy and to the new NPPF has to be brought into the balance and is a compelling factor supporting an approval.*

We agree that the national energy policy is a material issue, but see above in terms of electricity generation, but the recent announcement of new planning guidance is directly aimed at quashing statements like this where the assumption seems to be that because a scheme produces renewable energy then this **compels** LPAs to approve. That is completely wrong and local opinion and all the harmful effects have to be given great weight.

16.11 *10.8 Based on the planning assessment that has been undertaken in this statement , it is concluded that this proposal is consistent with the national planning policy and energy advice on making the best use of renewable energy resources wherever they are economically attractive and environmentally acceptable. Accordingly three Councils are invited to approve their respective application.*

If the reasoning in 10.7 drove the analysis in the ES then it is clear how this Planning Statement arrived at the incorrect conclusion that this scheme is acceptable. There is no mention of any balancing exercise and the policy test is nothing to do with making the best use of renewable energy resources wherever they are economically attractive and environmentally acceptable. That is wrong and it also misses out completely the social acceptability which is the third plank of sustainable development that underpins the NPPF. It is symptomatic of the way that the applicant has treated local

people and their concerns about impacts on where they live and work.

It is clear that no effective balancing exercise has been carried out by the applicant and their conclusions must be given no weight in the determination of the three planning applications.

16.12 KHG recognise that the electricity generated is a material issue that should be given weight in this determination. It is obvious that the amount of weight to be given to this is directly related to the amount of electricity generated as KHG argue that there are no other significant socio-economic benefits from this scheme, as most of the construction benefit will go to overseas turbine manufacturers and specialist commissioning companies.

By not erecting an anemometer mast the applicant has denied decision makers with any site specific information about possible generation. No weight can be given to their illustrative estimate as there is no evidence provided to justify it. KHG show that the fourteen massive turbines will produce enough electricity for around 7800 house equivalents to set against the harm caused.

16.13 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 have 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 this provides grounds for refusing this application as all such 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 until they receive concrete reassurance in writing that the aviation issues have mitigated to the satisfaction of the operators involved.

16.14 KHG has shown that there will be significant harm caused to 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, 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.

16.15 In terms of 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, albeit the final determination will be based on the balancing exercise.

16.16 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. There is an overwhelming case for refusal. Accordingly the three Councils are invited to refuse their respective applications.

View north across the A303 towards centre of windfarm site, from the footpath to the bronze-age tumuli at Kitson's Clump, Wonston – an unspoilt landscape with breath-taking views.