



Campaign to Protect
Rural England

ISLE OF WIGHT

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Mr Andrew Pegram
Development Control Manager
Isle of Wight Council
Seaclose Office s, Fairlee Road
Newport, Isle of Wight PO30 2QS.

Dear Mr Pegram,

TCP/27774 – P/01400/06

Land south of Wellow/east of Holmfield avenue/west of Stoneovers and off Broad Lane, Shalcombe, Yarmouth: proposed wind turbine generating station comprising 4 turbines 59m hub height and 100m overall height (tip height) and 2 turbines 68.5m hub height and 109.5m overall height (tip height) (total of 6 turbines) with associated infrastructure to include 59m high (approx) meteorological mast, crane pads, switching station, underground cables, temporary construction compound, parking bay and new access off Broad Lane.

The Campaign to Protect Rural England is a national organisation devoted to promoting and conserving the natural environment and to encouraging the sustainable use of land and natural resources. While Renewable Energy is part of this mandate, we recognise that research on different forms of renewable energy is at different stages, and that although onshore Wind Turbine technology is ahead in development terms, it is inefficient, intermittent, and makes tiny contributions to electricity generation in relation to the land it uses and in its landscape impact.

Landscape impact of the proposal

The landscape of the West Wight is one of the Island's most valued features, well away from industrial and commercial developments elsewhere on the Island. The coast of the West Wight peninsula features the Newtown National Nature Reserve, the Hamstead Heritage Coast, the Western Yar Estuary, the Needles headland and the Tennyson Heritage Coast, and within this peninsula are large Areas of Outstanding Natural Beauty: crucially, the application site at Wellow is bounded by AONB on three sides, including the visually important ridge of East Afton Down and Shalcombe Down, which, from the Tennyson Trail, looks directly across the site at

Wellow to the Solent and the Hampshire coast beyond. The intrusion represented by the scale and heights of the proposed structures consists therefore of views from the AONB on the south side, views from the Solent, New Forest National Park and Newtown Creek Nature Reserve on the north side, and intrusion of the turbines into the view from the water and the ferry of the harbour, estuary and village of Yarmouth, which are in the AONB.

It should be remarked that not only will these structures have an impact on the Island's AONB, but would also have an adverse impact on the proposed Maritime National Park in the Western Solent. One of the Key Principles of **Planning Policy Guidance 22 (Renewable Energy)** is that *"Development proposals should demonstrate ... how any environmental ... impacts have been minimised through careful consideration of location, scale, design, and other measures"*, while the IW Council's own **Supplementary Planning Guidance on Wind Turbines and Wind Farms** states *"The total effect of all such development is at a scale sympathetic to the intimate character and landform of the island"* and *"They avoid and do not have an adverse impact on the most sensitive areas of designated landscape, coastal, nature conservation or archaeological importance"*.

We also refer to the Whinash Wind Farm Inquiry (Feb 2006), where the Planning Inspector, while noting *"the need to take account of environmental impacts in terms of landscape and visual effects which will vary on a case by case basis according to the type of development, its location and landscape setting"*, concluded that *"the presence of a wind farm, of this scale and extent, would fail to conserve or enhance the natural beauty of both National Parks"*. In this case, the Inspector was referring to a Wind Farm outside designated landscapes (as is the case at Wellow) but 220m at the closest point to the Lake District National Park boundary, and 3.75km at the closest point to the Yorkshire Dales National Park boundary. This closeness was enough for the Inspector to conclude that *"I have reached the conclusion that the harm to this particular landscape outweighs the benefits of securing renewable energy at Whinash"*.

The Isle of Wight is on a much more intimate scale than the considerations in this last case, so we regard the conclusions as even more pertinent:

- **The scale and height of the Wellow wind turbines would have an adverse effect on the designated landscape, coast and estuaries, and this should outweigh any benefits of securing the renewable energy generated.**

However, in addition to the proposed wind turbines, four of them of overall height 100m and two of them of overall height 109.5m, there is proposed a **59m high meteorological lattice tower**:

- **The lattice tower is of a completely different design and appearance to the wind turbines, and is not in harmony with the overall design of the installation.**
- **The lattice tower is, of itself, an anomalous and intrusive object in the landscape.**

Similar in construction to a mobile phone mast, it is up to 4 times higher. For example, mobile phone masts in the countryside have recently been **refused** at

P/01171/05	Peacock Hill, Bembridge (in AONB)	15m high;
P/01642/05	Fairy Hill, Seaview	23.3m high
P/00643/06	Cockleton Farm, Gurnard	15m high.

The lattice tower in the present application is in an open landscape, much higher than any of these phone masts, and would have a much greater impact. It ought therefore, in itself, to be refused as unacceptable.

Other landscape impacts relate to the building of the access roads and the crane pads. According to the Supporting Statement (2.10), the seven concrete crane pads would be 18m x 35m = 630 sq.m each, with about 3km of permanent hard tracks 5m wide, for a total of concrete or hard surfacing of some 1.94 hectares (about 4.85 acres). This does not include substantial additional tracks and contractors' compound during construction. Not only is all this concrete unsightly and inappropriate, but the impeding of natural soakaway amounts to the equivalent of a small housing estate.

- The permanent access tracks and crane pads represent substantial environmental intrusion on to agricultural land.
- The hard surfacing of some 1.94 ha would exacerbate the flood risk to the lower lying houses at Wellow and Thorley Street, as well as affecting water courses and springs in the area.

Economic effects

According to PPS 22, *"The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission"*.

- The application appears to be (despite its quantity) remarkably reticent about any possible economic benefits to the Island. The benefits seem to be minimal.

Some short-term jobs would be created during construction, and the supply of blades for 6 turbines by the Island-based Vestas Blades would be a tiny proportion of the company's business and have no sustained effect on employment, though it is asserted in the Environmental Statement (ES 9.93) that Vestas could use the site as a demonstration for potential clients – given that most of its clients are overseas, where they already have wind farms for inspection, it seems doubtful that this assertion could carry much weight.

With regard to Tourism, this is called in the ES "Indirect employment effects" (see 9.88-9.92), the tenor of which is that the applicant has no idea how tourism would be affected by the installation.

- A large number of visitors to the Isle of Wight come for the scenery, the walking trails, the cycling network, sailing and coastal views, and tranquillity within an unspoiled landscape. While of initial curiosity value, wind farms are not a tourist attraction, and we contend that they would have an adverse effect on walkers and horseriders in the West Wight.

There are, indeed, many footpaths and bridleways in the area, some of which cross the site.

- **Horses particularly are likely to be “spooked” by the noise and movement, and horseriders would have to steer well clear of the area.**
- **The site would be a deterrent to air-based sports such as hang-gliding, whose participants would also have to keep well clear of the area.**
- **A number of small tourist operations (e.g. Bed & Breakfast) exist in the locality and could well be driven out of business by the turbines.**

Local effects

The effects on roads and road users need to be considered.

- **Broad Lane is a narrow one-lane road with passing places, and an excellent quiet lane for cyclists. It will inevitably become a major route for construction traffic and its tranquillity may well be lost for ever.**

Notably, the Quarries on Broad Lane have planning permission, used occasionally and claimed on old quarry consents going back 50 or 60 years, but quarry traffic does not have permission to use Broad Lane – they were given consent to make a direct access route across a field from the B3399 road. This was never implemented, and quarry trucks on Broad Lane are unauthorised. In other words, it has already been recognised by the IW Council that heavy traffic on Broad Lane is undesirable.

- **The presence of large moving wind turbines would be a major distraction to motorists on the roads bounding the site to north and south, namely the B3399 “middle road” and the B3401 through Thorley and Wellow. Accordingly, we regard the installation as dangerous in this regard and contrary to planning policy on “Highway considerations for new developments”.**

There are a number of technical problems which would be caused for local people, and for which the approach in the application seems to be “not to worry, you’ll get used to it”. Among these are:

- **Properties in Wellow would be affected by noise, however many technical details are supplied. The fact is, that the normal ambient background noise in the area is very small, so the noise presence of turbines would be very noticeable.**
- **It has been recognised in the ES (15.26-15.28) that some properties nearby would be affected by “shadow flicker”.**
- **There would be some interference with TV reception (ES 15.31), with the suggestion that householders would need to install new technology in mitigation.**
- **There would also be some interference with Mobile Phone signals (ES 15.32), but the application suggests that the mobile phone company is being “over-cautious”.**

Other concerns

There is a question of setting **precedents** for expansion of wind-farm developments on the Island. Currently the applicant has examined other sites and given reasons for choosing the Wellow site. But there is at the moment an extant planning permission for turbines on **Cheverton Down** on a prominent hilltop site in the AONB. This was upgraded from consent for a very small development to larger turbines on the basis that the change was "not significant". We disputed this at the time, but the turbines have not been built and it is now clear that the present consent is technologically obsolete, that the Isle of Wight community is now very much more sensitive to the value of its finest landscapes, and that any attempt to further upgrade the Cheverton Down consent to create a viable wind turbine development would be fiercely resisted. Accordingly:

- **We do not regard the unfortunate non-viable Cheverton Down consent as setting a precedent for any wind turbine development elsewhere in the Isle of Wight, including the Wellow application.**
- **However, consent for a new viable wind farm at Wellow would open the door to any other application, which could have a profound effect on other vulnerable landscapes and on tourist operations and recreational sites in other parts of the Island.**

While the connections from each turbine to the control box have been established as being through underground cables (it could hardly be otherwise, as you can't drape wires from the top of a moving wind turbine), the **connection to the National Grid** is stated as being the subject of a later planning application. We believe that this is an important issue which should have been addressed as part of the original (current) application.

- **At a time when overhead electric cables are regarded as an environmental eyesore, and when funds are being released to place existing cables underground, it would be completely unacceptable to create new overhead cables and pylons connecting the wind farm control cabin to the grid. We need reassurance that there would be no new overhead cables.**

The question of **decommissioning** the structures does not seem to have been adequately addressed. Although the applicant gives details (Supporting Statement 1.8) of two projects completed (4 turbines Orkney 11MW, 10 turbines Kettering 20MW) this is not a company with any history to speak of, and one would need considerable reassurance that funds for maintenance and decommissioning were totally earmarked and secured. The **economy** of wind energy projects is in any case completely distorted by government subsidies, and a change in government policy such as a shift to more effective energy sources could leave this company high and dry.

- **A completely secure bond or other insurance should be required so as to ensure that if this project were ever built, there would be no cost to the Island taxpayer of decommissioning it at the end of its useful life.**

We are also disturbed by the fact that the remarks in the application concerning decommissioning refer to the removal of structures **down to ground level**.

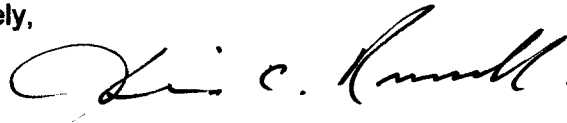
- **It would not be acceptable if hard surface access roads and concrete crane pads were still left after decommissioning.**

Finally, in terms of the contribution to the energy supply, any reference to usage **in the Isle of Wight** is rather spurious, since the output would be directly connected to the National Grid, in order to ensure continuity of supply when there is insufficient wind. In addition:

- **The very small contribution to electricity generation would be offset by the several years output which would be required in energy terms to construct and decommission this project.**

In conclusion, The Campaign to Protect Rural England (Isle of Wight) considers that the proposed wind farm would have a detrimental visual impact on some of the Island's most sensitive landscapes, that the economic benefits are mainly negative, that the intrusive effect on local communities would be traumatic, and that the reputation of West Wight as an unspoilt destination for the environmentally-conscious tourist would be ruined. The harm done would be disproportionate to the small gain and we urge that the application be **refused**.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dennis Russell', written in a cursive style.

(Professor) Dennis Russell, MSc, PhD, DSc, FIMA
Chairman, Campaign to Protect Rural England (Isle of Wight).

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