



The Wight Against Rural Turbines

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Objection to the Proposed Wind Farm South of Wellow, Isle of Wight

Planning Application P/01400/06

21st July 2006

The Wight Against Rural Turbines (ThWART) strongly supports energy conservation and renewable energy production that is predictable (such as tidal power) or provides energy in a storable format (as in the case of energy crops). It believes that benefits produced from renewable energy installations and developments must be clearly shown to outweigh any damage to the Island environment and its recreational amenity. In particular, ThWART is dedicated to preserving the Island landscape and opposing inappropriate siting of industrial scale wind turbines.

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Covering letter to:
Mr Andrew Pegram
Planning Services
Isle of Wight Council
Seaclose Offices
Fairlee Road
NEWPORT
PO30 2QS

21ST July 2006

Dear Mr Pegram

Planning Application P/01400/06—Wind Turbines near Wellow.

We write to object to the proposal to build wind turbines south of Wellow.

We have multiple objections falling into twelve areas. The form of our presentation follows a pattern. In each subject we compare the content of the application and the presented evidence to national, regional and local guidelines and precedents. We comment, and, if appropriate challenge, form a conclusion and record our objection. In the case of Planning Policy our objection takes the form of the statement that the particular planning requirement has not been met.

The order of subjects does not imply any priority or relative importance. Each and every objection is important in its own right.

The order of subject areas, and chapters, is as below and each subject area may contain multiple objections: -

- 1 Landscape
- 2 Consultation
- 3 Grid Connection
- 4 Recreation and Tourism
- 5 Public rights of way
- 6 Aviation Risk
- 7 Wild Life
- 8 Hydrology
- 9 Local Amenity
- 10 Driver Distraction & Site Access
- 11 Benefit Claims
- 12 Planning Policies

This letter, our document of numbered pages, and attachments, represents our submission.

Responding during the statutory consultation period of six weeks from first sight of the Application has proved a serious challenge. Accordingly we reserve the right to add or amend the information contained herein should further evidence emerge.

We write to represent the collective strength of ThWART. Our database of numbers of supporters contains 3,487 names and addresses at today's date.

Yours sincerely

Summary of Objections

Overall :

- Failure of applicant to explain:
 - Why this development?
 - Why in this location?
 - Why now?
- Failure of the applicant to address (or properly address) a wide range of significant issues and, in so doing.....
- Paying disregard to planning policies and guidance (PPS22, RPG9, Isle of Wight UDP and SPG).

Conclusion: Application should be rejected on all of the issue so far identified

Basis objection for objection, by subject area (and in no particular order) are summarised below. See individual sections within this document for detailed analysis.

1. Landscape:

- Failure to justify site selection (PPS22).
- Failure to demonstrate that objectives of AONB and Heritage Coast have been met (PPS22).
- Failure to provide adequate and appropriate photomontage evidence (ie as requested by AONB authority).
- Failure to recognise or address impact on The Solent (PPS22).
- Impact on listed buildings given insufficient attention (PPS22).

2. Community Consultation:

- Need to engage in proper local consultation (PPS22) unfulfilled.

3. Grid Connection:

- Failure to provide a plan or propose any detail of connection (PPS22/SPG).

4. Tourism & Recreation:

- Impact not assessed on a local or whole Island basis, with no data provided.

5. Public Rights of Way:

- No meaningful assessment provided.
- "Acceptable separation" of turbines from public rights of way not achieved (PPS22).
- Too close to bridleways for safety to horses and riders (PPS22).

6. Aviation Risks:

- Application should not have been submitted without consultation and positive response from the operators of Bournemouth International Airport (PPS22).
- Local recreational activities of hang-gliders and paragliders not addressed (PPS22).

7. Wild Life:

- No assessment of risk to migratory birds (PPS22).
- Identified risk to resident bird species.
- No data based assessment of risk to bats presented (PPS22).

8. Hydrology:

- No site survey regarding risk to aquifers (PPS23).
- No site assessment of risk to surface waters (PPS22).

9. Local Amenity, Enjoyment and Health:

9.1 Visual Intrusion:

- No assessment of effect on properties.
- No assessment of effect on public rights of way

9.2 Noise:

- Assessment provided by applicant is flawed (PPS22 & BS4147)
- No assessment of effect on public rights of way

9.3 Shadow/flicker and reflected light:

- Assessment provided by applicant is flawed (PPS22)
- No assessment of effect on public rights of way

9.4 Health:

- Reliance on old (1997) assessment of effects from low frequency noise

9.5 TV Reception:

- Failure to make assessment of risks (PPS22)
- BBC assessment tool suggests risks to over 4,000 homes

10. Driver Distraction and Site Access:

- Risks of driver distraction not addressed, eg to:
 - Relevant section of B3399/B3401 "Middle Road" (78 accidents involving injury within a 10 year period).
 - Broad Lane.
 - Relevant section of A3054 (Yarmouth to Newport road).
- Access of servicing and construction traffic not assessed for effects on:
 - Tourist traffic (especially to "The Orchards" holiday park).
 - Access to Shalfleet Primary School.
 - Broad Lane residences and commercial/tourist activities.

11. Benefits:

- No substantiated claims made by applicant
- Local wind conditions may only allow useful operation (ie more than 10% of rated generator output) for less than 30% of the time.
- Overall CO₂ savings likely to be very low.

12. Planning Policy:

- Proposal conflicts with national (PPS22), regional (RPG9) and local (Unitary Development Plan, Supplementary Planning Guidance) planning policies and guidelines.

1 LANDSCAPE IMPACT

1.1 Introduction

The site to which the application relates is at the heart of what must be England's finest marine landscape, offering a wide diversity of form and geology within a confined area.

Ultimately, the combination of England's only Sound (the Solent) between her only significant coastal island (the Wight) and her only historic coastal forest (the New Forest) is what makes this area unique.

This is reinforced by the fact that the area surrounding the site includes two Heritage Coasts, three Areas of Outstanding Natural Beauty, a National Park and a candidate for the much discussed proposed National Water Park. According to the Island Plan, UK or European designations protect 70% of the Island.

A landscape character assessment was commissioned by the West Wight Landscape Partnership in 2005¹. This provides an objective and accurate guide to the distinctive qualities of the West Wight landscape. The assessment states:

"West Wight landscape has highly distinctive qualities; its close relationship with the sea; its small scale highly varied and largely rural landscape; its remarkable geological features; its peaceful natural, sometimes remote, ambience. The latter is a particularly precious quality in the crowded south east of England."

"West Wight has considerable areas of remote landscape which are timeless in feel, with little or no settlement or even access in some cases."

"Intertwined with these themes is that of the small scale of West Wight and the great variety of landscape. West Wight encapsulates many of the landscapes of southern England in its small area."

The West Wight Landscape Character Assessment sets out the response of public consultation which demonstrates the wealth of natural and heritage features available in the West Wight, which contribute so significantly to the perception of the value of the area. Each of these features needs to be taken into account in considering this application both individually and cumulatively.

The applicant proposes to build 6 turbines of approximately 100 to 110 metres in height, together with an anemometer mast of approximately 59 metres.

At this height, the structures would become the defining feature for far more than the 30 km referred to by the applicant as the anticipated zone of visual impact.

Seen from mid-Solent, the much vaunted 'Gateway to the Island', they will dominate the landscape and interrupt the view of the distant Downs.

They would be higher above sea level than the highest point of Tennyson Down, as indicated by Figure 1.1A. They would be little short of the height above sea level of the Spinnaker Tower in Portsmouth.

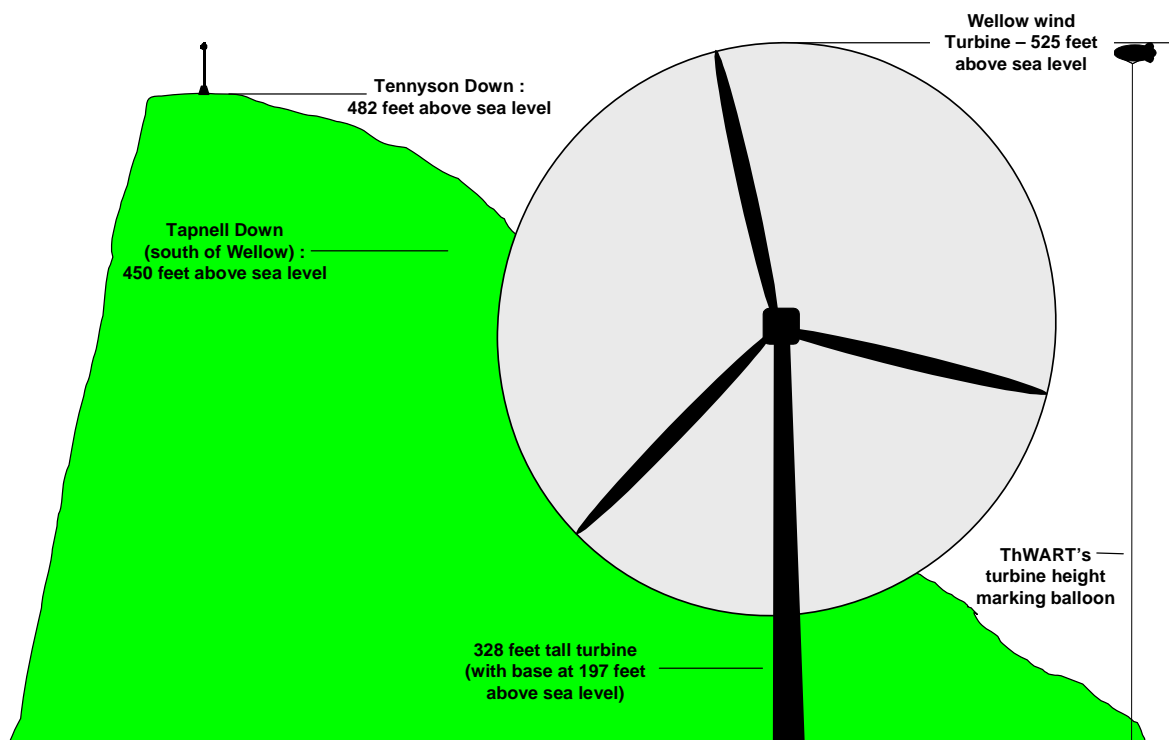
¹ West Wight Landscape Character Assessment prepared by Land Use Consultants, 43 Chalton Street, London NW1 1JD.

As part of its activities in preparing opposition to this proposal, ThWART has obtained a report from Robin Bryer, which is attached as Appendix 1A². We recommend the contents of this report, which advocates rejection of the application, to those considering this proposal.

The proposed wind farm, if permitted, would cause significant damage to the character of the landscape. It would be highly intrusive, and out of scale with the surrounding landscape. It would damage the amenity value of the area to residents and visitors. The consequential impact of the proposed wind farm would be enormously detrimental.

On this basis, amongst others, we oppose the application.

Figure 1.1A : Turbine Height above sea level would exceed maximum height of Tennyson Down



² Objection to an Application by West Wight Wind Farm Ltd to erect six wind turbines on land south of Wellow, Isle of Wight on behalf of The Wight Against Rural Turbines by Robin Bryer BA (Hons) Dunelm, MRTPI, Chartered Town Planner dated 19th June 2006

1.2 Lack of Proper Consideration of Alternative Site

Overall comment:

- **The applicant fails to justify the selection of the proposed site for its development, failing to comply with the requirements of PPS22 and RPG9.**
- **The applicant fails to provide sufficient information regarding wind speed to allow the value of the site to be verified.**
- **The applicant's other criteria for site selection are demonstrably not satisfied**

Conclusion: **The application should be rejected.**

1.2.1 A key consideration to an application of this nature must be

- **Why is there a need for the development?**
- **Why is there a need now for the development?**
- **Why is there a need here for the development?**

The applicant fails to justify the need for the development based on any of these considerations.

1.2.2 Why here? The applicant's review of alternative sites appears to be a thinly disguised attempt to justify the siting of a wind farm at Wellow. Amongst other failings, it does not take into account the potential to site the wind farm on the mainland. It shows no firm evidence that the wind conditions at the site are appropriate. It does not mention the considerable impact of heavy construction traffic on the fragile Island roads and it offers interpretations of other important criteria that ignore the facts.

Although the approach for site selection is put forward as a form of scientific process, the reality is that they appear to have looked for undesignated areas and then spoken to landowners to find a willing recipient.

1.2.3 The target to develop 10% of energy requirements from renewable sources is for the region of Hampshire and the Isle of Wight. In the application, there appears to have been no consideration or study of potential alternative sites for a wind farm in Hampshire.

1.2.4 The reason given for focussing only on the Isle of Wight results from the original stated purpose of the wind farm proposal by Aerolaminates Limited. This was to "act as a research and development facility at which their turbine blades could be tested and refined". The generation of electricity to be fed into the local grid was only given as a secondary reason.

1.2.5 This is clearly no longer the case as the generation of electricity is now the primary purpose of the applicant.

1.2.6 Even if it were appropriate originally to look solely at the Isle of Wight (which we do not accept), in view of the change in purpose for the project, it is essential that an evaluation of sites throughout the full region (namely Hampshire and the Isle of Wight) is undertaken to ensure that the most appropriate potential site is identified. The applicant has patently failed to undertake any such review.

1.2.7 The applicant claims³ that the application site is:

“...largely unconstrained in planning and environmental terms, but which possesses favourable characteristics in terms of the size of site, wind speed, vehicular access and the availability of a connection to the electricity grid, all of which are required to enable development of a viable wind farm.”

This claim is breath-taking in its disregard for the reality of the facts affecting the proposed site, and is unsubstantiated by any objective evidence, as will be seen from this document.

1.2.8 Wind speed is probably the most important criteria in selecting potential sites for a wind farm. However the data provided by the applicant does not provide firm evidence that sufficient electricity would be provided at times when it is needed.

1.2.9 The meteorological data provided in paragraph 8.3 of the West Wight Project Alternatives Technical Appendix included as part of the application states that the area is:

“**thought** to possess **average** speeds in excess of 6.5 metres per second” (emphasis added).

We are informed in paragraph 5.3 of the same Technical Annex that data obtained from the anemometer showed average wind speeds in excess of 6.5 metres per second.

1.2.10 The provision of “average speed” data in this context is meaningless. The applicant does not provide as evidence any data from the anemometer to indicate how frequently, for what length of time and at what time during the day or night the proposed wind farm could be expected to be running at its rated capacity. Without this information, it is impossible to substantiate the likely capacity and variability of the output from the turbines. The data that the applicant has presented regarding wind speed is insufficient to justify the siting of a wind farm at this site. For further discussion regarding the capacity of the development and variability of the output, see Section 11 of this document.

1.2.11 The main “negative filter” for a site given by the applicant (see paragraph 2.5 of the Technical Annex) is land within urban areas. This was considered to be an absolute constraint for (amongst other reasons):

“the proximity of such sites to built development”.

In paragraph 4.7, the proximity criterion is set at 500 metres. The only logic for the selection of this distance appears to be that the nearest house is 550 metres to the East.

³ See paragraph 2.14 of the applicant’s Environmental Statement

In paragraph 3.3 of the Environmental Statement to the Application, the applicant lists 7 properties within 1300 metres of the proposed site. There are in excess of 100 other properties within 1300 metres of which no mention is made. This includes the whole of Wellow, much of Thorley, the community at Tapnell Farm. All these properties would be affected to varying extents by both noise and flicker.

- 1.2.12 Good road access is given as an important criterion for site selection. Despite this, there is no detail as to the likely consequences of huge vehicles carrying hundreds of tons of concrete and other construction materials and equipment down the narrow, fragile country lanes which would be an essential part of a journey to the site, nor any sensible consideration of the effect of such journeys on local buildings and residents. The assessment of the criterion by the applicant is that sites:

“meet the criterion if they could definitely be accessed by an HGV and only partially met if significant highway or access improvements could be required.”

At the most optimistic, this proposed site could only be said partially to meet this criterion. In reality, the road access is wholly unsuitable.

- 1.2.13 The criterion for deciding on the impact on AONB and Heritage Coast by the applicant are:

“fully met if the areas of search lay outside these designations”.

This ignores wholly that the site is adjacent to, and is overlooked by, large sections of the AONB and Heritage coast⁴.

- 1.2.14 Regarding potential visual effect, the massive visual impact that the 7 towers of the height proposed, 6 with moving blades, is largely ignored.

The fact that there would be “adverse visual effects” is acknowledged by the applicant in their Technical Appendix (paragraph 7.2), where it refers to the re-arrangement of the site to “mitigate some of the adverse visual effects”.

- 1.2.15 Paragraph 2.11 of the Environmental Statement refers to public consultation on their scoping report. Even if appropriate public consultation was conducted, it is impossible to assess the validity of the applicant’s resulting claims without consequential data. There is no detail of the occasions, methodology or results of any such consultation. For further discussion as to the inappropriate lack of public consultation, please see Section 2 of this document.

- 1.2.16 We would query the ease of connection to the electricity grid from this site. Although not referred to by the applicant, it is understood that the cable would have to cross a main Gas pipe. This is a hazard that would require extra engineering and construction.

Paragraph 99 of the Technical Annex: Wind from PPS 22⁵ states that:

“The connection of the farm to the electricity grid forms an intrinsic part of the project and both [planning applications] should be considered together.

⁴ See further section 1.3 of this document.

⁵ See the Companion Guide to PPS 22, paragraph 99 of the Technical Annex: Wind (page 183).

The applicant has provided no planning application or any significant, reliable information regarding its proposals for grid connection. It has therefore failed to comply with PPS 22 (see Section 3).

1.2.17 Paragraph 10.76 of RPG 9⁶ states that:

“Priority should be given to the development of renewable energy schemes, particularly larger scale ones, in less sensitive areas including previously developed and industrial land and areas where there is already intrusive development or infrastructure, for example major transport corridors.”

Policy INF8: Location of Renewable Energy Development states:

“Renewable energy development, particularly wind and biomass, should be located and designed to minimise adverse impacts on landscape, wildlife and amenity. Outside of urban areas, priority should be given to development in less sensitive parts of countryside and coast, including on previously-developed land and in major transport areas.Within areas of protected and sensitive landscapes including AONB’s or the national parks development should (sic) generally be of a small scale or community-based. Proposals within or close to the boundaries of designated areas should demonstrate that proposals will not undermine the objectives that underpin the purposes of designation”.

The applicant has failed to demonstrate that the proposals will not undermine the objectives. See further section 1.2 of Chapter 1 of this document.

CONCLUSION

The applicant appears content to show that the proposed site is the “least worst” option. This falls outside of the obligation under PPS 22 to use “careful consideration” of location.

The applicant fails to comply with PPS 22 regarding grid connection.

The application fails to comply with Policy INF8 of RPG 9 as the location cannot be said to “minimise adverse impacts on landscape”. It is hard to identify an area of countryside and coast that could be said to be more sensitive in landscape terms than the West Wight.

Any search for a suitable site in the Region should include Hampshire.

There is no consideration of the appropriateness of alternative technologies to provide the Isle of Wight’s contribution to the renewable resource.

There is very little factual basis for the conclusions drawn in chapter 2 of the Environmental Statement and the related Alternatives Technical Appendix.

There is no evidence supplied that the wind conditions at the site would enable the proposed generators to work at their rated capacity for worthwhile, or claimed, periods.

Other key criteria and information have been interpreted in such a way as to ignore important facts such as the unsuitability of access roads, the close proximity of

⁶ Regional Planning Guidance for the South East (RPG9)

communities, the obvious visual impact that would be observed from most areas of the West Wight and the inevitable effect on the character of the area.

The proposed site complies with, at most, 4 of the 11 criteria set out in Figure 2.17 of the Technical Annex. On this basis, on the applicant's own criteria, it must be considered to be unsuitable.

For each and all of these reasons, the application should be rejected.

1.3 Proximity to AONB and Heritage Coasts

Overall comment:

- **The site is surrounded by AONB's and Heritage Coasts.**
- **The applicant fails to demonstrate that the proposed development would not compromise the objectives of the designation of those areas.**
- **The applicant has not taken account of an existing landscape assessment.**
- **The applicant does not satisfy the provisions of PPS 22 in these regards.**

Conclusion: **The application should be rejected on this basis.**

1.3.1 The site is surrounded on three sides by Areas of Outstanding Natural Beauty. The Isle of Wight AONB Management Plan⁷ sets out some objectives underlying the designation of AONB. The Plan states:

1.3.1.1 "The primary purpose of designation is the conservation and enhancement of the natural beauty (which includes wildlife and cultural heritage as well as scenery). In pursuing the primary purpose of designation account should be taken of the needs of agriculture, forestry and other rural industries and the social and economic needs of the local communities."

1.3.1.2 "The designation helps to protect not just the natural features – the trees, fields and open spaces but also settlements and working environments that are unique characteristics of the countryside."

1.3.2 In respect of wind turbines, the management plan contains a dedicated section and states the following:

"This position statement (*which was issued by the Countryside Agency and the National Association for AONB's and applies to both AONB's and Heritage Coast designations*) makes the following points:

1.3.2.1 Large commercial wind energy developments within AONB's or in locations outside the AONB which affect people's enjoyment of the AONB, are likely to be incompatible with the objectives of designation and should therefore be resisted in those areas.

1.3.2.2 The character of the countryside in some parts of an AONB or its surroundings may mean that small scale wind energy schemes (one to three turbines ranging up to 500 kW, in the region of 60m height to blade tip, and with clusters no more than 10 km apart) could be accommodated, where they do not compromise the objectives of the designation and respect the local countryside character.

1.3.3 PPS 22 states (at paragraph 11) that:

⁷ Isle of Wight AONB Management Plan 2004 - 2009

“In sites with nationally recognised designations (...National Parks, Areas of Outstanding Natural Beauty, Heritage Coasts,...Listed Buildings...) planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area would not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.”

1.3.4 The Companion Guide to PPS 22 at paragraph 5.15 states:

“If landscape character assessment has already been undertaken in the area, the results are also recommended as a basis for consideration of individual schemes. They present a relatively “neutral” description of an area in landscape terms, which can inform applicants and planning authorities in their discussions over the most appropriate future for the area.”

There is, as previously referred to a Landscape Character Assessment which was prepared for the West Wight. The applicant appears to have failed to take this assessment as the basis for consideration of its scheme and as such, has not complied with the obligations of PPS 22.

1.3.5 In this context, we believe that points made in the Inspector's Report for the proposed Whinash wind farm are valuable. The inspector attached importance to the impact of huge wind turbines on the landscape as a whole. The Report stated:

“the fundamental attributes of the site are its natural qualities, which in turn provide a context for the enjoyment of a much wider landscape where wildness and openness are part of the recreation experience”.⁸ He continued:

“the proposed turbines would appear massively out of scale with the host topography...”.⁹ The lack of proportionality in the West Wight would be more significant.

CONCLUSION

The applicant has not undertaken to any material degree an assessment firstly of all relevant designations which affect the site and its environs, and secondly of the scheme against the objectives of those designations. Such an assessment should be carried out for each of the designated areas individually, and then the cumulative effect should finally be assessed.

The applicant has not taken account of the existing landscape character assessment in its consideration.

The applicant has therefore not satisfied the obligations in PPS 22.

According to those administering the AONB and Heritage Coasts, such a development is likely to compromise the objectives of designation. The applicant's claim that the designations would not be affected is unsubstantiated.

For these reasons, the application should be rejected.

⁸ See paragraph 15.15 of the Inspectors Report

⁹ See paragraph 15.17 of the Inspectors Report

1.4 Photomontages

Overall comment:

- **The photomontages provided by the applicant are inadequate and self-serving.**

Conclusion: **The application should be rejected on this basis.**

1.4.1 The photomontages provided by the applicant are highly subjective and self-serving. No justification is given for the viewpoints selected. No rationale is given for failing to provide views from the 34 sites requested, for example, by AONB. The only statement made is that these 18 form “a representative sample of the main visual and landscape receptors”.

1.4.2 The applicant has most notably omitted to include photomontages from two of the most obviously sensitive viewpoints. These are:

- A view from Compton Down, directly above the site and looking North across it towards the Solent.
- A view from mid-Solent, approaching Yarmouth.

We attach at Figure 1.4A a photograph taken from Compton Down showing the height of the turbines marked by a balloon. This demonstrates the enormous visual impact that the turbines would have from this viewpoint. We attach at Figures 1.4B and 1.4C photomontages of the turbines from mid-Solent and on approach to Yarmouth ferry terminal. Again, this shows the massive impact that the turbines would have on all receptors from these viewpoints.

1.4.3 All photomontages provided by the applicant demonstrate enormous visual intrusion in the landscape, despite the attempt to lessen the impact of the turbines by devices such as the common use of overcast skies and convenient alignment of blades, and the inclusion of other features.

1.4.4 Exclusion of features in the applicant’s photomontages has, in at least one example, seems to lead to a reduction in perceived impact (Figure 1.4D).

1.4.5 With photographs, the human eye and brain do not take in the full depth and breadth of view nor, therefore, the full impact of what is being seen. The reality of the turbines in 3D, and with the blades moving, is that they would create an enormous visual intrusion. The movement would draw far greater attention to an object than would be the case if that object were static.

CONCLUSION

We believe that the applicant’s photomontages are self-serving and do not represent accurately the impact that the turbines would have on the landscape and all receptors.

Figure 1.4A : View from Wellow Down showing height of proposed turbines, using a helium-filled marker balloon from the border of Churchill’s Farm (adjacent to proposed turbine number 6 position)

Note: Vantage point was approximately 2km from the proposed turbine site, with Newton Creek another 5 km beyond that. Looking north east.

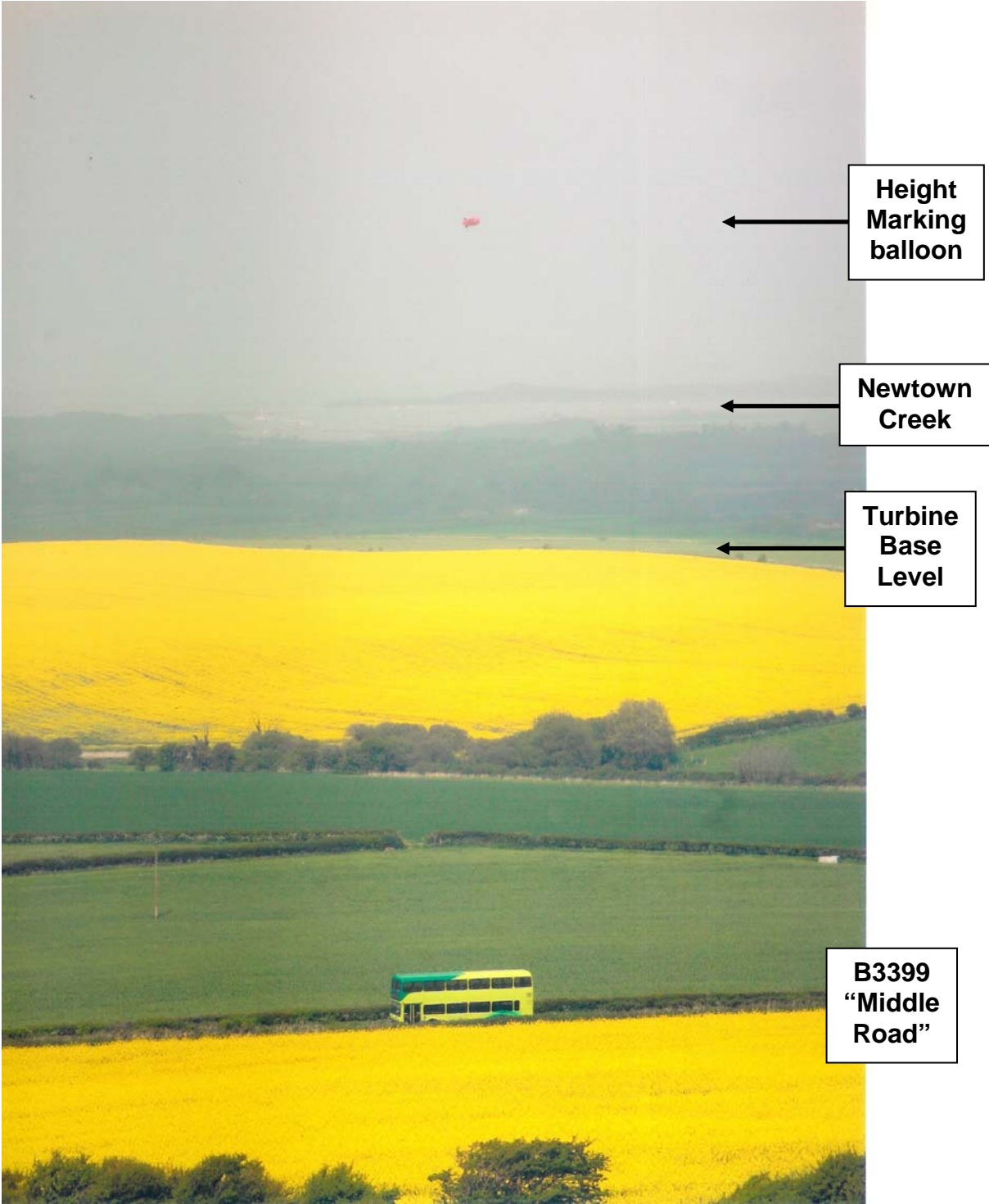


Figure 1.4B : View from The Solent on the ferry approach to Yarmouth - before and after construction



In the background are Mottistone Down (up to 203m above sea level) and, to the right, Brook/Wellow Down (130 to 164m).



**Wind turbines would reach 160 metres above sea level
(in 5 out of the 6 cases)**

- Notes: 1. Second turbine from left would reach approximately 155 metres above sea level.
2. Structure to right of 4th turbine from the left is an anemometer mast**

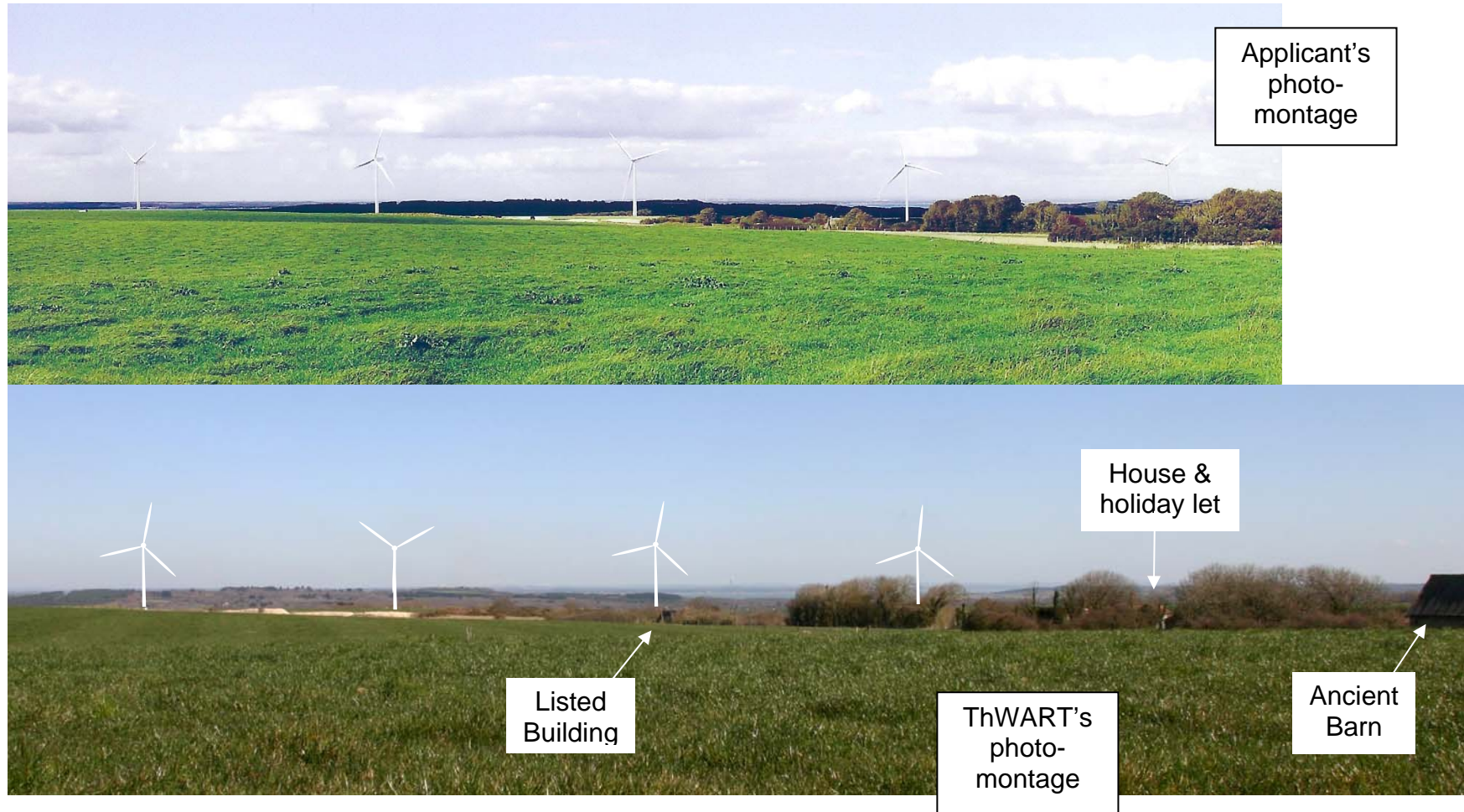
Figure 1.4C : View from on the ferry approach to Yarmouth – before and after construction



Helium filled balloon,
marks maximum
height (proposed)
of revolving blade tips

- Notes:**
- 1. Turbines reach 155 to 160 metres above sea level.**
 - 2. Structure to right of 4th turbine from the left is an anemometer mast**

Figure 1.4D : Comparison of shots from the B3399 (“Middle Road”)



Photographs taken from similar locations, close to B3399, looking NNE

1.5 Impact on the Solent

Overall comment:

- **The Solent is of fundamental importance to the Isle of Wight.**
- **It is both a principle gateway to the Island, and used for recreational and business purposes.**
- **The applicant has provided no information or evidence regarding the effect of its proposals on the Solent as to visual impact, effect on amenity, or other use.**

Conclusion: **The application should be rejected on this basis.**

1.5.1 The Solent both gives an important access to the Isle of Wight, via the ferry route from Lymington to Yarmouth, and provides the setting for an enormous amount of water based activity.

1.5.2 The value to the Island of the amenity of the Solent – for both recreational and commercial purposes - is enormous. It is used prolifically by residents and visitors in many ways; it helps bring significant numbers of people to the Island to use these waters. There are also the many businesses which use the Solent and waters around the Island for their commercial ventures, such as those offering water based recreational activities to residents and visitors.

1.5.3 It is staggering that the applicant does not appear to have taken account of the effect of its proposals on those using the Solent. The applicant has provided no evidence that it has considered or undertaken any consultation on this point.

1.5.4 The applicant makes scant reference to Solent users and their relevance to this proposal. Paragraphs 8.187 and 8.195 of the ES state:

With reference to Yarmouth Marina:

“There will be views of the turbines from the yacht marina at Yarmouth but this is not expected to result in a significant change in the view for those using the marina and sailing in and out of the Yar estuary.”

This statement is completely unsupported and displays a disregard for the value that both local and visiting sailors and other water users could place on the uniquely uncluttered and peaceful setting that makes Yarmouth harbour such an attractive destination.

With reference to Lymington Marina:

“...the turbines will be seen within the context of the yacht masts in the harbour and on a separate land mass, separated by the Solent.”

Their summary of the effect is that “users of the marina will not experience a significant change in their views from this location.” There is no basis given for this assertion. Also, there is no acknowledgement that the primary use of the Marina is by those leaving it by water and, by necessity, sailing into the Solent and so closer to the Island, where views will certainly be changed (Figure 1.4B).

1.5.5 In paragraph 8.239 of the Environmental Statement, the applicant states that “photographs were taken in the early Spring 2006 assessment to illustrate a series of sequential views experienced whilst crossing the Solent on the Lymington to Yarmouth ferry.”

The applicant admits that:

“the wind farm will become a prominent new feature in the views from the Lymington and Yarmouth ferry.”

We find it significant that the applicant does not include the photographs to which it has referred. We can only make the assumption that they are not included because they do not support the applicant’s case.

1.5.6 The applicant makes no reference to the fact that the ferry crossing gives passengers their first view of the Island. For visitors particularly, this view is one of the most defining sights of the Island and its landscape that they will experience.

CONCLUSION

The applicant has made no attempt to assess or set out the true impact of its proposals on those using the Solent, whether using it to travel to the Island or otherwise for business or recreational amenity purposes.

We believe that for this reason, the application should be rejected.

1.6 Proximity to Listed Buildings

Overall comment:

- **The West Wight is especially rich in heritage.**
- **The applicant has given no evidence that it has paid special care with its proposals because of the local listed buildings and other cultural heritage.**
- **The applicant has not complied with PPS 22 in this regard.**
- **The applicant fails to specify any mitigation as to the adverse effects on cultural heritage, or damage to archaeological remains and artefacts.**

Conclusion: **The application should be rejected on this basis.**

1.6.1 The West Wight is an area of the Island especially rich in heritage. Its archaeological features, supported by many significant finds, are evidence of man's activity here from earliest times. The Domesday survey shows the pattern of settlements already well established as well as the existence of manors at Thorley, Wellow, Afton, Wilmingham and Ningwood. On a smaller scale the area is characterised by numerous farmsteads of the 17th and 18th century, as well as a large number of historically important cottages in the villages of Wellow and Thorley. As the applicant itself states:

“the historic landscape of the study area gains coherence and character from the fairly narrow range of building types and common use of similar materials”¹⁰.

The overall impression is of an area of compact, quiet villages and narrow lanes little touched by more recent development, and so one in which the siting of a huge industrial unit would be totally alien and destructive.

1.6.2 English Heritage's "Wind Energy and the Historic Environment" (2006) states:

“Wind energy developments may also impair the setting of historic sites by detracting from their historic character, sense of place, tranquillity or remoteness”.

It is hard to envisage a site in which impairment could be more obvious.

1.6.3 PPS 22 states at paragraph 48 that:

“Special care will be needed if proposed sites for wind turbines should happen to be near listed buildings or conservation areas.”

The applicant identifies that there are many listed buildings in the vicinity of the proposed site. However, there is no evidence that any care, let alone special care, has been taken by the applicant in making its proposals.

1.6.4 PPS 22 also makes reference to PPG 15 (Planning and the Historic Environment) which says, amongst other things that physical survivals of our past are an irreplaceable record, the presence of which adds to our understanding of both the present and the past. In the Appeal Decision for the proposed wind farm at Guestwick, the Inspector said:

¹⁰ Paragraph 7.61 of the Environmental Statement

“...the defining characteristics of the settings of the many Listed Buildings concerned in this particular case are their historic and enduring rural isolation and their individual prominence in the local landscape.”

He further said:

“While the turbines might only be in place for 25 years, this time period would represent almost an entire generation of people who would be unable to view not just one, but a large number of the Listed Buildings in the area, in a landscape setting appropriate to their special architectural or historic interest. That setting (both overall and individual) would, I consider, be seriously harmed by the intrusion of such high, rotating and uncompromisingly modern structures....”.

We believe that the same considerations and factors apply to the site at Wellow.

- 1.6.5 In paragraph 7.69 of the Environmental Statement, the applicant lists elements of the proposals that could result in impacts on cultural heritage in the study area. We believe that any one of these impacts would be sufficient reason to reject the application. The applicant sets out a self-serving conclusion that “an appropriate programme of mitigation could reduce the severity of an adverse effect or remove it completely”. However, no information about any such programme is provided.
- 1.6.6 It is hard to see what mitigation could be introduced that would protect the cultural heritage and listed buildings in the area, other than not to proceed with the project.
- 1.6.7 The applicant admits the richness of the site in archaeological remains and artefacts.¹¹ Although nothing of major significance has come to light in the restricted areas where exploratory digs have been made on the proposed sites of turbines and crane pads, this in no way diminishes the possibility of damage to as yet undiscovered features in other areas of the site and especially as a result of the laying down of 3km of access roads.
- 1.6.8 In this respect, the applicant concedes that there are features of high sensitivity in the line of the grid connector trench and the switching station¹² that could pose a very real threat to archaeological remains. Yet the mitigation measures proposed by the applicant amounts simply to recording any archaeological features which are disturbed by construction.
- 1.6.9 The applicant states that there are no known published standard criteria for determining the significance of effects on archaeological interests. This may be true, but the biased interests of the applicant are shown by its generating of a self-serving matrix evaluating the importance of the site in relation to the magnitude of potential change. This takes no account of the laying of temporary or permanent access tracks over areas that have not been surveyed though “several features are identified in these areas”.

¹¹ See Chapter 7 of the applicant's Environmental Statement, e.g. sections 1.1, 4.17 and 5.1.

¹² See Chapter 7 of the applicant's Environmental Statement, sections 7.62 and 7.71.

1.6.10 ThWART has sought an opinion from Robin Bryer, as previously cited, in regard to the effects of the proposal on Listed Buildings. We support his findings, and attach his report as Appendix 1B¹³.

CONCLUSION

We believe that the proposed development would have an enormous detrimental effect on the landscape and the setting of historic buildings within that landscape.

We do not believe that any benefits from the proposed wind farm would adequately compensate or outweigh such detriment. This is supported by existing Appeal Decisions which should be relied upon to reject this application.

The applicant has failed to satisfy the obligations of PPS 22.

The applicant has failed to identify any way in which the damage that its development would cause could be appropriately mitigated.

The applicant has paid insufficient regard to the potential damage to any archaeological remains and artefacts.

For all and each of these reasons, this application should be rejected.

¹³ Further Objection concerning Listed Buildings in relation to an Application by West Wight Wind Farm Limited to erect six wind turbines on land South of Wellow, Isle of Wight on behalf of The Wight Against Rural Turbines by Robin Bryer BA (Hons) Dunelm, MRTPI.

2 Lack of Community Consultation

Overall comment:

- **Public “consultation” has amounted to 2 events over a 7 year period,**
- **Neither event allowed for serious discussion of the project with the developers.**

Conclusion: **The application should be rejected on this basis.**

2.1 Introduction

PPS22 states (page 8, "Key Principles" 1.vii) that "Developers of renewable energy projects should engage in active consultation and discussion with local communities at an early stage in the planning process, and before any planning application is formally submitted".

2.2 History of the Wind Farm Plans and Public Consultation

The applicant's claim (Environmental Statement, paragraph 2.3) that the search for a wind farm site began in 1999, while planning application for an anemometer mast was applied for and received in 2001.

No public discussions were conducted by the applicant until February 2004, and this only at the request of the Ningwood Residents Association. Your Energy's representative arrived late and left without satisfying many of the questions asked, leaving the vast majority who had attended very much against the project.

The Ningwood event followed by significant growth in membership of The Wight Against Rural Turbines from 600, rising to over 2,200 by November 2004*. Many of those now showing concern came from other parts of the Island or the mainland, to the extent that, by November, 86% of members lived beyond 2.5 miles from the proposed site. The wind farm scheme was now a much wider issue, and not restricted to just local concerns.

Despite this no further attempt at consultation took place with the general public until December 2004 when Your Energy arranged one exhibition at Wellow Institute. At that time the company had said that they would put in a planning application by Christmas, leaving little time left for meaningful discussion in any case.

This "exhibition" was conducted in what many considered an oppressive manner, with high security, and with staff apparently unable to answer the questions and concerns of the public. What it felt like to attend this event is very well described by an exhibition visitor in this extract of his letter, published in the Isle of Wight County Press of 17th December, 2004:

"On the one hand you had the local residents, well-mannered, some slightly bemused, asking polite questions. On the other hand you had this feeling of something sinister descending on this hapless village – police lurking outside, a dark-suited man at the entrance handing out tickets saying "Admit One" as though we were being granted a rare privilege, and a bouncer at the inner doorway with an earpiece

as though ready to call in SS reinforcements. Then you had these bright young things there as a front, primed to spout the company line. They had been parachuted into a community they obviously knew nothing about (and, it seemed, wanting to know nothing about) and would be happy to get back on the ferry as quickly as possible, having performed their task, which could be checked off as having “consulted the natives.

One can imagine such crews descending on small communities all over the country (having taken care beforehand to prime a local landowner with a promise of a large cheque). If the issue was not so serious, one might jokingly ask them where they had parked the UFO.”

Delays in Your Energy’s attempt at making a planning application continued, without further public consultation, until 9th June 2006 when the Isle of Wight Council could finally make an application notice.

In reality there have been no true discussions, merely a fait accompli. No significant, if any, changes were made after the Wellow exhibition where considerable concerns and opposition were expressed. There has been no attempt since to engage with the thousands of people who will be affected.

This experience was capped by a recent “Scoping” exercise to which ThWART and many others provided comprehensive and detailed comment, raising many questions and queries. On the first working day after the closing date for comment, the response from the applicant was that “nothing new” had been raised by those consulted. They then submitted the planning application so soon after that comments could not have been taken seriously on board.

This lack of true public consultation, combined with uncertainty of delay after delay from the applicant signifies an approach that is in direct conflict with the guidelines produced by in PPS22, which is concerned that developers engage with and take the community with them.

* Membership (as of 21/7/06) is 3,487.

3 Grid Connection

Overall comment:

- **Grid connection is not included in the overall plan, so that the application fails to comply with Isle of Wight Council's "Supplementary Planning Guidance" and the PPS22 Companion Guide.**

Conclusion: **The application should be rejected on this basis.**

3.1 Introduction

The applicant has submitted a proposal for a wind farm and comments in the "Supporting Statement" (paragraph 2.11) that although " a new permanent connection to the local electricity distribution network is required....this does not form part of this planning application".

3.2 Failure to Provide an Overall Plan, including Grid Connection

This omission of an application for grid connection is contrary to the Isle of Wight Council's "Supplementary Planning Guidance – Wind Turbines and Wind Farms, 2004" (Paragraph 4.4)* which states:

"Irrespective of the various organisations which may be involved in the overall development of wind farm technology (e.g. a wind farm developer or a local electricity distribution company) **the Council will expect a single master plan for the development both of the wind turbines and ancillary equipment**, taking into account the immediate landform and landscape characteristics, the positioning of existing buildings and the appropriateness of using either natural features or vegetation to screen ancillary equipment from wider views. The Council will expect detailed consideration to be given to the method of installing cables between turbines and ancillary equipment that may be required. Grid connections from turbines will be expected, to be designed to have minimal impact on landscape and preferably be underground."

Also PPS22 Companion guide (page 183, paragraph 99) states, that "the connection of the farm to the grid forms an intrinsic part of the project and should be considered together". As grid connection plans have not been submitted then PPS22 has not been complied with by the applicant and so should not be considered by the Council.

* Note: We are aware that the Council discussed and we are led to believe intended to adopt amendments to this Supplementary Planning Guidance Note in 2005. Under the amended SPG, the wording of the at the end of the paragraph 4.4 specifies (rather than prefers) that grid connection be underground and also that "Proposed connection to the grid must be shown to comply with the Electricity Act."

4 Recreation and Tourism

Overall comment:

- **The recreational value of the public rights of way for residents and visitors alike will be diminished if the wind farm were to go ahead.**
- **Surveys indicate that a proportion of tourists will stay away from areas with wind farms.**
- **Even with a very small (1%) loss of tourist income - or loss of growth – the net Island income would fall by around £20 Million over a five year period, even allowing for an unlikely £3 Million (constructional) income from the wind farm.**
- **A 5% loss of tourist income would cost the Island well over £100 Million over 5 years.**
- **Landscape and countryside are major reasons for Island visits by tourists.**
- **282 holiday accommodation options (within 3km) of the proposed site would be put at risk.**
- **The recreational value of noted gardens, private gardens open to the public (see main below), for residents and visitors alike will be diminished if the wind farm were to go ahead.**

Conclusion: **The application should be rejected on this basis**

4.1 Introduction

Recreation and tourism are mainly covered by the applicant in Chapter 9, “Land Use, Community and Social effects”.

Much of the content is muddled, with paragraph’s 9.21 to 9.26 referring to various tourism surveys with paragraph 9.27 stating that the impact to tourism is dealt with later.

The Applicant seeks to dismiss the effect on tourism in relation to the gain from the proposal.

4.2 Public Rights of Way

The use, of public rights of way by residents, and therefore the recreational amenity that is available to them, is totally ignored by the applicant.

The applicant also concludes that only the Hampstead Trail is of major importance, totally ignoring the use of the other footpaths/bridleways that cross the site or pass nearby and which are in daily use, for recreational activities such as walking, dog walking, horse-riding and cycling. (See Figure 5A)

The Environmental Statement ignores the fact that the footpath from Yarmouth to Broad Lane, via Mill Copse, plus the stretch of Broad Lane to connect with the Hampstead Trail at Prospect Cottage and, subsequently, the Tennyson Trail is one of the most heavily used footpaths by day visitors from the New Forest and mainland.

It is noteworthy throughout the application that the Isle of Wight Walking Festival is totally ignored. This annual festival is the largest in Europe lasting two weeks in mid-May and sees the public rights of way crossing or passing nearby the site well travelled.

Also ignored is the presence of Bellwood Riding Stables just a kilometre from Turbine 6, and the numerous horse paddocks within 2 kilometres of the site. These features identify that use of bridleways is likely to be high, as they indeed. This proposal would, if it were allowed, inhibit novice and experienced riders alike, due to shadow/flicker and/or noise, seriously reducing the value of the amenity and recreational activities.

To the north of the site the B3401, runs east-west, forming part of the 62 mile long Round The Island Cycle Route. During the construction period the routing of heavy lorries along the B3401 from Yarmouth to Thorley would compromise the cycle route.

4.3 Tourism

4.3.1 Importance of Tourism to the Isle of Wight

In the Regional Planning Guidance for the South East ("RPG9"), Chapter 14, "Tourism and Related Sport and Recreation", page 25, contains Policy TSR7 "Priority Areas for Tourism" which states:

"The coastal strip and the Isle of Wight – seeking complimentary approaches to the development and management of tourism so as to upgrade facilities, promote diversity and reduce seasonality and improve access, whilst retaining and enhancing the natural character of the area"

RPG9 also states (page 28, paragraph 14.9):

"The Isle of Wight's unique situation presents particular opportunities and challenges in relation to the further development of its tourism industry. Tourism generates almost one quarter of the Isle of Wight's gross domestic product (GDP), the highest proportion in the region."

4.3.2 Economic Cost of Potential Loss of Tourist Income

The applicant refers to surveys to try to demonstrate that wind farms do not negatively affect tourist activity. However, the survey results presented can be looked at in two ways, as follows:

In paragraph 9.24 of the Environmental Impact Assessment the applicant comments:

".....results showed 66% of tourists in Cornwall and 47.8% in Wales agreed that the wind farm had no impact on their visitor experience."

This could just as equally be read as that 34% in Cornwall and 52.5% in Wales responded that wind farms did have an impact on their visitor experience.

The Environmental Impact Assessment also states that:

".....in North Devon 86.7% suggested that the development of a wind farm would have no bearing on the likelihood of their visiting the area"

Put the other way round, 13.3% would consider not visiting the area. The applicant however, concludes from the evidence in these surveys that there is no evidence of changes in tourist revenue in other locations, other than of a negligible nature and this is surely incorrect.

There are many other surveys that could be considered, often showing risk of losing 10 to 25% tourist visits. Rather than debate such figures we contend that a more realistic and salutary measure of effect is to consider the *potential effect on Island income*. For instance:

In 2004/05 the Isle of Wight Tourist Board estimated tourist related revenue at £352million with a multiplier affect of £100million, so giving a total of around £450million of annual income.

Table 4A gives an analysis of potential Island income loss based on % visits lost from 1% to 10%, showing how significant the amounts are to the local economy.

TABLE 4A : Potential Cost to the Isle of Wight Economy of Loss of Tourist Visits

% Tourist Visits Lost	Annual Cost to Island	Loss of GDP
10	£45 Million	2.5%
5	£22.5 Million	1.25%
1	£4.5 Million	0.25%

The benefit to the Island in financial terms would be small by comparison. If the wind farm cost £10million to build, then even in the unlikely event that 50% (£3Million) of that came to Island businesses (with approximately £1 Million to Vestas Blades Ltd), then this amount would be dwarfed by losses of tourism income, as seen from Table 4B, whereby even a 1% downturn in tourism (or 1% loss of income growth) would cost the Island £17.5 Million over a 5 year period.

TABLE 4B : Analysis of overall cost and benefit to the Island Economy over a 5 year period

% Tourist Visits Lost	Cost to Island over a 5 year period	Wind Farm benefit to the Island over a five year period	Overall Loss to Island economy*
10	£225 Million	£3 Million	£222 Million
5	£112.5 Million	£3 Million	£109.5 Million
1	£22.5Million	£3 Million	£19.5 Million

* Note: If the expected life of the wind farm were 25 years then the overall losses would be approximately 5 fold those quoted

4.3.3 Why Tourists Would Stay Away

Why would tourists stay away? The answer could only be from a reduction in the attractiveness of the Island as a destination. Isle of Wight Council Tourism at its presentations claim that the most attractive feature of the Island for tourists is landscape, a quality that would be severely compromised if the proposed wind farm were built (see Section 1 above).

Notwithstanding this, the applicant states (Environmental Statement, paragraph 9.89) that there is no definitive information on the reasons that tourists chose the Isle of Wight.

However this statement is incorrect, as information is available from the “Walk the Wight” festival (Figure 4A). In 2005 26% said that their reason for visiting the Island was for “landscape and countryside”, while in 2006 this figure rose to 29%.

The “Walk the Wight” Festival has become a major and growing success, with almost 15,000 participants in 2006 up from just over 10,000 in the previous year (Figure 4B).

4.3.4 Tourist Accommodation within 3 kilometres of the Site

The Applicant states (Environmental Statement 9.92) that “the wind farm will have no major impact on any major tourist accommodation”. However, Table 4C identifies the majority of accommodation within 3 kilometres of the site, showing that there are 282 accommodation options locally. However, this table does not include accommodation in Yarmouth, Freshwater and other nearby settlements that also might be expected to suffer.

The opportunity of these tourist destinations to thrive and survive is crucial to the local economy and would be threatened by the proposed wind farm development. In particular, the Orchards Holiday Park* (less than 2 kilometres from the site) is one of the largest and most successful places of holiday accommodation on the Isle of Wight. It has 63 letting holiday caravans and 175 touring/camping units.

4.3.5 Constructional effect on Transport

During the period of construction, the disruption to visitors travelling to and from Yarmouth ferry port as not been considered*.

* Note: in a separate submission the owners of The Orchard Holiday Park Ltd will illustrate the Park’s value in terms of revenue to the Island local economy, employment and traffic generated and an on going 2006 visitor survey. To see the scope, type and quality of the facilities there a visit by Councillors is highly recommended.

4.4 Gardens

The gardens of Thorley Manor and Dog Kennel Cottage have been deemed to be of sufficient quality and merit to be invited to open under the aegis of the National Garden Scheme.

These gardens, together with many other gardens in Wellow and Thorley, would be dominated by the proposed turbines thus destroying the recreational pleasure of the garden owners, their families and guests and the many open day visitors.

**FIGURE 4A :2005/6 Walking Festival Participants :
Factors for loW Visits – 2005 & 2006**

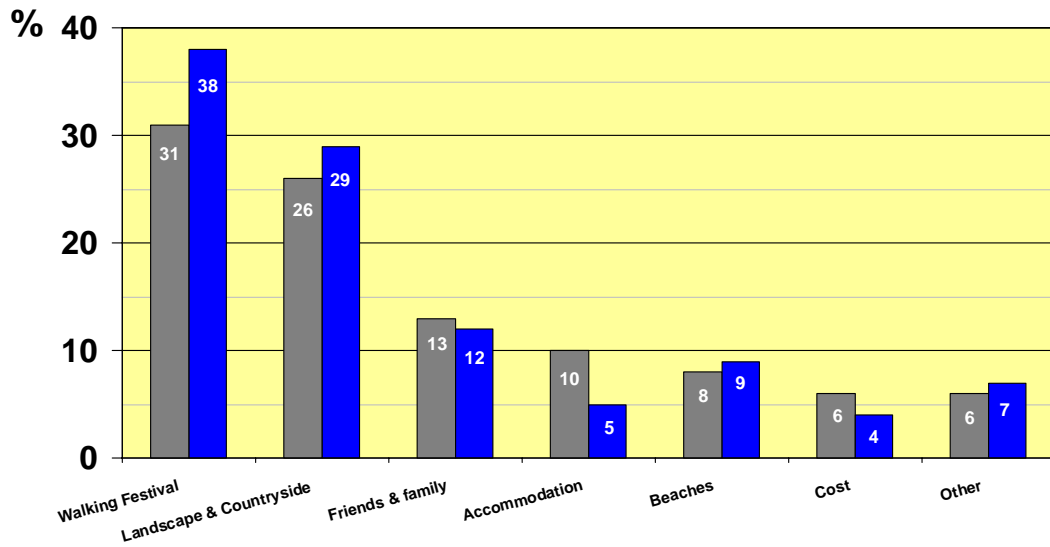


FIGURE 4B: Growth in the Isle of Wight Walking Festival

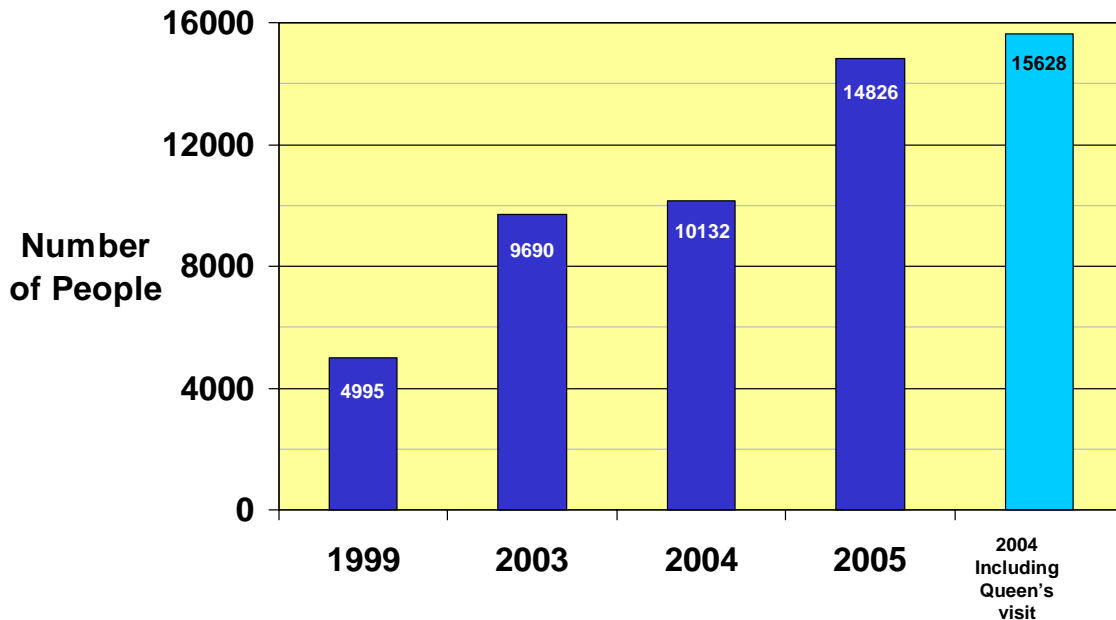


TABLE 4C: Tourist Accommodation within 3 km of the site

PROPERTY	Distance from proposed site (km)	Holiday Cottages, self-catering units	B&B Rooms	Holiday Caravans	Touring/ Camping
ORCHARDS HOLIDAY PARK, NEWBRIDGE	1.75			64	175
GLEBE FARM, CALBOURNE	2.6			6	
SILVER GLADES, HAMPSTEAD	2.9			10	Camping (July/Aug)
THE QUARRIES, BROAD LANE	0.75	1			
NEWCLOSE BARNS, THORLEY	1.2	3			
THORLEY MANOR, THORLEY	1	4*			
LEE FARM, THORLEY	1	3 + 2*			
MATTINGLEY FARM, WELLOW	1	3			
MRS TIGGYWINKLE, WELLOW	1	1			
BROOK COTTAGE, WELLOW	1	1			
GREEN BARN, WELLOW	1.8	1			
EMMIES COTTAGE, NEWBRIDGE	2	1			
THE LITTLE STABLE, CHESSELL	1.5	1			
PIXIE COTTAGE, NEWBRIDGE	1.75	1			
HOMESTEAD FARM, NEWBRIDGE	2		2		
SHALFLEET HOUSE, SHALFLEET	2.8		3		
TOTALS		22	5	80	175+

* Planning consent granted

Note: There is a significant amount of accommodation in Yarmouth and Freshwater etc that also needs to be considered, as being potentially at risk.

5 Proximity to and Effect on Public Rights of Way

Overall comment:

- **The proposed wind farm structures are so close to public rights of way that they often breach the “acceptable separation” distance and in one case “the minimum distance”, as stated in PPS22 (page 172, paragraph 57).**
- **In three cases the suggested “200 metre exclusion zone around bridle paths to avoid frightening horses” is breached (PPS22 page 172, paragraph 56).**
- **All the public rights of way involved are well used by residents and visitors alike.**

Conclusion: **The application should be rejected on this basis**

5.1 The proposed site is in extremely close proximity to a number of public rights of way (footpaths, bridleways and Broad Lane). Each of these public rights of way, including Broad Lane, are well used by both residents and Island visitors alike for walking, cycling and horse-riding evidencing clearly the value of the amenity that they provide. Photographs at the end of this section give some idea of how close to public right of way turbines would be placed if planning were granted.

5.2.1 PPS 22 at paragraphs 56 and 57 states:

“The British Horse Society, following internal consultations, has suggested a 200 metre exclusion zones (sic) around bridle paths to avoid wind turbines frightening horses. Whilst this could be deemed desirable, it is not a statutory requirement, and some negotiation should be undertaken if it is difficult to achieve this”.

“Similarly, there is no statutory separation between a wind turbine and a public right of way. Often, fall over distance is considered an acceptable separation, and the minimum distance is often taken to be that the turbine blades should not be permitted to oversail a public right of way.”

5.3 Three of the six sites for the proposed wind turbines (turbines 3, 4 & 6) are closer than the “acceptable separation” distance referred to in PPS 22. In one case, the proposed site appears to be less than “the minimum distance” referred to in PPS 22.

The applicant omits to refer to “acceptable separation”, as described in PPS 22 and simply states that “the minimum separation distance is achieved”.

5.4 Two of the six proposed turbine sites (turbines 3, 4 & 6) are 90 metres or less from the two bridleways on the site. Again, with apparent disregard for users and safety, the applicant states that whilst this is “considerably less” than that suggested by the British Horse Society, it discounts this as an issue because it is not able, within the confines of the site, to achieve a greater separation.

PPS 22 requires “negotiation” if the BHS suggested separation is not possible. We are unaware that the applicant has sought any such negotiation or indeed any discussion with amenity users or others prior to making its proposals.

5.5 In the Non-Technical Summary produced by the applicant, it states that:

“During the construction period, temporary closure or minor diversions may be needed on three of these rights of way to ensure public safety”.

The applicant is self-serving in equating “closure” and “minor diversions”; obviously these two options are of an entirely different magnitude. However, the applicant refers to both as of “negligible magnitude and not significant”.

It is unacceptable that there should be any closure of public rights of way at any time and this must not be permitted. If public safety is in issue, then the site is unsuitable and the application should be rejected.

5.6 The applicant provides no information, and appears to have sought no information, on the likely effects of its proposals on users of the public rights of way crossing the site. It simply states, in respect to walkers, that there is no relevant data and that the “effect is likely to vary between individuals”. It acknowledges that users of the site will suffer a large change in their experience of using these paths.

5.7 In respect of users of the bridleways, the applicant simply states that “the magnitude of any reduction in use is uncertain”. Again, the applicant appears to have made no efforts to discover the likely effects from users.

5.8 As a consequence of the very close proximity of the proposed wind turbines to public rights of way, turbine noise and flicker/shadow effects will have a significant impact on people using these amenities, whether on foot, cycling or on horseback. Enjoyment and amenity will be compromised as a direct consequence.¹⁴

CONCLUSION

The applicant does not satisfy the requirements of PPS 22 in regard to public rights of way.

The applicant has made no efforts to consult with users, or otherwise take account of the likely impacts and effects of its proposals upon users.

For these reasons, the application should be rejected.

¹⁴ For further information on noise and flicker/shadow risks, see sections 9.2 and 9.3 of this document.

Figure 5A : Proposed Site Layout and the Close Proximity of Public Rights of way (Scale: 1 cm = 225 metres, approx)

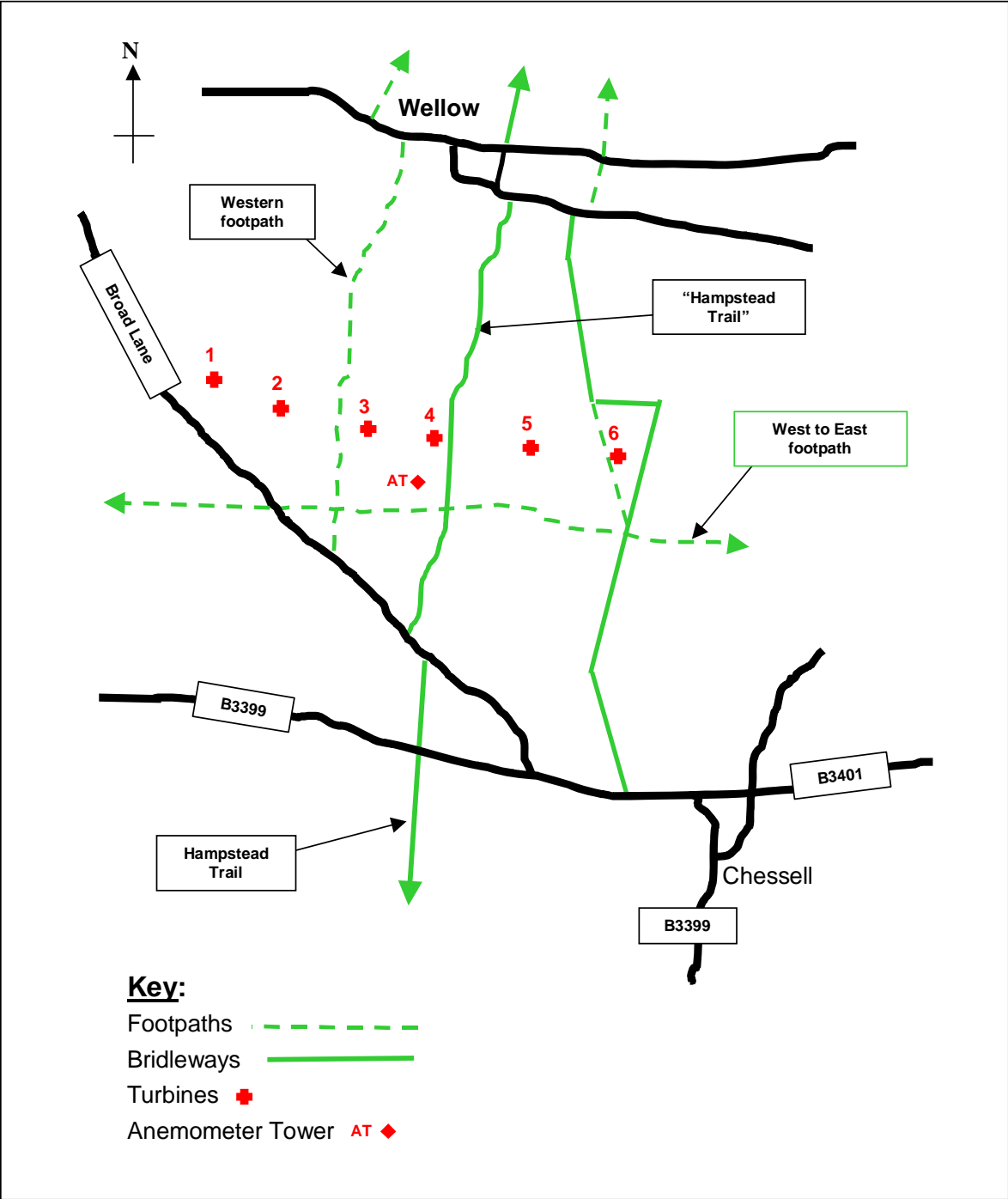


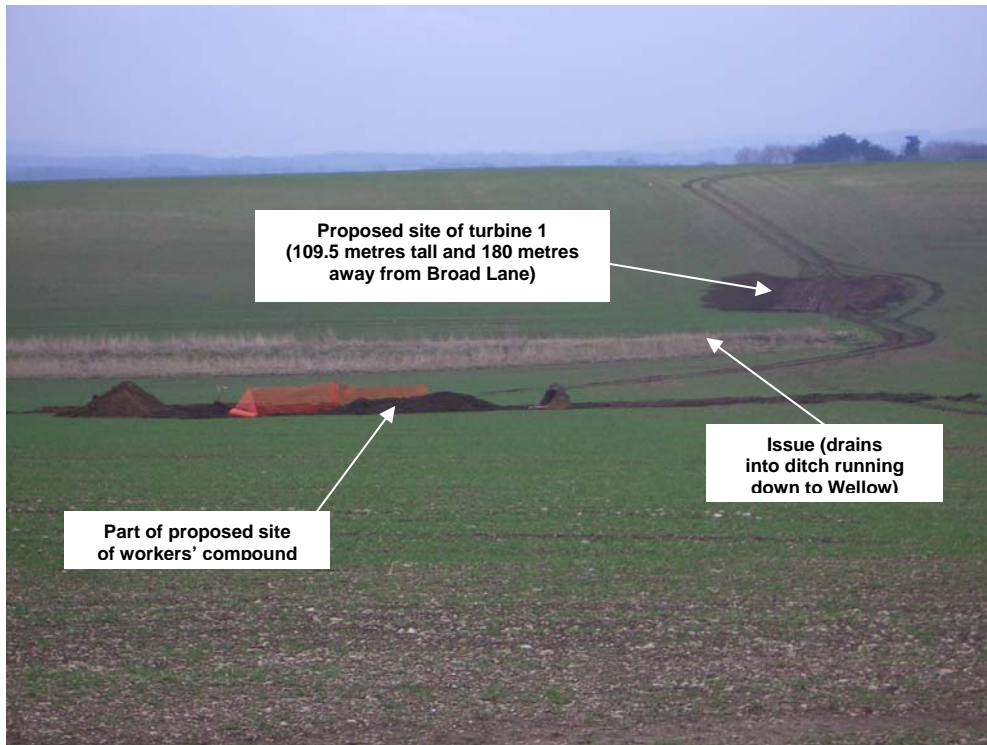
Table 5A: Distances from Turbine bases and Anemometer Tower (AT) to Public Rights of Way

Turbine no.	Right of Way	Distance (metres)	Acceptable separation - the "fall distance" (metres)*	Minimum distance - the "Over sail distance" (metres)*
1	Broad Lane	180	109.5 (116)	41
2	North/South Footpath, west of Hampstead Trail	180	100 (106)	41
3	North/South Footpath, west of Hampstead Trail	90	100 (106)	41
4	Hampstead Trail	90	100 (106)	41
5	East/West Footpath, south of Hampstead Trail	160	109.5 (116)	41
6	Bridleway to east of Hampstead Trail	75	100 (106)	41
	Diagonal footpath to east of Hampstead Trail	40		
	Junction on Middle Road/Chessell Pottery (head on view)	1,225		
AT	East/West Footpath, south of Hampstead Trail	55	59	Not applicable

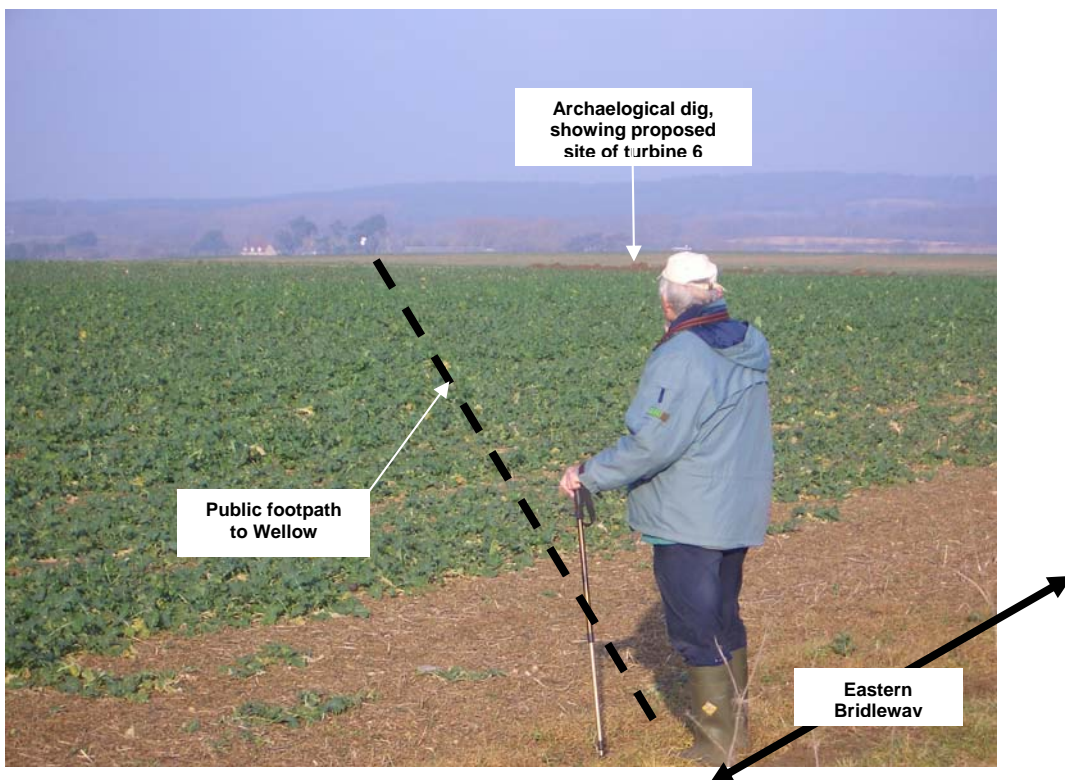
* Figures (for maximum turbine heights) are from Your Energy's "West Wight Project" planning application of May 2006 and, in brackets, from the March 2006 Scoping Report. The anemometer tower information is from the "West Wight Project" planning application of May 2006.

Photographs showing proximity to some of the public rights of way:

View towards nearby turbine 1 from Broad Lane (looking east)



Turbine 6 would “over sail” public footpath



6 Aviation Risk

Overall comment:

- **Bournemouth International Airport's radar system and aircraft safety would be compromised.**
- **Radar and aviation issues should be resolved before making a planning application (PPS22 Companion Guide, page) and therefore this planning application should have not been submitted at all.**
- **The applicant appears to not have consulted the operators of the local air-sea rescue helicopter service at all.**
- **The applicant has made no investigation of the safety risks or other effects on those using areas around the site from hang-gliding or paragliding.**
- **The proposal would damage the amenity of the location by making it unsafe to fly in certain wind conditions.**

Conclusion: **The application should be rejected on this basis.**

6.1 Aircraft

6.1.1 Introduction

It is accepted that wind turbines can pose a risk to air traffic control and safety by the generation of two adverse effects on radar:

- The tower and blades act as a reflector and present a static target to the radar system. This has the effect of swamping the receiver and making it blind to wanted targets in the immediate area beyond the turbine. It is thus not possible to see these targets. This effect is constant.
- The rotating blades of the turbine impart a Doppler frequency shift to the reflected radar pulse, which the radar displays as an aircraft. This effect depends on the orientation of the turbine to the radar, which varies with the wind direction.

The consequences of these effects are that, in the first instance, aircraft in the vicinity of the wind turbines may simply "disappear" off the radar screen. In the second instance, "false targets" may be generated on the radar screen, thus appearing as aircraft that may be in conflict with other real aircraft. Both of these effects generate significant safety concerns.

6.1.2 Risk to Bournemouth International Airport's Radar

The proposed wind farm is within 30 kilometres of Bournemouth airport and the owners, Nottingham East Midlands Airport, have already placed a clear objection against the building of the wind farm because of risk of radar interference and therefore aircraft safety.

6.1.3 Lack of Consultation with Bournemouth International Airport's Operators

The final paragraph (page 14) of PPS 22 states:

“...it is the responsibility of **developers** to address any potential impacts, taking account of Civil Aviation Authority, Ministry Of Defence and Department of Transport guidance in relation to radar and aviation, and the legislative requirements on separation distances, **before planning applications are submitted...**”

The “potential impacts” in relation to radar were evidently not resolved before submitting the planning application and, therefore, the planning application should not have been submitted.

6.1.4 No Evidence of Consultation with Coastguard Air-Sea Rescue Operators

The application appears not to have been discussed with the operators of the helicopter air-sea rescue service which is very active in the area, frequently flying low over the proposed wind farm site. As in 6.1.3 above, such consultations should have taken place before a planning application was submitted.

6.2 Effect on Amenity for Hang gliders & Paragliders

6.2.1 The applicant does not refer in its Environmental Statement to the use of the Downs to the South of the site by hang gliders and paragliders. There are clubs and businesses which are involved in and promote these activities using sites in the West Wight from which to fly.

6.2.2 The applicant does not refer to any consultation with individuals, groups or businesses involved in hang gliding or paragliding regarding their proposals.

6.2.3 We believe that a safety risk to hang gliders and paragliders results from the proposals. The applicant does not identify whether the turbines will cause turbulence to such users. However, we understand from individuals involved with these activities that they are concerned that there is a risk of significant turbulence, particularly for those flying from sites such as the very nearby Afton Down.

6.2.4 The proposal, therefore, risks significant impact upon the recreational amenity for both residents and visitors to the Island, and damage to local business.

CONCLUSION

The risk to the amenity of the surrounding area is unsatisfactory. The application should be rejected on this basis.

7 Risk to Wild Life

Overall comment:

- **Risk to migratory birds has not been assessed at all by the applicant, though evaluation would be expected (PPS22 Companion Guide, page 173, paragraph 61).**
- **Risk to the threatened species Golden Plover and Skylark is identified.**
- **Risk to bats when transiting or migrating is not assessed.**
- **Risk to resident Noctule bat - the bat species accounting for about 80% of deaths from wind turbine strike – has not been assessed.**
- **Risk to a rare bat species (Bechstein's Bat) needs to be addressed.**

Conclusion: **The application should be rejected on this basis.**

7.1 Birds

7.1.1 Background

The proposed site is between the Western Yar River, an SSSI of Primary importance, and the Newtown National Nature Reserve designated in 1996.

The PPS22 Companion Guide states (page 172, paragraph 58) that “the impact of a wind farm on the local ecology should be minimal”.

7.1.2 Risk to Migratory Birds

Surveys of migratory bird activity around the proposed site have not been presented at all – a very serious omission.

PPS22 states (page 173, paragraph 61) that “where potential ornithological sensitivities are higher (than the norm)” recommends “early consultation” with the RSPB etc and that “survey work, including studies of wintering/passage birds” may be required. This is the case with the West Wight.

Collision risk for migratory birds is an important factor, particularly those in transit, because they are less familiar with the territory and may arrive at night time. Those that spend more time locally will suffer additional risk of disturbance and habitat loss.

Local ornithologists identify the West Wight as an important route for migratory birds, such as the Hobby, Honey Buzzard, and Osprey, while summer migratory visitors include Nightingale and Black Redstart. In addition there are anecdotal reports of appearances of Montagu's Harrier and Hen Harrier close to nearby Broad Lane.

It should be noted that risk to migratory birds has been the sole reason for wind farm planning being refused at Appeal on at least two occasions¹⁵. Both of these cases - one an island situation - concerned undulating coastal areas and have similarities to the West Wight situation:

- Bowmore, Isle of Islay: wind farm proposal was in a location adjoining (but not inside) a designated area.

¹⁵ “Further Objection Concerning Birds ...”, Robin Bryer, July 2006 (Appendix 7A)

- Tayinloan: with similar issues to the Bowmore case, the Secretary of State considered whether conditions could be applied to the wind farm development so to protect the birds, but concluded there were no safeguards sufficiently certain in effect in order to enable him to meet the Government's obligations under Directive 79/409/EEC.

7.1.3 Risk to Resident Bird Species

Disturbance, habitat loss and collision risk are factors that are of high importance to these species.

Two important species have been identified as at risk (collision) by the surveys cited in the applicant's Environmental Statement:

- Golden Plover - "Amber list - decrease"
- Skylark – "Red list - dangerous decrease".

The applicant's Environmental Statement (paragraph 6.132) concludes that effects on these two species "cannot be mitigated without major and unacceptable changes to land use at the (proposed wind farm) site."

The Environmental Statement (paragraph 6.101) states that a collision rate of 16 Golden Plover per year, using a 95% allowance for avoidance.

Skylarks are known to inhabit the site year round, often nesting in "set-aside" land. The applicant's Environmental Statement (paragraph 6.116) states risk of fatal collision could be up to 12 birds per year, 10% of recorded population on the site.

7.1.4 Risks During Construction

Crossings of some of the hedgerow and grassy habitats will be necessary and the Environmental Statement (paragraph 6.128) states that to avoid disturbance, works will be carried out outside of the nesting season. If planning were granted this would need to be vigorously enforced. The Skylark would be vulnerable to the construction works and habitat could be lost.

7.2 Bats

7.2.1 Background

A large number of bat species occur in the area according to the applicant's Environmental Statement and, as protected species, they are an important consideration. Bat activity is frequently seen by locals at dusk.

7.2.2 Bat Risk – higher flying heights ignored.

Although foraging and feeding zones are referred to in the application documents¹⁶ (see Figures 1 to 6), there is minimal reference to 'commuting flight zone', the heights that bats fly at when transiting, migrating or in storm conditions, while some of the flight zones referred to are open to serious question¹⁷, underestimating the risk from wind turbines. "Commuting flight zones" far exceed foraging and feeding zones in height, and can reach up to 300 metres above ground level, overlapping the reach (18 to 109.5 metres) of wind turbine blades.

Fast moving blades themselves can kill bats on impact. However, the far greater risk of death is from the wake vortex given off from the trailing edge of the blades, as these leave a far narrower margin of safety when flying through the turning blades.

7.2.3 Risk to the Noctule Bat not properly addressed

In Germany, research has shown that of all the recorded bat deaths at wind turbine sites, the Noctule accounts for around 80% of them¹⁷ and the appendix¹⁶ to the applicant's Environmental Statement acknowledges that this species is present at the site.

There are no diagrams in the appendix to the Environmental Statement, as there should be, showing the foraging zone and the potential feeding zone for the Noctule bat, a 'large, fast flying bat' and so the risk to this susceptible species has not been properly addressed. This species is known to feed at 0.5 to 300 metre heights¹⁷, overlapping the reach of the proposed turbine's blades.

7.2.3 Rare Breeding Site of Bechstein's Bat Nearby

A breeding site for Bechstein's Bat, only the eight such site identified in the country, has recently been found at the MOD's Newtown Training Area¹⁸, 6 kilometres from the site. The species was identified as present within 5 km of the proposed wind farm area by the applicant and so further consideration of the risk to this species is needed than is currently provided.

¹⁶ "Bat Habitat Assessment – West Wight", Terence O'Rourke, April 2006.

¹⁷ "West Wight. Re: Bat Habitat Assessment", Robert Stebbings Consultancy Ltd, July 2006 (Appendix 7B)

¹⁸ "Isle of Wight County Press", 7th July 2006, page 3

8. Hydrology

Overall Comment:

- **The applicant has undertaken on site no surveys to investigate impact on water quality (failing to comply with PPS23)**
- **The applicant has undertaken no on site assessment of surface water effects.**

Conclusion : **The application should be rejected on this basis**

8.1 Risk to Water Quality

8.1.1 Lack of Assessment of the Site

The applicant states in its Environmental Statement¹⁹ that it has undertaken no surveys of the site in order to investigate potential impacts of the proposal on hydrology and water quality on the site and its surroundings. Instead, it has relied on desk based information and data.

ThWART is aware that the Environment Agency has objected to the application on the grounds that “there is insufficient information to demonstrate that the risk of pollution to controlled waters is acceptable”.

8.1.2 Failure to comply with PPS23

PPS23 obliges the applicant to demonstrate a thorough understanding of the nature and extent of the risks and to propose suitable measures to deal with such risks prior to the determination of the application.

The application therefore fails to comply with PPS 23.

8.2 Proximity to water flows, and risk to the Yar, Newtown Creek and properties

8.2.1 Lack of Assessment of Impact

No proper assessment of the effect of building the wind farm on surface and near surface water movement has been made and yet there is a risk to the ecology, environment and amenity of the West Wight.

The proposal calls for the building of a service roadway running predominantly east west from Broad Land, across the direction of natural water flows, while the installation of concrete bases for the turbines might also be expected to have an impact on the behaviour on water flows. There is no model identifying what the impact would be within the Environmental Statement.

Wind farm construction has produced catastrophic results to water-courses and the surrounding ecology and human activity in some cases. For example near Derrybrien in Galway, Ireland, the failure to investigate the potential effect on water movement lead to peat and soil movement leading to the death of an estimated 50,000 fish, risk to 50,000

¹⁹ See paragraph 14.4 and 14.5

more, while the direct impact on human activity was the closure of two roads and threat (continued) to local buildings. The Irish government now face prosecution by the EU, for allowing the development to go ahead.

The potential impact may not be nearly as high in the case of the proposed wind farm for the West Wight but it should be properly assessed, after all the risks at Derrybrien were thought originally to be low.

8.2.2 Lack of consultation

The applicant has evidently failed to consult (let alone take advice) locally on this issue, exemplified by the comments already made about the proposal by the Yarmouth Harbour Commission on 30th June 2006.

8.2.3 Risk to water courses

Surface water passing through the proposed site drains to the west towards the river Yar and to the east, towards Newtown Creek. Both the Yar and Newtown Creek are nature conservation areas and very important amenity areas for boating and yachting, both for Island residents and visitors.

8.2.4 Risk to local services and employment

The port services at Yarmouth include the Lymington ferry, West Wight's major conduit to the mainland, and boat building and maintenance operations. The proposal could potentially affect these activities through effect on water movement and subsequent erosion.

8.2.4 Risk to properties

The village of Wellow, situated 1,000 metres away and 30 to 40 metres lower down than the proposed site, has suffered flooding on numerous past occasions. No assessment of the risk of increasing or exacerbating this hazard has been presented.

9. Impact on local Amenity, Enjoyment and Health

Several subjects are dealt with in this section. All of them are important in their own right, while cumulative effect is very substantial.

9.1 Visual Intrusion and Effect on Visual Amenity

Overall comment:

- **The proposed wind farm is of scale out of character with the Isle of Wight's intimate landscape**
- **The proposed wind farm will have significant visual intrusion on public rights of way through and nearby the site**
- **Visual intrusion would severely affect up to 120 properties within 1 kilometre of the site**
- **Visual intrusion would affect up to a further 150 properties within 4 kilometres of the site**
- **Visual intrusion would affect up to 280 holiday accommodation units within 3 kilometres of the site**
- **If the wind farm went ahead it would contravene the Island AONB Management Plan 2004-9 statement which refers to the retention of "the intrinsic special qualities of the environment".**

Conclusion: **The application should be rejected on this basis**

9.1.1 Scale of Structures

The structures proposed for the wind farm are as follows:

- 6 wind turbines in all; 4 of 100 metre maximum height and 2 of 109.5 metres in height, all with 41 metre length blades
- 1 anemometer mast of 59 metres in height

In this context, the points made in the Inspector's Report for the proposed Whinash wind farm - which was rejected at Appeal on 19th April 2006 - are valuable. The inspector attached importance to the impact of huge wind turbines on the landscape as a whole. The Report stated:

"the fundamental attributes of the site are its natural qualities, which in turn provide a context for the enjoyment of a much wider landscape where wildness and openness are part of the recreation experience".²⁰

He continued:

"the proposed turbines would appear massively out of scale with the host topography..."²¹

This lack of proportionality in the West Wight would be more significant, with the consequence of massive visual impact and intrusion.

²⁰ See paragraph 15.15 of the Inspectors Report

²¹ See paragraph 15.17 of the Inspectors Report

9.1.2 Affected groups

9.1.2.1 Users of Public Rights of Way

If the wind farm were built, everyone using local roads, footpaths and bridleways close to or crossing the proposed site (see Figure 5A and Table 5A above) will have customary views altered beyond recognition by the constant presence of turbines. They would also find that the familiarly intimate character of many of these routes substantially altered as a result of changes to road pattern and width to accommodate construction and maintenance vehicles and the installation of service roads.

Those using the Tennyson Trail will have views of moving blades or more of the turbine structures during their progress along the top of the chalk downs.

9.1.2.2 Local Dwellings

Local residents and visitors using local dwellings will be obliged to live with these moving industrial structures, whose impact will be constant and long-term whether individuals are driving, walking, relaxing in the garden, gardening or glimpsing them through a window.

There are in excess of 120 properties within 1 kilometre of the proposed turbines, with high risk of visual intrusion include, as follows:

- 100 or more properties in the villages of Wellow and Thorley.
- 12 properties at Tapnell Farm.
- 5 properties along Broad Lane.
- 2 properties (the existing house and a new house for which planning has been granted) at Churchill's Farm.
- 4 properties around Ningwood Farm.

In addition there are approximately 150 properties within 4 kilometres of the proposed turbines with risk of visual intrusion, as follows:

- Approximately 50 properties within Bouldnor (east of Yarmouth)
- Approximately 30 properties within "The Mount" area in Yarmouth
- Approximately 60 properties along or to the east of Copse Lane, Freshwater.
- Up to 10 properties in Calbourne, especially at the southern end of Elm Lane.

9.1.2.3 Island Visitors

Holidaymakers and other visitors who come to the area of the West Wight to enjoy the special qualities of the landscape with its remoteness, openness and sense of peace will find their expectations unfulfilled. It is likely that at least some – those who enjoy the area for what it currently is - are unlikely to return.

Holiday accommodation within 3 kilometres of the site has been identified (see Table 4A) as over 280 available units, follows:

- 80 holiday caravans
- 175 camp sites for touring vehicles
- 22 self-catering/holiday cottage properties
- 5 bed & breakfast rooms

9.1.3 Adherence to Policy

The Isle of Wight AONB Management Plan 2004-2009 includes this statement of the vision for it to have become by 2025:

“(A place) where new technologies have been accommodated through careful consideration and mitigation for their impact upon the AONB, bringing economic and social benefits and retaining the intrinsic special qualities of the environment, where economic benefit has been brought to local communities directly through sustainable tourism...”

The conclusion is that the “intrinsic special qualities of the environment” could not be retained if the proposal were allowed to go ahead.

9.2 Wind Turbine Noise Effects

Overall comment:

- **The proposed wind farm will exceed acceptable noise levels at 14 to 72 local properties, according to assessment using ETSU-R-97 guidelines, the measure recommended by PPS22.**
- **13 to 59 properties are likely to be affected by significant night-time noise increases (above background levels) when assessed using BS4147:1997.**
- **A further 14 properties are likely to be affected by at least marginal increases in night-time noise, according to BS4147:1997.**
- **11 to 56 properties are likely to be affected by at least marginal day-time (“amenity time”) noise increases when assessed using BS4147:1997.**
- **Users of the several public rights of way that cross and pass near to the proposed wind farm site would be exposed to high levels (at least 50dB(A)) of turbine noise, but the applicant has presented no assessment or recognition of this.**

Conclusion: **The application should be rejected on this basis**

9.2.1 Assessment using ETSU-R-97

The applicant suggests in Chapter 10 of the Environmental Statement that there be no loss of amenity by wind farm “neighbours” due to noise. This conclusion is reached using the ETSU-R-97 guidelines, as recommended in PPS22.

ETSU-R-97 “The Measurement and Assessment of Noise from Wind Farms”²² details the *opinions* of a working group, which met around 10 years ago and its limitations have been frequently challenged²³. It does not address some key issues, for example no measurement methodology for blade swish is presented because of a lack of data on the subject at the time the document was written and there is no guidance given about noise prediction yet this is one of the most important components of the Environmental Statement. Another fundamental issue with ETSU-R-97 is that it does recognise the impact that wind farm noise will have in areas that have very low background noise (see table 10.3 of the Environmental Statement). This is important, as at around the proposed wind farm site background noise is often very low both at night and during daytime amenity hours (see tables 10.8 and 10.9 of the Environmental Statement).

However, even with all its limitations, using ETSU-R-97 to make an objective analysis of the available data shows that noise generated by the proposed wind farm will exceed recommended limits in some of the “test” properties used around the proposed site.

Crucially, the applicant’s report disregards the fact that noise is additive. Addition of a background noise factor is common practice, yet has not been carried out. **Figures 9A and 9B** (below) show the affect of adding a factor for the measured background noise to the predicted noise generated by the turbines for Hartshole Cottage and Churchill’s Farm, for example. These graphs are an exact reproduction of those shown for “amenity” hours in figures 10.3 and 10.4 of the Environmental Statement, but with additional (red) lines, which make allowance for the additive effect, showing that the true residual noise

²² ETSU-R-97 document, previously accessible from the DTI website but no longer available from that source.

²³ “ETSU-R-97 – Why it is Wrong”, New Acoustics, July 2005.

exceeds the ETSU-R-97 lower noise limit by 1.2dB(A) at Hartshole Cottage and 0.75dB(A) at Churchill's Farm, respectively.

FIGURE 9A: Hartshole Cottage – Noise Levels
Amenity (daytime) Hours

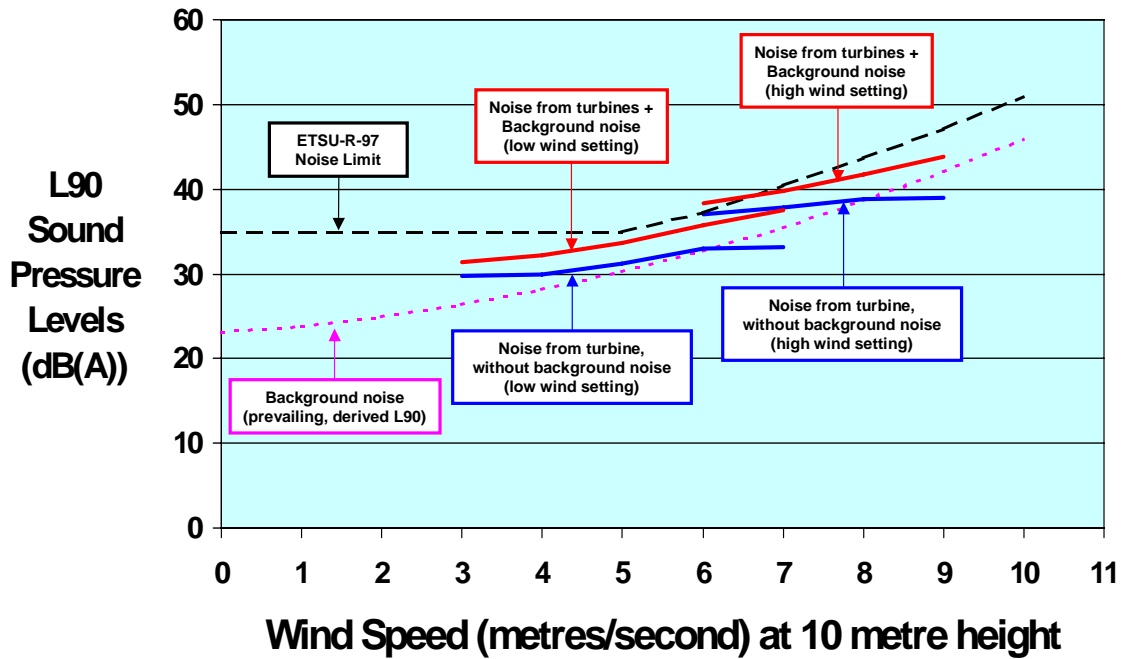
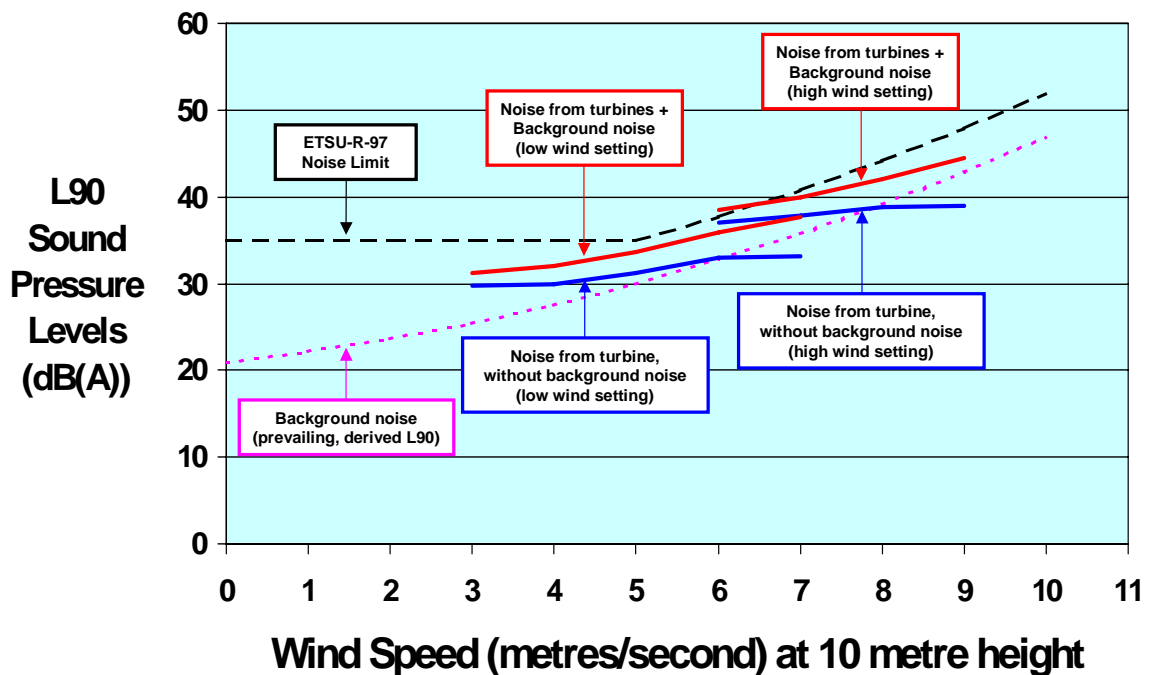


FIGURE 9B: Churchills Farm – Noise Levels
Amenity (daytime) Hours



Further to this the applicant’s report, by only making reference to the 6 “test” properties, tends to lead the reader away from taking into account the possible impact on the numerous other properties around the site that would be at similar or near similar levels of risk.

To assess this wider impact, if we refer to the sound contour map (figure 10.2 of the Environmental Statement) and apply the additive effect of background noise, we arrive at the conclusion that the “37dB(A)” contour will mark the “border”, in approximate terms, between what is acceptable under ETSU-R-97 and what is not.

As virtually the whole of Wellow falls within the contour marked “36dB(A)” – and that 3dB(A) is “a barely discernable difference” - much of the village is almost certainly within the noise complaint zone.

The consequence is that a significant number of properties, as shown in **Table 9A**, are likely to receive wind turbine noise beyond the acceptable limits, as specified in ETSU-R-97.

Table 9A : Properties that are likely to suffer noise nuisance (according to ETSU-R-97)

Location	Approximate number of properties affected ¹		
	Within “38dB(A)” ²	Within “37dB(A)” ²	Within “36dB(A)” ²
Wellow village	10	25	55
Prospect Cottage +	3	3	3
Churchills Farm	1	1	1
Tapnell Farm	-	12	12
Dog Kennel Cottage	-	-	1
TOTALS	14	41	72
¹ From 1:10,000 OS Map			
² From sound contour map (figure 10.2 of the Environmental Statement)			

9.2.2 Assessing Change Relative to Existing Background Noise

ETSU-R-97 does not relate “acceptable” noise levels to existing background noise, when the latter is at low levels (30dB(A) or less) and background levels are often this low around the proposed wind farm site (see Figures 9A and 9B above). However, while supporting the use of ETS-R-97, the PPS22 Companion Guide (page 167, paragraph 41) states: “Well specified and well-designed wind farms should be located so that increases in ambient noise levels around noise-sensitive developments are kept to acceptable levels with relation to existing background noise”. Consequently it is worth considering BS4147:1997 “Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas” as a more effective assessment of the likely loss of amenity to residents and visitors using local dwellings.

BS 4142 has been used for the last 30 years or so as the means of deciding whether noise is a nuisance or not. It is not statutory law but is has been used satisfactorily and

frequently by council Environmental Health Departments to decide arguments about noise.

The proposed wind farm can be considered to be an industrial site. The noise spectrum given in the report shows a noise pattern typical of any axial flow fan and many other noise sources, typically radiating noise from an industrial plant. British Standard BS4142:1997 has the advantage of recognising that existing dwellings already have an established background noise level and considering whether new noise added to that environment is likely to cause a nuisance.

The standard requires that the background noise levels are measured without the noise source operating and then allows for the affect of the new noise to be assessed relative to the datum established.

Levels of change for 5 properties referred to in the Environmental Statement, relative to background noise, are given in Table 9B below, indicating the scale of change.

Table 9B : Predicted Turbine Noise Increase Over Background Noise

Property	Location (relative to proposed wind farm)	Night-time (dB(A))	Amenity (dB (A))
Hartshole Cottage	North - 820 metres	+9.5	+4.5
Prospect Cottage	South - 700 metres	+9.5	+1
Churchill's Farm	East - 550 metres	+9	+4.5
8 Tapnell Cottage	South West - 750 metres	+5	
Shalcombe Cottage	South South East - 1,200 metres	+5	

Notes:

- Sound pressure (dB(A)) figures are calculated by deducting background levels (reported in tables 10.8 and 10.9 of the Environmental Statement) from predicted turbine noise levels.
- A 10dB rise equates approximately a doubling in noise level (as stated in paragraph 10.14 of the Environmental Statement).
- BS4147:1997 also states: "If the noise contains a distinguishable, discrete, continuous note (whine, hiss, screech, hum, etc.) or if there are distinct impulses in the noise (bangs, clicks, clatters, or thumps), or if the noise is irregular enough in character to attract attention, add 5dB to the specific noise level to obtain the rating level. Make only a single 5dB correction if one or more of the above characteristics is present." In this case the level of noise calculated can be considered to be the specific noise and so no corrective addition has been made to the figures presented.

BS4142 states: "Use the rating level for the assessment of the specific noise and subtract from it the measured background noise level.

- A difference of around 10dB or higher indicates that complaints are likely.
- A difference of around 5dB is of marginal significance.
- At a difference below 5dB, the lower the value the less likelihood there is that complaints will occur....."

The results from **Table 9B** indicate that, overall, 13 to 59 properties are at risk of suffering significant increases in night-time noise, in many cases a doubling, as follows:

- Hartshole Cottage and other properties within the village of Wellow. (From **Table 9A**, the number of properties affected is likely to be affected would be 10 to 55.)

- Prospect Cottage and two other nearby properties.
- Churchill's Farm.

The results from **Table 9B** also indicate that a further 14 properties would suffer at least marginal increases in night-time noise as follows:

- 12 properties at Tapnell Farm.
- Shalcombe Cottage and one other adjacent property.

The results from **Table 9B** indicate that overall 11 to 56 properties are at risk to suffering at least marginal increases in day-time amenity noise, as follows:

- Hartshole Cottage and other properties within the village of Wellow. (From **Table 9A**, the number of properties affected is likely to be affected would be 10 to 45.)
- Churchill's Farm.

9.2.3 Noise Impact on Public Rights of Way

Despite the close proximity of several well used footpaths and bridleways (see **Figure 5A and Table 5A**) no assessment of noise impact has been presented. However, from figure 10.2 of the applicant's Environmental Statement it is clear that noise levels of over 50dB(A) would be experienced in what is currently quiet countryside.

9.2.4 Low Frequency Noise

Low frequency noise is dismissed as an issue in the application, while the Companion Guide to PPS22 states (page 170, paragraph 45) that "there is no evidence that ground transmitted low frequency noise from wind turbines is at sufficient level to be harmful to human health". Notwithstanding this, further research into low frequency noise is ongoing (e.g. at Salford University) and new findings in this area, such as the different individual sensitivity (and sensitization) to this phenomena need to be taken account of and a precautionary approach is considered in section 9.4 below.

9.3 Flicker/Shadow Effects and Reflected Light

Overall comment:

- **Moving shadow effects from the proposed wind farm blades would be likely to reduce the amenity of around 20 residential properties on the south side of Wellow and at Dog Kennel Cottage.**
- **Reduction in amenity are also likely to occur with the Wellow Millenium Green, a public open space adjacent to Wellow Institute due to these shadow effects.**
- **Moving shadow effects would reduce the amenity and enjoyment of public footpaths and bridleways that cross or are near to the proposed site and are potentially hazardous to horse-riders.**
- **Moving shadow effects on drivers and others using Broad Lane, a well used but single track roadway, are likely to reduce amenity value and also to increase accident risk.**
- **Reflected light effects would potentially affect many properties and major and minor roads in the vicinity.**

Conclusion: **The application should be rejected on this basis**

9.3.1 Background

Due to their height wind turbines cast long shadows under bright sunlight, particularly during winter when the sun is lower in the sky.

If the turbines are rotating, the shadows “flicker” each time a turbine blade passes through the sunlight. The flicker effect imitates a stroboscopic light and impacts properties within the shadowed area.

Residents living close to a wind farm in Cumbria have suffered from this effect.²⁴ They have described it as “*like being in a disco*” and needing to either close their curtains or to move rooms, restricting the amenity and enjoyment of their properties.

9.3.2 Affect on Property

The Companion Guide to PPS22 states that flickering shadow will occur within ten rotor diameters of a wind turbine and this will be a problem when the sun is low in the sky and the wind turbine, sun and receptor are all in a line.

Accordingly the Applicant has investigated local properties that lie within 820m (10 x rotor diameters) and within 130 degrees either side of north relative to the turbines. This analysis has shown that 2 properties are likely to be affected:

- Dog Kennel Cottage, Broad Lane
- Hartshole Cottage, Wellow

However, what has not been considered is that, because the land slopes away from the proposed wind farm site and down towards the villages of Wellow and Thorley, shadows are likely to be thrown further than the “standard” 10 times rotor distance.

²⁴ Far Old Park Farm, Ireleth, Cumbria

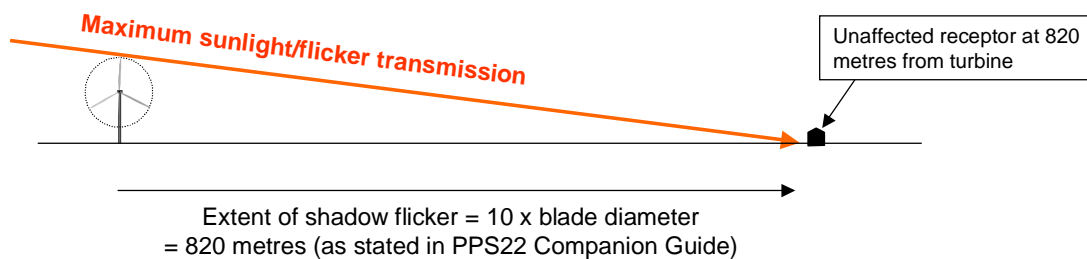
Based on a 30 metre fall in land level over the original 820 metres it can be calculated that shadows will be thrown beyond 1,000 metres (**FIGURE 9C**).

As a result of this, all the proposed turbines would be likely to throw shadows into the village of Wellow, so that around 20 properties, including the Wellow Institute would suffer reduction in amenity. The effects would also occur on the Millenium Green, the public space adjacent to the Wellow Institute.

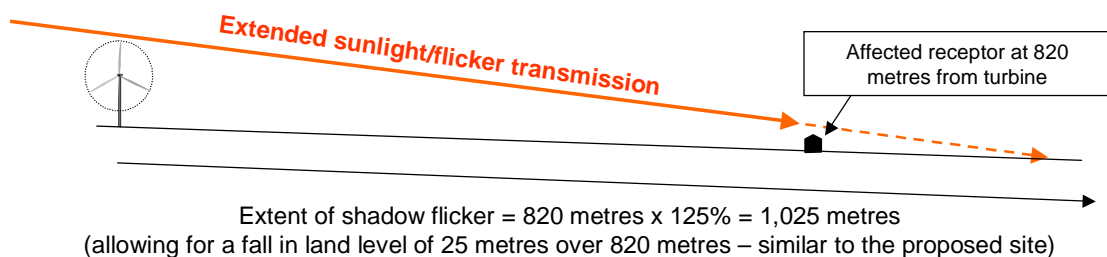
In addition Dog Kennel Cottage is likely to suffer from shadow flicker effects from proposed turbines 1 and 2, while Bellwood Stables and adjacent properties would be affected by turbine 6. The latter case could prove very problematical for novice riders and horses at that site and reduce the amenity and enjoyment offered by that business.

Figure 9C : Extent of shadow/flicker effect

1. Based on a level site between turbine and receptor



2. Based on falling land between turbine and receptor (as on the proposed site)



PPS22 states (page 177, paragraph 78) that turbines can cause “flashes of reflected light, which can be visible for some distance,” and that, although it is possible to reduce reflected light effects “it is not possible to eliminate it”. As well as in Wellow, properties to the north of the site (Broad Lane), west of the site (Freshwater/Afton) and to the east of the site (Calbourne) are likely to see some effects.

9.3.3 Affect on Public Rights of Way

In addition to the likely effect on the Wellow Millenium Green (see above), shadow flicker effects will be experienced on the footpaths and bridleways crossing the site or adjacent to the site (see **FIGURE 5A**). This may prove hazardous for horse-riders in particular,

especially in the case of novice horses and/or riders, but in any case is extremely likely to reduce the amenity and enjoyment of these thoroughfares for all users.

9.3.4 Affect on Roadways

Shadow flicker will impact on vehicles and other users of Broad Lane, a frequently used “cut through” to and from Yarmouth to the B3399 “Middle Road”. As this road is single track there would be an increased risk of head-on collision, if drivers become too distracted by shadow/flicker effects (see Section 10 below).

Reflected Light may affect drivers using the B3399 “Middle Road” between Wilmingham Lane and Calbourne and also on the A3054, particularly between Bouldnor and Ningwood.

9.4 Health Effects

Overall comment:

- **Low frequency sound and connected health effects are not properly understood and more research is needed regarding the health effects from wind farms to those living nearby.**
- **French National Academy of Medicine report recommends that industrial wind turbines should be kept at a minimum distance of 1,500 metres from housing.**

Conclusion: **The application should be rejected on this basis**

9.4.1 Background

Wind turbines generate two types of sound:

- Aerodynamic noise – this is generated by the blades passing through the air
- Low frequency (infrasound) – this is generated by rotating machinery and turbulence.

Low frequency noise is discussed here, while the loss of amenity and the potential impact on local residents arising from the generation of aerodynamic noise have already been discussed in Section 9.2 above.

9.4.2 Precautionary Approach to Low Frequency Noise

The Companion Guide to PPS22 states that “ground transmitted low frequency noise is at sufficient level to be harmful to human health”, but the only reference cited dates back almost 10 years to 1997. More recent work and the practical experience of those living close to wind farms brings this conclusion into question.

An example of how serious the issue over low frequency sound and the associated health risk have become comes from the French National Academy of Medicine. They call for more detailed research but recommend that in the interim no turbines should be built within 1.5 kilometres of a home²⁵. This “precautionary principle” approach, if applied in England, would rule out the Wellow wind farm, as there are over a hundred properties within a 1.5 kilometres of the 6 turbines proposed. In fact not one of the proposed turbines sites would individually qualify on this basis.

Individual sensitivity to low frequency sound varies significantly because of differences in personal hearing thresholds²⁶, while individuals appear become sensitised to it during exposure, making this a difficult area to assess and understand but it is argued that this supports a precautionary approach.

²⁵ Windpower Monthly – June 2006

²⁶ “Prodedure for the assessment of low frequency noise complaints”, University of Salford, 2005.

9.4.2 Research on Low Frequency Noise

Low frequency sound has been reviewed for DEFRA by Leventhall, Pelmeare and Benton (2003)²⁷, who state:

- *“Low frequency noise causes extreme duress to a number of people who are sensitive to its effects”* (p4);
- *“Infrasound is an emission from many artificial sources air movement machinery including wind turbines ...”* (p54);
- *“The effects of infrasound or low frequency noise are of particular concern because of its pervasiveness due to numerous sources, efficient propagation and reduced efficiency of many structures in attenuating low frequency noise compared with other noise”* (p54);
- *“There is no doubt that some humans exposed to infrasound experience abnormal ear, central nervous system and resonance induced symptoms that are real and stressful”* (p60);

The World Health Organisation recognises the special place of low frequency noise in the home as an environmental problem. Its publication on Community Noise²⁸ expresses a number of concerns about the impact of low frequency noise, including:

- *“it should be noted that low frequency noise, for example, from ventilation systems can disturb rest and sleep even at low sound levels”*;
- *“for noise with a large proportion of low frequency sounds a still lower guideline (than 30dB(A), the maximum for a good nights sleep) is recommended”*;
- *“it should be noted that a large proportion of low frequency components in a noise may increase considerably the adverse effects on health”*;
- *“the evidence on low frequency noise is sufficiently strong to warrant concern”*;

There is no detailed analysis of the health problems experienced by people living near wind farms, largely because existing wind farms have been situated away from areas of population density and comprise lower numbers of smaller machines.

However, Amanda Harry, a Plymouth G.P., studied the 14 people who lived near the 16 turbine (30 metres high) Bears Down wind farm at Padstow, Cornwall. Distances from the nearest turbine dwellings ranged from 300 metres to a mile. Her study revealed:

- All but one said that they felt their lives had been adversely affected by the effects of the turbines and they were experiencing more headaches.
- 10 out of the 14 said they were having problems sleeping and suffering anxiety symptoms.

Similar problems have been found by Dr Bridget Osborne, a GP in Moel Maelogan, a village in North Wales, where three turbines were erected in 2002.

²⁷ Leventhall, Pelmeare and Benton, “A Review of Published Research on Low Frequency Noise and its Effects” (DEFRA 2003)

²⁸ Berglund et al 2000

Local residents, living close to a wind farm in the Cumbrian villages of Askam, Marton and Ireleth, stress that it is the quality of the noise as much as the loudness. They describe it as “*like a broken down washing machine*” and equate “*the way it comes and goes*” as being like “*chinese water torture*”.

A report by South Cambridgeshire NHS Primary Health Care Trust ²⁹ includes the following comment:

- Noise “...is the major drawback of wind turbines. It comes from both the mechanical gearing (which can be controlled) and from the aerodynamic properties of the rotating blades (uncontrollable). At present there is no established method for predicting in advance the wind turbine noise levels to be generated by wind farms”.
- “These drawbacks create annoyance, feelings of disturbance, concern, irritation, distress and harassment, which can produce adverse reactions. Noise is the most prominent cause of the annoyance”.

No large scale study has been done on the effects of low frequency sound from wind turbines but it is clear from comments from around the world that people living near to wind farms experience health problems resulting from their operation.

²⁹ “Briefing Paper on Health Implications of Wind Farms”, Dr David Kanka, 17th August 2004

9.5 Likely Effect on TV Reception

Overall Comment:

- **The applicant has undertaken no significant research with respect to the likely impact on television reception by the site (contrary to PPS22).**
- **BBC 'web tool' predicts that 4,047 homes will suffer television interference with no alternative "off-air" service available.**
- **The applicant offers no suggestions as to how these effects could be mitigated and removed.**

Conclusion: **The application should be rejected on this basis.**

9.5.1 According to the BBC and Ofcom:

"It is well known that large...structures such as wind farms can adversely affect terrestrial television reception."³⁰

9.5.2 Chapter 15 of the Environmental Statement states³¹ that its consultants, Sinclair Knight Merz, "undertook a study to examine (inter alia) the potential effects of the proposals on...communication links that cross the site...".

However, no study, in the true sense of the word, has been conducted. Instead, as the developer itself explains its methodology:

"The potential effects of the proposals on communication systems have been assessed through consultation with stakeholders. Their responses highlight the degree to which the presence of the proposals will affect communication signals carried by their infrastructure and equipment."³²

In regard to television interference, the applicant's consultation exercise is incomplete, and the information given is inadequate and highly misleading. It does not give any true idea of the extent of likely problems of interference.

9.5.3 ThWART has been informed that on 19th May 2006, the applicant's agent, Terence O'Rourke Ltd, received an e-mail from Arqiva, the transmission infrastructure provider. This e-mail advised that there could be interference to TV reception in properties near the wind turbines and that the BBC's own OS grid reference based web tool could be used to gain an early estimate of how many could be affected.³³

9.5.4 When the grid references for the 6 proposed turbines are fed into this web tool, it predicts that the television reception for as many as 4,047 homes will be affected, with no alternative 'off air' service available.

9.5.5 We note that, in the application, the applicant makes no reference to, or gives results from, this web tool. If it had used the tool, the applicant has chosen not to pass on the findings.

³⁰ See "The Impact of Large Buildings and Structures (including Wind Farms) on Terrestrial Television Reception", issued by the BBC and Ofcom.

³¹ See paragraph 15.1

³² See paragraph 15.18

³³ See http://www.bbc.co.uk/reception/factsheets/pdfs/buildings_factsheet.pdf

9.5.6 The applicant seemingly continues to mislead with its statement that the BBC made 'no response'. The BBC has provided the web tool as it "enables developers to carry out evaluations for themselves". As an "experienced developer of wind farms", Your Energy Ltd should have been well aware of the BBC's web tool.

9.5.7 PPS 22 has as a key principle (viii):

"Development proposals should demonstrate any environmental, economic and social benefits as well as how any environmental and social impacts have been minimised through careful consideration of location, scale, design and other measures".

In conflict with this, the application states:

"The likelihood of broadcasting interference requires property-specific investigation during commissioning and operation of the wind farm. Complete mitigation is possible through measures that can be put in place, and can be addressed in planning conditions."

9.5.8 The applicant has, therefore, failed to comply with PPS22 as the likely interference for television reception caused to over 4,000 homes is a clear "social impact". The applicant has failed to demonstrate any attempt to make clear the extent of the likely problem, or to suggest any mitigation of it.

9.5.9 The applicant's suggestion that interference caused to people's television reception can be resolved after commissioning of the wind farm is unsatisfactory. This is an example of the applicant's lack of care and rigour in making this proposal.

There are reported examples of communities who have faced major difficulties in having the interference to their television caused by wind farms resolved within months or even years. In one example, Millhouse Green wind farm on Royd Moor, near Barnsley, local residents suffered with initially no, and then poor, television reception for more than 2 years.

The applicant suggests that mitigation can be addressed through planning conditions. Again, we believe that this is unsatisfactory.

This is reinforced by a previous Appeal Decision in respect of a turbine in Wales³⁴, in which the inspector commented:

"In addition, I am not convinced that the consideration of potential electro-magnetic interference, including the adverse effects on television, radio or microwave links, can be the subject of a condition without some form of prior assessment. In this case no information is provided on the subject."

The applicant has provided no information on likely interference, and we do not therefore believe, following the inspector's Decision, that planning conditions are a possible or appropriate solution.

9.5.10 The applicant does not provide any information as to any possible effects of the turbines on radio reception.

³⁴ Ref: APP/Y6930/A/03/1133515

CONCLUSION

The applicant has not complied with the obligations under PPS 22. Further, the lack of in-depth analysis or mitigating action plan is a fundamental flaw to the application.

For these reasons the application should be rejected.

10 Driver Distraction and Site Access

Overall comment:

Distraction to drivers:

- **On the B3399/B3401 “Middle Road” there would be a risk to an already hazardous stretch of road, which has seen 78 injury involving accidents over 10 years.**
- **The proposed location of turbine 6 poses risk to drivers using the junction with the Brook Road, which accounts for 10 of those accidents, including 6 involving “serious” injury.**
- **The well used but single track Broad Lane would be overshadowed by the proposed turbine 1, 109.5 metres tall and only 180 metres distant, causing further distraction to drivers.**
- **Drivers on the A3054 (section to east of Bouldnor) would be at risk.**
- **The applicant has failed to recognise, investigate or assess these risks.**

Access to site:

- **Applicant has failed to consider for the constructional period:**
 - **Impact on tourist traffic in the area, including to the Orchards Holiday Park**
 - **Access to Shalfleet Primary School**
 - **Impact on Broad Lane and the business and recreational activities**
- **Applicant has failed to consider long-term effects (during wind farm operation) to these local activities and to Broad Lane, in particular.**
- **Applicant has failed to properly explain how access to the proposed site can be restricted and fails to take into account existing public rights of way access, during construction or operation.**

Conclusion: **The application should be rejected on this basis.**

10.1 Driver Distraction

10.1.1 The Companion Guide to PPS22 states³⁵ :

“Concern is often expressed over the effects of wind turbines on car drivers, who may be distracted by the turbines and the movement of the blades. Drivers are faced with a number of varied and competing distractions designed to attract attention. At all times drivers are required to take reasonable care... Wind turbines should therefore not be treated any differently from other distractions a driver must face and should not be considered particularly hazardous”.

This paragraph appears to overlook the fundamental difference between hoardings and turbines. Hoardings are sited where they attract attention, thus can easily be seen, and so are more likely to be anticipated by drivers. The turbines move, and therefore the distraction created will be greater.

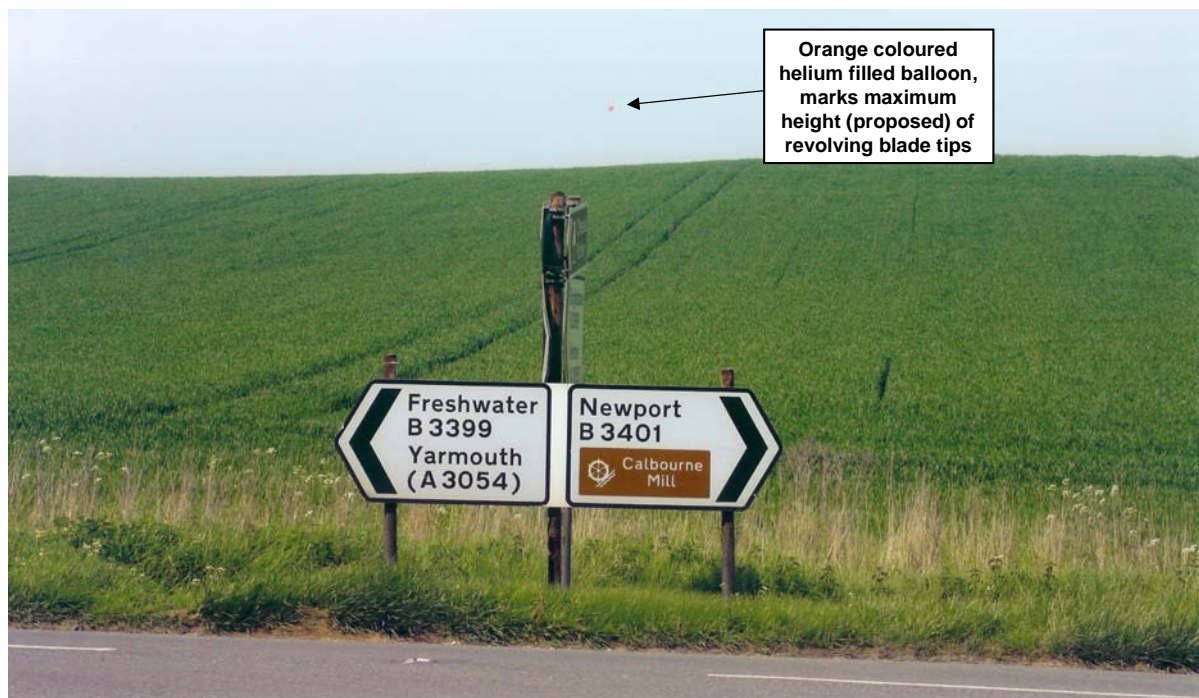
Further, drivers will be subject to a series of intermittent views of moving turbine blades, accentuated by the numerous bends and rises and falls in the road, and the changing hedge levels and intervening groups of trees.

³⁵ Paragraph 54 of the Companion Guide

- 10.1.2 In the context of the proposed site, there are obvious issues which are likely to cause serious concern:
- The close proximity (at 180 metres distance) of turbine 1 to the well used Broad Lane. The turbine proposed here would be at least 109.5 metres tall, causing a massive visual intrusion (see photograph at end of Section 5 above).
 - The proposed location of turbine 6 and would be a likely distraction to drivers negotiating the already hazardous junction from the Brook Road (B3399) onto the “Middle Road” (B3399/B3401) at Chessell. The junction is almost due south of the proposed turbine location.

We attach a photograph (Figure 10A) showing the approach (from Brook) to this junction, with the height of the proposed turbine 6 demonstrated by a helium filled balloon. The balloon was flown as close to the intended site for turbine 6 as was possible - within 85 metres of the proposed location and at a similar height above sea (and ground) level.

Figure 10A : Additional Distraction to Drivers at the Brook Road Junction with the “Middle Road”



Drivers from Brook are already faced with very fast moving traffic on B3399/B3401, a “favourite” overtaking spot, while turbine blades ahead would provide further distraction

- 10.1.3 It is of interest to point out that although the applicant’s Environmental Statement spends considerable paragraphs discussing the effect that the turbines might have on motorists travelling on roads within the ZVI (Zone of Visual Influence), the application makes no comment as to driver distraction, and the likelihood of accidents occurring as a result. It provides no information as to the accident record for the roads local to the site. Clearly, the applicant has chosen to make no assessment of the distraction effect on motorists from a safety point of view.

- 10.1.4 ThWART has obtained from the Hampshire Constabulary a summary of accidents on the B3399/B3401 (the “Middle Road”), between Calbourne and the junction with Wilmingham Lane, Afton, between 1st January 1996 and 31st March 2006 ³⁶.

The Police only record accidents in which there have been injuries and these records indicate 78 accidents on this short stretch of road. Of these, 10 were collisions at the junction with Brook Road referred to above and 6 of them resulted in serious injury. A further accident was a collision at Broad Lane. A further 45 of these accidents involved drivers who, in some manner, lost control of their vehicles. This emphasizes yet further that the condition of the road is such that no further distractions should be added.

- 10.1.5 There are also significant risks perceived to drivers travelling on the road approaching Calbourne (from Newport) and the A3054, north of the site. On that latter road, drivers will also be prone to intermittent sightings of the turbines. This is especially true of the section immediately to the east of Bouldnor, which will be the first close-up view of the turbines that motorists arriving on the ferry will have on that road.

CONCLUSION

We believe that the turbines will risk causing significant distraction to drivers, and could therefore create a heightened risk of accidents on roads that are already accident prone.

As a result, the application should be rejected.

10.2 Access to site

- 10.2.1 The Environment Statement states³⁷ that, in accordance with best practice, the transport assessment has been discussed, as appropriate, with the local Highway Authority, the local Police Authority and the Highways Agency.

No details of these assessments is forthcoming, for example, there is no assessment as to the width and state of Broad Lane and its southern exit. There also appears to have been no consultation with the Emergency Services at St.Marys Hospital regarding effects on the movements of emergency vehicles.

Paragraph 13.15 of the Environment Statement infers that abnormal loads will only be moved between 0930 and 1500 hours.

In assessing impacts on traffic levels, the applicant appears to ignore (inter alia) the access from and to St Mary’s Hospital on the A3054, to ignore tourist traffic travelling to and from Yarmouth ferry terminal, traffic (especially touring caravans & motor caravans) travelling to the Orchards Holiday Park in Newbridge and traffic travelling to and from East Cowes and Fishbourne.

- 10.2.2 In paragraph 13.36 of the Environmental Statement, the applicant outlines 9 potential routes for various types of traffic during construction, as follows:

³⁶ A hard copy of this report is available from ThWART

³⁷ Paragraph 13.8 of the Environmental Statement

Table 10A: Applicant’s Route Descriptions

Route	Route descriptions (adapted from Table 13.3 of the applicant’s Environmental Statement)
1	From the Medina Wharf facility along the access road to the A3020 to the junction with the A3054 (Forest Road) via Somerton roundabout.
2	From Vestas Blades facility, Newport to the Forest Road roundabout on the A3020.
3	A3054 (Forest Road) to the Shalfleet bridge (signals).
4	A3054 from Shalfleet bridge to the junction, to the east of Yarmouth, with the B3401 (Thorley Road).
5	B3401 (from A3052) to the junction with Broad Lane at the Thorley cross roads.
6	B3401 (Main Road), from the junction with Broad Lane at Thorley cross roads, through Wellow to the T-junction with Station Road, Ningwood and along Station Road to the A3054 (Yarmouth to Newport road).
7	From Broad Lane junction with the B3401 (“Middle Road”), along to Station Road (Ningwood) via Newbridge village.
8	B3401 from the Glebe farm access through Calbourne up Sur Hill down Calbourne Road to the Forest Road roundabout (this route must be via Newport itself, including Coppin’s Bridge)
9	Elm Lane, from its junction with the A3054 (Yarmouth to Newport road) to its junction with the B3401 (“Middle Road”) at Calbourne.

10.2.3 Route 1 is likely to conflict with Emergency Services to St Marys Hospital.

Route 2 is likely to conflict with Hospital administrative traffic and access to the Dodnor industrial estate.

In respect of Routes 3 and 4, abnormal loads will cause significant effects on all ferry traffic to and from all parts of the Island to all three ferry terminals.

Routes 5 and 6 form part of the Round The Island Cycle Route (see also Section 4.2 of this document).

Also in respect of Route 6, the applicant states:

“The section also includes Station Road from its junction with the A3054 to its junction with the B3401”.

Only scant and passing reference has been made to the issues of drop offs and collections from Shalfleet Primary School, while no mention has been made that arrivals and departures for the Orchards Holiday Park that also use this route.

In respect of Route 7, the applicant ignores the southern exit from Broad Lane onto the Middle Road. As discussed in paragraph 10.1 above, this is a dangerous junction. The described route (as above) continues through the

particularly constrained roadway through Newbridge. However, according to the applicant's route maps - figures 13.4 and 13.19 to 13.24 - Route 7 does not pass through Newbridge, as stated in their table!

In respect of Route 8, this appears to send vehicles through Carisbrooke into Newport to the A3020 (Cowes Road) via Coppin's Bridge, having to negotiate Newport High Street (or worse still the even more constrained Whitepit Lane route to Shide) on the way. The applicant appears not to have even bothered to drive the route to investigate it properly

Route 9 (Elm Lane) is constrained by width at places throughout its length but particularly towards the southern end, with high hedges and, near Calbourne by housing.

All routes present massive problems to movement of materials and machinery such as high lift cranes etc during construction and maintenance.

10.2.4 The culmination of all these routes is that all traffic will at some time be travelling onto, over and from Broad Lane.

10.2.5 In Table 13.5, the applicant provides a summary of the predicted modifications to road furniture that will be required along the preferred route. We submit that this is far too simplistic a prediction, as it is not related to time or frequency of the abnormal loads.

10.2.6 The applicant deals with traffic generation during construction - Phase 1 in paragraphs 13.93 to 13.111. It lays out a series of assumption and tables. The ultimate conclusion of the applicant is that the increase in traffic is negligible.

We do not accept this conclusion. Further, local residents already know that any increase or interruption of traffic on either of the A3054 (Newport to Yarmouth road) or the B3399/B3401 (Newport to Freshwater road) has significant consequences for the other.

10.2.7 The applicant states that construction of the wind farm is likely to last approximately six to nine months. This allows a tolerance of 50% in the applicant's calculations. That tolerance does not appear to have been factored into their conclusions. Nor is there any conclusion on the effect on traffic of the time of year of construction, and the consequential changes in traffic patterns at these times.

10.2.8 In paragraph 13.111, the applicant states:

".....once the final choice of turbines and delivery constraints are known, a specific route capacity based on actual traffic flow data can be conducted".

This information is essential to the assessment of the application. The applicant has had ample opportunity to survey and provide this information. The failure to do so should lead to the rejection of the application.

10.2.9 For Operation period phase 2 the applicant states in paragraph 13.114: "In the highly unlikely event that any large replacement turbine components such as blades or gearboxes are required, delivery vehicles will travel to site in

accordance with the construction transport strategy outlined above, and will provide advance notice to local residents.”

We assume from this statement that the applicant does not anticipate the need to change blades and gearboxes in respect of the stated “R & D” purposes for Vestas. Presumably, also, the new access road opposite Thorley Church to connect to Broad Lane will have to be left intact to facilitate this.

All such movements would also affect and delay tourist traffic.

- 10.2.10 In paragraph 13.116 of the Environmental Statement, the applicant states: “Public access to the West Wight wind farm will not be permitted without prior arrangement. Information panels will be at key viewpoints around the Island. This will ensure that the potential for vehicles to be drawn close to the wind farm for viewing will be reduced”.

We believe that this provides insufficient analysis of the situation, provides no proper plan of action and appears to be entirely wishful thinking. There is no information as to where such information panels would be sited, for instance, or who will maintain them.

Further, this statement disregards the proximity of the turbines to the public rights of way across the site (see Figure 5A, in Section 5A). It must be noted that there is no public parking at any points of access to the public rights of way that cross the site. It is not made clear by what method public access to the generating station and the turbines could be restricted.

- 10.2.11 We have already challenged many of the assumptions made by the applicant. However, we will deal specifically with issues that relate to Broad Lane.

Broad Lane :

- Broad Lane is extremely narrow; in fact, throughout its length, it is narrower than the suggested permanent access tracks to the turbines.
- Throughout its length there are no official passing bays, only entrances to fields, to Prospect Quarry, to private properties and a few places where the banks of the road have been eroded. For much of its length it is impossible for the smallest of vehicles to pass side by side.
- The road surface is barely metalled. It is pot-holed and the edges are continually breaking up. It is rarely used on its main length by HGV's as it is wholly unsuitable for such traffic.
- The exit at the southern end onto the B3399 (“Middle Road”), turning left is merely dangerous. Turning right is the equivalent of playing “Russian Roulette”.
- At the southern end, there are two residences, Shalcombe Cottage and Shalcombe Holding, placed on either side of the junction
- Where Broad Lane is crossed by the Hampstead Trail there is Prospect Cottage (Grade 2 listed) and the access to “The Quarries”, a residence and small-holding with an attached holiday cottage.

- Approximately 1 km from the northern end of Broad lane is the residence, gardens and small-holding of Dog Kennel Cottage.

Use of Broad Lane

Apart from the local receptors and trade vehicles servicing their properties and the farm vehicles servicing adjacent fields, the main users at present are usually:

1. Residents of the Brook/Brighstone area accessing the Yarmouth ferry terminal.
2. Walkers coming to and from Yarmouth.
3. Local horse riders.
4. Cycling groups.

In general groups 2, 3 and 4 exceed group 1.

Travelling by any means from South to North on Broad Lane affords some of the most inspiring panoramic views that the Island has to offer.

Construction Period

It is impossible to justify or give credence to a Traffic & Transport plan that:

1. Converges every conceivable type of vehicle onto Broad Lane, which is of insufficient width and state of repair to cater for it.
2. Totally ignores access for residents and visitors to and from properties, including a holiday let and a small-holding for a possible period of nine months.

It is hard to conceive a one-way system that can alleviate the latter.

Operational Period

- Broad Lane is the only highway that has access to the site and at one point is only 180 metres from the proposed siting of Turbine 1.
- Unless Broad Lane is given "Restricted Access" to all vehicles save for its Receptors, the result could will be chaotic.

CONCLUSION

1. During the Construction Period, the applicant has:
 - Failed to make a choice of turbines.
 - Failed to consider the effects to the tourist traffic to and from the ferry ports.
 - Failed to consider the effects on traffic to and from the Orchards Holiday Park.
 - Failed to consider seriously the impact on Shalfleet Primary School.
 - Failed to consider the impact on Broad Lane and its receptors.
 - Failed to address the time of year it would commence and finish the operation.
2. During the Operational Period, the applicant has:
 - Failed to state explain it is going to restrict access to the site.
 - Failed to consider the long-term effects on Broad Lane.

The applicant has underestimated the importance and impacts of this area throughout its application. As a consequence, the application should be rejected.

11 Benefit Claims

Overall comment:

- **Electricity production claims are unsupported and appear exaggerated.**
- **No commitment from the developer to even use Island manufactured blades.**
- **Fluctuation in output under local wind conditions is likely to mean that for much of the time (as much as 70%) electrical output is very low (zero to 10% of rated capacity).**
- **Carbon dioxide saving claims are unsupported and (at best) are only likely to equate to the emissions of 26 articulated lorries.**
- **Other simpler, cheaper and more locally acceptable ways of carbon saving are available and should be investigated before any further consideration of this application.**

Conclusion: **The application should be rejected on this basis**

11.1 Introduction

The fundamental questions for this proposal are:

1. Why this development?
2. Why in this location?
3. Why now?

In the case of the first question no explanation of the appropriateness of this proposal is made. No review is attempted of the Isle of Wight's (and the west Wight in particular) for renewable energy opportunities in the wider sense, taking into account its natural resources and its need to maintain its need to retain its landscape and recreational based activities and industry. Also no analysis of the character of the Island's energy needs, whether it be for power (electricity), heat or for vehicle use, is attempted. Without this explanation, the driving force behind this proposal appears to be solely, to supply into the electrical grid system for offshore profit and, as we have argued, at great expense to the Isle of Wight.

Section 1.2 above poses serious doubts over the applicant's original explanations in the case of the second question, while the majority of this document raises a host of reasons why the site location is entirely inappropriate.

With a continually unsettled national government energy policy under yet further review, the third question needs very serious analysis to explain why this proposal should have been brought forward at this time.

Nevertheless, comment on the developer's claims (or rather the lack of substantiation of them) follow:

The claims for the wind farm (Planning Statement, paragraph 2.22) are that:

- Average annual output = 10% of the Island's electricity needs
- Save between 19,665 to 29,819 tonnes of CO₂ emission annually

No evidence is provided for these claims and they should be substantiated by the applicant, with step-by-step explanation of their calculations. The company behind this application has been questioned before on its claims and not only by ThWART³⁸.

The applicant is not even clear on what wind turbine gear it would install given a planning permission and so there is no guarantee even that the blades would come from the blade manufacturing facility on the Isle of Wight. In the only wind farm that the applicants have “built themselves” near Kettering, the gear installed is from Enercon (and not Vestas).

11.2 Electricity Production

No calculation is provided to show electricity generated. The crucial factor in this is the wind resource, which must be considered in two ways:

- Average output
- Fluctuation in output (ie capacity to match supply and demand)

In the first case the measurement is important to the wind farm developer because it will give them an estimate of energy produced and therefore income. Income is currently supported by government sponsored (and consumer funded) Renewable Energy Certificates (“ROC’s”), which effectively doubles (or more) the price the operator is paid for the electricity produced, so artificially making onshore wind farms currently VERY profitable. With the latest government review in hand, significant changes in this support could result in the wind farm finances becoming unsustainable or significantly reduced. The Island could be left with all the negative impacts already referred to in previous sections of this document, compounded with the potential of a “white elephant” development on the landscape.

The applicant’s claim for “average output” we believe is grossly exaggerated, and are confident that they will not be able prove that this belief to be ill-founded.

The second measure is important as it identifies what proportion of time the wind farm is producing low or no output, which may be considerable, depending on the variability of wind conditions. If for instance there is low output much of the time this has to be balanced against the fact that landscape impact and visual intrusion, for instance, will be incurred for 100% of the time.

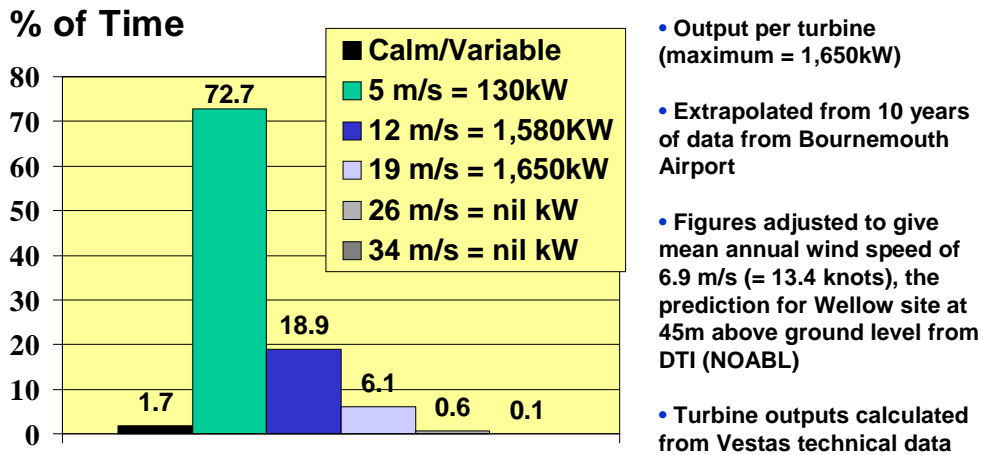
In Figure 11A, output levels from a Vestas V82 turbine (Vestas technical data) are used with wind speed data from Bournemouth International airport, adjusted to give a similar annual mean wind speed as at Wellow (from DTI NOABL data). This gives an indication of output fluctuation.

This analysis says that for around three quarters of the time that output would be very low (less than 10% of theoretical generator capacity). If this were so then the question of balance must be answered:

How does this intermittent output justify the development, taking into account all the negative impacts dealt with in sections 1 to 10, above, many of which would have to be endured for much or even all of the time?

³⁸ StopCWF “Consultation Response, Volume 2”, 2004, pages 48-50. www.stopcwf.org.uk

**FIGURE 11A:
Local Wind Conditions = Unreliable Output**



11.3 Carbon Dioxide Savings

Claims for carbon dioxide savings are unsupported and step-by-step calculations should be made available for open scrutiny, as follows:

1. What carbon dioxide production would be displaced and at what level.*
2. How the level of carbon dioxide savings are calculated (from detailed analysis of electricity production multiplied by a government approved conversion rate).
3. What carbon dioxide costs there will be from manufacture, construction and servicing of the wind farm, including provision of roads, crane pads and grid connection equipment and its housing.
4. What carbon dioxide costs there would be from taking the road and crane pad areas out of agricultural (ie plant) production.
5. Calculation of net reduction (1 less 2 and 3 above).

* Practical experience of wind farm power output management from the North Sea coastal areas of Germany have identified that 50 to 60% of other (more dependable) power generation is needed to be kept running all of the time to fill in for wind fluctuations³⁹, while reliable power generation capacity of almost all the remaining 40 to 50% wind capacity needs to be “ready to run”, all of the time⁴⁰.

Note: Nevertheless, using the lower of the current unsupported figures for carbon savings, it may be calculated that this intrusive wind farm development would account for the emissions from only 26 lorries**. An approach involving simple reduction in vehicle movements would be a easier to achieve, cheaper and more locally acceptable approach to such low levels of emission saving.

** Based on an articulated lorry, traveling at 50 mph, emitting 756 tonnes of carbon dioxide per annum⁴¹).

³⁹ E-ON/Netz “Wind Report 2004”, pages 3 and 9.

⁴⁰ E-ON/Netz “Wind Report 2005”, page 9.

⁴¹ “Standard Road Transport Fuel Conversion Figures” DEFRA

12 Planning Policy

Overall comment:

The proposed wind farm conflicts with various national, regional and local planning policies.

Conclusion: **The application should be rejected on this basis.**

We will detail policies that are contravened, and give reasons why that contravention occurs.

12.1 NATIONAL POLICY

Planning Policy Statement 22: Renewable Energy

Key Principles

(vii) *“...Developers of renewable energy projects should engage in active consultation and discussion with local communities at an early stage in the planning process, and before any planning application is formally submitted”.*

The proposal contravenes this Key Principle because the applicant did not engage in active consultation and discussion. (See also Section 2 above)

(viii) *Development proposals should demonstrate...how any environmental and social impacts have been minimised through careful consideration of location, scale, design and other measures.”*

The proposal contravenes this Key Principle because it does not minimise environmental and social impacts. The scale and location of the wind farm will, by contrast, maximise such impacts.

Locational Considerations

11 *In sites with nationally recognised designations...planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.*

The proposal contravenes this paragraph because the objectives of designation will be compromised. The adverse impact on the designated areas is not outweighed by the dubious and/or unproven benefits of the proposal. Further, the proposal does not provide any benefits to the area.

12 *Small scale developments should be permitted within areas such as National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts provided that there is no significant environmental detriment to the area concerned.*

Whilst not inside such areas, the proposal is for a site very close to AONBs and Heritage Coasts. It is not small scale and would create a significant detriment to the area.

14 *...the potential impact on designated areas of renewable energy projects close to [the] boundaries will be a material consideration to be taken into account in determining planning applications.*

20 *Of all renewable technologies, wind turbines are likely to have the greatest visual and landscape effects. However, in assessing planning applications, local authorities should recognise that the impact of turbines on the landscape will vary according to the size and number of turbines and the type of landscape involved...*

The landscape at and surrounding the proposed site, and the size of the proposed turbines, will maximise the impact of the proposal. This must, therefore, be a material consideration to the determination of this application.

This is reinforced by the statement made on behalf of the Secretary of State for Trade and Industry in respect of the proposed Whinash wind farm⁴². He said, in respect of the Whinash site:

“[The Secretary of State] agrees with the Inspector’s conclusions that the Whinash site is an important and integral part of a far reaching landscape which is highly sensitive to change and that the adverse environmental impacts of the Development would conflict with the aims of Planning Policy Statement 22 which is, in part, to minimise the impacts of wind generation and to achieve environmental safeguards. He also agrees with the Inspector’s conclusion that the environmental harm to this particular landscape outweighs the benefits of securing renewable energy at the Whinash site.”

The landscape surrounding this proposed site is, as with Whinash, far reaching and highly sensitive to change. On this basis the proposal should, as with Whinash, be rejected.

22 *Local planning authorities should ensure that renewable energy developments have been located and designed in such a way to minimise increases in ambient noise.*

The proposed development has not been so located and designed.

25 *...It is the responsibility of developers to address any potential impacts, taking account of Civil Aviation Authority...guidance in relation to radar and aviation...before planning applications are submitted.*

Based on the objections that have been raised, for example by the operators of Bournemouth International Airport, these potential impacts were not addressed, and the application should be rejected (as it should not have even been submitted).

⁴² Letter dated 2 March 2006 from Richard Mellish, Director, Electricity Consents of the DTI Energy Group to Steve Malloy of Renewable Development Co Ltd.

12.2 REGIONAL POLICY

Regional Planning Guidance for the South East (RPG 9)

Chapter 10 Energy Efficiency and Renewable Energy

INF7 Local Development Documents should include policies, and development proposals as far as practicable should seek to contribute to the achievement of the following regional and indicative sub-regional targets for land-based renewable energy...

Sub-region "Hampshire and the Isle of Wight"

As the sub-region consists of Hampshire together with the Isle of Wight, it is inappropriate for this application to focus on the possibility of development ONLY on the Isle of Wight. Assessments of sites throughout the sub-region should be made, together with the effects of activities throughout the sub-region in working to achieve the indicative targets.

INF8 Local Development Frameworks should encourage the development of renewable energy in order to achieve the regional and sub-regional targets. Renewable energy development, particularly wind and biomass, should be located and designed to minimise adverse impacts on landscape, wildlife and amenity. Outside of urban areas, priority should be given to development in less sensitive parts of countryside and coast, including on previously-developed land and in major transport areas.

The location and design of all renewable energy proposals should be informed by landscape character assessment where available. Within areas of protected and sensitive landscapes including AONB's...should generally be of a small scale or community based. Proposals within or close to the boundaries of designated areas should demonstrate that development will not undermine the objectives that underpin the purposes of designation.

The location of this proposed development will create significant adverse impacts on the landscape, wildlife and on amenity. This land is not previously developed or close to any form of major transport. The proposed development conflicts with the existing landscape character assessment undertaken for the West Wight. The proposed development is not community based, nor small scale. The development would undermine the objectives of the AONB and Heritage Coast designation.

The effect on the landscape is well illustrated by reference to the ferry crossing into Yarmouth (see Figures 1.4B & 1.4C). From the ferry, a visitor sees the general landform, the sweeping hills and pockets of woodland with the groups of houses or odd houses on their own. As one gets closer, the particular historic importance becomes clear as the forts become visible. The overall impression is formed by taking on board all the various elements as the journey is being enjoyed.

The point is that there would be a massive overall impact created by inserting the wind turbines into what is acknowledged to be a small scale, intimate landscape punctuated with buildings but where no large scale construction has taken place. The ridgeline remains, as it has, no doubt existed for centuries.

The guidance in paragraph 10.58 states that assessments of renewable energy potential show that as well as wind and biomass, photovoltaics, wave and tidal stream energy are

identified as having increasing potential (omitted from the applicant's reference to this paragraph in its application).

Paragraphs 12.14 – 12.16 and Chapter 14 make clear the encouragement of the Island as a tourist destination whilst protecting the local environment. Paragraph 14.9 states that "The Isle of Wight's unique situation presents particular opportunities and challenges in relation to the further development of its tourism industry. Tourism generates almost one quarter of the Isle of Wight's GDP, the highest proportion in the region." With the importance of tourism to the Isle of Wight, and the importance of the West Wight region to overall Island tourism, the relationship between renewable energy generation and effects on tourism needs to be carefully balanced.

Paragraph 10.75 states "Many of the areas with the highest wind speeds are on higher ground, within sensitive and protected countryside, including Areas of Outstanding Natural Beauty and the proposed national parks in the New Forest and the South Downs. However, it is also clear that there are large parts of the region where there are no nationally important landscape or wildlife designations and wind speed is relatively high. It is expected that all local authorities in the region will accommodate at least one wind energy development over the next two decades".

Consent for one development on the Isle of Wight has been granted (at Cheverton) and as such the policy expectation has been met.

Paragraph 10.76 states that "priority should be given to the development of renewable energy schemes, particularly larger scale ones, in less sensitive areas including previously developed and industrial land and areas where there is already intrusive development or infrastructure, for example major transport corridors."

According to INF 8 and the related guidance paragraphs, this application should be rejected.

12.3 LOCAL POLICY

The Isle of Wight Unitary Development Plan **(adopted 18th May 2001)**

3. Strategic Policies

- S1 *New development will be concentrated within existing urban areas.*
- S4 *The countryside will be protected from inappropriate development.*
- S10 *In areas of designated or defined scientific, nature conservation, archaeological, historic or landscape value, development will be permitted only if it will conserve or enhance the features of special character of these areas.*

The development is inappropriate, it will not conserve or enhance the special character of designated areas, nor is it in an urban area.

4. General Location of Development

- G1 *In general, development will be expected to be located within settlements defined in this plan by development envelopes. Land outside these boundaries is considered to be countryside where development, other than exceptions specified in other policies or proposals, will be resisted.*
- 4.3 *The two basic principles underlying the development policies of the plan are:*

- (i) *that development should be directed, as far as possible, towards existing settlements*
- (ii) *that the countryside should be protected from development, as far as possible, while recognising that some changes are inevitable and that developments which are essential to the effective operation of the rural economy, or for the greater good of the Island, may be appropriate.*

The development is proposed for land outside the development envelopes. The proposal is not essential to the effective operation of the rural economy, nor can it be said to be for the greater good of the Island, the benefits almost all going to an offshore developer/operator.

- G4 *Planning applications for new development will be permitted, provided they:*
- a *harmonise with their surroundings, landscape or townscape by using appropriate scale, design and landscaping;*
 - c *have proper regard to all access needs and traffic generation, including access by foot, cycle and public transport;*
 - d *maintain and enhance the interests of nature conservation and environmental protection;*
 - e *are sympathetic to the character and materials of their surroundings;*
 - f *do not protrude above prominent ridges or skylines;*
 - h *do not intrude into prominent views into, out of, or across any town, village or area of countryside;*
 - i *do not intrude into the setting of any prominent building or significant landscape;*
 - j *do not adversely affect any area, site or feature of archaeological, architectural, ecological, palaeo-ecological, geological, cultural or historic interest, or their settings;*

The proposed development conflicts with each of these requirements.

- G5 *Outside the defined settlements, development may exceptionally be permitted where it requires a rural location, is of benefit to the rural economy, is well designed and landscaped, is of an appropriate scale, and is in one or more of ...[listed] categories of development.*

The above development will not be acceptable where it would:

- 2 *reduce the quality of the environment and landscape;*
- 3 *cause the loss of, or damage to, identified areas or features of conservation or wildlife value; or*
- 5 *reduce the value of the countryside and coast as a sporting and recreational resource;*
- 8 *harm the setting of a settlement, or village or part of that setting.*

The proposed development does not fall into any of the listed categories of development. Even if it were assessed as falling into "other uses" (G5m), the proposal would fall foul of the acceptability criteria set out.

- G10 *Before granting planning permission for development,... the Council will take into account the potential for conflict between existing, adjoining or surrounding development and activities. Proposals may be refused permission if they are considered incompatible with existing, adjoining or nearby activities.*

This development will be significantly detrimental in effect and impact on the residential properties in the area. It will also be damaging to the amenity offered by the area for those living in, visiting and using the area.

9. Tourism

Objectives The objectives of this section of the plan are:

- to promote tourism as a growth industry;*
- to protect existing tourism assets;...*
- to promote rural tourism...*

9.4 Much of the Island's appeal lies in the coastline and countryside, and its general environment can make a lasting impression on visitors. 50% of the Island is designated as an Area of Outstanding Natural Beauty and there are 43.5 km of Heritage Coast. There are also an additional 830 km of bridleways, footpaths and green lanes. Green tourism is a growth area of the industry and tourism and recreation will continue to make an important contribution to the economy of rural areas. ... The Unitary Development Plan has an important part to play in developing a pro-active approach to new investment and employment opportunities in rural areas, yet at the same time encouraging rural tourism to develop in such a way so as not to destroy the very asset on which it depends.

The development will damage existing tourism assets which, as noted by the plan, relate significantly to the appeal of the untouched landscape. The development will not bring in new investment to rural areas, and any possible employment is hinted at, rather than committed to by the applicant, and would likely be short-term and low scale in any event.

10. Countryside

10.1 The Island's countryside is one of its most important assets.

Objectives The objectives of the plan are:

- to protect and enhance the landscape character and beauty of the countryside and coast from inappropriate development;*
- only to allow development in the countryside that is essential to a viable rural economy.*

C1 Planning applications for appropriate development in the countryside must maintain and protect the landscape whether viewed from the land or sea, and should be for the benefit of the rural economy and the people who live there. Development which may be acceptable in the countryside must take account of the landscape character and local distinctiveness of the area.

C10 Development will not be permitted if it would be likely to destroy or adversely affect, directly or indirectly, a Site of Special Scientific Interest or National Nature Reserve.

The plan acknowledges as a key principle that the countryside is one of the most important assets of the Island. The size and location of the proposed development will damage a significant part of that asset, as the visual impact of the turbines will have a highly damaging effect. This will be the case from both land and sea. The development would not, therefore, protect the landscape.

The development cannot be said to be for the benefit of the rural economy and local residents. The distinctiveness of the area is evidenced by the AONB and Heritage Coast

designations surrounding the site. The development will have a significant and adverse effect on those designated areas.

16. Utility and Community Services

U18 Proposals for the production of energy from renewable sources will be approved, provided that:

- a the total effect of all such development is at a scale sympathetic to the intimate character and landform of the Island;*
- b they avoid and do not have an unacceptable adverse impact on the most sensitive areas of designated landscape, coastal, nature conservation or archaeological importance;*
- c they minimise any detrimental effect from noise, electromagnetic, visual or similar interference;*
- d they do not have a detrimental effect on water requirements or quality.*

The proposed development is of an enormously intrusive size, which would be wholly out of keeping with the intimacy and scale of the Island's landscape. The proposal has no regard for the sensitive location, and the developer has made no attempt to be sympathetic to it. The development does not comply with the provisos to this policy.

The Isle of Wight Council – Supplementary Planning Guidance to UDP Policy U18 (adopted September 2004)

2. Context

2.2 A study of the range of renewable energy resources in the South of England was carried out in 1993/4 by consultants acting for the Government. This resulted in an assessment of potential renewable energy resources on a country-by-country basis. For the Island, the greatest potential was considered to be the wind resource, but the report recognised that this potential resource will be reduced by environmental constraints.

2.3 The Isle of Wight Council's Renewable Energy Strategy and its accompanying Background Report sets the context for the development of renewable energy options on the Isle of Wight, including wind farms and wind turbines.

The study highlighting wind as the "greatest potential" is now more than 13 years old. As it is out of date, its findings must, therefore, be thrown into serious doubt. In any event, even then the study recognised that the use of the wind resource "will be reduced by environmental constraints".

The unreliability due to age of the study is shown by the Isle of Wight Council's current discussion regarding a Renewable Energy Policy, which we believe moves significantly away from this approach.

4. Detailed Guidance for Wind turbine and Wind Farms in the Isle of Wight

The total effect of all such development is at a scale sympathetic to the intimate character and landform of the Island.

4.2 There is a long-term commitment...to protect the landscape beauty and character of the Island's countryside and coasts.....

- 4.3 *The Council will expect any planning application to take into consideration the guidance set out in the AONB Management Plan and any other Council landscape character guidance.*
- 4.4 *...The Council will expect detailed consideration to be given to the method of installing cables between turbines and ancillary equipment that may be required. Grid connections from turbines will be expected to be designed to have minimal impact on landscape and preferably be underground.*
- 4.5 *...Proposals which would require alterations to the road network in order to provide construction or maintenance access and which would lead to the loss of landscape features or habitats of local or national value will not normally be permitted.*
- 4.7 *The Council will expect the submission of high-quality, fully researched, applications for wind farm developments....*

We do not believe that the application is fully researched. The Council, for example, requires details on grid connection which are not included within this application. The application does not take into account the views of the AONB, nor does it “protect” the Island’s landscape and coasts. It is not sympathetic to the intimate landscape of the Island.

They avoid and do not have an unacceptable adverse impact on the most sensitive areas of designated landscape, coastal, nature conservation or archaeological importance.

- 4.10 *The Isle of Wight does have a unique character, both in terms of its built environment and the natural and landscape context in which the development is set. This section of this SPG note sets out the approach that the Council will take, when considering the potential impact of proposed wind farms on the natural and built environment.*
- 4.11 *In general, appropriately designed and located wind turbines will be more acceptable where they either avoid or can be demonstrated not to have an unacceptable impact on the following landscapes and designations, which generally will have equal importance in the determination of applications.*
- *Area of Outstanding Natural Beauty*
 - *Heritage Coasts*
- 4.13 *Applications will also be expected to minimise the impact upon wildlife...*

This application sited so near to AONB and Heritage Coast will have an unacceptable adverse impact on these designated areas.

They minimise any detrimental effect from noise, electromagnetic, visual or similar interference.

The applicant has not attempted to minimise the effects of the application on television or radio interference. It has simply stated that it will deal with this after commissioning of the wind farm. We believe its attempts to deal with noise, shadow/flicker, radar and other interference are significantly flawed.

We are aware that the Council discussed and we are led to believe intended to adopt amendments to this Supplementary Planning Guidance Note. Under the amended SPG,

the application falls foul of the Council Policy even more dramatically than under the Note of September 2004.

CONCLUSION

The application contravenes a significant number of national, regional and local land use planning policies. As a consequence, it is clear that the application must be rejected.

Details of Appendices

The following appendices include original material or are difficult to access through normal means.

These appendices are available as separate files in electronic or hard copy format.

If not already received, copies of these appendices may be obtained from ThWART.

Appendix 1A :

“Objection to an Application by West Wight Wind Farm Ltd to erect six wind turbines on land south of Wellow, Isle of Wight on behalf of The Wight Against Rural Turbines”, by Robin Bryer BA (Hons) Dunelm, MRTPI, Chartered Town Planner dated 19th June 2006

Appendix 1B :

“Further Objection Listed Buildings in relation to an Application by West Wight Wind Farm Limited to erect six wind turbines on land South of Wellow, Isle of Wight on behalf of The Wight Against Rural Turbines”, by Robin Bryer BA (Hons) Dunelm, MRTPI, July 2006.

Appendix 7A :

“Further Objection Concerning Birds in relation to an Application by West Wight Wind Farm Limited to erect six wind turbines on land South of Wellow, Isle of Wight on behalf of The Wight Against Rural Turbines”, Robin Bryer, BA (Hons) Dunelm, MRTPI, July 2006.

Appendix 7B :

“West Wight. Re:Bat Habitat Assessment”, Robert Stebbings Consultancy Ltd, July 2006.