



The Wight Against Rural Turbines

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Response to Addendum document to the Planning Application for the Proposed Wind Farm South of Wellow, Isle of Wight

Planning Application P/01400/06

29th September 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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ThWART (The Wight Against Rural Turbines) Limited, July 2006

Preface

For ease of use response to the Addendum document has been organised in chapters to match those of the Addendum document itself.

In addition to the direct response to the Addendum document, further issues are still held against the application, including those highlighted in the following summaries and as detailed in our response¹ to the original planning application:

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.

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

Benefits Claims:

No justification for the figures presented (for power production etc) in the planning application appear there or in the addendum. As these are a key element in the balancing exercise laid out in PPS22 we suggest that, without their proper justification, these figures must be ignored in the planning process.

We intend to comment further on this issue.

¹ “Objection to the Proposed Wind Farm South of Wellow, Isle of Wight”, ThWART, 21st July 2006.

Note: The Isle of Wight Council's Head of Tourism stated his concerns of risk to the Island's tourist income, in his letter of 21st July 2006 to the Planning Office.

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

BY HAND

4th October 2006

Dear Mr Pegram

Addendum document to Planning Application P/01400/06 - Wind Turbines near Wellow.

Please find enclosed our response to the addendum document.

In view of the lengthy time that the Applicant has been considering its proposals for wind turbines at Wellow, it is surprising that it was unable to state its case fully in the original application documents.

ThWART believes strongly that it is inappropriate for the Addendum document to be considered with the application in the decision making process.

The Addendum document – an enormously lengthy 96-page document - must be seen in the true light surrounding its completion. It is patently a self-serving document, seeking to answer criticisms that have been made of the application. What it fails to do is to provide objective analysis of facts surrounding that application.

The Applicant has clearly demonstrated by the omissions and failings in the application that, in preparing both its proposals and the application, it had made insufficient effort and that both were inadequately conceived and prepared.

Without prejudice to that opinion, in any review or consideration of the Addendum document supplied by the Applicant, we would urge the Council and its Officers to review and reconsider each of the points of failure of the application made by objectors, including ThWART.

We do not believe that these points of failure have been – or can be – satisfactorily resolved by the Applicant to make this application one that can, or should, be accepted.

We write to represent the collective strength of ThWART. Our database of numbers of supporters contains in excess of 3,450 names and addresses at today's date.

Yours sincerely

for and on behalf of ThWART

1 Foreword

In view of the lengthy time that the Applicant has been considering its proposals for wind turbines at Wellow, it is surprising that it was unable to state its case fully in the application documents.

ThWART believes strongly that it is inappropriate for the Addendum document to be considered with the application in the decision making process.

The Addendum document – an enormously lengthy 96 page document - must be seen in the true light surrounding its completion. It is patently a self-serving document, seeking to answer criticisms that have been made of the application. What it fails to do is to provide objective analysis of facts surrounding that application.

The Applicant has clearly demonstrated by the omissions and failings in the application that, in preparing both its proposals and the application, it had made insufficient effort and both were inadequately conceived and prepared.

Most consultation, including all public consultation, was conducted on the original, inadequate, application documents. Although it has concerns as to the scope and scale of the public consultation exercise, as it seemed to ThWART that there was insufficient advertising of these events and that display information provided was superficial, it is clear that the introduction of this Addendum document makes the public consultation exercise have even less relevance. The addition of new sections, emphasising R&D and the interests of Vestas, are wholly inappropriate. If these were not important enough to have been included within the original application, it is strange that they are presented as of such material importance subsequently.

It is the original application documents, with all of their inadequacies and omissions, that should be the focus of the Council's decision making.

We do not believe that the process being followed is in accordance with government procedures. In respect of the Addendum document, the following must be noted:

- The objectivity and validity of the Addendum document must be questioned as it is clearly designed to serve a single purpose – the answering of criticisms made of the application;
- The quality of the evidence provided in the Addendum document is questionable;
- It is not accepted that the information in the Addendum document is not new, or that it is correct.

By way of summary, we list below the many issues that ThWART raised in its Objection Document with the original application, showing its inadequacy and the reasons that it should be rejected.

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).**

ThWART's objections in its Objection document are summarised as follows:

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.

Conclusion

ThWART does not believe that the Addendum document should be accepted by the Council as a relevant part of the decision making process.

Without prejudice to that opinion, in any review or consideration of the Addendum document supplied by the Applicant, we would urge the Council and its Officers to review and reconsider each of the points of failure of the application made by opponents, including ThWART.

We do not believe that these points of failure have been – or can be – satisfactorily resolved by the Applicant to make this application one that can, or should, be accepted.

2 Planning Policy Context

In ThWART's objection document of 21st July 2006, the following observations and conclusion were reached:

Overall comment:

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

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

The addendum document document makes no significant attempt to address the issues raised in relation to local, regional (RPG9) or, in particular, to national (PPS22) planning guidelines, as detailed below.

The addendum document document (**Paragraph 2.4**) quotes from "The Energy Challenge" published by DTI in July 2006. By merely quoting from an Annex to the paper however, the Applicant fails to give an overall view.

To give a broader perspective the Executive Summary (pages 12 to 25) refers to:

1. The challenge to reduce CO₂ emissions.
2. Saving energy as the "starting point"
3. "Cleaner energy"
4. Energy security
5. "What do our proposals deliver"

"Renewable Electricity" is dealt with under the third item and in greater depth in the main document where it is clearly recognised² that there is a need to "provide greater support to emerging technologies and less support for established technologies". The banding system proposed would give increased support to **off**-shore wind, tidal and wave power, solar photovoltaics etc and less support to **on**-shore wind and landfill gas etc.

Notwithstanding this, the overriding factor in the text quoted by the Applicant is the relevance of the national guidelines ("Planning Policy Statement 22: Renewable Energy") and that "full consideration of the application *and its likely impacts*" should take place.

The planning application under consideration contravenes PPS22, and under the guidelines has unacceptable impacts including the following:

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)

² Paragraph 5.30, page 101, "The Energy Challenge", DTI, July 2006.

- (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 farm³. 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

³ Letter dated 2 March 2006 from Richard Mellish, Director, Electricity Consents of the DTI Energy Group to Steve Malloy of Renewable Development Co Ltd.

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).

Connection to the Grid

In addition, the omission of an application for grid connection is contrary to the advice given in the PPS22 Companion guide (page 183, paragraph 99), which states:

"...connection of the farm to the grid forms an intrinsic part of the project and should be considered together".

The omission of grid connection details is also 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."

As grid connection plans have not been submitted, and PPS22 and the SPG requirements met, then this application should not be rejected on this basis.

3 Non-Technical Summary

In **paragraph 3.2** of the addendum document a list of properties and their respective distances to the proposed turbines appears.

Comment:

This list gives a very selective and incomplete view of the situation and appears to try to minimise the impact on nearby properties.

In several of the situations listed (Table 3.1) one property is identified, yet there are multiple properties involved. For instance all of the properties in the village of Wellow, many in Thorley and those on the outskirts of Newbridge and Ningwood are closer to proposed turbine sites than Chessel Pottery!

Table 3.1 Properties listed and adjacent properties not referred to

Properties listed	Adjacent properties not referred to
Hartshole Cottage	The remainder of Wellow village
Manor Farm	The remainder of Wellow village
No. 8 Tapnell Cottage	The remainder of the Tapnell settlement
The Quarries	This is two properties (and not one)
Shalcombe	This is two properties (and not one)
Chessel Pottery	The remainder of the Chessel settlement
Churchill's Farm	Planning permission is in place for a second property here
Stoneovers	Multiple properties, including Bellwood Stables and Riding School

In our response document of 21st July 2006 an assessment of "Visual Intrusion and Effect on Visual Amenity" (page 46), gave a wider perspective of the number of properties within the vicinity, as follows:

- 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

4 Introduction

No comment to respond to!

5 Alternatives

5.1 In its original Objection document, ThWART identified several issues regarding the Applicant's site selection that should lead to the rejection of the application. The Addendum document fails to answer those issues. On that basis, we believe that the rejection of the application remains the correct route.

5.2 Repeating the summary of issues raised by ThWART on this point:

- **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**

5.3 In the Addendum document (particularly paragraphs 5.6 – 5.15), the Applicant purports to detail how it has tried to minimise landscape and visual impacts of the proposals. The Applicant concedes that to make the site - even in its opinion - suitable, many compromises to its plans have to be made. It acknowledges that these compromises all reduce the value of the proposals in the production of renewable energy. The concessions that they acknowledge include:

- not being able to position the turbines in the preferred direction for prevailing winds;
- a reduction in the number of turbines;
- selection of smaller turbines;
- having to space the turbines in such a way that will reduce the energy production;
- being significantly constrained in turbine layout, and selection, because the "West Wight site is surrounded by inhabited properties" (para 5.11). In respect of noise, the Applicant confirms the significant point that the site does raise enormous problems with regard to noise. For further points on noise, please see section 13 of this document.

What seems clear is that, in practice, the Applicant is providing self-serving information, seeking to justify the site, even though it accepts that the site and the plans to which it is forced by the failings of the site, are significantly less than ideal.

5.4 It is of value to restate paragraph 10.76 of RPG 9⁴, which says:

"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."

Further, 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

⁴ Regional Planning Guidance for the South East (RPG9)

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”.

5.5 It is clear that, although the Applicant seeks to show how it has minimised landscape and visual impacts, it simply ignores those opinions which do not meet its objectives. For example, although the Applicant claims the linear layout that it has selected as a benefit to its scheme, the Countryside Agency, in its Opposition to the Application, said (inter alia):

“The 6 turbines are placed in a linear formation within a landscape with very few other linear features and form a very prominent “wall”...”

We support the view of the Countryside Agency.

5.6 To say, as the Applicant does at paragraph 5.32, that the site selection is justified because they have picked a site that is not within the AONB - rather than one that is - is disgraceful.

The Applicant omits any reference in the Addendum document to the land surrounding the site, much of which is designated and will be significantly affected by its proposals.

As the site is immediately adjacent to much designated land, it is a fundamental flaw that the Applicant has failed to demonstrate that the proposals will not undermine the objectives of those designations. By contrast, the AONB partnership has, it must be remembered, objected to the proposals, including because there would be “a detrimental visual impact on the AONB...”.

5.7 The Applicant has failed to comply with the obligation under PPS 22 to use “careful consideration” of location. 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.

5.8 The Applicant claims in paragraph 5.37 that the West Wight landscape was determined to be “not inherently sensitive to change”. It provides no external substantiation for this claim. However, this opinion appears to be in direct conflict with the Application, where it stated at 8.100 (inter alia):

“The open and panoramic views from this landscape type are an important aspect that defines its character. The overall magnitude of change is therefore assessed as large/medium resulting in substantial impact. This impact is considered to be adverse because the character of parts of this sensitive landscape will be significantly changed.” [emphasis added].

Further, we would refer again to the landscape character assessment commissioned by the West Wight Landscape Partnership in 2005⁵. This document 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 landscape character assessment, and the Applicant’s own statements in the application, show the conclusion in paragraph 5.37 to be clearly wrong.

- 5.9 In paragraph 5.16 of the Addendum document, the Applicant states that “where possible, the access track layout and alignment follows existing tracks and field boundaries”.

A study of the plans produced by the Applicant (Figure 3.1 in the application) appears to demonstrate that this is not correct. It is also interesting that the Applicant gives significant weight to the interests of the landowner in setting its plans – more than it appears to give to those who will be directly affected by the proposals, but will not have any financial benefit from them.

- 5.10 The inclusion of information from Vestas (at paragraphs 5.39 – 5.41) relating to its business is no more than a distraction.

In the Addendum document, the Applicant says that having nearby wind turbines is of “critical nature” to Vestas’ continued success. Vestas is quoted as saying that the Island’s decision on the wind farm “will be watched closely” by other local authorities with far less “economic benefit at stake”.

However, the value of these statements must be questioned as they are clearly made to support the vested interests that both parties have in the application.

These questions should include the following:

- Vestas have admitted that the success of the Wellow application is not significant to Vestas business interests. So what economic benefit is at stake?
- We would further refer to the statement by John Rimmer, head of process developments for Vestas Blades UK, quoted in the Financial Times on 11th September 2006:

⁵ West Wight Landscape Character Assessment prepared by Land Use Consultants, 43 Chalton Street, London NW1 1JD.

“There’s no UK demand for our wind turbines, but for our business, it doesn’t matter.”

- They say that to have turbines on the Island will be good for morale of their staff. Can staff morale not be raised without damaging the unspoilt landscape of the West Wight?
- What “training” can a functioning wind farm offer?
- We have to question the value of R&D on a turbine the design of which is already at today’s date 7 years old. If development of turbines progresses “rapidly” as the Applicant states (paragraph 5.17), one must question what R&D function can be fulfilled by a turbine that is, presumably, soon to be superseded.
- The Applicant does not make it clear whether R&D requires any ongoing activities at the site, beyond a normal functioning wind farm. If it does require activity, such as the replacement of blades, or other parts of the turbines, these must be disclosed and form part of the planning consideration.
- If ongoing activity does not form part of the application, then why do turbines **on the Island** offer such a significant advantage for R&D? If, as we have been led to understand from the Council’s planning department, the Applicant means, by R&D, the collection of data, then the very description of this activity as R&D, and the suggestion that a particular location for a turbine to undertake this activity is important are clearly unsustainable. With current technology, the ability to collect data remotely means that the location of a wind turbine is generally irrelevant for this purpose.

Whilst important for the Island’s economy, Vestas’ business interests are not relevant and material in the making of this planning decision.

5.11 In paragraph 5.22, the Applicant confirms that it has selected the chosen turbine because it is designed for low to medium wind speeds. This begs the question why a site that has higher wind speeds is not the priority. Again, this appears to confirm that the site was selected first, and then the proposals built around that site. This is in clear breach of planning guidelines, and strongly evidences the failures that ThWART has identified in the Applicant’s processes.

5.12 In paragraph 5.26, the Applicant gives as justification for its proposals to select larger turbines that having larger turbines, because it means fewer turbine bases “...reduces the risk of any ...potential for bird collisions.”

Yet again, statements made as fact by the Applicant can be shown to be wrong. A key factor in bird collisions is the blade swept area.

The 6 turbines, as proposed, have a blade swept area of over 1½ times (153.7%) of 9 smaller (NM54/950) turbines. To demonstrate:

- 6 turbines x 41m blades = $6 \times \pi r^2 = 6 \times 3.14 \times (41 \times 41) = 3.167$ hectares (or 6.334 full size football pitches)
- 9 turbines x 27m blades = $9 \times \pi r^2 = 9 \times 3.14 \times (27 \times 27) = 2.06$ hectares (or 4.12 full size football pitches).

5.13 In paragraphs 5.28 and 5.29, the Applicant expressly states that turbines of 124m “would be unacceptable at this location from a landscape and visual impact point of view”. However, as the Applicant is saying, with its application, that turbines of 110m are perfectly acceptable, the Applicant is showing an extraordinarily arbitrary judgement, without objective justification. Once again, this implies that the Applicant views the Addendum document as a means to post-justify its decisions.

5.14 In its review of alternatives for site selection (paragraphs 5.34 – 5.38), the Applicant has failed to explain why the Isle of Wight is the only part of the sub-region (which would otherwise include Hampshire) it has considered for possible sites. This remains, therefore, a significant failure on its part.

In respect of all of the flaws in the Applicant's site selection process, we would refer to section 1.2 of the ThWART Objection document.

6 Site Description

No comment.

7 Proposals

Many issues on the proposals made by the applicant have been raised, including those by ThWART. We would refer back to the Objection document by ThWART, and other statements of opposition for full details. However, to deal with those points raised by the applicant in the addendum document, we would make the following comments.

- 7.1 In paragraph 7.2 of the addendum document, the applicant refers to crane pad design, and cross refers to paragraph 4.2 of the ES. As this paragraph makes no reference to crane pads, we would presume that the applicant means to refer to paragraph 4.11.

As with the original application, there is no commitment from the applicant to remove the constructed crane pads at the end of life of the development.

- 7.2 Although the applicant refers to there being no permanent lighting during normal operation in paragraph 7.2 of the addendum document, no detail is provided as to what lighting will be in place throughout the construction period. If lighting is to be used during construction, it is a material omission, yet again, by the applicant.

In paragraph 7.6, the applicant states that no aircraft warning lights will be required. This appears to ignore (inter alia) the responses to the application by both the Civil Aviation Authority and Defence Estates, both of which make reference to the potential need for lighting.

- 7.3 In paragraph 7.8 of the Addendum document, the applicant refers to a “typical connection arrangement”, giving no detail as to the method of the connection of the proposed development to the grid. A further paragraph providing no real information is set out at paragraph 7.15 of the Addendum document.

We would refer to section 3 of ThWART’s Objection document which set out the failure of the application to comply with relevant planning rules in regard to grid connection. That Objection document stated:

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.**

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...”.

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 the correct course of action remains to reject the application for failing to comply with both PPS22 and the relevant SPG.

7.4 In paragraph 7.11, the applicant states that the meteorological mast will be used to collect data. However, the applicant provides no information as to how such data will be collected, or evidence as to how such information could be relevant to Vestas for “R&D”. The applicant again claims that the siting of the mast is “an important consideration” for “R&D” use, but provides no information to allow this to be substantiated.

7.5 The applicant then seeks in paragraph 7.14 to justify its selection of a zinc galvanised lattice structure for the mast, rather than a guyed structure. The latter would be significantly less intrusive on the landscape. However, the applicant’s justifications for choosing a more intrusive structure are that it doesn’t require substantial maintenance and it takes up less of the landowners land.

This reveals how derisory are the applicant’s attempts to balance its plans against the negative effects on landscape and otherwise. Here, it puts its own and the landowner’s financial interests as a clear priority to other considerations.

The final justification for using a lattice structure is because (the applicant says) it would have less affect on birds. It provides no information to support this claim. If it is the case that the mast which has been in situ on the land for approximately 2 years has not been a problem for birds, then we would suggest that a properly marked guyed structure would be the better alternative of the two.

7.6 In paragraph 7.16, the applicant provides information regarding consultants involved in undertaking analysis of wind data and the energy assessment for the proposed wind farm.

In its Objection Document, ThWART commented that:

“the applicant fails to provide sufficient information regarding wind speed to allow the value of the site to be verified.”

We would repeat paragraph 1.2.10 of the Objection Document, which said:

“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.”

Despite the additional paragraphs in the addendum document, the applicant has still provided no actual evidence as to wind data.

Without the actual estimates of the likely wind and associated energy production from this specific site, the applicant continues to have provided insufficient evidence regarding wind speed to justify the siting of a wind farm at this site.

8 EIA Issues & Methodology

ThWART raised issues ⁶ about the methodology to be used in the EIA, in its response to the Scoping Report of March 2006.

No further information has been supplied and all of these issues remain outstanding. The issues with methodology reflect badly on the applicant's consultation process, as outlined in the "Preface" at the beginning of this document.

⁶ "Response to 'Updated EIA Scoping Report'", ThWART, 21st April 2006.

9 Birds

The Environmental Statement attached to the planning application identified a serious risk to Skylark and to Golden Plover which is subject to protection under EU Directive 79/404, as part of the assemblage of the Solent and Southampton Water SPA.

The addendum document attempts to 'play down' the risks to Golden Plover in particular.

A review of the original data⁷ (as far as is available) concludes that there is :

- Serious risk to Golden Plover (and thus to the SPA).
- A safety threat to Skylark and the assemblage of 'at risk' farmland birds on the site.
- Insufficient data to fully assess risk to migratory birds

9.1 Serious Risk to Golden Plover:

The original reports presented as evidence within the Environmental Statement to this planning application are limited in nature, with data samples from the summer of 2003 and from the late winter of 2003 and the end of winter/early spring of 2006.

Paragraph 9.6 of the Addendum document states that Golden Plover "occasionally used the site". On Page 26 this report states, however, that Golden Plover are present for "6 of the 12 months on this site", while the original appendix reports identify frequent sightings of large numbers of birds on or over the site (Tables 9.1a & 9.1b). These conflicts mean that the credibility of the Addendum document and the safety of the conclusions drawn there are open to question.

Table 9.1a : Golden Plover Sightings, 2002/3 ⁸

No.s of birds	Date	Comment
17	17 th October	From a "Preliminary visit"
104 (90 + 14)	18 th November	90 birds flew in and roosted in oilseed rape, adjacent to proposed site of turbine 1
1	8 th December	Adjacent to proposed siting of turbine 2
7	3 rd March	Flew along proposed siting of turbines 1 to 3

Table 9.1a : Golden Plover Sightings, 2006 ⁹

No.s Recorded	Comment from the report
Up to 535 seen in one visit	Species seen on 3 occasions, with a single flock of 350 birds seen in late December south east of Wellow village, in an area approximately 900 metres from the proposed sites for turbines 5 & 6. Flocks were also "recorded regularly flying over the site in November and December", with "small numbers recorded flying over the site in March".

⁷ Review of the Bird Data and Conclusions Presented by the Applicant for the Wellow Wind Farm Proposal (P/01400/06), R.Tucker, 2006

⁸ From "Wintering Bird Survey 2003/4, Manor Farm, Wellow, Isle of Wight", Jonathan Cox & Keith Marsden, 2004.

⁹ "Wintering Bird Surveys West Wight for Your Energy Limited", Terence O'Rourke Ltd, April 2006.

What is also striking about the 2006 report (Table 9.1b) are the detailed comments about sightings of large numbers of birds* in November and December, yet no data is presented or used in risk calculations. Why is this?

* The “535” birds seen in one visit would amount to over a half of the annual Golden Plover assemblage associated with Newtown Nature Reserve ¹⁰.

In addition we have been provided with comment on the activities of Golden Plover from Michael Waterhouse, author of “The Strange Death of British Birdsong”, clearly indicating likely and frequent low level flight from Newtown Nature Reserve across to the (western) Yar river, with the proposed wind farm site in between the two, explaining the likely occurrence of large numbers of birds passing ‘through’ this area. He has written to ThWART as follows:

“ *Shalfleet Manor, Yarmouth
September 19th 2006*

I am writing to you as a local ornithologist who lives in the Newtown estuary. I am a published author, an ex-Council member of the Wildfowl and Wetlands Trust (Slimbridge) and I take weekly trips onto this estuary to enjoy the birds so I know something about my subject.

Thank you for a copy of the report prepared by Manchester University with regard to the effects of a proposed West Wight wind farm on migratory birds. Whilst I am concerned about the possibility of collision damage to migratory birds, I am much more concerned about the threat posed to local bird movements during the months from August to March as a result of a possible wind farm at Wellow.

*Two of the most important wetland bird habitats on the South Coast of England are the Newtown and Yar estuaries. If you draw a straight line between Newtown and the middle/upper reaches of the Yar it will pass directly over the proposed site. (My point about the Mid/Upper reaches is that at low tide they represent important feeding zones for waders- especially **Black Tailed Godwits**. Black Tailed Godwits winter in internationally important numbers on the Newtown Estuary and move over to the Yar from time to time.*

***Golden Plover** and **Black Tailed Godwits** are sociable birds and tend to move in flocks. Golden Plover arrive with us on the Island in the Autumn and stay until March moving between the estuaries. Both species travel in numbers and at low altitudes as the distance between the Newtown and Yar estuaries is only a few miles. The potential for collision damage to these local species (in winter months) is in my opinion much higher than with other species such as Honey Buzzards migrating from the continent to the UK in the spring.....”*

¹⁰ Tables 3 to 7 from “Wintering Bird Surveys West Wight for Your Energy Limited”, Terence O’Rourke Ltd, April 2006.

Comment on Risk Calculations for Golden Plover:

The original risk calculation (used in the Environmental Statement) contains the following elements to downgrade final risk level:

- 80% reduction in likely impact to allow for low wind speeds when “turbines will not turn”.
- 95% reduction in likely impact to allow for active avoidance by the flying birds.

To put this into perspective, these elements in the calculations would reduce a theoretical 1 in 10 risk to 1 in 250.

In addition, in the risk calculations carried out, flights at “less than 20 metres height” or “more than 100 metres height” have been ignored. No explanation of how flying height is assessed is given and it appears obvious this assessment would be very difficult to carry out accurately and so is likely to produce arbitrary results. However, by taking this route calculation would reduce the risk prediction still further, as follows:

$$585 \text{ seconds} / 1,350 \text{ seconds} = 0.433$$

On this basis an original (theoretical) 1 in 10 risk would be further reduced to 1 in 577.

Consequently, the conclusion in the Environmental Statement that the risk to Golden Plover is serious may actually understate the risk.

An adapted calculation (used in the addendum document) uses selected data only, none of which is available from the original appendix report ¹¹. By taking this approach a further 70-fold reduction is applied in the risk calculation, which allows a conclusion within the addendum document that risk is (conveniently) very low.

Note: Comparison of the selected data used in the addendum document with the original data used in the planning application is made in Tables 9.1c and 9.1d, below. This shows the extremely limited source information used in coming to the “new” conclusion of low risk in the addendum document.

Table 9.1c : Golden Plover Flight Activity (from the addendum document)

Date	(a) Number of birds	(b) Time at “rotor height” (seconds)	(a) x (b)
			Total “bird seconds” at rotor height
27/1	29	30	870
27/1	3	30	90
27/1	32	15	480
24/2	1	15	15
24/2	12	60	720
24/2	1	45	45
24/2	1	345	345
2/3	53	45	2,385
Totals	132	585	4,950

¹¹ “Wintering Bird Surveys West Wight for Your Energy Limited”, Terence O'Rourke Ltd, April 2006.

Table 9.1d : Golden Plover Flight Activity (from the Environmental Statement)

Watch Date (& Number)	Number of records	Number of birds	Flight times (seconds)			
			Total	At less than 20 metres	20 to 100 metres	More than 100 metres
27/1 (1)	4	96	285	210	75	0
27/1 (2)	3	~99	135	135	0	0
24/2 (9)	4	32	675	45	420	210
24/2 (10)	1	1	60	15	45	0
2/3 (11)	3	81	90	45	45	0
2/3 (12)	1	7	15	15	0	0
7/3 (14)	2	~48	45	45	0	0
15/3 (17)	1	3	15	15	0	0
30/3 (19)	1	~50	30	30	0	0
Totals	19	417	1,350	555	585	210

9.2 A Safety Threat to Skylark and the Assemblage of ‘At Risk’ Farmland Birds on the Proposed Wind-farm Site

Data from the original appendix reports is not always referred to in the Environmental Statement (or the Addendum document), while some mistakes in categorising species into their proper risk status are also apparent in these reports.

Species at high risk (‘Red List’) were recorded in all of the reports¹², with Grey Partridge, Hen Harrier, House Sparrow, Linnet, Reed Bunting, Skylark, Song Thrush, Starling and Yellowhammer being witnessed as resident within the proposed wind farm area or, if based elsewhere, regularly feeding within that locality.

Several species at moderate risk (‘Amber List’) were recorded in 2 or more of the 3 original appendix reports, included Dunnock, Fieldfare, Goldcrest, Kestrel, Lapwing, Meadow Pipit, Merlin, Peregrine, Snipe, Stonechat, Swallow and Redwing. Several “Amber List” gull species were recorded in the 2006 report.

Of these species Skylark, Fieldfare, Lapwing, Meadow Pipit and Redwing, were recorded in large numbers, while of particular note is the (repeated) identification of Hen Harriers.

Four of these species – Fieldfare, Merlin, Peregrine and Redwing – also appear in the Schedule 1 list of the UK Wildlife and Countryside Act, 1981.

The risk to this notable assemblage of farmland birds on the site was considered of “high importance” in the appendix report from summer 2003, “Given the dramatic and widespread population declines in these species within the UK”.

¹² Review of the Bird Data and Conclusions Presented by the Applicant for the Wellow Wind Farm Proposal (P/01400/06), R.Tucker, 2006

The Environmental Statement and the Addendum document report do not evaluate the risk to this assemblage sufficiently well or in a systematic manner.

Michael Waterhouse continues (and concludes) his letter by saying :

*“.....I would also like to make the point that I feel **Skylarks** will suffer in the spring/summer months at Wellow from possible collision risk but more importantly from disturbance.*

*The **Skylark** is in serious decline across Britain although the Isle of Wight remains a stronghold, particularly around Wellow. Bearing in mind the demise of this species nationally it would seem wrong to put at risk in the West Wight where it still flourishes.”*

9.3 Risk to Migratory Birds

No survey was presented in the Environmental Statement that specifically dealt with migratory birds. Limited recordings of migratory species were made in the spring of 2003⁷, however timing of other surveys would have precluded any assessment of autumn passage migration.

Desk-top “assessment” of migratory bird activity is presented in the Addendum document to the planning application. The analyses offered are based on extrapolation from other situations, often from regions of very different climate, with the Addendum document apparently attempting to present conclusions that generally falling into two categories:

- 1 Species would cross the English Channel on a wide front and so the Isle of Wight would not be a focus for migration
- 2 Birds would be flying at too great a height to risk impact with turbine blades

In the first case “The Migration Atlas”¹³ shows that a large number of migratory species have been identified in the West Wight and nearby.

In the second premise the (unsupported) supposition ignores the fact that a number of passage species have been recorded (as ringed birds) in the West Wight. Also, specifically in **Paragraph 9.69** of the Addendum document, it is stated that “.....there is a danger of using flight height data from specific studies and applying these findings as universal rules”. They continue, “...this is particularly relevant when comparing findings from the Middle east, where there is intense thermal activity to the much cooler temperate conditions of the UK”. What value is there then in the conclusions drawn in **Paragraph 9.70** on the likely height of honey buzzards?

Consequently, with the lack of primary data and the premises apparently applied to secondary data, the addendum document fails to offer a credible assessment of risk to migratory birds.

Specifically the authors of the Addendum document acknowledge the dangers inherent in their working on limited data. In **Paragraph 9.64**, for instance, they admit “There are more frequent records of honey buzzard from the eastern side of the Isle of Wight, although it is not clear whether this is a reflection of observer bias or a definite trend in the behaviour of honey buzzard”.

¹³ “The Migration Atlas – Movements of the Birds of Britain and Ireland”, BTO, 2002.

Later (**Paragraph 9.73**) the Addendum document authors comment on the low number of available records of Honey Buzzards in the West Wight, clearly ignoring their own previous warning of possible observer bias from Paragraph 9.64. Therefore their conclusion of “*does not pose a significant risk*” is unreliable and therefore untenable.

Also, for further example, in **Paragraph 9.73** the statement is made that “only a handful (Honey Buzzards) are recorded in the Isle of Wight” is contradicted by data presented in **Paragraph 9.64**.

9.4 In conclusion:

1. The risk to Golden Plover (as part of the assemblage of the Solent and Southampton Water SPA) from the proposed wind farm must be considered as significant, despite attempts by the Applicant to “play down” the issue in their Addendum document document. As stated in the Applicant’s Environmental Statement (paragraph 6.132) effects on this species “cannot be mitigated without major and unacceptable changes to land use at the site”.
2. The risk to the notable assemblage of farmland birds on the site, including the ‘at risk’ Dunnock, Fieldfare, Goldcrest, Grey Partridge, Hen Harrier, House Sparrow, Kestrel, Lapwing, Linnet, Meadow Pipit, Merlin, Peregrine, Redwing, Reed Bunting, Skylark, Snipe, Song Thrush, Starling, Stonechat, Swallow, Redwing and Yellowhammer, is also significant. As stated in the Applicant’s Environmental Statement (paragraph 6.132) effects on this Skylark “cannot be mitigated without major and unacceptable changes to land use at the site”. Further investigation of the appendix reports leads to the conclusion that the species list should be extended to take into account the farmland birds assemblage as a whole.
3. The risk to migratory birds has been considered without access to primary data and so has not been adequately assessed.

10 Cultural Heritage

The Applicant has provided no further information or case and our comments and conclusion remain unchanged, taking into account the rejected Appeal for the proposed wind farm at Guestwick, the Inspector said:

“...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.

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.**

11 Landscape and visual effects

- 11.1 In its Objection document, ThWART identified that the photomontages provided by the Applicant were inadequate and self-serving, and that they failed to represent accurately the impact that the proposed turbines would have on the landscape and all receptors.
- 11.2 In the Addendum document, the Applicant provides a further 4 photomontages (views 19 – 22). No justification is given, yet again, for the failure to accord with the request of AONB, amongst others, to provide views from 34 sites.
- 11.3 The new photomontages do demonstrate the huge visual intrusion of the proposed turbines, notwithstanding the attempts to minimize this, for example in the case of Viewpoints 19 and 21 by poor definition and convenient cloud background.

The Applicant does seek to make a fresh attempt to minimize the degree of visual intrusion in a particular view by the suggestion that the turbines will only represent a limited number of degrees in an overall view.

- 11.4 Viewpoints 19 and 20 are typical of the views from extensive sections of the Tennyson and Hamstead Trails, and thus demonstrate the points made in ThWART's Objection Document (see paragraphs 1.4.2 inter alia).
- 11.5 Viewpoint 22, the view from mid-Solent approaching Yarmouth, represents the turbines as so near black in colour that their visibility against the background landscape is reduced. The Applicant claims, without supporting justification, that "at this distance the turbines will, during certain weather conditions, merge with the landform of the Island."

However, the Applicant's representative view, and its opinion, must be contrasted to the representations of the view approaching Yarmouth which was created by ThWART and included as Figures 1.4B and C in its Objection document. We believe that these views create a more reliable representation of the impact than those produced by the Applicant.

- 11.6 The Applicant seeks sweepingly to discount the visual intrusion shown by the photomontages required by the Council by saying that:

"as a whole, the sense of remoteness and tranquil setting of this part of the Chalk Down landscape is not considered to be significantly affected" (viewpoint 19); and "the Solent seascape has the capacity to accommodate the turbines and will reduce the potential effects on the visual amenity and character".

We believe that these claims are self-serving and unjustifiable.

- 11.7 In the section of the Addendum document commencing at paragraph 11.38, the Applicant makes a first attempt at assessing the number of properties that would experience the effects of the proposal. However, the number of houses that the Applicant refers to are continually and significantly understated.

Repeating the summary in ThWART's Objection document:

- **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".**

11.8 As stated in ThWART's Objection document, there are in excess of 120 properties within 1 kilometre of the proposed turbines, with high risk of visual intrusion which 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.

In addition, holiday accommodation within 3 kilometres of the site has been identified as over 280 available units, as follows:

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

11.9 We believe that the Applicant has understated the scale of the effect of the proposed turbines. Indeed, the Applicant's summary is self-serving. Whilst it may be that it is a minority of the properties in the total West Wight that will be directly affected by the proposals, it ignores the fact that a significant number of properties, and people, will be significantly affected by its plans.

On a review of the electoral roll, taking only the addresses which the Applicant accepts will be significantly affected, it reveals that at least 787 people are directly impacted.

A further example of the Applicant's understatement is in its description of the mast as "transparent". Patently, a latticework structure is not transparent. For further comment on the mast, please see Section 7 of this document.

- 11.10 The Applicant further seeks to distort the picture when it seeks to use as a relevant test for the effect of its proposals on the AONB that the adverse effects “are limited when considered in the context of the Island as a whole” (paragraph 11.71).
- 11.11 In paragraph 11.63 on page 62 of the Addendum document¹⁴, the Applicant references Tranquility Maps comparing the early 1960’s and 1990’s. The striking points from these maps, which the Applicant fails to make any comment on, are:
- The percentage of the Isle of Wight which is still “tranquil” is significantly higher than the nearby mainland.
 - The proposed wind farm site is within a tranquil area, and bordered by areas marked as “vulnerable”.

¹⁴ There appears to be some misnumbering of paragraphs in the Addendum document; there are two sets of paragraphs numbered 11.62 – 11.69 on pages 60 – 63.

12 Land Use, Community and Social Effects

In the Addendum document, the Applicant says that it wishes a strategy to be determined with the Council regarding public rights of way to “ensure that the maximum practical separation is achieved between turbines and rights of way”.

Figure 12 shows the location of public rights of way and the proximity of proposed turbine and anemometer tower sites, which help explain the summary of comments made by ThWART in its original Objection document., which still stand:

- **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.**

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.

The Applicant has not sought to deal with these issues in its Addendum document., while the Council’s Highways department have understandably objected to the planning application in their letter of 14t July 2006.

Turbine 6 would “over sail” public footpath

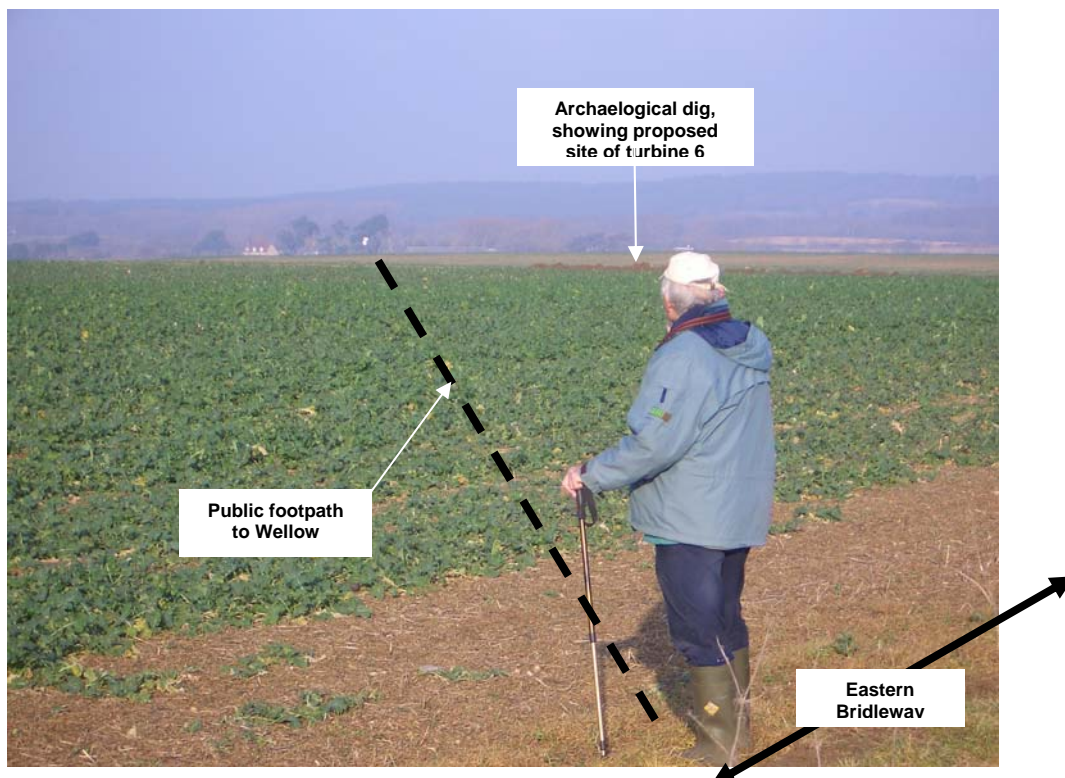
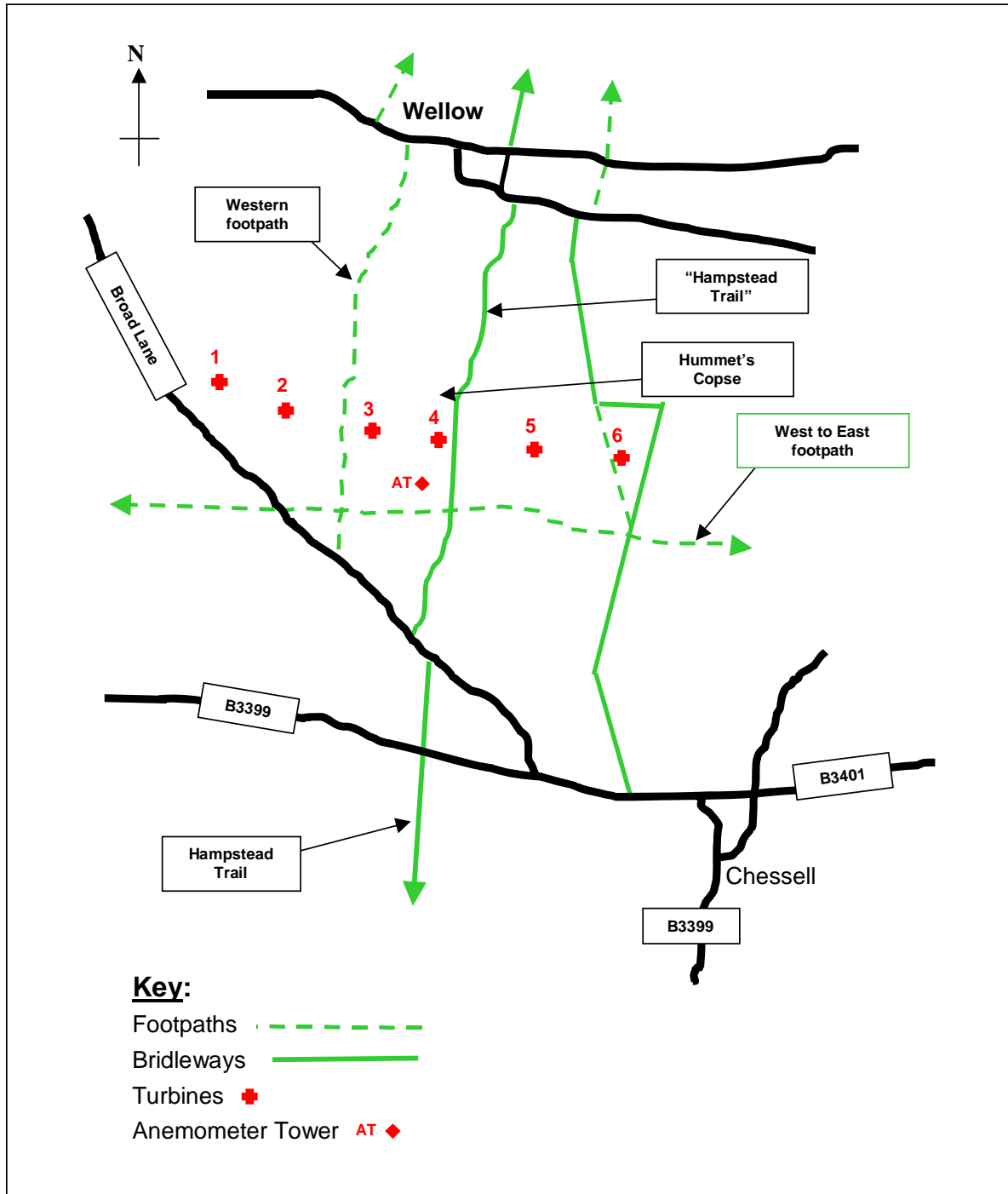


Figure 12 : Proposed Site Layout and the Close Proximity of Public Rights of way (Scale: 1 cm = 225 metres, approx)



13 Noise & Vibration

Wind farm noise is a problem experienced by those that live nearby installations and who experience the situation over a range of conditions and over long periods. By contrast the experiences of short-term visitors to wind farms are often limited to one set of conditions and location and to that individual's perception of noise.

13.1 New Findings on Wind Farm Noise – “Aerodynamic Modulation”

In late September 2006 it has come to our attention that the much criticised¹⁵ “ETSU-R-97” guideline, referred to in PPS22 as the basis of assessing the impact of wind farm noise on nearby residents, is under current DTI (and DEFRA) review. Recent experience with the current larger scale industrial turbines in Deeping St Nicholas, Lincolnshire, for instance, show that noise is causing disruption to sleeping patterns and causing associated anxiety for “neighbours”.

Investigation¹⁶ for the DTI by the Hayes McKenzie Partnership Ltd from this site and two others has concluded that the phenomenon of “aerodynamic modulation” is the cause. (It seems that “low frequency noise” may have, in the past, been wrongly cited as the cause of this problem).

The Hayes McKenzie report says that this effect is “greater than foreseen by the authors of ETSU-R-97”, particularly during night hours” and “can result in internal (indoor) wind farm noise levels which are audible and may provoke an adverse reaction from a listener. This may take the form of increased time in returning to sleep.....”.

Quotes from complainants from the report include the following:

Site 1: Location 1

The noise “thumped and resulted in us experiencing headaches and pressure sensations within my head. It is like a heart beat and appears to come through the floor into our bedroom. Even with the windows closed we can still hear the noise”.

Site 2: Location 1

Descriptions of noise include: *“thumping and roaring; sounds like a number of piston engines with a roaring furnace; woken trying to sleep; thumping during the second half of the night; thumping not much roaring; bumping, thumping; whirring whoop whoop; headaches and feeling tired due to lack of sleep”.*

This new information, highlighting concerns over the suitability of ETSU-R-97 as a measure of noise risk, has lead DTI to “carry out a peer review” of these 10-year old guidelines and the department to state that “it is intended to complete this review and publish the final report and recommendations in Autumn 2006”.

We previously concluded in our response to the planning application that use of ETSU-R-97, as the basis of noise related issues with wind farms, is unacceptable, as it does not properly take into account potential noise increases over background noise, particularly when the latter is at very low levels, as at Wellow. Now that ETS-R-97 is under review, we suggest that, whatever other considerations are made over the planning application for

¹⁵ “ETSU-R-97 – Why it is Wrong”, New Acoustics, July 2005.

¹⁶ “The Measurement of Low Frequency Noise at Three UK Wind farms”, DTI (see www.dti.gov.uk/files/file31270.pdf)

Wellow, no planning permission should or could be granted until these new findings are taken into account.

13.2 Response to the Addendum Document

The addendum document uses ETSU-R-97 as its sole reference, following the advice given in PPS22. Despite this, because of the obvious weaknesses of the now 10-year old ETSU-R-97 guidelines, we believe that the applicant should have taken responsibility beyond using this single measure and suggest that, if this had been done, then the Wellow would have been recognised as an unsatisfactory potential wind farm site.

Nevertheless, we have some comment on what the applicant has presented within the addendum document on noise issues.

The addendum document presents data based on ETSU-R-97 noise limits. As commented on in the ThWART Objection document, the applicant makes no allowance for the additive effect of background noise in its computations in the original application and this shortcoming is continued in the addendum document.

Using the data presented in the addendum document as “Table 13.1” and a (standard practice) allowance made for background noise of 3dB added, then predicted noise levels would exceed – or be very close to - the day-time limits at both Hartshole Cottage and at Churchill’s Farm for a range of wind speeds, as follows:

Predicted noise levels (dB(A)) versus ETSU-R-97 day-time limits

1. Hartshole Cottage							
Wind Speed (metres/second)	3	4	5	6	7	8	9
(a) Predicted Noise levels	30	30	31	37	38	39	39
(b) Background allowance + (a)	33	33	34	40	41	42	42
(c) ETSU-R-97 limits	35	35	35	38	40	44	47
Variance – (b) minus (c) *	-2	-2	-1	+2	+1	-2	-5

* Positive figures indicate that ETS-R-97 limit would be exceeded*

2. Churchill’s Farm							
Wind Speed (metres/second)	3	4	5	6	7	8	9
(a) Predicted Noise levels	30	30	31	37	38	39	39
(b) Background allowance + (a)	33	33	34	40	41	42	42
(c) ETSU-R-97 limits	35	35	35	38	41	44	47
Variance – (b) minus (c) *	-2	-2	-1	+2	0	-2	-5

* Positive figures indicate that ETS-R-97 limit would be exceeded*

Significantly Hartshole Cottage, although being the closest property to the proposed wind farm within the village of Wellow, is also representative of much of Wellow itself and so must not be considered in isolation. The conclusions that we reached in our objection document (as summarised in section 13.3 below) take a wider view of the number of properties that are likely to be affected.

13.3 Conclusions

The comments made in the ThWART Objection Document of 21st July 2006, still stand and were summarised as follows:

- **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.**

The phenomenon of “aerodynamic modulation”, as introduced above, is under review by DTI/DEFRA, is a further serious cause of concern.

On all these counts we conclude that the application for Wellow should be rejected.

14 Air Quality and Climate

This section of the addendum document deals with issues of construction of the proposed wind farm, if planning application were to be granted.

We make no comment on this, as we believe that the other more immediate and important planning issues referred to in this response and in our objection document of 21st July 2006 should lead to a rejection of the planning application in any case.

15 Habitats and Wildlife

With the risk to birds covered as an individual item (see Chapter 9 above), the other major concern raised in our objection document of 21st July 2006 was risk to bats.

We have had further separate comment from bat experts as follows:

- Wight Conservation (Ian Davidson-Watts)
- The Robert Stebbings Consultancy Limited

15.1 Wight Conservation

Ian Davidson-Watts, whose work has been supported by English Nature (now Natural England), the Environment Agency, People's Trust for Endangered Species and the Mammals Trust UK, comments for Wight Conservation, as follows:

"The addendum clearly states that the results relating bats are interim and it is not therefore possible to review the bat related data until this work is made fully available, particularly as bats become highly mobile during the autumn months due to mating activities. Our research identifies that 80% of bat deaths at wind farms occur during August to November and also that bats appear to feed around turbines (i.e. it can attract them) and then they collide with blades.

Research into the techniques employed in the bat survey suggest that they will not be able to gauge height of bats and that radar, thermal imaging and balloons with bat detectors should have been used. In short, the bat survey undertaken this summer was not properly conducted.

By way of background, I can confirm that all bats are fully protected under UK and EU legislation, and the EC Habitats Directive in particular looks to member states to ensure the favourable conservation status of all bat species when assessing schemes with potential to cause damage. More locally the Isle of Wight is one of the most significant areas of the UK for bats. Survey/research work undertaken by myself since the late nineties has identified internationally important populations of rare woodland bats at Briddlesford and more recently (summer 2006), populations of the rare barbastelle and Bechstein's bats have been located in woodlands at Newtown Harbour, Bouldnor and Brighstone. It is likely that these species are more widespread on the Isle of Wight. The Island is also known to support populations of the rare grey long-eared bats.

Without the full bat report it is difficult to make an objective review of the bat work supporting the scheme. However, from the information presented I offer the following comments:

1. I agree with the report in that there is very little information available on how wind farms affect bat species. Most is from the USA where bat species undertake a more formal migratory pattern. In central Europe those bat species that have been studied are known to migrate, and although no specific research has been undertaken on migrating bats in the UK, the Isle of Wight is well known for its bat 'visitors' from the continent, including particoloured bats and Kuhl's pipistrelles. In addition to this, tracking of bats in the UK (by Professor John Altringham, Leeds University and Dr Katie Parsons, formerly of Bristol University) show them covering great distances to swarming/mating sites during the autumn months, often making 50-60 kilometre journeys across open habitats in a single night. More locally, the proposed wind farm

site is reasonably close to and almost surrounded (on a landscape scale) by woodlands at Bouldnor, Newtown and Mottistone, some of which are definitely known to support breeding populations of rare woodland bats. It is very possible that bats from these colonies disperse through or close to the proposed windfarm during the autumn months.

2. The report correctly states that the dominant habitat type (arable) is of low foraging value to bats, however this does not necessarily deal with bats moving through the area from one wood to another (commuting or dispersing). The bat report supporting the Environmental Statement also makes a number of assumptions concerning bat flight heights and relates it to feeding/foraging behaviour, despite concluding that the site is of low foraging value. Therefore the assessment of whether bats will be hit by turbines is based on foraging behaviour (i.e. how bats fly when feeding), yet it also concludes, in contradiction to this, that bats are unlikely to be feeding where the wind turbines will be located.

The most important question is at what height do bats travel through the site during the autumn months and there is insufficient data from the bat reports to answer this question, as surveys during the autumn months have not been undertaken. Secondly, I find it difficult to believe that the surveyors were able to determine flight height - grouped in flight bands as stated in the report - using bat detectors (except at dusk where if very luckily a bat was actually seen). It is even harder to believe that the remote bat detector systems could achieve this. However, more information from a full report would be needed to assess this method.

3. Hummet's Copse and the nearby habitats may offer the best roosting possibilities for bats potentially affected by the planning proposal. There is no mention of whether the potential roosts in trees of Hummet's Copse or other trees were specifically climbed for examination or that checks on emergence were done to see if roosting bats were present. (One noctule was reported as possibly emerging from a poplar tree, so this would also need to be confirmed.).

Small woods such as Hummet's Copse may also support rare woodland bats, as males of Bechstein's and Barbastelle bats have been located in various woodland sites across the Island, including in small isolated copses. Mist netting and the use of the ultrasonic lure should be used to adequately survey these small woods to help inform the impact assessment of the proposals.

In summary, I consider there is insufficient information available on bats (a European protected species) to make a considered planning decision. Roosting potential for woodland bats has been identified in Hummet copse and nearby habitats, yet insufficient survey effort using the correct methods has been undertaken. Although the majority of the site is of low foraging value to bats, this does not preclude bats regularly moving through the site, particularly during the autumn months when nearby breeding colonies are likely to be dispersing. There is however no survey information to assess this potential. Given the limited information on how bats are potentially affected by wind farms (generally) and the high value of adjacent woodlands for Europe's rarest bat species, a precautionary approach to this scheme should be adopted until sufficient information gained by using the appropriate methods and timing of assessment, through the year, is made available."

15.2 Robert Stebbings Consultancy

Robert Stebbings Consultancy¹⁷ provide independent ecological consultancy, with work primarily contracted to English Nature, Countryside Council for Wales, Scottish Natural Heritage, Defence Estates, Highways Agency, Environment Agency, British Waterways, DEFRA, Welsh Development Agency and many other governmental and non-governmental organisations.

ThWART's objection document of 21st July 2006 contains comment following Maurice Webber of Robert Stebbings Consultancy observations on the Environmental Statement. It was concluded from this that:

- Risk to higher flying (migrating) bats had been ignored
- Risk to Noctule bat (accounting for 80% of bats killed by wind turbines in Germany) had been ignored.

Mr Webber's comment and questions on the addendum document are as follows:

“Paragraph 15.14:

“There is no indication of the time scale relating to observations made using Pettersons or Anabat CDI bat detectors. There should be full minimum of 12 months continual recording to have any serious value as to what bats utilise the study area. The results will only indicate which species are using the site prior to wind turbines being erected. How are the predictions being assessed to indicate as to which species will be attracted by the turbines? Recent observations on the turbine next to Whitemoor Prison at March, Cambridgeshire has found plumes of midges on the leeward side of the turbine tower. This will attract bats to a 'deadly' feeding area.

Paragraph 15.15:

If midge clouds form behind the turbine towers this Pipistrelle colony will feed around the turbines.

(Note: the Pipistrelle “route” described in the addendum document identifies Pipistrelles flying above the Hampstead Trail and around Hummet's Copse, bringing them very close – within a few metres – of the proposed turbine site 4 – see Figure 12 in section 12 above)

Paragraph 15.16:

Do these water courses have high insect hatches?

Paragraph 15.17:

Pipistrelle bats in Germany are killed by wind turbines. *Myotis* and other species of bats migrate at higher altitudes.

Paragraph 15.21:

Bats in Britain migrate as in other countries. Large numbers of bats have been recorded on North Sea oil platforms, (seen on radar) crossing the Channel and observed flying with flocks of birds along the south coast of England. This has been known for over 50 years. Little detail is known about migrating British bats.

Paragraph 15.23:

Noctules and Serotine do not use linear commuting routes. Barbestelle bats do not use linear commuting routes either, although they tend to fly close to the ground. Indeed, the only reason bats are observed flying along hedges and woodland edges is that flying

¹⁷ See appendix 1 for details

insects congregate in those areas and so bats feed in those areas. However, it is completely incorrect to think bats need 'linear habitats' to navigate.

Paragraph 15.24:

It is not known how far Noctule bats travel to feed but they and Greater Horseshoe bats have been tracked and found feeding over twenty kilometres radius from their day roost. We have seen these bats enter the roost by dropping like stones from a high altitude (of over 300 metres). Radar studies (up to 40 years ago) show that bats migrate across the Channel at up to 3,000 metres altitude.

15.3 Conclusions

The comments made by Wight Wildlife and Robert Stebbings Consultancy pose serious questions for the methodology and background knowledge employed by the applicant in both its Environmental Statement and the addendum document.

In particular, the inadequacy of the assessment presented in the addendum document is brought into question by both commentators, who severely question the timing and duration of the survey that was reported.

What is clear is that there is that there is significant bat activity within the proposed wind farm site and that wind farms present a potentially serious risk to these species, which are protected under UK and EU law. We conclude therefore that planning permission should be refused without adequate assessment of the risks involved being presented, after a full peer review.

16 Traffic and Transport

In ThWART's objection document of 21st July 2006, the following observations and conclusion were raised under the subject "Driver Distraction and Site Access" :

Overall comment:

Distraction to drivers:

- On the B3399/B3401 "Middle Road" there would be a further risk to a 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.**

The addendum document document has failed to address or even recognise these concerns, whilst it raises further comment and concerns from us, as follows:

Paragraph 16.2 states that "in addition to the transport route, detail was requested on the construction management plan (CMP). The CMP will be produced and agreed with the Isle of Wight Council before construction commences. The basic information is provided in this chapter....."

Comment: The question of "Traffic and Transport" is far too important both during construction and "post construction" for the majority of the "CMP" to be discussed after planning permission has been granted

What should be fully investigated, in particular, are the abnormal movements as these are likely to amount to 42 movements* to and from the site, all of them slow moving and constrained by the route, particularly while passing through Station Road, Ningwood (see comment below on Paragraph 16.4 of the Addendum document). The A3054 could be paralysed for up to 42 days.

*18 blades and 24 tower sections.

Also - Note our comments (above) from our objection document of 21st July 2006.

Paragraph 16.4 – Route: A3054 junction with Station Road, Ningwood.

Comment: A “swept path” analysis has been provided by the Applicant, but this only takes into account this junction and fails to consider the rest of Station Road, which includes the following obstructions:

- Blind corner with the high walls of Grade II listed buildings (at Ningwood Manor).
- 5 metres maximum “pinch point” between power line poles at Lantern Cottage.
- 6 metres maximum “pinch point” between power line poles at Ningwood Manor.
- Access to Shalfleet School

Also, this road is vital to the all year traffic going to and from “The Orchards” Holiday Park at Newbridge.

Paragraph 16.5 cites mitigation measure:

“Set up and running of community action plan to advise and respond to third party questions and concerns as they relate to highway issues”

Comment: There is no detail of how this would be done. What are meant exactly by “third party” and if this “mitigation measure” could not be enforced and it is of very limited value.

Paragraph 16.5 cites another mitigation measure:

“Set up and regular convening of stakeholders group meetings/forums to ensure affected residents, schools and businesses etc are actively involved in reducing and controlling vehicular movement impacts”

Comment: There is no detail or schedule of how this would be done and what “stakeholders” would be included (selected?) or excluded. Explanation of how, in a practical sense, this “mitigation measure” be enforced is needed, otherwise it is of very limited value.

Paragraph 16.6 states: “It is vital that the detail on the CMP is agreed with the Isle of Wight Council prior to commencement of the works. The plan will provide comprehensive route plans for all HGV’s and abnormal loads. Such plans will be accompanied by “swept path” analysis based on topographical survey data at the following locations....”

Comment: There is no mention of Broad Lane and the issues involved there (despite being raised in our document of 21st July 2006). These are:

- The effect, during and after construction, on business and recreational activities that are enjoyed by the residents and visitors to Broad Lane.
- The junction with the “Middle Road”, at the southern end of Broad Lane, which is probably one of the most dangerous junctions to deal with on the Island.

This lack of recognition of the issues involved demonstrates a lack of seriousness on behalf of the Applicant.

Paragraph 16.8 states that “Traffic delay was raised as an issue that had not been adequately addressed in the original ES text. The Isle of Wight Council Highways staff were satisfied that this could be addressed subsequently once they had viewed the provisional information to be included in the CMP as presented above”

Comment: It is very hard to believe that so little detail is forthcoming (or would be required by Isle of Wight Council Highways staff), prior to a planning application being granted, as even outside of the main tourist season it is quite obvious that there are frequent delays on most Island main roads. (See also 16.2 above).

This is particularly the case as the Applicant is now placing great weight on the use of the wind farm as an “R & D” facility, whereby blade changing would apparently be part of that process (see Vestas’ letter in paragraph 5.41, bullet 5, sub-bullet 3 of the Addendum document Document) - i.e. testing of “leading edge” materials.

CONCLUSION:

The application should be rejected, as concerns raised in our response document of 21st July 2006 have not been addressed, while far more detail of the CMP should be provided before planning permission is granted.

Figure 16A : 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

17 Water Environment

The conditions set out by the Environment Agency (in **paragraph 17.11** of the Addendum document) would need to be rigorously enforced by the Isle of Wight Council in the event of planning permission.

18 Shadow Flicker, Aviation & Communication

18.1 Shadow Flicker

No further comment has been made by the developer and so ThWART's comments from 21st July 2006 still stand, as follows:

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**

18.2 Aviation

The Applicant has admitted that Bournemouth International Airport have raised an objection to the proposed wind farm, whereas it is clear from PPS22 (paragraph 25) that Radar and aviation issues should be resolved before making a planning application Therefore this planning application should have not been submitted at all and should be rejected on this basis.

Our other comments are as follows:

- Bournemouth International Airport's radar system and aircraft safety would be compromised.
- 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 hang-gliders or paragliders in certain wind conditions.

18.3 Communications

In its Addendum document, the Applicant acknowledges that "interference with television signals is commonly experienced by residences in close proximity to wind turbines". This is a significant contrast to its previous position in the Application, where it said only that Arqiva had suggested that the television reception of some properties could be affected.

We would repeat the summary of issues raised by ThWART in its Objection document:

- 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.

Whilst some suggestions as to mitigation are made by the Applicant, these appear extremely generic; it does not appear to have made any site specific suggestions. As ThWART previously stated, 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.

We would repeat the Appeal Decision against a turbine in Wales¹⁸, 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.

19 Miscellaneous (Mitigation measures)

Comments are made under the specific Chapter headings, as necessary.

¹⁸ Ref: APP/Y6930/A/03/1133515



Dr Robert E Stebbings

1. Qualifications

- 1.1 I hold the degree of Doctor of Philosophy of the University of East Anglia, I am a Chartered Biologist, a Fellow of the Institute of Biology, a Member of the Institute of Ecology and Environmental Management, a Fellow of the Zoological Society and a Fellow of the Linnean Society. In 1992 I was awarded the Mammal Society Medal for contributions to mammalogy (especially relating to bat science). I am a member of several scientific societies and am President of the Suffolk Naturalists Society and Vice President of The Bat Conservation Trust. I am a member of the Health and Safety Executive Ad-hoc Committee on Pesticides in the Timber Treatment Industry.
- 1.2 I have worked on bats since 1952 first as an amateur but from 1960 as a professional ecologist working for the Nature Conservancy. Subsequently from 1974 - 1989 I continued as a scientific civil servant working for the Institute of Terrestrial Ecology as a Principal Scientific Officer (Grade 7). I was contracted to the Nature Conservancy Council (NCC) to undertake scientific research on bats and to provide specialist advice on matters concerning bats to, and where necessary, on behalf of, the NCC.
- 1.3 From 1976 until 1987 I was chairman of the Chiroptera [Bat] Specialist Group, Species Survival Commission, of the International Union for the Conservation of Nature and Natural Resources (based in Switzerland) and was responsible for assessment of the status of bats worldwide and for negotiating with governments to implement conservation legislation and protection and for devising management proposals for recovery programmes.
- 1.4 I became an independent wildlife consultant in 1989 and a director of a small Company, specialising in environmental problems especially concerning animal and plant species protected by legislation. We undertake an average of 125 client based projects each year, of which half are exclusively concerned with bats or bats are included within the project. Much of this site assessment relates to bats, devising management plans for them and implementing programmes including the design and building of roosts as well as managing habitats. In addition, in-house financed research projects on bats are undertaken some having been initiated in the late 1940s through to the 1960s and 1970s.
- 1.5 We are frequently contracted by English Nature, Countryside Council for Wales and Scottish Natural Heritage and other Statutory Bodies to provide staff training and specialist advice concerning bats (and other species). Until 2004 we provided advice on bats in the East Midlands Region of English Nature to professional organisations and the public on the behalf of and under contract to English Nature (now Natural England as from 1 October 2006).



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INDEPENDENT CONSULTANT ECOLOGISTS

Research ecologist, mammalogist, herpetologist, botanist.

CURRENT PRINCIPAL ACTIVITIES (with retained and associate staff)

Undertaking ecological assessments and specialist surveys of species, especially those protected by legislation eg *Wildlife & Countryside Act 1981 (WCA)*, *The Conservation (Natural Habitats & c.) Regulations 1994*, *The Countryside and Rights of Way Act 2000* and *Protection of Badgers Act 1992*. This includes development of ecological impact assessments and detailed management plans and in supervising their implementation for species and habitats. Work is contracted primarily by English Nature (Now Natural England), Countryside Council for Wales, Scottish Natural Heritage, Ministry of Defence (Defence Estates), Highways Agency, Environment Agency, British Waterways, DEFRA, Welsh Development Agency (Welsh Assembly Government), but also, many other organisations both governmental and NGOs.

Preparing and presenting evidence for inquiries concerning planning appeals. As expert witness for the CPS, police, Statutory Nature Conservation Organisations and other bodies, investigating and preparing casework leading to prosecutions under the *WCA 1981*, *The Conservation (Natural Habitats & c.) Regulations 1994*, *Protection of Animal Acts 1911-1964*, *Animal Health and Welfare Act 1984* and *The Convention on International Trade in Endangered Species of Wild Fauna and Flora, 1973, (CITES)*.

We provide a design and build service for wildlife mitigation and conservation initiatives conforming with all HSE (including Mines Inspectorate) and local planning requirements. Other long term research on British bat populations is in progress in various locations with one project started in January 1952 and others from 1960.

The Consultancy has provided 'in-house' staff training for English Nature and Countryside Council for Wales on wildlife surveying and interpretation of legislation as well as for the Environment Agency, British Waterways, police wildlife liaison officers, Local, District and County Councils. Developing and presenting courses for the remedial timber treatment industry, the Forest Authority and Field Studies Council.

FORMER POST (Dr R E Stebbings in person)
Principal Scientific Officer (Grade 7) (Research Ecologist),
Institute of Terrestrial Ecology, Natural Environment Research Council
Post held 1972 - 1989
Main Research topic: Autecology of British Bats.
(Contracted to the Nature Conservancy Council 1974-1989).

Principal Activities

Project leader for field research on population dynamics and ecology of bats. Field and laboratory research on chronic and lethal effects on wildlife of pesticides used in agriculture and for remedial timber treatments.

Development of National/International wildlife legislation, drafting and implementation casework with National and International Statutory Wildlife Conservation Organisations (Bonn & Bern Conventions, CWCWP Act 1975, WCA 1981).

Buildings and mines surveyor, assessor/designer of protective measures for mine shafts, including providing detailed engineering specifications and supervising contractors.

Lecturer, graduate and post graduate adviser, supervisor/examiner of Ph.D candidates.

Consultant on habitats and their management, especially to the NCC for E (EN), CCW, SNH, IUCN and foreign government agencies, but also to the MoD, DoE, National Trust, local government, British Rail, British Steel, British Gas, British Coal (OCE) private industry and conservation NGOs.

PREVIOUS APPOINTMENTS

1970 - 1972 Post Graduate Research, University of East Anglia, Population Ecology of Bats.
1968 - 1970 Research ecologist studying plant community ecology of coastal ecosystems, Nature Conservancy, Norwich. Specialist advisor to National and local Government on treatment of coastal oil pollution.
1960- 1968 Research ecologist with the Nature Conservancy, Dorset.

Main Research Topics:

1. Population ecology of reptiles and especially snakes (2 years).
2. Stratigraphic history of salt marshes and development of modern plant communities.
3. Aerial photographic interpretation of coastal habitats around Great Britain.
4. Design of controlled environments for growing plants (patented by Prestcold).

AWARDS 1992 Mammal Society Medal.

PROFESSIONAL QUALIFICATIONS AND DEGREES

1968 Fellow of the Zoological Society.
1969 Member of the Institute of Biology.
1977 Doctor of Philosophy, University of East Anglia.
1979 Chartered Biologist, Institute of Biology.
1989 Fellow of the Linnean Society.
1990 Fellow of the Institute of Biology.
1994 Member of The Institute of Ecology and Environmental Management.



HONORARY POSTS (selection, not comprehensive)

1964-1978	Council Member, The Mammal Society.
1968 to present	Joint Secretary of Bat Group, The Mammal Society, Ringing Secretary.
1972 to 1996	Specialist consultant, Conservation Cmtte. British Herpetological Soc.
1973-1975	Project leader- Otter survey (GB) for Mammal Society.
1973-1978	Gavin Maxwell Otter Project - Committee member.
1974-1978	Grants Committee Member, Nature Conservancy Council/WWF .
1976-1987	Chairman, Chiroptera Specialist Group, SSC, IUCN.(World remit).
1980 - 1996	Scientific consultant to the Jersey Wildlife Preservation Trust.
1981-1986	Director, Bat Conservation International (Milwaukee and London).
1988 to 2004	HSE ad-hoc Cmtte. on Pesticides in the Timber Treatment Industry.
1990 - 1995	Vice Chairman, Bat Conservation Trust.
1995 to present	Vice President, Bat Conservation Trust.
1992 to 1994,	
1996+	President, Suffolk Natural History Society.

INTERNATIONAL PROJECTS

1974 (Feb-March) Sarawak	Project leader. Environmental impact assessment of the Sarawak Economic Development Plan, Commissioned by the Sarawak Government.
1976 (June-July) Equador	Catalogue species composition of forest bat fauna. Project sponsored by UK and Equador Governments.
1979 (May-June) Belize	Catalogue species of the rain forest bat communities. MoD sponsored.
1980, 1987 Kenya	Project leader. Developing proposals for setting up and maintenance of protection for coastal cave Nature Reserves. Commissioned by IUCN.
1981 (February) Thailand	Project Leader. Developing a conservation strategy for an endangered mammal (bat). Commissioned by Thai Forestry Dept.
1985-1995 Kalimantan	Barito Project - Principal Investigator studying plant/animal interactions in primary forest.
1990-1994 Brazil	Study of the rôle bats play in the transmission of diseases to wildlife and domestic animals.

SPECIALIST ADVICE

Advice has been sought by governmental and non-governmental organisations and projects initiated and/or supervised in most European countries and in USA, Canada, Brazil, Bolivia, Peru, Guam, New Zealand, Australia and others.

PUBLICATIONS

Published over 120 scientific and other publications, including 6 books (mostly on bats), as well as producing over 1550 specialist reports and proofs of evidence for clients, in fifteen years.

