

LOWER WINTERBORNE PARISH COUNCIL

LOWER WINTERBORNE WIND FARM Planning Application No. 2/2003/0765

ANNEX A – OBJECTIONS TO THE APPLICATION

1. **Opposition by Residents** The Your Energy original outline proposal and its subsequent planning application were debated at both the Winterborne Zelston and Winterborne Kingston Annual Village Meetings in April, at an extraordinary meeting of the Parish Council on 2nd September, and at its normal monthly meeting on 9th September. **There was huge attendance at all of these meetings where the overwhelming body of opinion objected to this application.** This opinion is mirrored in the correspondence received by North Dorset District Council (NDDC) and / or the Lower Winterborne Parish Council (LWPC) where **187 of the 205 letters originating from within the LWPC area objected to this application.**

In addition, NDDC has received a further 51 replies from settlements mentioned in Volume 1 of the Environmental Statement as being ‘visually affected by this development’ i.e. Sturminster Marshall, Bloxworth, Morden and the Almer and Mapperton Conservation Areas. **43 of these replies object to the application.**

Note. On receipt of this planning application, the Parish Council sent a letter to all residents in the Lower Winterborne Parish Council (LWPC) area to advise them:

- o *The application had been received and where it could be viewed.*
- o *The date and venue of the extraordinary meeting called to discuss the application*
- o *The date and venue of the next normal Parish Council meeting when the Parish Council would make its decision*

It also invited residents to register their objection to, or support for the application, to NDDC (copied to the Parish Clerk) and if they so wished, to their local MP and District Councillors. A simple standard reply was also attached for those who wished to use it. A copy of this letter is attached. (Annex E).

2. **The development will dominate and have an adverse visual impact on the Winterborne Zelston Conservation Area, and on the character and appearance of the surrounding countryside and adjacent areas of AONB.** This cluster of nine 105m high wind turbine generators will be located at heights between 67m and 100m above sea level, on a hill that is just 106m high. Therefore, all of the turbines will protrude above the skyline, by between 66m and 99m, and will be visible for miles around.
3. **Planning history/precedent.** In refusing previous planning applications for developments in Winterborne Zelston, NDDC has established the precedent that the character and appearance of this Conservation Area should be protected.

In particular, Application No 2/2002/0509 for Bushes Farm Winterborne Zelston (*i.e. one of the farms affected by this application and located approx 250 to 300m east of Turbines 1&2*) was recently refused by NDDC. In upholding this decision the Planning Inspectorate considered that “.....the resulting incongruous appearance would be highly detrimental to the rural character of the site and its surroundings” and that “.....the

proposal would seriously harm the character of the existing building and surrounding countryside”.

Application No. 2/2003/0161 for Huish Farm Cottage, Winterborne Zelston was also refused by NDDC for similar reasons.

The Parish Council believes that the character and appearance of this Conservation area should continue to be preserved and that the application should be refused.

4. **Granting this Application in the absence of Wind Farm Policy in NDDC would create a dangerous precedent** When the Parish Council Chairman and Parish Clerk visited NDDC on Friday 25 April 2003 to discuss wind farms in general, and to obtain a copy of the Wind Farm Policy, they were told by Janet Parffett that ‘such a document did not yet exist and that within NDDC there was a policy vacuum’. Subsequently, the NDDC Chief Executive’s letter to Jo Davies, Secretary D.A.R.T., and dated 13 August 2003 confirms that this is still the case as she states that ‘The Plan (*NDDC Local Plan 2003*) is, however, silent on wind power.’

In the absence of any such published policy, the Parish Council believes that determination of this, and any other Wind farm application, would be premature until the policy document has been formulated, approved and incorporated in the NDDC Local Plan.

5. **The details contained in the Environmental Statement contravene the following policies:**

- a. **NDDC** - Overall Local Plan Strategy Paragraph 1.16 sections 7 and 8
Policy 1.1 (i), (iii) and (iv) – Policy 1.6 – Policy 1.7 - Policy 1.8 (ii), (iii), (v) and (xi)
Policy 1.9 - Policy 1.12 (ii) – Policy 1.19 (ii) - Policy 1.23 – Policy 1.24 – Paragraph 1.108 – Policy 1.28 – Policy 1.29 – Policy 1.33 – Policy 1.36 – Policy 1.37 – Policy 1.38

Specific comments are detailed in Annex B.

- b. **Bournemouth, Dorset and Poole Structure Plan**
Environment Policy - C, D, F, M, Q, R, S.
- c. **National and Regional Planning Guidance**

The following are particularly relevant to this planning application:

PPG1 General Policy and Principles paragraphs 29 and 32
PPG 9 Nature Conservation
PPG 15 Planning and Historic Environment
PPG 16 Archaeology and Planning
PPG 22 Renewable Energy Annex paragraph 11, paragraph 17 (is a further planning application necessary)
PPG 24 Planning and Noise

RPG 10 Regional Policy Guidance for the South West
Updates to national, regional and county guidelines are expected in the near future.

d. Countryside

UK statutory legislation.

Badgers – The Badgers Act (1991) and Protection of Badgers Act (1992)

Bats – Wildlife and Countryside Act (1981) Schedule 5

Birds – Wildlife and Countryside Act (1981) Schedule 6, UK Biodiversity Action Plan, Red List - Birds of Conservation Concern Status.

Brown Hares – UK Biodiversity Action Plan

6. The proposed development will exacerbate the flooding problems already experienced in Winterborne Zelston.

During periods of exceptional rainfall, the bridge at the west end of Winterborne Zelston is unable to cope with the volume of water flowing in the River Winterborne. At such times, the combination of water flowing around the bridge (rather than through it) and a high water table results in homes in Winterborne Zelston being flooded. If this development is permitted, this situation will be exacerbated by the following elements of the proposal.

a. The proposed new bridge. The span of the existing bridge is 2.4m and, in times of exceptional rainfall, acts as dam and causes approximately 6 acres of upstream agricultural land to flood (Source: the land owner). The proposed bridge has a span 6.5 m, a lintel 175mm higher and has a capacity of almost three times that of the original one. Whilst this will doubtless relieve the flooding of the agricultural land, the Winterborne Zelston bridge will become even more inundated and more homes will be flooded.

b. The turbine foundations The Landtake Area Calculation indicates that the turbine bases and associated hard standing will occupy 4860 square metres, and the WTG Base Drawing, (Vol3 Fig 4) shows the foundations to be 2.85 metres deep. The effect of introducing these very large, reinforced concrete slabs will drastically reduce the ground absorbency within the site, resulting in increased water run off from the site onto the flood plain and into the River Winterborne and add to the flooding problems mentioned above.

c. Substation & tracks The foundations and hardcore required for the Substation, and access tracks will affect a further 27,140 sq metres of the existing landscape, to varying depths, and further add to the problem.

7. Road Safety The wind farm will be clearly visible from points along the A31 trunk road between Red Post and The Botany Bay public house. This stretch of road is historically dangerous and the Highways Agency has just spent a six figure sum on it to introduce a 40mph speed limit and improve visibility, in a bid to reduce accidents. Accordingly the Parish Council believes that:

a. During the construction phase, the additional volume of 55 daily HGV vehicle deliveries (including plant, machinery and some carrying 40m rotor blades), crossing the oncoming flow of traffic to gain access to the site, will have significant road safety implications on this inherently dangerous stretch of road.

b. If and when the construction phase is completed, the development will be intermittently visible along this narrow, busy stretch of trunk road and will be a distraction to drivers.

8. **Reasons of Aircraft Safety and Radar Interference**

- a. Notwithstanding the references to consultations with the MOD and other appropriate agencies mentioned in the ES, the Parish Council is concerned that, at 105m, the turbines will constitute a hazard to the MOD, Emergency Services, 'Royal Flight' and leisure helicopters and aircraft that regularly over fly this area.
- b. As the turbines are in excess of the 91.4m mentioned in PPG 22, should they be fitted with aircraft warning lights? If they do, then the question of light pollution comes into the equation.
- c. We draw attention to the concern expressed by a parishioner (Ser 163 in your representation file) regarding the question of possible radar blackout in the vicinity of the three major military installations at Blandford, Bovington and Poole.

9. **The Noise Measurement Tests are considered to be flawed**

Noise measurements were carried out in four separate locations for a period of 22 days from 9th April to 1st May 2003. The report acknowledges that higher noise levels were recorded in two of those locations 'due to their proximity to the A31'.

During the period 9th to 17th of April the normally very busy A354 from Blandford to Puddletown was closed and the A31 was the authorized route for diverted traffic. Hence traffic levels on the A31 would have been significantly higher than normal during this period. Over the next five days, holiday traffic would mean that the A31 was again carrying higher levels of traffic than normal.

Since the purpose of these tests was to determine the **normal** ambient noise levels and these tests were conducted under **quite abnormal conditions for over 50% of the testing period**, we believe that the results obtained will be skewed in the Applicants favour. For this reason, **the tests should be considered flawed and the applicant should be asked to repeat them under more normal conditions.**

10. **If constructed, this site would be the first wind farm development in a well inhabited area of southern England and would represent a major shift in the terms of the type of development permitted in the countryside.**

To allow this to happen in the absence of a clearly defined local policy would set a dangerous precedent.

11. **The impact of this development, in terms of the disruption, nuisance, environmental damage and reduction in the quality of life for local residents is not justified.**

12. **We object to the industrialisation of 3.2 Hectares of prime agricultural land.**

13. **The proposed development will obstruct bridleways and rights of way.**

14. **The development will interfere with television reception in an area where poor reception is already experienced in some parts of the parish**

15. **It will have an adverse affect on the flora and fauna on the proposed site and surrounding areas, as the site abuts two Sites of Nature Conservation Interest. A third is approximately 0.5km to the north west of the site.**

16. **The ES contains numerous misleading statements**

Examples are:

a. **Vol 1, Para 1.3.3** “Access to the site is relatively straight forward and will require minimal disturbance to road systems in the area”

- The report indicates that the A31 will need to be strengthened and widened in places and widened at the site access. (Vol. 2, Para 3.1.1)
- During the extraordinary meeting of the Parish Council, on 2nd September, Mr Sandham advised that the vehicles transporting the rotor blades would need to travel in the centre of the roads and at these times the roads would need to be temporarily closed to other traffic.
- Vol 2. Fig 12 shows in diagrammatic form how these 50m transporters will negotiate the access and looks anything but straightforward...

In our view these factors together with numerous HGV’s entering the site will result in **significant disturbance to road systems in the area.**

b. **Vol 1, Para 1.3.3** “Congestion in Winterborne Zelston is apparently a difficult issue for local residents and the reduction of farm traffic through the new access arrangements will relieve such congestion”

Whilst the Parish Council has received complaints regarding speeding, inconsiderate driving in the village, damage caused by contractors vehicles and the dangers of the A31, it has no knowledge of any congestion problems.

c. **Vol 1, Para 1.3.3** “The existing bridge..... and is locally thought to be complicit in localized flooding..... Bridge upgrading could contribute to flood relief for the localized area”

As indicated in Para 6, the bridge may well relieve flooding of agricultural land, but will result in increased flooding in Winterborne Zelston.

d. **Vol 1, Para 1.6** *one of the benefits of this development would be “further long term employment and possibilities through the requirement of ongoing operational management and /or maintenance of the proposed development”*

At the Winterborne Zelston Annual Village Meeting, on 23rd April, Your Energy advised that, once erected, the wind farm would be automatic. As such, it would be unmanned and the only maintenance required would be ‘a man with an oil can every so often’.

e. **Vol 1, Para 2.4 – Consultations** Your Energy reported the results of this straw poll to the residents who attended the Winterborne Zelston Annual Village Meeting, on 23rd April. At that time, Your Energy conceded that as these figures were not truly

representative, they had also conducted a second poll for those living in the DT11 postcode area. The results of that poll were 64% in favour, 8% against and 28% not committed either way. – this latter set of figures does not appear in the document.

Note. Your Energy was advised that, due to the size of the DT11 postcode area, the results of neither poll were meaningful in terms of local opinion.

f. The Planning Appraisal The title page of this document suggests that it forms part of the Environmental Statement, whereas Vol 2, Para 2.2 clearly states that it does not. However, if it is accepted to be a valid contribution to this application, it should be noted that in many cases where policies are quoted in the document, the relevant points have not been quoted in full and, in some cases this gives the policy / section a different perspective.