

Sparsholt Parish Council (SPC) strongly objects to the above application for the following reasons:-

a. Consultation

The college has failed to consult effectively and in a responsible manner as a publicly funded body. The notification and timings over a major bank holiday weekend prevented what could have been larger numbers of people attending and therefore more meaningful feedback than this application states. (Please see separate letter attached.)

b. Visual Impact

Our greatest objection is to the impact that a 74m wind turbine will have on the landscape. This impact cannot be mitigated in any way.

The objections to impact on the landscape are fully articulated in a letter to WCC regarding this application from the Campaign for the Protection of Rural England. We fully endorse the opinions expressed in that letter

The height of the turbine is a particular concern. Core strategy Policy MTRA 5 states: ...'because of their sensitive rural locations, masterplans should be prepared prior to development which identify the site opportunities and constraints, promote sensitive land and building stewardship, promote sustainable development, and maximise sustainable transport opportunities, **whilst limiting impacts on the surrounding environment and communities'**

This proposal takes no account of the existing rural landscape and the dark skies and will therefore have an extreme detrimental effect on the environment and surrounding landscape.

SPC believes that the student training (Reference: Planning Design and Access Statement paragraph 2.3.3) should be a mix of classroom, computer based training (CBT) and practical. There are many land-based turbines in UK that can be used for the practical and therefore there is no essential requirement for this turbine at the College.

c. Fit with Planning Policy

See paragraph b. Visual Impact above. It is also understood that Hampshire County Council has a policy of no more wind turbines on their land or funded by HCC and it is believed that the turbine location is on such land.

d. Fit with Planning Policy

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e. Threat to Wildlife

The application states that a bat survey was not considered necessary. Yet there have been many reports of bats being found dead near wind turbines. Most recently reported in The Telegraph on 23rd July 2014 - Bats get 'the bends' from wind turbines.

Bats are prevalent in the area and SPC considers a bat survey essential.

No consideration has been given to migratory birds. The turbine location is on the direct migratory flight path of rare Ospreys returning to the North of Scotland.

f. Aviation

SPC is concerned that the MOD Low Flying routes may be adjusted closer to the village to avoid the turbine. Therefore we would like as part of pre-application consultation to see confirmation from the MOD that this proposal would have no impact on their current routes.

g. Cumulative Effect

This will be the 5th wind turbine within a relatively small distance (3 already at Kirton Farm

and a recently approved 17m one at the college) and starts to set a precedent for others in the future.

h. Noise

Should this application be approved SPC would look to WCC to impose conditions that the predicted noise levels are met in operation and require action to be taken to remedy or restrict use should they be exceeded.

The Environmental Report contains noise predictions – specifically, how much background noise will rise at the nearest affected homes. These are predictions only, from a desk-based exercise.

Calculations are based on ETSU-R-97 a standard developed by the wind turbine industry and concerns have been expressed that the techniques used may not give an accurate estimate for the noise generated especially at night in a quiet rural environment.

The application states that a different model may be purchased. Any planning permission should have a condition placed on the consent to ensure noise levels do not exceed those predicted.

i. Proximity

The turbine site is unacceptably close to a byway, open to all traffic, to the left and estimated to be 500m from the proposed turbine. The Crawley to Up Somborne Road is about 760m to the north and the main Stockbridge Road at its nearest is 1200m away. Part of a turbine blade was thrown 1.3Km when a turbine failed in Germany.

This turbine could have an adverse effect on drivers as it would be a distraction because of the colour and height.

SPC is also concerned that there are properties within 2Km of the proposed location.

j. Shadow Flicker

Shadow flicker will affect students within 900m from the wind turbine. This is considered by some to be an unacceptable nuisance and linked to medical concerns. It is not clear that the impact on students at the college has been fully assessed.

k. Health and Safety

See paragraph h. Proximity.

Planning Application Sparsholt College Wind Turbine 14/01616/FUL – Consultation

Sparsholt Parish Council (SPC) believes that Sparsholt College (the College) has failed to meet their statutory obligation to consult a majority of parties in the vicinity of their proposed wind turbine as required by section 61W (specifically sub points (2) and (4)(b)) of the Town and Country Planning Act 1990 (as amended 2014). Consultations that did take place were not organised in a responsible manner as would reasonably be expected of a publicly funded body. Our reasons in detail are as follows:

- a. The College sent an email to the SPC Clerk on Tuesday 15th April 2014 notifying a drop-in consultation at the College to be held on Wednesday 23rd April 2014. This was ridiculously short notice for an event that should seek to allow the majority of interested parties to attend in any circumstances. The above period was over the Good Friday / Easter Monday weekend and in the prime two week Easter holiday period.
- b. The notification to farmers in the area was sent out on Sunday 20th April at 16.44, the Bank holiday weekend Sunday, and only one working day before the event.
The timings of para a. and b. above ensured that the minimum number of people would attend, showed scant regard for local opinion and in our opinion are at worst devious and not appropriate for a publicly funded body.
- c. The application states that 15 people attended the event and that overall feedback was positive. 7 people completed survey forms (only 6 fully completed), which at face value are

positive but there is no analysis of where the respondents are from. Notwithstanding because of the low attendance caused by para a. above the conclusions of the analysis are meaningless.

- d. The Principal attended the SPC AGM on 24th April to give his college's Annual Report and was not there as part of any pre application on this proposal. However he did respond to questions and statements from the floor. These included concerns that a proper consultation should be held and, from those who had attended the drop-in and had compared notes at the AGM, that different answers had been given on several occasions during the drop-in event.
- e. The Principal, subsequently, declined a written request from SPC to run a consultation event in Sparsholt Village Hall that, with sufficient notice, would have permitted a much larger audience.

WCC should satisfy itself that the college has met their pre-application obligations. If not this application should be rejected and not reconsidered until a proper consultation has been held. As advised by CPRE, we consider that the pre-application consultation should include the provision of a balloon on site to represent the highest point of the turbine blades and that sufficient time and sufficient notice of the times available should be allowed so that a majority of those in the vicinity have the opportunity to see the impact for themselves.

WCC 14/01616 – 1 no. wind turbine of up to 74m in height with ancillary development

CPRE Hampshire **strongly objects** to this application for the reason set out below.

CPRE supports renewable energy developments where they are appropriately sited. We have a clear preference for solar generation over wind turbines as the landscape impact of solar panels can often be mitigated by location and screening. Very rarely is this true of wind turbines of any significant size.

The 74 metre height wind turbine proposed is a large turbine, being some 22 metres taller than Nelson's Monument in Trafalgar Square, and 3 times the height of the three small turbines in place at Kirton farm

As regards the **benefits** of such a wind turbine in the proposed location, it is stated that one purpose is to form part of the wider aspirations of the college to develop several technologies as part of establishing a **Regional Centre for the Demonstration and Learning of Sustainable, Low Carbon and Renewable Technologies** at Sparsholt College. This is a laudable aspiration but no justification is given as to why a 74 metre turbine with severe adverse landscape impact is necessary to achieve it. The College already has a 17 metre turbine available, and arrangements could be made for students to visit the existing turbines at Kirton Farm which is only some 3 kilometres by road from the College.

The turbine would **provide some renewable energy**. Its output capacity is stated as 1300 MWh per annum but according to the Renewable Energy Foundation, an acknowledged expert in this area, an annual load factor of 25% of the output capacity can be expected having regard to intermittency within a mean wind speed of 6.2 to 6.8 m/s. At the accepted average of 4,266 KWh per household this would power only 75 households and save 162 tons of CO₂. Accordingly **the benefit of this turbine in generating renewable energy is very limited**. This is very important in considering the adverse impacts.

From our own observations, the **landscape within 5 kilometres of the site** is open agricultural land with scattered woodlands. It is open and gently rolling (contrary to the Landscape and Visual Impact Assessment (LVIA) which gives the impression of steep slopes). While without a formal landscape designation, this is an unspoiled **landscape of considerable beauty**. Apart from the

College itself (which is quite well screened by trees) it is almost entirely undeveloped. The site is shown as in an area of the highest tranquillity on the CPRE Tranquillity Map. Accordingly this **landscape is very rural in nature, very tranquil and with dark skies at night. It is highly sensitive to change by introduction of development.**

A white wind turbine of some 74 metres in height would be a **major intrusion into this sensitive landscape.** It would bring a strong vertical element into what is a rolling horizontal landscape. The result would be a **strong change in landscape character.** The need for red lighting at night, for aviation safety purposes would have a very severe impact on the quality of the dark skies.

The LVIA acknowledges the significant effect of this turbine would have on landscape character, but in our view both underplays the sensitivity of the landscape and the adverse impact of the proposed turbine.

This **landscape can be viewed at close quarters by the public** from Footpath 1 to the east, Byway 34 to the west and Byway 502 to the south west, and the track leading down from Forest Extra which we understand is also used by the public. The visual amenity provided by views of the landscape from these public vantage points would be fundamentally altered as this large turbine with its moving blades would become the focus of attention of the eyes, dominating the outlook. This would be worse in winter when leaves are off the trees and hedgerows. In our view there would be a **severe adverse impact on visual amenity.**

While the LVIA acknowledges the dominant impact this turbine would have on these public rights of way, the use of Viewpoints does not fully communicate the impact this turbine would have. From our observations, it would be the dominating feature in the view from Footpath 1 from the top of the slope leading away from the B3049 right down to the buildings of the College, a distance of about 1 kilometre. On Byway 34 it would be the dominant feature for practically the whole length leading south from the Kings Somborne road to the junction with Byway 502, and for some distance along Byway 502 leading east, (contrary to the impression given by the LVIA of intervening landform at VP2) a distance of nearly 2 kilometres.

The cumulative assessment indicates that turbine needs to be seen in the context of the 3 existing turbines at Kirton Farm, but the latter are only some 25 metres in height and grey in colour. From our observations, their impact on the landscape is very limited, when compared to the height and bulk of a 74 metre turbine in white.

Summarising landscape impact, **we consider that if this turbine were permitted there would be severe adverse impact on landscape character, visual amenity, tranquillity and dark skies.**

While renewable energy development is encouraged by the National Planning Policy Framework (NPPF), statements of the Secretary of State have made clear that the need for renewable does not automatically overcome landscape considerations, and National Planning Policy Guidance makes clear that renewable energy developments should be acceptable for their proposed location.

We consider that the proposed location for a 74 metre wind turbine is not acceptable on landscape grounds and should be refused

CPRE Hampshire South Downs & Central Planning Group