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FAO Mr Stephen Clark
Development Management Service
North Dorset District Council
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4 September 2014

Application No: 2/2014/0768/PAEIA

Proposal: **Install 4 No. wind turbines (with a maximum height from existing ground level to blade tip of 125metres). Construct permanent ancillary development comprising site access tracks, permanent crane hardstanding areas and external switchgear buildings for each turbine, 1 No. sub-station, and underground onsite electrical cabling. Form temporary construction compound and laydown area, and temporary secondary crane hardstanding areas for each turbine.**

Location: **Land at E 385111 N 100255 A354 - Blandford Hill Winterborne Whitechurch to Thornicombe Hill Winterborne Whitechurch**

Dear Mr Clark,

All residents on the electoral roll were invited by the Parish Council to view the planning application on 5th and 6th August and then vote 'for or against' the proposal. 46% of residents voted of whom 64% are opposed to this planning application.

Winterborne Whitechurch Parish Council therefore **strongly objects** to this application for the following reasons:

1. RENEWABLE ENERGY POLICY.

In the Landscape Sensitivity to Wind and Solar in North Dorset District prepared by LUC in April 2014 for North Dorset District Council it is stated that North Dorset District has a generally high level of sensitivity to wind energy development. In every part of the District sensitivity to turbines of over 65 metres to tip is judged to be 'high'. Even for smaller scales of development there are no locations where sensitivity is assessed as being 'low'

There are currently no legally binding renewable energy targets for any UK local authority areas. The Department for Communities and Local Government publication ‘planning practice guidance for renewable and low carbon energy, July 2013’ makes this clear in paragraph 6 page 4: “the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, **there is no quota which the local plan has to deliver**”.

A report on The Status of Renewable Energy Generation in Dorset County by the Council for the Protection of Rural England (CPRE), July 2014 strongly suggests that the county is well on target to reach the aspirational 7.5% local onshore renewable energy target included in the Bournemouth, Dorset and Poole Renewable Energy Strategy to 2020. North Dorset is already one of the highest contributors toward the target and the CPRE report recommends that “**Local Planning Authorities are in an ideal position to review and adjust, if necessary, their renewable energy policy with a view to ensuring that development from now on causes minimal damage to Dorset’s unique, small-scale, high value rural environment**”.

2. RESIDENTIAL AMENITY.

The Parish Council do not consider the assessment offered by REG to have adequately covered the potential detrimental effects to residential amenity.

The applicant’s photo-montages have been taken with trees and hedges in full-leaf thereby minimising the visual impact which will in fact be hugely increased for six months of the year when trees and hedges are not in leaf.

REG have not provided visibility assessments for all dwellings closest to the turbines i.e. those on Blandford Hill, Rook Lane and Lower Street and no mention has been made at all of visibility from properties on Dorchester Hill. REG state in their visibility assessment from ‘Sunstar’, the dwelling most affected by open views toward the turbines that ‘views will be limited potentially by the recently planted hedging depending on the height it is permitted to reach’. A normal hedge height is unlikely to sufficiently block the view of 125m turbines.

REG have also not included the potential effects of shadow flicker in their residential amenity assessment. The Department of Energy and Climate Change - Update of UK Shadow Flicker Evidence Base - 2011, states “shadow flicker is more likely to be relevant when considering potential effects on residential amenity than health effects” and “cumulative long-term effects might meet the criteria of a **significant nuisance**”.

The proposed wind turbines will be in extremely close proximity (within 1000m) to many village dwellings and within 830m of the nearest dwelling. Despite REG’s reassurance to the contrary in their Residential Amenity Assessment, the Parish Council believes that the wind turbines **cannot fail to be** ‘overwhelming overbearing or oppressive’ and **will result in unacceptable harm to residential amenity**.

3. LANDSCAPE AND VISUAL.

Winterborne Whitechurch is only 400m from an AONB. AONB planning guidelines state ‘Ensure farm diversification projects do not have a negative impact on local character’. Wind turbines will dominate and industrialise the local rural landscape and end the currently uninterrupted views both into and out of the AONB. They will be visually invasive and detrimentally affect popular viewpoints and recreational routes in a wide radius around the village. This planning application will therefore have a **significantly negative** effect on the character of the landscape.

If this application and others i.e. Tolpuddle, Navitas Bay and Slyers Lane are passed there will be a cumulative 'turbine corridor' effect on the landscape which may lead to withdrawal of UNESCO world heritage status to the Jurassic Coast which will severely affect Dorset's tourist economy.

4. HERITAGE.

Within Winterborne Whitechurch St Marys Church is a grade 1 listed building and there are 22 grade 2 listed buildings. There are many local Heritage sites nearby, seven other Grade 1 listed buildings within three miles of the village and the Winterborne Whitechurch conservation area is on the East Farm boundary. We have no doubt that the settings and visual appreciation of our heritage assets will be adversely affected by wind turbines. This will result in reduced tourism and seriously threaten the local economy and viability of existing local businesses

The Winterborne Valley has been occupied and farmed for thousands of years and approximately 500m from the proposed turbine site recent archeological excavation by Bournemouth University has uncovered a Roman villa, a rare Iron Age Banjo enclosure and a Bronze Age settlement. Appendix 13.4a Archeological and Historical background confirms through aerial photography and google earth images how rich the proposed wind turbine site and immediate surrounds are in crop marks which indicate ancient barrows, enclosures and ditches. Construction of the wind farm could have an adverse impact on likely archaeological remains at these sites. It is vital that local history of such significance is preserved for future generations.

5. TURBINE NOISE.

We do not consider that REG has adequately assessed or reported the potential effects of turbine noise and vibration during the day and particularly at night on the health of village residents. Bakker et al (2012) found stronger association of disturbed sleep and psychological distress with wind farm development in rural communities rather than in noisier areas.

The potential impact on egg production at the local egg packing plant could have a knock on effect on future employment levels.

The current guidance (ETSU-R-97) used has been shown to be unreliable and fails to protect those vulnerable against noise nuisance and noise induced health effects. We are particularly concerned about the possible effect on those residents who rely on hearing aids as there are several people on Blandford Hill whose quality of life could be severely affected by any interference to this essential equipment. There have been retrospective claims regarding noise particularly Low Frequency Noise and Amplitude Modulation (swishing and thumping noise) with out of court settlements.

There is an increasing amount of scientific evidence that proposes in rural areas a separation distance of 2km from nearest properties for turbines of height 100m or more to reduce adverse health effects.

Turbine hub height of approximately 100m means noise can be refracted (wind direction being a factor) and means inhabitants at some distance can experience adverse effects. Although REG state that the assessment extends to 2km from the turbines no mention is made of how the level of noise will be enhanced by wind direction and speed and whether noise levels could adversely affect dwellings on Dorchester Hill and the Park Home properties on Lady Bailey (bearing in mind these are not brick construction and any noise including vibration would be felt more than standard construction buildings).

6. ORNITHOLOGY/ECOLOGY

On the basis of the current assessment the potentially damaging effect of wind turbines in the construction, operational and decommissioning phases on birds and wildlife has been significantly underplayed.

The Ornithological assessment provided by REG identifies a large variety of birds living within, visiting and passing through the proposed turbine site. There are also three statutory sites with ornithological interest and two ornithological special protection areas within 20 km of proposed site. Many of the species (Skylark, Song Thrush, Fieldfare, Yellow Hammer, Corn Bunting, and House Sparrow) identified as nesting within the proposed turbine site are on the Red list of Birds of Conservation Concern (BoCC). The RSPB (Royal Society for the Protection of Birds) criteria for the Red List means that the continued existence of these birds is severely threatened. There are also many identified birds on the AMBER list.

For the Ornithological environmental statement REG has only consulted Natural England as no response has been received from the Dorset Wildlife Trust. Natural England could be considered biased in their opinion as the organisation is mainly funded by and is responsible to the Government Department for Environment, Food and Rural Affairs (DEFRA). The role of Natural England is 'to **support** the Government's wider strategic policies' i.e. renewable energy strategy.

The Parish Council therefore requests that to ensure a balanced opinion 'specialist' organisations such as the RSPB or British Trust for Ornithology and the Bat Conservation Trust are consulted on the turbine proposal before a planning decision is made.

7. GRID CONNECTION.

REG propose to lay high voltage power cables under the westbound A354 down Blandford Hill, along Rook Lane and Lower Street to connect to the National Grid at the sub-station in Winterborne Kingston. The lower part of this route is very prone to flooding and in extremely close proximity to village dwellings which raises serious health and safety concerns for our community.

A government report from the Science and Environment Department in 2012 - Underground Power Lines and Health - states 'as the human body is a hive of electrical activity there is scope for electric and magnetic fields of sufficient strength to have biological impacts'. There is longstanding scientific evidence that there may be an increased risk of childhood Leukemia from exposure to power frequency magnetic fields. The government report concludes by saying "Undergrounding of a line would reduce the level of EMFs (electrical magnetic fields) experienced, but high magnetic field levels may still occur immediately above the cable".

Taking into account that the A354 down Blandford Hill has no solid foundation, any disturbance to the chalk to create a 0.45 metre wide/deep trench will result in increased traffic noise being transmitted underground. Residents along this road have already experienced difficulties with grids and noise from service holes and in one case a year of visits has failed to rectify the problem.

Therefore, there would be a need for a complete resurface to avoid noise from grids, patches and ground disturbance.

8. TRAFFIC

Road safety could be severely compromised due to the visual distraction of the turbines especially at the dangerous A354/C6 junction to Winterborne Kingston. There have been several accidents at this spot including fatalities and serious injuries but many more smaller non injury shunts not mentioned in the REG report. The REG traffic survey does not provide a fair reflection of traffic in the area as it was carried out in January 2013 (21st to 27th) when due to weather conditions less traffic was using A354 locally. (On the 23rd January 2013 a Dorset Road Safe Campaign was held in the village which was affected in part by snow and poor weather). The local Community Speed Watch Campaign has recorded average traffic of 400 to 500 vehicles an hour during the summer period.

9. TELECOMMUNICATIONS AND TELEVISION

REG state in their assessment that the proposed wind turbines will have a ‘negligible’ effect on 2G, 3G and 4G coverage. Winterborne Whitechurch already receives less than satisfactory mobile phone reception and a ‘negligible’ effect may be enough to worsen reception negatively affecting not only residents but businesses also.

REG state that the effect of wind turbines on television reception will be only of ‘Minor adverse significance’. Ofcom guidance -Tall structures and their impact on broadcast and other wireless services - 2009 however, states the effects may be enhanced “particularly if the development is sited on much higher ground than the surrounding areas, as may happen with a wind farm. Reports have been received of reflection effects affecting broadcast television up to 20km from the structure”. They also add “Depending on the size of the structure, some locations could still lose reception completely”.

Detrimental effects due to wind turbines on telecommunications and television would be unacceptable to the village community.

In summary, Winterborne Whitechurch Parish Council urges North Dorset District Planning Officer and Planning Committee to heed the concerns of our community and protect our environment from this inappropriate development. North Dorset has contributed enough to the Dorset Onshore Renewable Energy target and the Blandford Hill Wind Farm is not required. To approve this planning application will result in a hugely detrimental effect not only upon the character of our historical landscape but the lives and wellbeing of many residents and therefore planning permission should be refused.

Yours sincerely

Rob Turley

Clerk to Winterborne Whitechurch Parish Council