

PROPOSED WINDFARM AT SPRING FARM RIDGE, HELMDON/GREATWORTH,
NORTHAMPTONSHIRE (SOUTH NORTHANTS COUNCIL PLANNING APPLICATION
S/2010/1437/MAF)

PUBLIC INQUIRY INTO APPEAL AGAINST REFUSAL OF PLANNING PERMISSION

APP/Z2830/A/11/2165035

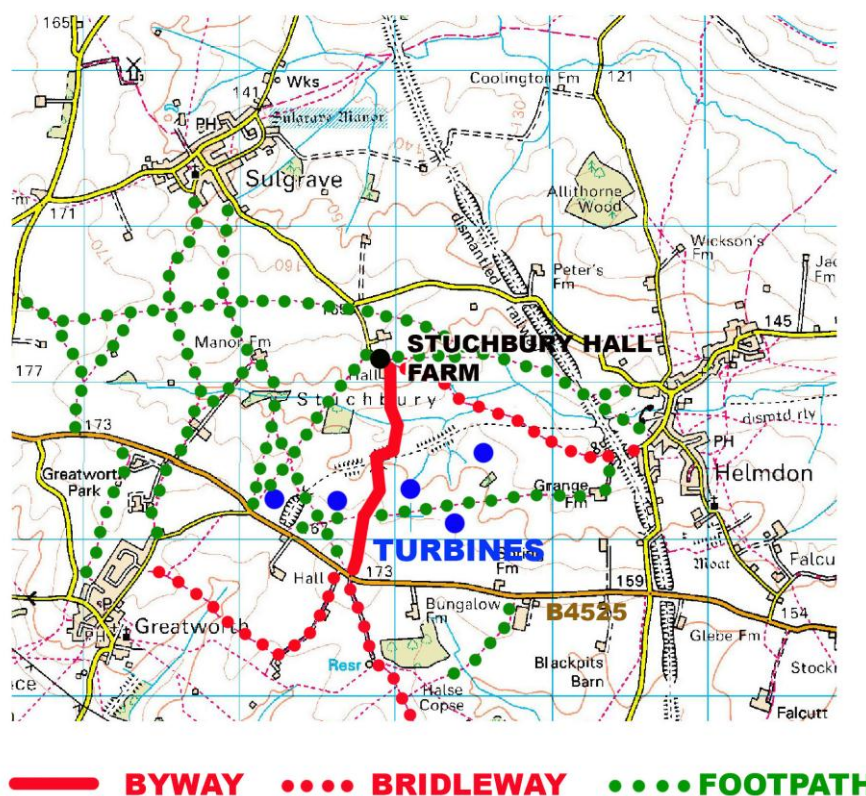
APPENDIX 2 TO STATEMENT BY COLIN WOOTTON

ON BEHALF OF

SULGRAVE PARISH COUNCIL

AN ASSESSMENT OF THE IMPLICATIONS FOR USERS OF LOCAL
BYWAYS, BRIDLEWAYS AND FOOTPATHS

A number of byways, bridleways and footpaths used by Sulgrave parishioners would be affected by the proposed development, as shown on the map below:



The implications of the proposed wind turbines for users of these public rights of way are considered under two headings:

1. Byways and Bridleways.

The section of byway leading from Stuchbury Hall Farm to the B4525 is part of a direct public right of way from Sulgrave southwards to Brackley. The bridleway leading from Stuchbury Hall Farm to Helmdon is part of a direct public right of way between that village and Sulgrave.

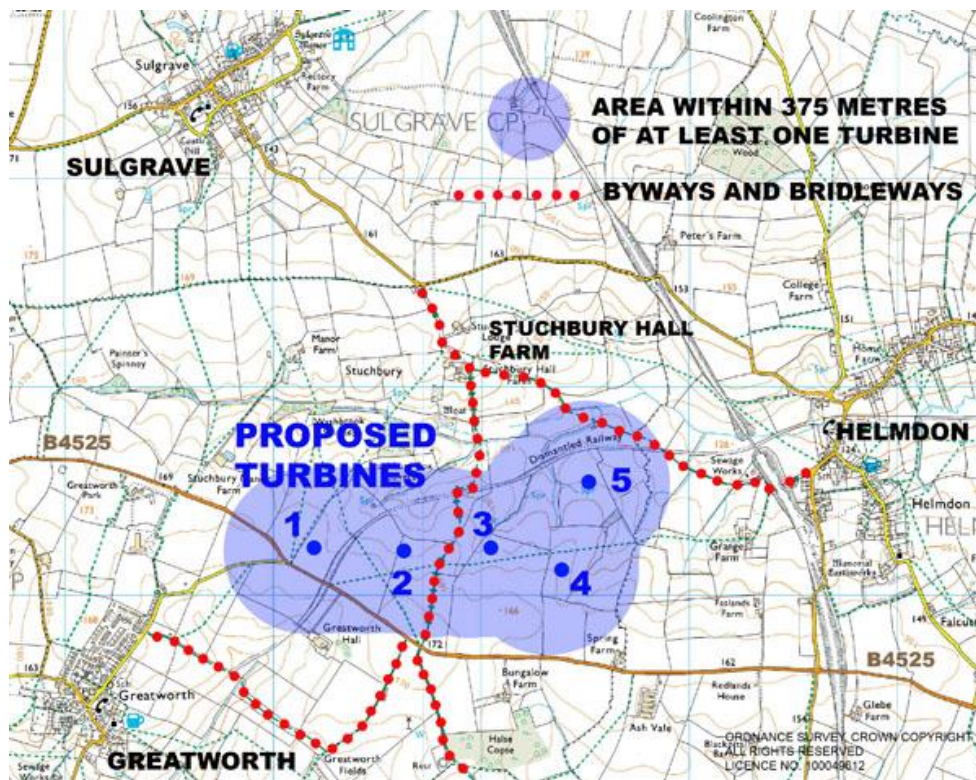
These ancient rights of way are open to horse riders and off road cyclists as well as pedestrians.

If there is one thing which defines Sulgrave and most of the surrounding villages, it is the large, thriving and increasing horse population. This is no accident, the area is a mecca of attractive, safe, off-road riding routes, some of them public bridleways and others the result of a generous welcome by local landowners over many years. Advice from the British Horse Society regarding the siting of wind turbines is as follows:

As a starting point when assessing a site and its potential layout a separation distance of four times the overall height would be the target for National Trails and Ride UK routes as these are likely to be used by equestrians unfamiliar with turbines. A distance of three times overall height for all other routes, including roads, with the 200m recommended in the Technical Guidance to PPS22 being seen as the minimum where it is shown in a particular case that this would be acceptable.

The turbines proposed for the Spring Farm Ridge project would be 410 feet high or 125 metres. Thus a separation distance of three times their height would be 375 metres.

The map below shows the area with the proposed sites for the turbines marked as blue dots. The area of land which would be within 375 metres of a turbine is shaded blue.



It will be seen that over half of the distance of the byway leading south from Stuchbury Hall Farm would be within 375 metres of at least two turbines. Indeed anyone riding along this byway would be passing between two turbines, each of them within 200 metres. At a distance of 326 metres, the central section of the bridleway from Stuchbury Hall Farm to Helmdon would also be within 375 metres of a turbine.

The particular issues cited by the BHS which are likely to alarm horses are:

- Moving blade shadows on the ground (probably the most important issue)

- Movement in the landscape, particularly if sudden or unexpected.
- Noise, either from the mechanism or from wind on the blades
- Blade flicker and strobing in sunlight.

All of these effects would at various times be experienced to a very high degree by riders using the byway and bridleway. The southerly, easterly and westerly locations of the turbines relative to the routes would render blade shadows, flicker and strobing particularly problematic.

In its "Highways and Windfarms Good Practice Guide" the Highways Agency states: *"Wind turbulence generated by a wind turbine may affect road users where a wind turbine is located close to where non-motorised users are travelling. Whilst wind turbines are generally located in windy locations the amount of turbulence caused by the presence of the wind turbine may pose a hazard. The distance over which the turbulence of a turbine can be felt (its wake) can be up to three times the rotor diameter in distance. Therefore care should be taken when locating turbines near to where non-motorised users are travelling."*

The rotor diameter of the proposed turbines would be 90 metres and thus the Highways Agency considers that non-motorised travellers within 270 metres of them could be at risk from turbulence. As we have seen, two of the turbines would be within 200 metres of the byway used by non-motorised travellers on foot, horseback or bicycle.

It can be seen that the use of these routes by horse riders would become so potentially dangerous as to render them unusable.

Whilst the steeds of the increasing number of offroad cyclists who use these byways and bridleways may be less inclined to shy than those of the horse riders, the riders' enjoyment of the peace and quiet of the countryside would be equally compromised.

The only mitigating factor to these unpleasant and potentially dangerous effects which the applicant sets out in the planning application is that: *"...the landscape of the site is relatively flat and open, and as such users of the public rights of way within and in close proximity to the proposed development, and specifically equestrian users, will not experience unexpected views of operational turbines."*

2. Footpaths

Several footpaths across the proposed windfarm site link Sulgrave with the villages of Helmdon and Greatworth. Whilst the original importance of these as direct and regular routes for pedestrians between villages has declined their use for recreational purposes in an unspoilt countryside environment has hugely increased over recent years, both for residents and visitors. In its section on "Village Walks", Sulgrave Village Website summarises this situation as follows:

There are many opportunities for walking in the parish, both on quiet roads and via an excellent and generally well-maintained network of footpaths. Gates and stiles are mainly in good condition and several have recently been renewed to a high standard by the Northamptonshire County Council. There are waymarking arrows and fingerposts where necessary. This is a gently undulating pastoral landscape and there are some surprisingly distant views to savour. Far from any main roads, the walks here can be enjoyed in a silence which is sometimes almost profound.

The website also details many of the group walks enjoyed by villagers, organised by the Parish Footpath Warden. Additionally, as part of the national "Walking - The Way to Health" initiative by Natural England, the British Heart Foundation and local partners, South Northamptonshire Council has led the development of walking groups in this area. The aim is to promote free, easy-to-join schemes to encourage people to walk safely in their local areas for the benefit of their health. Helmdon, Greatworth and Sulgrave are just three of over 500 communities offering regular walks led by trained volunteers.

I have had a brief opportunity to view the proofs of evidence of Mr Stevenson on behalf of the appellant and Mr Hall on behalf of the local planning authority and would point out the following inconsistencies in the distances between footpaths and the nearest proposed turbine.

	Mr Stevenson	Mr Hall
Turbine 1	120m	84.2m
Turbine 2	90m	75.5m
Turbine 3	60m	41m
Turbine 4	80m	95.6m
Turbine 5	340m	330m

I am a Chartered Surveyor (retired) and possess an up-to-date gps instrument capable of accuracies of up to a metre or so. In using this on the footpaths in question, with waypoints entered from the appellants' latest turbine location grid references, I can confirm that Mr Hall's calculations are correct.

The Environmental Statement accompanying the planning application states:

"PPS22 identifies that fall over distance is usually the accepted separation distance from public rights of way. The proposed development will be compliant with this requirement."

The fall over distance of 125 metres from public rights of way was therefore clearly considered to be an important criterion a) in deeming the site to be appropriate for a wind farm during the site selection process and b) in the iterative process of determining the final locations of the turbines.

The Further Environmental Evidence submitted to South Northants Council in February 2012 states:

"Micro-siting of four of the proposed wind turbines has led to small amendments to the separation distances achieved from Public Rights of Way (PRoW) within and in close proximity to the site. Of the two turbines that the ES identified as being within the separation distances from bridleways advocated by PPS22, Turbine 3 has been relocated approximately 5m further away from the Byway Open to All Traffic that passes through the site and Turbine 1 has moved approximately 25m to the east which increase the separation distance achieved from the B4525 by approximately 15m. Turbine 5 has been micro-sited by the greatest distance (approximately 44m) but remains well beyond the separation distances sought from PRoW. The assessment of impacts, given the minor nature of changes to the proposed development, remains unchanged. Please refer to Chapter 17 of the ES."

Clearly, therefore, the 125 metre separation distance from footpaths remained as a criterion as suggested in the statement that turbine 5 *"....remains well beyond the separation distances sought from PRoW"* and *"Please refer to Chapter 17 of the ES"*.

The FEI statement notes that Turbine 3 has been relocated approximately 5 metres further away from the byway but fails to mention that it would now be within 41 metres of a footpath.

In adding the additional constraints imposed on the site by the need to avoid bat habitats it was clearly no longer possible to respect the stated criterion of "being compliant" with fall over distance. Surely the inevitable conclusion should have been that the site was too constrained to meet the various conflicting criteria and the company's search for suitable locations for renewable energy projects should have been directed elsewhere.

In fact, the planning application was submitted with no indication that "fall over as an accepted separation distance" had been abandoned and the council and those responding to the application were surely entitled to conclude that the final locations were in fact compliant with it.

I note from Broadview’s proofs of evidence prepared for this inquiry that there is nowhere any mention of “fall over” distance.

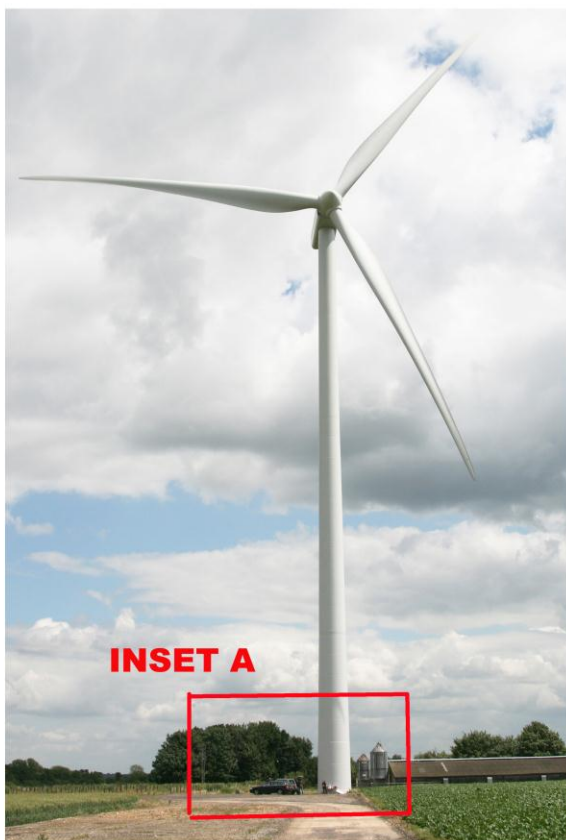
There is, however, a reference to “oversail distance” in Mr Bell’s proof of evidence, as follows:

“I have referred to the fact that no turbine would oversail a RoW. The Companion Guide (paragraph 57) confirms that there is no statutory separation distance between a wind turbine and a RoW and that the minimum distance is often taken to be that the turbine blades should not oversail a route.”

Firstly, this seems to indicate that the iterative design process was less about respecting identified criteria and more about finding new criteria which could more easily be met. Secondly, as can be seen from Richard Hall’s evidence in respect of rights of way, one turbine would in fact be within oversail distance so that even the “new” criteria cannot be met.

I accept that there is no statutory separation distance between turbines and rights of way. However, many planning decisions are made in respect of how well a proposal is deemed to meet generally accepted guidance rather than statute. Clearly in this instance it has been impossible for the appellant to arrive at any turbine layout that meets the generally accepted guidance and this fact must weigh heavily against the proposal in the decision which has to be made in respect of this appeal.

The following photograph gives an indication of the size of the turbines relative to pedestrians walking amongst them on footpaths at these sorts of distances:



WIND TURBINE AT SWAFFHAM, NORFOLK

125m from ground level to tip of blade in an upright position

INSET A



It is submitted that this experience would be the very opposite of that sought by villagers and visitors looking for quiet recreation in unspoilt countryside. At 41 metres distance the 45 metre long blades would oversail the footpath, there would be more or less constant and unnaturally rhythmical loud wind noise with blade flicker and strobe effects in sunlight coupled with air turbulence.

For Sulgrave pedestrians heading southwards, their views would be completely dominated by the turbines as can be seen from this photo montage from a viewpoint on the east-west footpath along the southernmost parish boundary:



The red dot indicates the top of the already erected meteorological mast.

For most people these effects would render the use of the ancient rights of way extremely unattractive.

CONCLUSIONS

Even if the five 125 metre high turbines proposed in this application were at more than the generally accepted minimum distance from byways, bridleways and footpaths, the visual impact on the users of rights of way between the villages of Sulgrave, Helmdon and Greatworth would be such as totally to undermine their enjoyment of the presently quiet and unspoilt countryside – for the majority of them, the very reason for their presence.

The fact that most of the turbines would be closer than the generally accepted minimum distances would not only amplify this visual effect but also further devalue the countryside experience by the addition of noise, blade flicker and turbulence.

It is submitted that these combined effects would render the use of considerable lengths of these ancient rights of way at best unpleasant and at worst potentially dangerous. This would constitute a significant loss of amenity to both villagers and the many visitors to the area.

Colin S Wootton MRICS MRTPI (Rtd)

28.04.2012