

SELLINDGE PARISH COUNCIL COMMENTS ON :

HARRINGE BROOKS WINDFARM APPLICATION Y12 / 0451 / SH

Sellindge Parish Council (S.P.C.) STRONGLY OBJECTS to this application.

S.P.C. finds the application flawed in many points.

ONGOING MATTERS

- 1 With a Bill going through Parliament at present to set minimum distances for wind turbines from residential properties, is the applicant trying to push the application through fast? If the Bill is enacted on, these wind turbines would not be allowed due to them being too close – *House of Lords Bill 'To make provision for a minimum distance between wind turbines and residential properties according to the size of wind turbines and for connected purposes. – Where under section 2.4 (c) Greater than 100m (high) but does not exceed 150m (high), the minimum distance requirement is 2000m.* This would mean that due to the height of the proposed wind turbines none would be allowed.
Would it not be irresponsible to allow this application to go ahead at this present moment in time.
- 2 The proposed Lydd Airport application is another reason why this application should not be considered at this moment in time. The Lydd Airport application is of important social and economic importance to Shepway, providing long lasting jobs for Shepway people, which the wind turbines does not.
The result of the Public inquiry is due very soon, hence the Parish Council feel that this application should not be allowed to go ahead at this moment in time.

PLANNING STATEMENT

- 1 In paragraph 4 *'The site of the proposed Wind Park has been selected to minimise, and where possible, avoid potential adverse impacts on the environment and local Communities Furthermore, the layout and design of the proposed Wind Park has been chosen to provide the best fit within the landscape, taking advantage of the existing topography and screening available..... the proposed Wind Park will not result in any unacceptable impacts on environmental resources and communities'.*

S.P.C. COMMENT (1) Do not see how six wind turbines of 125m (410ft) on a hill that is approx 80ft higher than the Village of Sellindge NOT HAVE ADVERSE IMPACTS ON THE COMMUNITY.

S.P.C. COMMENT (2) The vast majority of the screening is of trees that lose their leaves in Autumn

S.P.C. COMMENT (3) The cumulative affect of six wind turbines of 125m would have an MAJOR ADVERSE VISUAL IMPACT affect on the communities of Sellindge and Court – at - Street.
- 2 Paragraph 12. *The HB WP will generate a number of construction jobs over a period of up to 9 months. Although Ecotricity will maximise the use of local contractors where possible, the ultimate responsibility for employment will be with the contractor.*

S.P.C. COMMENT (4) Very short term employment, plus how many local contractors have the required experience to take on such a job.

- 3 Paragraph 24. *ensuring the physical and natural environment of the South East is conserved and enhanced*

S.P.C. COMMENT (5). A windfarm with six wind turbines at this site would not ensure the physical and natural environment of the South East is conserved and enhanced.

ensuring that the South East is prepared for the inevitable impacts of climate change achieving safe, secure and socially inclusive communities across the region, and ensuring that the most deprived people also have an equal opportunity to benefit from and contribute to a better quality of life”.

S.P.C. COMMENT (6). Building a wind farm at this site, where the underground aquifer must be quite near the surface, due to the number of spring in Harringe Brooks wood, would not help against the effects of climate change, as the aquifer could well be a source of drinking water in the future

- 4 In paragraph 28 Policy NRM 16 is quoted.

i *The potential to integrate the proposal with existing or new development*

S.P.C. COMMENT (7) You cannot integrate this type of development with existing development when the village is old

li *The potential benefits to host communities and opportunities for environmental enhancement*

S.P.C. COMMENT (8) Six wind turbines of 125m high and on a hill will not enhance the environment.

- 5 29. Paragraphs 9.102 and 9.103 of the South East Regional Plan in relation to **Policy NRM16** state that proposals “*should be considered on their individual merits with regard to scale, location, technology type and cumulative impact*”

S.P.C. COMMENT (9) The scale in size / height and the cumulative impact of the application at this location would be a major adverse impact on Sellindge and Court – at – Street and an adverse impact on the wider location.

- 6 30. The Shepway Local Plan First Review was adopted in 2006. **Policy SD1: Sustainability** ng: ‘*Preserve and enhance built and cultural heritage including Listed Buildings and their settings, conservation areas, sites and settings of nationally and locally important ancient monuments and archaeological sites, historic parks and gardens and, historic landscape*

S.P.C. COMMENT (10) Impact on listed building and other buildings of age in Sellindge as a whole, which maybe not listed but are in the Parish Councils view of equal importance will be severely impacted visually due the height of the wind turbines.

Protect and enhance areas of countryside that are of special quality, particularly the Kent Downs Area of Outstanding Natural Beauty, Special Landscape Areas, Local Landscape Areas, Heritage Coast and undeveloped coast, ancient woodlands and, the best and most versatile agricultural land. Sustain the character and diversity of the wider countryside in general.

S.P.C. COMMENT (11) Due to the location and height of the proposed wind turbines there will be unacceptable extreme visual impact on the Kent Downs Area of Outstanding Natural Beauty to the North, East and South the same can be said for the North Downs Special Landscape Area to the South, East and North. Even the Kent Downs Area of Outstanding Natural Beauty to the North West will be adversely affected.

Protect and enhance designated or proposed sites of international, national, countrywide and local wildlife importance and plant or animal life protected by law. Maintain the District's overall stock of nature conservation resources.

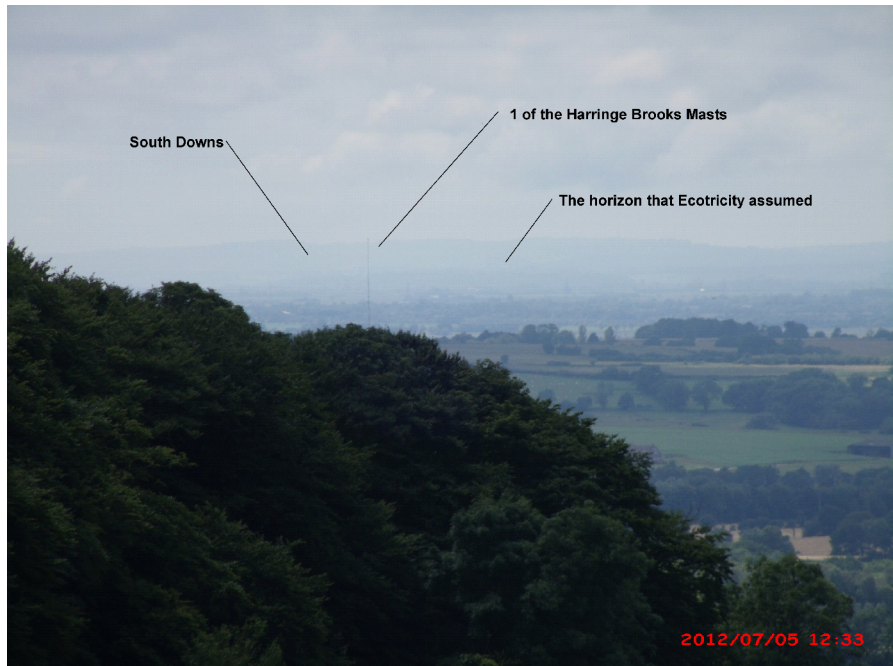
S.P.C. COMMENT(12). Having the application so near the ancient wood of Harringe Brooks is bound to have some impact on the local wildlife. The close location of Port Lympe Wildlife park is also of grave concern

Safeguard and enhance the amenity of residents'

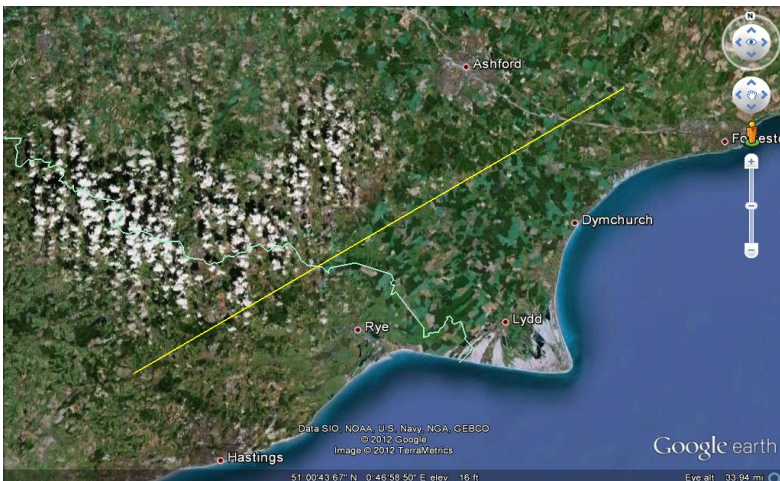
S.P.C. COMMENT (13) The main amenity is walking the various footpaths in this area and visiting the Port Lympe Wildlife Park. The most popular being able to sit and relax in the garden with a nice view. Therefore the amenity is not safeguarded and in no way enhanced. Another amenity used by local people and in fact very popular with tourist is Farthing Common, on the North Downs. The wind turbines will have a major adverse impact on the view from this point. The Ecotricity pictures from the North Downs are flawed, as they were not taken on a very clear day and show a false horizon.



← Extract from fig 5.12 viewpoint 13 Farthing Common shows the wind turbines above the horizon. The same can be said for 5.12 viewpoint 15 Cobbs Hill, 5.12 viewpoint 17 Tolsford Hill and especially 5.12 viewpoint 18 Brabourne Down.



This photo shows → that on a clearer day the South Downs can be seen. The top of the Harringe Brooks mast is on the horizon, which would mean the wind turbines would have a major adverse impact on this popular tourist viewpoint.



← Google Earth image of the viewpoint from Farthing Common

S.P.C. COMMENT (14) Due to the height of the ground where the turbines will be placed, turbine 6 is approx 366ft above sea level + turbine height of 410ft = 776ft, compared with the height of Farthing Common 604ft means the tip of the wind turbine when pointing straight up will be 172ft higher than Farthing Common.

- 7 Paragraph 31. The policy states that if development proposals significantly conflict with one or more of the environmental criteria listed, they will only be permitted where it can be shown that:-
'There is an overriding economic or social need.'
- S.P.C. COMMENT (15)** The Social and Economic need to Shepway off the Lydd Airport application could well be an overriding need.
- Negative impacts are minimised as far as possible, and Measures will be taken to compensate for the adverse environmental effect. Compensatory measures should, as a minimum, ensure that no net environmental loss occurs'.*
- S.P.C. COMMENT (16)** Due to the height of the wind turbines and the number, I cannot see how the negative visual impact can be minimised to the Kent Downs Area of Outstanding Natural Beauty to the North, East and South, North Downs Special Landscape Area to the South, East and North, Barrow Hill and Sellindge, Stanford to the North and Lympe to the East.
- 8 Paragraph 32. It could be considered that because the proposed wind park is in close proximity to the AONB, this policy is not complied with in part i.e. *'protect and enhance areas of countryside that are of special quality, particularly the Kent Downs AONB'*. However, proximity and visibility alone from the AONB does not automatically lead to deterioration in the special qualities of the AONB. The landscape assessment has determined that the impacts arising from the development relate to the wider context of the AONB and its relationship in the wider landscape. However, even if there is any doubt on the impact on the AONB the policy then further clarifies the position by stating that development **will** be permitted under certain circumstances, even if there is a conflict with one or more of the environmental criteria. As this application will deliver significant benefits in the form of green generation and given the weight this is afforded in national, regional and local policy it is considered that this development complies with this policy.
- S.P.C. COMMENT (17)** Due to the height of the wind turbines the visual impact to the Kent Downs Area of Outstanding Natural Beauty to the North popular view points of Farthing Common, Brabourne Downs, Cobbs Hill and Tolsford Hill will be extreme. With the wind turbines being so high, they will be above the horizon and detract the view, in the way that they will catch your eye.
- S.P.C. COMMENT (18)** It is also noted that they will cause a visual impact on a much large area, with them being very visible to the popular viewpoints on Wye Crown, near Ashford and Create Road East and Create Road West at Folkestone.
- 9 Paragraph 34. This is a positive policy which states that planning permission will be granted for development that encourages the use of renewable sources of energy and reduces fossil fuel consumption, subject to a number of criteria as follows:-
'No prominent or large-scale development will be permitted in the AONB.
No unacceptable impact on the landscape, nature conservation, built environment or amenity interest.
- S.P.C. COMMENT (19).** The pictures prove that there will be extreme visual impact on the landscape from Kent Downs Area of Outstanding Natural Beauty to the North, East and South, North Downs Special Landscape Area to the South, East and North, Barrow Hill and Sellindge, Stanford to the North and Lympe to the East.
- 10 35. The policy also outlines the following matters to be included in the assessment of proposed renewable energy developments:
- *The number, size and siting of plant, buildings, equipment, access roads and ancillary development, such as roads and overhead cables;*

S.P.C. COMMENT (20) Due to the height and number of wind turbines, there will be a cumulative visual impact and a overbearing impact on Sellindge especially Barrow Hill to the North and Court at Street to the South.

- **Proximity to residential development and roads**

S.P.C. COMMENT (21) The proximity to development at Barrow Hill is by far too close, and there are grave concerns as to the proximity to the M20

- *Effects on airfields, flight-paths and communications systems;*

S.P.C. COMMENT (22) There are various airfields identified in fig 3.1 of the Environment Statement, the Lydd Airport to the South, Water Farm, Near Brabourne in the North West and Pent Farm, near Postling in the North the later 2 are quite close, within approx 3 miles also the Kent Gliding Club at Challock.

S.P.C. COMMENT (23) For some reason there is no mention of the Harringe Lane Micro light airfield, Sellindge which also receives light aircraft and is within 200m of 1 of the proposed wind turbines.

S.P.C. COMMENT (24) There is also no mention of the MOD sites at Hythe and Lydd which have regular helicopter flights of a low level across the site.

- *Effects on nature conservation interests, including bird life and Sites of Scientific Interest.*

S.P.C. COMMENT (25) Having the application site so close to woodland must present a danger to birdlife.

- 11 Paragraph36. The Core Strategy is at a reasonably advanced stage, having been submitted to the Secretary of State for examination in January 2012. It therefore forms a material consideration. **The District's spatial strategy is outlined in Policy SS1 and it advises that the**

'spatial priority for new development in the 'North Downs Area' is within the strategic corridor (outside of the AONB and without material impact on its setting)'. This proposal lies within the strategic corridor.

S.P.C. COMMENT (26) Although it is within the Strategic Corridor, it has the Kent Downs Area of Outstanding Natural Beauty to the North, East and South and the North Downs Special Landscape Area to the South, East and North.

As Lympne Parish is part of the Kent Downs AONB, it could be said that 4 of the wind turbines is within the Kent Downs AONB

Local Guidance

- 12 Paragraph 40. The Adopted Local Plan approaches landscape and visual amenity through several different policies. **Policy CO1: Development in the Countryside** outlines the broad principles against which development proposals in the countryside will be assessed. It states that development will be permitted where proposals ...

'Maintain or enhance features of landscape, wildlife, historic, geological and agricultural importance, and the particular quality and character of the countryside;

S.P.C. COMMENT (27). This would neither maintain nor enhance the landscape

Demonstrate that they cannot be practicably located within an existing settlement and essentially require a countryside location... **Are acceptable in highway and infrastructure terms...**

S.P.C. COMMENT (28). Have grave concerns that the wind farm could be a distraction to drivers on M20

- 13 Paragraph 41. This policy goes on to state that
'development proposals that would significantly conflict with one or more of the criteria above will only be permitted where it can be shown that:-
There is an overriding social or economic need;
S.P.C. COMMENT (29). There is not enough overriding need.
Negative impacts are minimised as far as possible and;
S.P.C. COMMENT (30). Due to the height and cumulative effect don't see how this is possible
Adequate measures will be taken to compensate for any of the adverse environmental effect. Compensatory measures should, as a minimum, ensure that no net environmental loss occurs'.
S.P.C. COMMENT (31). The problem here is the Village of Sellindge including Barrow Hill which has the most extreme environmental impact. 4 of the turbines are in Lympe Parish with 2 in Sellindge Parish, although Sellindge has the vast amount of the problems !
- 14 Paragraph 43. *The proposed HB WP is outside the Special Landscape and Local Landscape Areas.*
S.P.C. COMMENT (32). Technically as Lympe Parish is within the AONB this statement is untrue.
- 15 Paragraph 44. Ancient woodland is specifically protected by **Policy CO7** which states that
'the Local Planning Authority will not permit development which would harm the nature conservation, landscape and scientific value of Ancient Woodland.
S.P.C. COMMENT (33). Don't see how having the wind turbines so close to ancient woodland, would not cause some problems
S.P.C. COMMENT (34). Harringe Brooks Wood is a designated Local Wildlife Site (SH07)
- 16 Paragraph 45. The site is bordered by Harringe Brooks Wood which is designated as ancient woodland. There will be no loss of trees associated with the proposed development. The wood will continue to form a feature within both the local landscape and in views towards the elevated land of the Aldington Ridge from the wider landscape to the north. Analysis of the wind park on the ecology of the woodland has concluded that the impact has been minimised with the addition of ecology enhancement which is likely to lead to an overall positive contribution.
S.P.C. COMMENT (35). Would think having 6 wind turbines would outweigh any ecology enhancements
- 17 Paragraph 47. The assessment identifies those special components of natural beauty which have the potential to be influenced by the proposed development. These include the landform of both the Kent Downs and Hythe Escarpment and the nature of views both into and out from these designated landscape, *as well as the qualities of tranquillity and remoteness.* From vantage points on the scarp tops of the Kent Downs, the turbines only occupy a small percentage of the horizontal field of view within wide, expansive views. Although the turbines will be visible on the skyline in these views and may result in significant visual effects from some locations, the nature and form of the turbines and their layout allows visual permeability and maintains the depth of the field of view.
S.P.C. COMMENT (36). How can having 6 wind turbines not deter from the qualities of tranquillity and remoteness.

- 18 Paragraph 50. In addition to assessing the effects of the proposed wind park upon views from the public realm, a Residential Visual Amenity Assessment has been undertaken in order to establish the likely significance of effects arising within 2km of the proposed turbines. The assessment focuses upon the potential magnitude of change to views, and the resulting significance. A number of properties surrounding the Site including individual farmsteads and dwellings and the settlements of Sellindge, Barrow Hill, Westenhanger, Newingreen, Lympne and Court-at-Street have the potential to experience significant effects on residential visual amenity due to their proximity, orientation and open views towards the proposed turbines.
- S.P.C. COMMENT (37).** A vast amount of Sellindge, Barrow Hill and Westenhanger would be extremely affected to the North and Court at Street and parts of Aldington to the South.
- S.P.C. COMMENT (38).** According to the survey Only 6 dwelling in Sellindge have a major visual impact and 52 have a moderate visual impact, these were due to be screened by trees. However the vast majority of these trees are trees like Ash which by the end of October (if not before) will be completely bare of leaves until May, meaning that during that period they would also have a major visual impact.
- S.P.C. COMMENT (39).** Only dwelling on the outskirts of the Village were considered, I know that they will be visible from Greenfields, as you can see the teat masts from there, also from Cock Ash, Monks Horton.
- 19 Paragraph 52. In summary, the ES assessment has concluded that the HB WP would cause a limited number of significant effects to the landscape character and to limited views within 2.5km of the application site. In the landscape beyond 2.5km it is considered that the effects on the landscape character and views would not be significant. It can therefore be concluded that the proposal is consistent with development plan policies, particularly as the policy provides for instances where developments can still be allowed even if there is a conflict with the environmental criteria identified. There is an overriding social need for the proposal, negative impacts have been minimised and adequate measures have been incorporated to compensate for any adverse environmental effects.
- S.P.C. COMMENT (40).** There will be significant effects to the landscape within 2.5km and as proved in the figures even winder a field, at Wye Crown over Ashford way and Crete Road East and West at Folkestone.

Natural Environment

- 20 Paragraph 65. The ponds identified in the Phase 1 survey were further assessed for Great Crested Newts. This confirmed that only two ponds which lie outside the developable area, supported a low population of county importance. There will be no turbines within 145m of the ponds known to be used by Great Crested Newts and no access tracks will be constructed within 30km of these ponds. There will be no loss or damage to the ponds. The track construction works will be carried out outside the time period when there is a high risk to great crested newts, and if it is considered likely there is a risk to them a licence will be sought for Natural England and further mitigation such as one way newt fencing will be erected.
- S.P.C. COMMENT (41).** The lake and large pond within Harringe Brooks Wood has a diverse wildlife there and must be protected.
- 21 Paragraph 68. Following a number of surveys, it was determined that the bat activity over the site was very low and no mitigation is necessary
- S.P.C. COMMENT (42).** Surprised this is said to be very low. Even though it may be low some sort of mitigation should be used. In fact after going through the ES, this statement is somewhat false, due to the way the Bat survey was carried out.

- 22 Paragraph 69. An Environmental Management Plan will be drawn up identifying key management policies. These will be implemented following construction of the turbines for the duration of the operational phase, which will include management of hedgerows, woodland, pond and areas of grassland on the site. The habitat on the site will be improved, specifically for birds but also to the benefit of other wildlife.

S.P.C. COMMENT (43). The e Parish Council would like to see the Environmental Management Plan before construction.

Cultural Heritage

- 23 Paragraph 78. In respect of direct effects, the EIA concluded that there are no direct impacts on known archaeological features although there is moderate potential for encountering as yet unidentified archaeological assets. Thus the assessment recommended an archaeological watching brief be undertaken on intrusive groundwork's.

S.P.C. COMMENT (44). One would have thought that as Otterpool Quarry, which is not very far away has SSSI status due to geological archaeological (fossils) there may be similar at this site.

- 24 Paragraph 79. With regard to indirect effects, the EIA concludes that the moderate impact on Westenhanger Castle could be capable of being considered to be a significant impact within the EIA definition, and this could be divided into two if the barns and Westenhanger Manor are considered separately, although in reality the buildings form part of a single monument as has been recognised in the scheduling. The impact on Otterpool Manor (Grade II) has also been assessed as significant. The remaining minor impacts on all other cultural heritage assets that been assessed are not significant. The Environmental Statement concluded that no specific mitigation was required with regard to cultural heritage features.

S.P.C. COMMENT (45). The Parish Council considers the visual impact on all properties is of extreme importance and we cannot see anyway that mitigation can address the matter.

S.P.C. COMMENT (46). Is not Harringe Court a Grade 11 listed building ?

- 25 Paragraph 80. The design of the development has carefully considered the potential impact on archaeology, built environment and the historic landscape. The process has been iterative with the intention, of through design, to mitigate the impact this development has on these features. The reversible nature of this development mitigates any impact even further therefore both of these policies are complied with.

S.P.C. COMMENT (47). The Parish Council does not agree that having 6 extremely high wind turbines causing an extreme visual impact can be mitigated by the fact that they may be demolished in 25 years time.

Noise

- 26 Paragraph 91. Following a baseline assessment of background noise at residential properties around the proposed Harringe Brooks WP, the predicted noise from operation of the proposed wind park would comply with the requirements of ETSU-R-97 at all residential locations. As the noise assessment finds that the ETSU-R-97 requirements are met, there will be no adverse noise impact that arises from the development.

S.P.C. COMMENT (48). Noise may not be a problem during the day, but there are concerns about during the night. Sellindge already suffers from the harmonics from the converter station to the East of the Village. There are other concerns with noise which is dealt with later.

Access

- 27 Paragraph 97. Chapter 12 of the ES also assessed the access route in terms of its suitability to accommodate the delivery of the turbine components. Potential pinch points for the abnormal loads were identified and assessed using appropriate software. These swept path analysis plans identified that the turbines components can be delivered to site with only the temporary removal of some street furniture including street signs and lights. The access onto site will require some alteration to the existing access point onto Otterpool Manor but these alterations will be done within the land ownership boundary.

S.P.C. COMMENT (49). Sellindge Parish Council insists that if the application is passed, all construction vehicles use the M20 junction 11, then A20 to access the site, this should include concrete lorries etc.

S.P.C. COMMENT (50). Sellindge Parish Council insists that if the application is passed, after construction all street furniture, street signs etc are erected as soon as possible.

Aviation

- 28 Paragraph 101. As part of the pre application assessment, including scoping consultation, Ecotricity requested comments on the proposal from aviation bodies. Their responses can be found in Chapter 2 Environmental Impact Assessment. Lydd Airport raised some concerns based upon their potential future expansion plans proposed at the airport. **These include a runway extension for the installation of Radar.** An application for the redevelopment was submitted to Shepway District Council and was approved. However, this application has been subject to a Public Inquiry and the proposal is still being considered by the Planning Inspectorate. **The concerns expressed by Lydd Airport relates to the proposed installation of the radar station which will only be installed if the runway extension is granted permission and is implemented.** Consequently without the proposed expansion, the impact upon Lydd Airport is negligible.

S.P.C. COMMENT (51). The proposed Lydd Airport application is another reason why this application should not be considered at this moment in time. The Lydd Airport application is of important social and economic importance to Shepway, providing long lasting jobs for Shepway, which the wind turbines does not.

- 29 Paragraph 102. Pent Farm Airstrip, Kent Microlight Club and the Defence Estates provided no objection to the proposal following consultation. Manston Airport provided some comment on the proposal during the scoping stage. However the CAA did not request they be consulted as they are outside of the 30km consultation zone as recommended within aviation guidance. Given the distance from the site to the airport, the impact is considered to be negligible.

S.P.C. COMMENT (52). As mentioned before there is no mention of the Kent Microlight Club (Harringe Court Airstrip) which also has light aircraft using it and Defence Estates at Hythe and Lydd at fig 3.1 of the Environment assessment. Did they reply saying no objection or did they not reply ?

S.P.C. COMMENT (53). Sellindge Parish Council is gravely concerned on the close proximity of the Harringe Court Airstrip and the regular low flying of defence helicopters.

Shadow Flicker

- 30 Paragraph 103. The Environmental Statement also considers the potential for shadow flicker effects from the HB WP. A shadow flicker assessment shows that assuming a worst case scenario, **a total of 51 properties could experience shadow flicker effects**. The ES proposes a procedure, which the Local Planning Authority could secure by way of a planning condition, to be followed to ensure that these effects do not cause a nuisance at those properties. There is no local or regional policy which relates to this potential effect. Such mitigation has been demonstrated to be effective at a number of UK wind turbine sites, including the Ecotech Turbine in Norfolk.

S.P.C. COMMENT (54). Sellindge Parish Council finds that 51 properties is an extreme amount. In fact the statement is somewhat false see EA section later in this report.

ENVIRONMENT IMPACT ASSESSMENT

31 APPENDIX 2.1: PRE SCOPING CONSULTATION RESPONSES

S.P.C. COMMENT (55). All the pre scoping consultation letters refer to Burches Rough, which caused the Parish Council confused at the start. There does not seem to be letter clarifying the matter.

S.P.C. COMMENT (56). There does not seem to any mention of Sky satellite, would have thought with structures of this height there could be possible problems

S.P.C. COMMENT (57). The Defence Estates response in relation to an application for 14 wind turbines !!!!

APPENDIX 2.2: SCOPING REQUEST

32 8.8 In turn, this level of wind generation would help tackle climate change by preventing the release of 14,000 tonnes of carbon dioxide per annum, the main greenhouse gas². In addition to supplanting CO₂ emissions, the attendant emissions of sulphur dioxide (SO₂) and nitrogen oxides (NO_x) from fossil fuel consumption, are also reduced.

S.P.C. COMMENT (58). As all wind turbines are made overseas, the CO₂ emissions saved will be greatly decreased with all the transport CO₂ emissions.

33 8.69 It is worth highlighting paragraph 20 of PPS22 which states:
"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, and that these impacts may be temporary if conditions are attached to planning permissions which require the future de-commissioning of turbines."

S.P.C. COMMENT (59). The notion that 25 YEARS is temporary is totally unacceptable.

APPENDIX 2.3: SCOPING RESPOSES

S.P.C. COMMENT (60). It is noted that Shepway highlight various flaws in the Scoping report, including no alternative sites

S.P.C. COMMENT (61). It is noted that Lydd Airport oppose due to the wind farm causing problems with future radar installations needed, for the complete safe running of their airport should they get permission to extend their runway

S.P.C. COMMENT (62). Kent Downs AONB state that the 'site lies within the setting of the Kent Downs AONB' and refer to the matter for a need to have alternative sites

S.P.C. COMMENT (63). Kent Wildlife Trust and Natural England both have concerns on the scope of the EA

S.P.C. COMMENT (64). In a memorandum from Shepway, in paragraph 6 on noise, they say that '... can always be dependant on wind direction could be influenced from noise associated with the railway line and the motorway.' The Parish Council totally agree with this. It also goes on to mention that the wind farm on the Romney Marsh cannot be compared to the application as the landscape is totally different.

APPENDIX 2.4: POST SCOPING CONSULTATION

34 In a letter from Natural England dated March 12 2012, they ask that Bat detectors be put on the monitoring masts.

S.P.C. COMMENT (65). Although Natural England has asked for remote Bat detectors surveys around the masts, this has not been carried out. Kent Wildlife Trust also mentioned this.

S.P.C. COMMENT (66). The Parish Council notes that Folkestone Racecourse has concerns on the visual perspective of the wind turbines.

APPENDIX 5.1 Landscape Evaluation Criteria

S.P.C. COMMENT (67). The Parish Council is concerned as to where appendixes 3 and 4 are?

35 Landscape Evaluation Criteria (1) Scale.

A large scale landscape, such as extensive rolling uplands or expansive plains, where the turbines are in proportion with the landscape, is likely to have greater capacity for wind energy development than a small scale landscape where turbines can appear to dominate.

S.P.C. COMMENT (68). The site is a small scale landscape and therefore the wind turbines especially of this size will dominate. The site does not fulfil this criteria.

36 Landscape Evaluation Criteria (2) Landform.

Landform that is smooth and convex, or flat and uniform will generally have greater capacity for wind energy development than dramatic or rugged landform. This is because the former types of landform tend to be less prominent and less distinctive in character.

S.P.C. COMMENT (69). The site is not on anywhere near flat ground there is a 90ft difference in height of ground between bottom Barrow Hill approx 210ft above sea level and wind turbine 6 which is approx 300ft above sea level. The site does not fulfil this criteria.

37 Landscape Evaluation Criteria (3) Landcover.

Simple, regular, uncluttered landscapes with sweeping lines and extensive areas of consistent ground cover are likely to have higher capacity for wind energy development than areas with more complex, irregular or intimate landscape patterns (for example ancient, irregular field systems).

S.P.C. COMMENT (70). Although there are large arable fields, having Harringe Brooks wood, Spring Wood and Park Wood in close proximity, mean that the site does not fulfil this criteria.

38 Landscape Evaluation Criteria (4) Human Influence.

A high degree of human influence on the landscape will generally mean that it has greater capacity to accommodate wind energy development. Turbines are likely to be less conspicuous in brownfield or industrial landscapes already affected by built structures such as masts, pylons or chimneys, provided there are no visual conflicts where the structures are seen in close proximity. Commercial forestry also introduces a human influence to upland landscapes and so will generally have higher capacity.

S.P.C. COMMENT (71). The site is neither brown field or industrial, although there are pylons, with the wind turbines being twice the height, therefore the site does not fulfil this criteria.

39 Landscape Evaluation Criteria (5) Skylines and Settings.

Landscapes that do not form a distinctive backdrop or context tend to have greater capacity for wind energy development than those with strong visual features and focal points such as hilltop monuments, church spires or designed landscape features, which may form important skylines, landmarks or settings for settlements.

S.P.C. COMMENT (72). The site is actually on the Aldington ridge which is an important backdrop to Sellindge, with Harringe Brooks Wood being a distinctive focal point. Therefore the site does not fulfil this criteria

40 Landscape Evaluation Criteria (6) Visibility and Views.

Landscapes that are visually contained by topography, trees or woodlands and hence have limited inward and outward views will have greater capacity than areas with extensive inward and outward views. Such features may give screening for the lower parts of turbines and for associated access and infrastructure. Extensive close or middle range views from scenic routes, well-known vistas or tourist viewpoints will decrease a landscape's capacity for wind energy development.

S.P.C. COMMENT (73). Any screening is from deciduous trees which of course lose all their leaves by October until May so there will only be minor screening for about 5 months of the year to the close extensive views of Sellindge and Court – at – Street. Extensive middle range views from the North Downs will be evident throughout the year and could well have an impact on tourist viewpoints like Farthing Common and Brabourne Down. Therefore the site does not fulfil this criteria.

41 Landscape Evaluation Criteria (7) Landscape Quality (condition).

Areas where the condition and integrity of landscape patterns, elements and features are relatively good will have less capacity for wind energy development than areas where condition is poor.

S.P.C. COMMENT (74). The area is of good landscape quality. Therefore the site does not fulfil this criteria.

42 Landscape Evaluation Criteria (8) Scenic Quality.

Scenic quality, that is visual appeal due to important views, visual interest and variety, contrasting landscape patterns, or dramatic topography, will generally decrease the capacity to accommodate wind energy development. Land of high scenic quality occurs within designated landscapes (World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts) but also elsewhere. The approaches to and settings of areas of high scenic quality will have reduced capacity where there is continuity of landscape character, quality and ecological interests extending outside the designated area.

S.P.C. COMMENT (75). As the site is so close to the Kent North Downs AONB to the North, East and South, the site will cause dramatic changes to the continuity of the landscape character and quality outside the designated area of the Kent North Downs AONB. Therefore the site does not fulfil this criteria.

43 Landscape Evaluation Criteria (9) Wildness and Tranquillity.

The presence of a relatively wild and/or tranquil character (due to remoteness, freedom from disturbance and factors such as openness and perceived naturalness) will reduce the capacity of a landscape to accommodate wind energy development. The introduction of wind turbines may alter perceptions of wildness and tranquillity, introducing movement, sound and light effects and possibly bringing a more industrial character.

S.P.C. COMMENT (76). According to map, the site may well be on part of the Greensand Ridge Natural Area. It is a fact that the view from the footpaths in the area and the Greensand Ridge trail does give a sense of tranquillity, and having wind turbines at this site would introduce an industrial character. Therefore the site does not fulfil this criteria.

44 Landscape Evaluation Criteria (10) Historic Environment.

The presence of sites and areas containing archaeological, historical or built environment features that are highly valued for their historic environment interest will decrease capacity for wind farms, particularly where these features may directly be affected by construction works and/or access tracks; or where enjoyment and the ability to interpret these features may be diminished.

S.P.C. COMMENT (77). Having Westenhanger Castle and Lympne Castle is such a close proximity is of concern. Also most of Barrow Hill has older dwelling dates back to the 1700's and some fine Victorian examples, although these are not grade 2 listed etc. are of great importance to the character of Barrow Hill. Therefore the site does not fulfil this criteria.

45 Landscape Evaluation Criteria (11) Cultural Associations.

Specific cultural (i.e. historical, folklore, literary or artistic) associations relating to the landscape may result in decreased capacity for wind energy development if the character or perceptions of the landscape concerned are likely to be significantly degraded.

S.P.C. COMMENT (78). There seems to have been a lot of historical activity, with Barrow Hill getting its name from the Iron Age Burial Barrows in the area. There is also signs of medieval activity to the South with the site of a medieval chapel, and village (now disappeared) not to far away and the site of a British Romano to the west. Could Harringe Brooks Wood have been an important water source. Therefore this site does not appear to fulfil this criteria.

46 Landscape Evaluation Criteria (12) Amenity and recreation.

Areas offering access to high quality landscapes, memorable places, special experiences and to a range of opportunities for open-air recreation will have less capacity for wind energy development due to potential effects on a site's accessibility and/or on the quality of the recreational experience enjoyed by the public.

S.P.C. COMMENT (79). Although there is only 1 footpath going through the site it is well used by people enjoying the unspoilt views over to the North Downs. The large lake at Harringe Brooks Wood is well stocked with fish, and people have fishing rights, and there is also boats. The Kent Microlight have there airstrip adjoining the site, and although they say there is no problem, it may well put people off using the airstrip. A model aircraft club also have their airstrip adjoining the site which may present problems, and put some people off.

Source: Natural England – 'Assessing the Environmental Capacity for On-Shore Wind Energy Development' – Consultation Draft (July 2009)

S.P.C. COMMENT (80). It's the Parish Councils view that none of the criteria can said be fulfilled.

47 APPENDIX 5.2: METHODOLOGY FOR ASSESSING LANDSCAPE CHARACTER EFFECTS

S.P.C. COMMENT (81). The Parish Council see no way that the wind farm could improve the visual appearance, where 2 completely different landscapes meet, the Aldington Ridge (part of the Greensand Ridge and the Sellindge Plateau. The methodology seems flawed.

48 APPENDIX 5.3: METHODOLOGY FOR ASSESSMENT OF VISUAL EFFECTS ON RESIDENTIAL PROPERTIES

S.P.C. COMMENT (82). The fact that Google Earth and Google Streetview were used in identifying outlook and any screening is very flawed. In the case of screening, these 2 programs would not give you any idea what type of screening it was, the vast majority of hedge screening is of dedicious type, which of cause will loose all leaves for approx 7 months of the year. As all the houses up Barrow Hill are close together or terrace, so Google Streetview would not be of help.

S.P.C. COMMENT (83). There does not seem to be any reference to the height of the ground the turbines are on, to Sellindge or other locations. Using Google Earth we estimate that.

Wind Turbine 1 is approx 277ft above sea level

Wind Turbine 2 is approx 235ft above sea level

Wind Turbine 3 is approx 235ft above sea level

Wind Turbine 4 is approx 262ft above sea level

Wind Turbine 5 is approx 288ft above sea level

Wind Turbine 6 is approx 336ft above sea level

And the surrounding areas are.

St Mary's Church, Sellindge is approx 213ft above sea level

Potten Farm, Main Road, Sellindge is approx 223ft above sea level

Sellindge Village Hall, Main Road, Sellindge is approx 215ft above sea level

Lower Swan Lane (at A20), Sellindge is approx 220ft above sea level

Sellindge Sports and Social Club, Swan Lane, Sellindge is approx 238ft above sea level

Greenfields, Top part Swan Lane, Sellindge is approx 248ft above sea level

Meadow Grove, Lower Barrow Hill, Sellindge is approx 210ft above sea level

Top of Barrow Hill, Sellindge is approx 244ft above sea level

Westenhanger Castle, is approx 235ft above sea level

Lympne (West), is approx 331ft above sea level

Court – at – Street, is approx 321ft above sea level

Aldington Parish Church, is approx 280ft above sea level

Park Farm, is approx 200ft above sea level

Lower Park Farm, is approx 178ft above sea level

Harringe Court Cottages, Harringe Lane, Sellindge is approx 249ft above sea level

This means for the majority of Sellindge being around 220ft above sea level, means the actual visual impact should be height of turbine ground minus village ground height plus turbine height.
Turbine 6 (ground ht) 336ft – Village Ground Ht 220ft = 116ft + Turbine height 410ft = 526ft

This will mean that all the visual impact and shadow flicker may well be flawed.

49 APPENDIX 5.5: ASSESSMENT OF VISUAL EFFECTS - VIEWPOINTS 1-30

S.P.C. COMMENT (84). Do not agree that roads, footpaths and properties with major impact, would only be short term. 25 years IS NOT SHORT TERM

S.P.C. COMMENT (85). Do not agree that road users of the A20 is low impact, it would be and could be a very dangerous distraction.

S.P.C. COMMENT (86). As mentioned in S.P.C.Comment 13, the photos taken from Farthing Common, Barbourne Down etc are severely flawed due to being taken on a not so clear day, so the wrong horizon was worked on, so these should be high impacts and not moderate.

S.P.C. COMMENT (87). The Parish Council is extremely concerned that there is no reference to the impact on the M20. The Parish Council feels that the wind farm could cause an extreme distraction to drivers.

50 Appendix 5.6: Residential Visual Amenity Assessment

S.P.C. COMMENT (88). All dwellings along Main Road (A20) with the North view will have a major visual impact. Especially from there grounds, its becoming quite popular nowadays to have the outside seating area away from the dwelling. With a detached dwelling it could be anywhere around the dwelling.

S.P.C. COMMENT (89). All dwellings along Barrow Hill (A20) with the North view will have a major visual impact. Especially from there grounds, its becoming quite popular nowadays to have the outside seating area away from the dwelling. With a detached dwelling it could be anywhere around the dwelling. It is absurd to say only 6 have major visual impact as there is screening in the form of vegetation. You can not hide a 410ft wind turbine behind a hedge!

Appendix 7.1 Extended Phase 1 Habitat and Protected Species Survey

51 Surveys - 14. The extended Phase 1 survey of the site was conducted during several site visits. An initial assessment was conducted on 23rd January 2009, with a second walk over survey on 16th and 17th March 2011 to conduct a full badger survey, habitat assessment, and to ascertain options for enhancements.

Reptiles - 20. The potential suitability of the habitat on the study site for use by reptiles was evaluated during the extended Phase 1 habitat and protected species survey. Due to the time of year of the surveys it was not possible to undertake direct observation surveys for reptiles. Habitat suitable for use by basking, foraging and hibernating reptiles was recorded, and the need for further surveys was assessed

Limitations - 27. The surveys were undertaken during winter and spring when not all plant species may have been visible above ground. However, it was considered that enough was seen of the habitats present to make a suitable assessment. The surveys were not undertaken at an optimal time of year for finding signs of water voles.

S.P.C. COMMENT (90). As the applicant has had 4 years to do these surveys, why were there not a survey done during summer as well.

S.P.C. COMMENT (91). There is no follow up on the reptile survey.

S.P.C. COMMENT (92). The survey found Great Crested Newts at 2 ponds, however other ponds in the area cannot be discounted, as newts do roam from pond to pond.

S.P.C. COMMENT (93). In the event that the application is allowed, the Parish Council want s condition that A Natural England licence is obtain, to ensure the safety and wellbeing of the Great Crested Newts on site.

S.P.C. COMMENT (94). Same comment as 92 except for reptiles.

S.P.C. COMMENT (95). In the event that the application is allowed, particular care should be taken with the hare population which is a UKBAP priority species.

S.P.C. COMMENT (96). Numerous Badger setts have been found on site it is of utmost importance that Natural England is involved with this site.

S.P.C. COMMENT (97). They call the ponds, lake and the large pond within the wood, standing water. However as they are spring fed they are not actually standing water, there is flow from the spring to the outgoing brook.

APPENDIX 7.2 PRELIMINARY BAT ROOST ASSESSMENT SURVEY

52 Bat roost survey carried out on June 10th and 23rd 2009

Surveyor note – ‘Please note that due to the relative late date of the survey, all trees were in full leaves making the survey difficult in places. It is therefore possible that some trees showing bat roosting potential may have been missed’.

S.P.C. COMMENT (98). It would seem from the Bat Surveyor, she was not happy with the survey being done at this time of year. So why did Ecology have it done at this time of year!?

S.P.C. COMMENT (99). Also she comments that no internal inspections were carried out. So only exterior visual inspections.

S.P.C. COMMENT (100). One most important site was not even surveyed, the old WW2 R.A.F. buildings in Otterpool Lane, (pictured below) an excellent bat roosting area with a nice hedgeline towards the Harringe Brooks Wood which is only about 600m away.



S.P.C. COMMENT (101). One would have thought that the industrial estate over the road from these buildings would have also offered the bats roosting sites.

S.P.C. COMMENT (102). Although there was a listening station and transect route along Park Wood, Barrow Hill with 11 to 15 bat passes, Park Wood was not surveyed for roosts !

S.P.C. COMMENT (103). With these issues, the Parish Council considers the Bat Roost survey to be very flawed. Not actually the fault of the bat surveyor but Ecotricity.

53 APPENDIX 7.3 BAT SURVEY 2010

Natural England Technical Information Note TIN051 Bats and onshore wind turbines

Some extracts from Natural England Tech Note – TIN051

Bats likely to be at risk from wind turbines

Low risk	Medium risk	High risk
Myotis species	Common pipistrelle	Noctule
Long-eared bats	Serotine	Leisler's
Horseshoe bats	Soprano pipistrelle	Nathusius' pipistrelle
Barbastelle		

Populations likely to be threatened due to impacts from wind turbines

Low	Medium	High
Long eared bats	Serotine	Nathusius' pipistrelle
Myotis species	Barbastelle	Leisler's
Horseshoe bats	Noctule	
Soprano pipistrelle		

Common pipistrelle

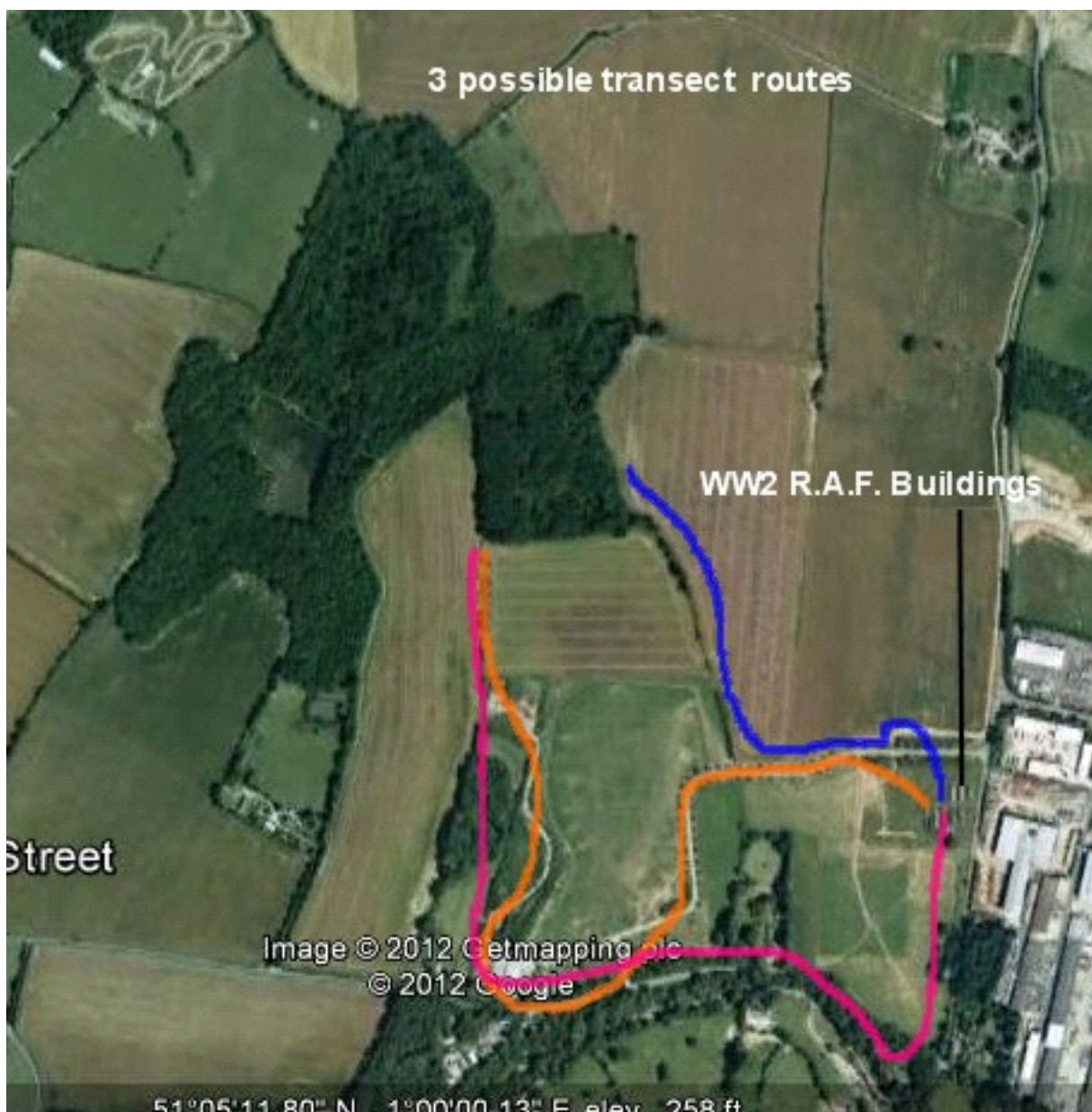
Appendix 2: The risk of collision fatalities affecting bat populations

Bat species	Relative population size and status**	Risk of collision^	Population Threat
Common pipistrelle	Common	Medium	Low
Soprano pipistrelle	Common	Medium	Low
Brown long eared bat	Common	Low	Low
Daubenton's bat	Common	Low	Low
Natterer's bat	Fairly common	Low	Low
Whiskered bat	Locally distributed	Low	Low
Brandt's bat	Common N.W, rare or absent E,S	Low	Low
Serotine	Widespread, restricted S	Medium	Medium*
Noctule	Uncommon	High	High
Leisler's bat	Scarce	High	High
Nathusius' pipistrelle	Rare	High	High
Lesser Horseshoe	Rare, endangered	Low	Low
Greater Horseshoe	V Rare, endangered	Low	Low
Barbastelle	Widespread, rare	Medium	Medium
Bechstein's bat	V rare	Low	Low

S.P.C. COMMENT (104). Very concerned that although the Natural England TIN 051 says that where a woodland, is near site **more monitoring of the site is needed, static monitoring over a log period.** But only 36 hours of activity surveys were undertaken.

S.P.C. COMMENT (105). Very concerned that although the Natural England TIN 051 says that where a woodland, is near site **at height surveys should be carried out.** But in her limitations she says **no at height surveys** taken and no static monitoring. She also mentions that local Bat Group, and Natural England had not been consulted at the time she wrote her report. We would have thought that these organisations would have been notified at the start.

S.P.C. COMMENT (106). Very concerned that only 3 transect routes were surveyed, North, West and East. A possible 3 North transects could have been surveyed coming from the WW2 R.A.F. buildings as shown below.



S.P.C. COMMENT (107). In the surveyors ending statement, she says that a further roost survey should be carried out, she also comments that the WW2 air raids shelters should be surveyed (these are further down the field from the WW2 R.A.F. buildings, which she does not mention)

54 APPENDIX 7.9 AUTOMATED BAT SURVEY 2011

Automated survey of WW2 bunker in field between Otterpool Lane and Harringe Brooks Wood
In place between August 2nd and August 22nd 2011, but only 7 night of recording

S.P.C. COMMENT (108). Why was the recording period so short?

S.P.C. COMMENT (109). In this short time span there were 2 recordings of Leisler's bat, which is at a located completely the other site to the 1 other, recorded. Leisler's bat is harder to record as they unlike most other bats, do fly at a higher height and also fly across open land.

S.P.C. COMMENT (110). In the main Environment Impact Assessment Report, Ecotrcity say they will put bat detectors at height on 1 of their monitoring mast, we feel there should be 1 on both, as the Leisler's bat has been recorded at both sides of Harringe Brooks Wood and the monitoring masts are on both sides of the wood.

S.P.C. COMMENT (111). In the main Environment Impact Assessment Report, Ecotrcity say they will be placing the wind turbines 70m from Harringe Brooks Wood and 1 at 100m where the Leisler's bat was recorded. We would like to see all wind turbines 100m from Harringe Brooks Wood, as the Leisler's bat has now been confirmed both sides of the wood. We would like to point out that in Europe the distance is 200m

S.P.C. COMMENT (112). It does mention in the Natural England tec note TIN 051 that bats can be attracted to the heat from the turbine. One would have thought that as the Leisler's bat can be a high flying bat, they could be at risk. Remember there was no surveys done of possible transect routes to the South.

S.P.C. COMMENT (113). The automated bat survey, although short does seem to prove that bats do fly some distance over open ground, as Soprano Pipistrelle Common Pipistrelle were also recorded

Other comments on bats

S.P.C. COMMENT (114). It is well documented about bats being killed from being just near to wind turbines an article in New Scientist August 2008 the article states '*... , a new study shows that the moving blades cause a drop in pressure that makes the delicate lungs of bats suddenly expand, bursting the tissue's blood vessels. This is known as a barotrauma, and is well-known to scuba divers'..... 'Baerwald and colleagues collected 188 dead bats from wind farms across southern Alberta, and determined their cause of death. They found that 90% of the bats had signs of internal haemorrhaging, but only half showed any signs of direct contact with the windmill blades. Only 8% had signs of external injuries but no internal injuries'.*

Would the location of the site around a wood make this problem even worse?

S.P.C. COMMENT (115). There is concern that the sound of the wind turbines could interfere with the bats sensing.

55 APPENDIX 7.4 DORMOUSE SURVEY 2009 APPENDIX 7.5 DORMOUSE SURVEY 2011

S.P.C. COMMENT (116). As Dormouse (European Protected species) has been found, we would expect the necessary licence to be obtained from Natural England, and disturbance is kept to a minimum and dormouse bridges put in place every night throughout construction should the application go ahead.

56 APPENDIX 7.6 PRELIMINARY GREAT CRESTED NEWT SURVEY

APPENDIX 7.7 GREAT CRESTED NEWT SURVEY 2011

S.P.C. COMMENT (117). It is interesting to see that all of the ponds have good potential for Great Crested Newts with confirmed presence in 2 of them. As these ponds are not that far apart, none of the ponds can be discounted.

S.P.C. COMMENT (118). As Great Crested Newts (European Protected species) have been found, we would expect the necessary licence to be obtained from Natural England, and disturbance is kept to a minimum. Should the application go ahead?

57 APPENDIX 8.1: ORNITHOLOGICAL SURVEY METHODS AND RESULTS

Breeding survey - 8.1.5 Six visits were made to the survey area between 3 April – 12 July 2009 (on 3-5 and 18-20 April, 2-4 and 16-17 May, 13-14 June and 11-12 July 2009).

Breeding birds –

8.1.25 A total of 59 species were recorded during the breeding bird survey of which 51 species bred

8.1.26 One pair of hobby (a Schedule 1 species; confidential) and a total of 98 breeding territories of twelve UK BAP priority species were found (Fig. 8).

S.P.C. COMMENT (119). With a total of 59 different species of birds present, with 51 breeding, this proves that Harringe Brooks has a very diverse wildlife population. Most important is the breeding pair of Hobby a European Protected species and UK schedule 1 protected. Also there being 98 breeding territories of twelve UK BAP priority species were found

Note- UKBAP (UK Biodiversity Action Plan) priority species found breeding were.

Skylark	22 breeding territories
Turtle Dove	2 breeding territories
Dunnock	22 breeding territories
Yellowhammer	14 breeding territories
Song Thrush	6 breeding territories
Starling	11 breeding territories
Reed Bunting	2 breeding territories
Cuckoo	1 breeding territories
Linnet	10 breeding territories
House Sparrow	6 breeding territories
Yellow Wagtail	1 breeding territories
Bullfinch	1 breeding territories

S.P.C. COMMENT (120). The fact that there was 22 breeding pairs of Skylark a UKBAP priority species in the survey area, proves the fact that the site is not really suitable for a wind farm, as these will be nesting out in the fields possibly alongside the wind turbines.

S.P.C. COMMENT (121). Very concerned that Looking at fig 8.2 there was quite a few Skylark breeding territories found near wind turbines 3, 4, 5 and 6, and quite a few Linnet, Yellowhammer and Dunnock breeding territories found near wind turbines 3 and 4.

Wintering birds - The survey area was surveyed once per calendar month during November 2008 – March 2009 and September-October 2009.

S.P.C. COMMENT (122). Harringe Brooks Wood is an important wintering area for birds with 80 different species recorded, for example there was 1,912 all species there in January 2009.

S.P.C. COMMENT (123). There were extremely large flocks of Wood Pigeon with a height of 1,480 birds in February 2009

S.P.C. COMMENT (124). Harringe Brooks Wood is also an important stop off for birds migrating South for the winter, in September 2009 there were 278 Swallows.

S.P.C. COMMENT (125). Very concerned that with this amount of Swallows flying around in September the amount of bird strike probability is totally unacceptable, the same can be said for all the overwintering birds. Flocks of Black – Headed Gulls of up to 300 and the vast amount of Wood Pigeon, which will be flying at around the lower part of the blade sweep, with blades doing a blade end sweep of around 200 MPH, the amount of bird high strike will be totally unacceptable.

Flight activity - 8.1.19 Information on bird flight activity was collected during November 2008 – October 2009

Flight activity

8.1.29 Flight activity by 29 species of bird was recorded, including eight target species; little egret, red kite, marsh harrier, hobby, peregrine, golden plover, Mediterranean gull and common tern

8.1.33 Nineteen hobby flights were recorded (Table 3); three in May, one in July, ten in August and five in September. **Twelve of these included portions within potential rotor-sweep height** (Figure. 8.3).

S.P.C. COMMENT (126). 12 times out of 19 equals around 2/3 of the time the Hobby was flying within potential rotor – sweep height.

S.P.C. COMMENT (127). Very concerned as to the amount of Hobby flights around the positions of wind turbines 2, 3, and 4, with possibly wind turbine 6 as well.

S.P.C. COMMENT (128). Very concerned that the survey was quite short, only 6 x 2 hours per calendar month, this only equates to 12 hours per calendar month. The Hobby's were seen flying 19 times, how many flights were done while they were not there, and even more concerning how many within potential rotor sweep height.

S.P.C. COMMENT (129). Very concerned to find that all the flight records are only available upon request, we feel they should have been included.

S.P.C. COMMENT (130). Several other rare birds were also recorded – Little Egret, Red Kite, Marsh Harrier, Peregrine Falcon, Golden Plover, Mediterranean Gull and Common Tern.

8.1.40 **Relatively modest levels of flight activity were recorded for black-headed gull and herring gull, low levels for buzzard, common gull and lesser black-backed gull. All other species were recorded occasionally.**

S.P.C. COMMENT (131). The 8.1.40 statement is totally absurd, as this is based on only 6 x 2 hour watches per calendar month.

S.P.C. COMMENT (132). Why was there no entomological (insects) survey carried out. Harringe Brooks Wood has such a excellent array of wildlife, one immediately thinks of the Purple Emperor butterfly which actually lives in the top of trees, so could be flying at around the right height for being caught in the blade sweep.

Appendix 10.1: General Approach to Noise Impact Assessment

S.P.C. COMMENT (133). Due to the closeness and the winds which the vast majority of the time come from the direction of the wind farm, there will be some noise, especially for people living in Barrow Hill. The swish swish of the blades will cause problems for a lot of people. The Electoral list for May 2011 shows 265 electors in Barrow Hill and that's not including children of course.

Infrasound

S.P.C. COMMENT (134). – is well documented that some wild animals use infrasound, having Port Lympne under 1 km from site is most concerning. Port Lympne Wind Animal Park is a very important wild animal centre, not only is it the local zoo, where people can come a view animals from all over the world, it is an important breeding site, and is connected with re – introducing and saving animals from all over the world.

S.P.C. COMMENT (135). It is also well documented that children may be suseptitable to effects from infrasound. There are 2 good primary schools within 2km of the site.

S.P.C. COMMENT (136). It is also well documented that people with learning disabilities many who suffer from autism may be susceptible to effects from infrasound. There are 3 care homes for people with learning disabilities Richardson Court with 9 residents, just a 1,000m away May Morning, Barrow Hill with 7 residents and May Lodge, Barrow Hill with 6 residents. There is also the Home Farm Trust, at Lympe Place, which is a large care home only around 1,000m away in Lympe. We know there are at least 2 people with learning disabilities who live independently, there well may be more.

S.P.C. COMMENT (137). Noise would not have been such an issue with the nearest wind farm on the Romney Marsh, as it is located on flat ground and around 4,000m from the nearest Village.

S.P.C. COMMENT (138). There is plenty of research documents for and against the effects of infrasound

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Infrasound From Wind Turbines Could Affect Humans

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Abstract

Wind turbines generate low-frequency sounds that affect the ear. The ear is superficially similar to a microphone, converting mechanical sound waves into electrical signals, but does this by complex physiologic processes. Serious misconceptions about low-frequency sound and the ear have resulted from a failure to consider in detail how the ear works. Although the cells that provide hearing are insensitive to infrasound, other sensory cells in the ear are much more sensitive, which can be demonstrated by electrical recordings. Responses to infrasound reach the brain through pathways that do not involve conscious hearing but instead may produce sensations of fullness, pressure or tinnitus, or have no sensation. Activation of subconscious pathways by infrasound could disturb sleep. Based on our current knowledge of how the ear works, it is quite possible that low-frequency sounds at the levels generated by wind turbines could affect those living nearby.'

Financial Post

Canada

Wednesday July 11th 2012

TORONTO — Opponents of wind farms are hailing Health Canada's decision to study the possible connection between noise generated by the towering turbines and adverse health effects reported by people living close to them. Federal Health Minister Leona Aglukkaq announced Tuesday that Ottawa will conduct the study, which "is in response to questions from residents living near wind farms about possible health effects of low-frequency noise generated by wind turbines."

..... "I've been to dozens of town halls across the province and have heard the painful stories of those who've reported these adverse health effects," Fedeli said. "The fact the federal government feels this study is necessary is reason enough to put a halt to any more wind turbines being built in Ontario right now."

S.P.C. COMMENT (139). The one worrying aspect is, you will not know if you are a person who is affected by infrasound until you have been subjected to it. As mentioned in SPC comment 131 there are 265 electors in Barrow Hill if 25% were affected that would mean 66 people

S.P.C. COMMENT (140). One thing that does come up time and time again is 'more research is still needed to be sure'

S.P.C. COMMENT (141). Why was there no sound monitoring at the bottom of Barrow Hill.

S.P.C. COMMENT (142). The results for the Humblebee House noise monitor show that the predicted wind turbine noise would be higher than the background noise.

Shadow Flicker

12.14 A total of 351 receptors were identified as being within the area that may be affected by shadow flicker for more than 10 hours per year.

12.15 The assessment calculated the potential for shadow flicker at the 351 receptors as a result of the six wind turbines and identified 53 receptors that have the potential to experience 30 hours or more a year of shadow flicker.

12.16 Of these 53 receptors 51 have windows that face a turbine and are not screened by buildings. Due to existing screening the impact upon the remaining 2 properties will be not significant and so they were not assessed further.

S.P.C. COMMENT (143). Having 51 residential properties so severely affected by shadow flicker is totally unacceptable

S.P.C. COMMENT (144). Shadow flicker should only occur between the beginning of November and the end of January a total of about 92 days, with the worse time being December, it will not just affect houses with windows facing the turbines, there is bound to be the shadow of the turbine its self on the ground around you.

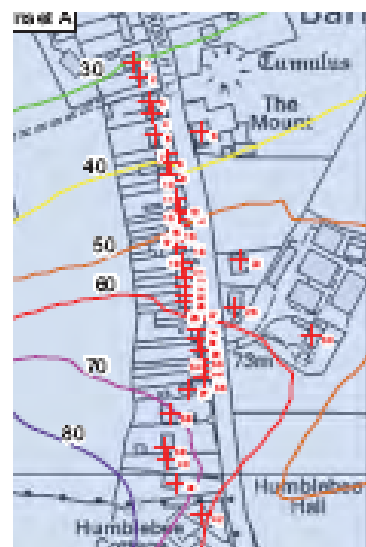
Health and Safety Executive/Local Authority Enforcement Liaison Committee (HELA) circular, entitled 'Disco Lights and Flicker Sensitive Epilepsy'. It provides medical details on flicker frequencies likely to give rise to epileptic effects. It states: 'In 1971 the Greater London Council banned the use of flicker rates greater than 8

fps but to be effective the above figures show that any advice on restriction of flicker rate has to limit the frequency to below 5 fps.' The Harringe Brooks wind turbines have three blades and rotate within the ranges of 6 - 21.5 rpm (rotations per minute) with a resulting flicker frequency of 0.3 Hz – 1.07Hz (0.5 to 1.07 fps or flickers per second). This is below the concerning level of flicker.

Planning for Renewable Energy A Companion Guide to PPS22 (2004), Chapter 8: Wind, Para 77 'Around 0.5 % of the population is epileptic and of these around 5 % are photo-sensitive. Of photo-sensitive epileptics less than 5 % are sensitive to lowest frequencies of 2.5-3 Hz, the remainder are sensitive only to higher frequencies. The flicker caused by wind turbines is equal to the blade passing frequency. A fast-moving three-bladed machine will give rise to the highest levels of flicker frequency. These levels are well below 2 Hz. The new generation of wind turbines is known to operate at levels below 1 Hz.'

S.P.C. COMMENT (145). There must be an remote possibility of epilepsy.

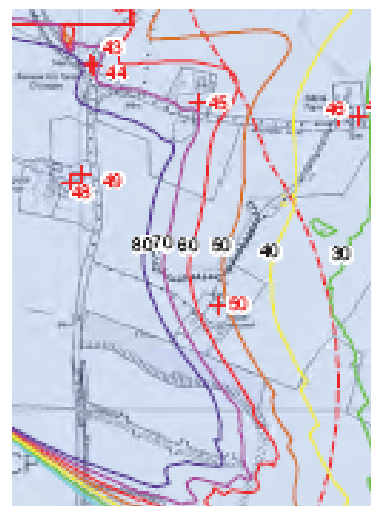
S.P.C. COMMENT (146). It is of grave concern that the two care homes for people with learning disabilities on Barrow Hill are not highlighted in these properties, although Maymorning Lodge is on the 30 hour per year line, with Maymorning next door, so they will get between 20 and 30 hours per year. This type of care home may have problems with shadow flicker, with residents suffering from a whole host of problems.



S.P.C. COMMENT (147). It is also of grave concern to see that Wood Finishers Direct, which is also the home to The Barn stoves and fireplaces, will be subject to 125.6 hours per year, these companies have public visiting them on a daily basis.

S.P.C. COMMENT (148). The popular Airport Café having 68.5 hours of shadow flicker, which could cause them problems and the B1 and B2 development that they have planning permission for at the rear of there grounds.

S.P.C. COMMENT (149). The new section of Lymgne industrial estate, which has planning permission for more B1 and B2 properties, the road network has already been built. This area will be subject to 100+ hours of shadow flicker, decreasing to 80hours further to the East.



S.P.C. COMMENT (150). It would be extremely distracting for anyone driving down Otterpool Lane to the lights and along the A20, where for a section it will be 80+ hours.

S.P.C. COMMENT (151). Even a section of the M20 comes within the shadow flicker, it may only be 10 hours, but there will be an even greater section that will experience 0 to 10 hours, any distraction to drivers on the M20 is totally unacceptable.



S.P.C. COMMENT (152). Where the M20 goes between the sound barriers, the effect on the coast bound carriageway will be made even worse, by the shadow flicker also being on the wall, as well as the road surface.

Turbine issues not mentioned

Turbine going out of control

S.P.C. COMMENT (153). Although it is very rare for a wind turbine to go out of control, it does happen and there are plenty of youtube videos to prove this. Due to the height of these turbines and the ground height, the closeness of the residential properties in Barrow Hill, all of Barrow Hill will be directly in the line of any debris that is thrown.

S.P.C. COMMENT (154). Lymgne industrial estate is even closer, and the Port Lymgne Wildlife Park

Ice Throw

S.P.C. COMMENT (155). The same can be said about ice throw, and this is more of a common problem, there is also a well used footpath close to wind turbine 6

Construction

4.11 The site is underlain by a principal aquifer. The site is also located outside the 100-year flood zone as indicated on the Environment Agency flood map.

S.P.C. COMMENT (156). There are concerns about constructing over a principal aquifer, especially where cannot be that deep in this area, due to the number of springs.

4.27 As shown on the foundations will be circular with a typical maximum diameter of 16.4 Metres and a maximum depth of 2.3 metres. Although extremely unlikely with a development on agricultural land it is possible that depending on local ground conditions up to eight piles may be required. The foundation holes will be excavated using a JCB. If required, a method statement for the construction and final design of the foundations will be submitted to the local planning authority prior to the commencement of the development.

S.P.C. COMMENT (157). They say that the ground is Hythe Beds, but where you have Hythe Beds on a ridge you get ragstone. In other words Hythe Beds form ragstone. The site is on the Aldington Ridge which over the years has had many quarries, and then there is Otterpool quarry to the East. It is almost certain that they will hit rock within 1 or 2m. Whilst putting the new Village Sign up, some rock was encountered. The large rock (ragstone) at the Village Hall came from the working of the CTRL when it was being constructed in the village.

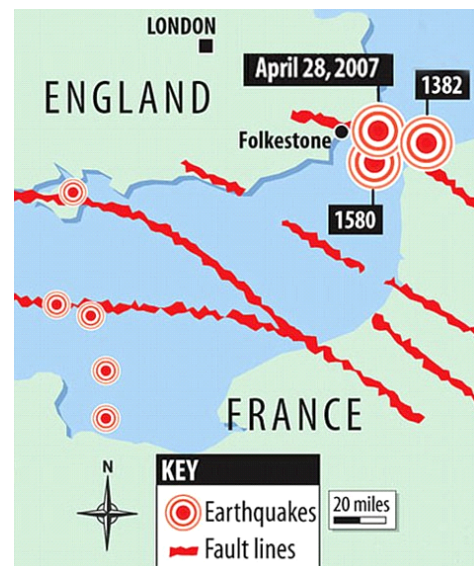
S.P.C. COMMENT (158). As there may well be a need for piles, concerns over the principal aquifer becoming contaminated. This aquifer could possibly be an important source of water in the future. We are in an area of water scarcity.

S.P.C. COMMENT (159). Could putting piles into the aquifer cause problems with the current springs, could it disrupt them, could it cause spring to come up elsewhere.

S.P.C. COMMENT (160). There could be possible ground vibration, especially for Barrow Hill

S.P.C. COMMENT (161). On the morning of Saturday April 28th 2007 Sellindge felt the earthquake that caused a lot of damage to parts of Folkestone. We point out the fact that the areas where more damage occurred was parts of Folkestone that are on the Greensand Ridge. There was even some damage to properties in Sellindge.

S.P.C. COMMENT (162). The Greensand Ridge is actually an earthquake fault line, and there have been many articles and papers over the years saying that we are over due a big earthquake.



CONCLUSIONS

The Harringe Brooks Wind Park Site – Y12 / 0451 / SH

The application should be held until

House of Lords Bill 'To make provision for a minimum distance between wind turbines and residential properties according to the size of wind turbines and for connected purposes'. Has made its way through parliament.

The result of the Lydd Airport application has been received.

The area is not suitable for a wind park

SELLINDGE Site not acceptable because

Due to the height of the turbines, plus the height difference of the ground it will be an overbearing impact on the village of Sellindge.

The cumulative affect of the wind farm will make it an extremely dominant aspect.

The amount of shadow flicker that residents in Barrow Hill will have.

Due to the amount of shadow flicker at Barrow Hill, these property prices will plummet and may well make some un saleable.

There will be some decline in property prices throughout the village

The closeness of the turbines.

The possible ground vibration from the site being on rock.

The possible effect on the 2 care homes on Barrow Hill for people with learning disabilities.

The distraction to drivers on Otterpool Lane and the A20, especially during shadow flicker.

The distraction to drivers on the M20, especially during shadow flicker.

Due to the closeness of the turbines, there is grave concern about effects of infrasound, a factor that requires more research.

Concerns about the possible effects to people health in Sellindge

NORTH DOWNS AONB

The site is much too close to the North Downs AONB.

The site will damage the view from within the North Downs AONB.

The view from the popular local and tourist viewpoint in the North Downs AONB at Farthing Common would be adversely affected.

The view from the North Downs AONB to the South on the Greensand Ridge will be adversely affected. To say that you will be able to see the view between the turbines in not good enough.

ECOLOGY

General habitat survey was insufficient, as they were done in winter and early spring, so there is no clear indication of what habitats there are.

The site is situated in the Wealden Greensand Natural Area.

Harringe Brooks Wood which is a Local Wildlife Site.

Harringe Brooks Wood is designated for its ancient woodland and species-rich, wet neutral grassland. The actively-managed woodland is dominated by Ash and Field Maple (*Acer campestre*) with Hazel (*Corylus avellana*) and Hornbeam, Pedunculate Oak (*Quercus robur*) and Sessile Oak (*Q. petraea*). The ground flora is rich and includes at least 26 ancient woodland indicator species. Two ponds are also present within the wood.

Note- UKBAP (UK Biodiversity Action Plan)

Lowland mixed deciduous woodland is listed as a priority habitat in the UKBAP.

Ponds are listed as a priority habitat in the UKBAP.

Hedgerows are listed as priority habitats on the UKBAP.

Brown hares, a (UKBAP priority species), were recorded on the site.

Badgers (UKBAP priority species), were also recorded on the site

A total of 59 different species of birds present, with 51 breeding, this proves that Harringe Brooks has a very diverse wildlife population.

Most important is the breeding pair of Hobby a European Protected species and UK schedule 1 protected.

There was 98 breeding territories of twelve UK BAP priority species were found

The fact that there was 22 breeding pairs of Skylark a UKBAP priority species in the survey area, proves the fact that the site is not really suitable for a wind farm, as these will be nesting out in the fields possibly alongside the wind turbines.

Very concerned that Looking at fig 8.2 there was quite a few Skylark breeding territories found near wind turbines 3, 4, 5 and 6, and quite a few Linnet, Yellowhammer and Dunnock breeding territories found near wind turbines 3 and 4.

Ornithological Survey should have been more intensive, as there were so many rare birds on site.

There were around 10 other rare birds recorded on site.

Important over wintering site for birds, with 80 species recorded

Great Crested Newts (UKBAP priority species) were also found in 2 ponds.

There was no reptile survey done

There was no entomology survey done

Bat roost survey done at wrong time of year

Bat roost survey did not take in the RAF huts in Otterpool Lane

Transect routes from these RAF huts were not considered

Bat survey was not extensive enough, seeing there was woodland adjacent to

CONSTRUCTION

Concerns as to the volume of traffic during construction.

Concerns that there has not been a geological survey done

Concerns that the development may contaminate aquifer

Concerns that the aquifer may be disturbed, stopping some of the spring and causing new springs to come up, who knows where.

No alternative site was considered.

WIDER AREA

The wind farm would be an overbearing and dominant feature for the residents of Court – at – Street

Concerns to the possible effects of infrasound to the residents of Court – at – Street

The wind farm would be an overbearing and dominant feature for the residents of The area round Aldington Church

Concerns to the possible effects of infrasound to the animals in Port Lympne Wildlife Park

Nigel Fursdon – Sellindge Parish Council