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10 May 2016

Dear Tina Pickup

Proposal: 4 x 18m high, small scale free standing, vertical axis wind turbines

Location: 4 Penner Road, Havant, PO9 1QH

Ref: APP/16/00313

Thank you for consulting the RSPB on the erection of four 18m high wind turbines at 4 Penner Road. The RSPB believes that renewable energy is an essential tool in the fight against climate change, which poses the biggest threat to the long-term survival of birds and wildlife. The RSPB therefore supports the increased use of renewable energy sources, as long as they are sited, designed and managed so that they do not harm birds or their habitats.

The Penner Road site lies within close proximity (Turbine 1 lies within 70m) to Chichester and Langstones Harbour Special Protection Area (SPA), Solent Maritime Special Area of Conservation (SAC), Chichester and Langstone Harbours Ramsar site and Langstone Harbour Site of Special Scientific Interest (SSSI). The SPA designation recognises the international importance of Langstone harbour in respect of breeding little and sandwich terns, little egret on passage and overwintering waterfowl including black-tailed godwit, dark-bellied Brent Goose, dunlin, grey plover, redshank and ringed plover. In addition the proposal lies within Southmoor Reserve Site of Importance for Nature Conservation (SINC) and adjacent to the reserve managed by Hampshire and Isle of Wight Wildlife Trust.

The environmental information supporting the application does not recognise the proximity of the SPA/SAC/Ramsar/SSSI and does not provide sufficient information to allow the competent authority to determine no likely significant effects. Therefore we **object due to insufficient information**. In addition to bird collision risk, bird displacement as a result of disturbance from the turbines (e.g. noise, flicker) should also be considered as part of this assessment.

Contrary to the report provided by the applicant we are not aware of specific evidence in relation to vertical axis wind turbines (which are a fairly new technology) and bird collision risk. There are a large number of variable which determine collision risk including underlying topography, vegetation, bird behaviour, wind conditions, flight speed,

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working to give nature a home around the world.

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Chief Executive: Dr Mike Clarke **Regional Director:** Chris Corrigan

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type of flight and proximity to breeding and overwintering locations and therefore turbine design alone will not be sufficient to ensure bird collision is not a risk.

As the applicant stated the RSPB has installed wind turbines on several of its reserves, however, this does not have bearing on the appropriateness of wind turbines in other localities. Extensive survey work provided the evidence to demonstrate that a wind turbine at these RSPB sites would not be detrimental to birds and bats, this evidence has not been provided for the Penner Road site. We question the accuracy of some of the information included in the applicants supporting information, in respect of the lack of features of wildlife interest in the vicinity and lack of any breeding birds or bats using the site and adjacent area. It is important that the environmental information provided to assess any potential impacts of the proposals is evidence based.

In conclusion we object to this application due to insufficient information. We trust that you find these comments useful in determining this application and would be most grateful if we could be kept informed of developments in relation to this planning application. It is understood from a conversation with the applicant that they will look to provide further information and we may look to amend our response once this is made available.

Yours sincerely



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