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9th May 2016

Your Ref: APP/16/00313
Our Ref: 13.70.3.34

Dear Mrs Pickup

PROPOSAL:

**ERECTION OF 4 NO. 18M HIGH SMALL SCALE FREE STANDING COLUMNS MOUNTED
VERTICAL AXIS WIND TURBINES.**

LOCATION:

4 PENNER ROAD, HAVANT, PO9 1QH

DESIGNATED SITES:

CHICHESTER AND LANGSTONE HARBOURS – RAMSAR, SPECIAL PROTECTION AREA (SPA)
LANGSTONE HARBOUR – SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
SOUTHMOOR RESERVE – SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

The Hampshire and Isle of Wight Wildlife Trust (HIWWT) is the leading nature conservation charity in Hampshire and on the Isle of Wight; we manage 48 nature reserves covering in excess of 4,500 hectares. Our reserves are widely scattered throughout the two counties and are managed for the benefit of wildlife. We acknowledge that through the planning process, our reserves that are adjacent to a proposed development may not sometimes be flagged up to the Local Authority. However given that our Southmoor reserve, which forms part of the internationally important Chichester and Langstone Harbours Ramsar, SPA and SSSI, lies immediately adjacent to the southern boundary of the application site, and we have previously been consulted by the Local Authority in relation to development proposals at this site, we are disappointed that we have not been consulted on this application.

We are mindful that changes to our climate threaten the resilience of biodiversity unless urgent action is taken to reduce carbon emissions and as such we are generally supportive of applications for renewable energy schemes, particularly where these can be sited to avoid detrimental impacts on and/or the loss of wildlife features of interest. As you will be aware, during the operational phase of any wind turbine proposal the receptors most at risk are likely to be species groups that are airborne, for example birds and bats. The risks involve direct collision within the moving turbine area, indirect injury caused by a phenomenon known as barotrauma¹ (specifically bats) and displacement caused by disturbance as a result of the turbines (for example noise or flickering caused by their rotation) and other associated activities. It is therefore essential that detailed survey work is carried out in order that

¹ Injury to internal organs caused by a bat flying through the vortex of decompressed air caused by the rotating turbine blade (Baerwald *et al.*, 2008).

a robust assessment of the potential impacts on the respective species groups can be carried out and to ensure that the turbines are located where they will have the lowest impact on important and protected species and habitats. Having reviewed the supporting information we note that no ecological survey work has been provided in support of this application and therefore we strongly **object** to these proposals.

As we understand it the proposals for this site include the installation of four vertical axis turbines, one (turbine 4) in the north-west corner of the site and three (turbines 1, 2 and 3) along the southern boundary. The proposed development site is located adjacent to and partly on (turbines 2 and 3) the Southmoor Reserve SINC, immediately adjacent to the HIWWT Southmoor Nature Reserve and in very close proximity to the aforementioned Ramsar, SPA, SSSI and the Solent Maritime SAC. These sites are recognised for their grazing marsh habitat, which is an internationally important feeding resource for overwintering birds, particularly waders and Brent geese. As such there is the potential that the proposals could displace birds from this important site and therefore these proposals will need to be assessed through the Habitats Regulations. In addition supporting ecological information should follow appropriate guidance and survey protocols for onshore wind turbines in relation to birds and bats.

The Ecological and Ornithological Impact section of the Environmental Impact Statement² (EIS) (paragraph 2) states that the *“Penner Road site is not known as bird nesting site for all species of bird. The installation will not be carried out during the nesting season if bird nests are encountered. There are no known instances of regular bird nesting in the locality of the four wind turbines proposed locations”*.

Given the information provided within the EIS it would appear that no professional ecological advice has been sought in relation to this application, other than that available on the internet. Contrary to the statements above regarding nesting birds, we have recorded 18 species within the scrub/grassland habitats in the northern part of our nature reserve and immediately adjacent to the proposed locations of turbines 1, 2 and 3. Other non-breeding birds may also pass over the site and as we have already stated the area is designated for the importance of its over-wintering bird populations. As the northern boundary of our nature reserve borders the proposed development site it can be considered that nesting birds are certainly in the vicinity of the Penner Road site, and may in fact nest on the Penner Road site where suitable habitat occurs. This statement also fails to consider the potential impacts that may occur once the site is operational, which is potentially when the greatest impact on birds is likely to occur.

Paragraph 3 states that *“There are no known bat nests or nesting grounds within 50m protected by law”* and that *“It is only necessary to follow the guidelines of the TIN051 if evidence exists that Bat populations are present or if the habitat feature of the turbines proposed or their immediate vicinity and the location chosen for the turbines will not overhang trees or bushes.”*

The scrub habitats forming the northern boundary of our reserve are considered suitable for use by foraging bats, since it forms a linear habitat feature and is linked to other habitat features in the local area. The corridor between the southern end of the building and the northern edge of the scrub is also likely to provide a more sheltered environment for bat foraging in sub-optimal conditions, for example when windy. The Bat Conservation Trust’s Good Practice Guidelines³ states that *“Evidence suggests that micro-turbines may impact bats, particularly when they are installed close to roosts (BCT 2007)⁴. It is therefore recommended that potential impacts on bats from micro-turbines are assessed on a site-by-site basis.”* In the absence of any bat survey work it is not known whether any bat roosts are present nearby nor the extent to which bats use the site for foraging, despite what is stated in the EIS, as such it is not possible to assess the level of impact. Natural England’s guidance note TIN051 provides the following good practice and recommendations aimed at minimising harm to bats (bold and underlined is our emphasis);

² SSE (March 2016) SSE4, Penner Road Havant Vertical Axis Wind Turbine Proposals – Environmental Impact Assessment

³ Hundt, L (2012) Bat Surveys: Good Practice Guidelines, 2nd edition, Bat Conservation Trust

⁴ BCT (2007) Micro-turbine bat mortality incidents (June 2007). http://www.bats.org.uk/pages/microgeneration_issues.html

- **Site selection is an important factor in avoiding impacts on wildlife**, though it is likely that many other factors will influence site selection.
- The context of the development should be evaluated, taking into account the following factors: **location and extent of wind farm, size and abundance of bat populations impacted, and their current use of landscape**.
- **Where harm has been predicted by appropriate surveys, this could be minimised by altering locations of turbines within a site**. For example, **in many cases risk could be minimised by locating turbines so that their blade tips are at least 50m from the highest part of hedges, tree-lines or woodland in the vicinity**, as bat activity beyond this declines significantly. While bats are still active further away from linear features, the level of bat activity is likely to be so low that there is a very low risk of impact.
- If roosts have been identified close to, or on, a proposed site, **turbines should be located as far away as possible from the roost and any identified flight paths**. **In practice, this may be covered if turbine blade tips are situated at least 50m from any habitat features or structures suitable for roosts**. This is most easily described by imagining a 50m buffer or 3D corridor drawn round the feature (hedge, wood etc.) and ensuring no part of the turbine (tower or blade) intersects with this. **Situations involving high or medium risk species (for example noctules or pipistrelles) will need to be assessed on a case by case basis**.
- If high risk situations occur, and impacts are predicted on bat populations, altering the use of the turbines may reduce harm. For example, **it may be possible to switch off a turbine for a period of time if surveys reveal important flight paths are used at a particular time of year**. Other mitigation strategies are currently being explored.
- **Standardised surveying/monitoring pre and post installation should be required in most high risk situations and welcomed everywhere**. Detailed monitoring is required in sites where impacts are predicted. Such methods could include installation of remote detectors at height to record activity, and corpse searching. Such data can make a valuable contribution to the evidence base and help set the risk in context.

The above guidance is based on having an understanding as to how bats may use the site, and from that information each turbine can be sited accordingly. It is also worth noting that the guidance for the 50m buffer assumes turbines to be of a particular height, but in the case of micro turbines, such as these, that are only 18m tall, the impacts on bats could be significantly greater if situated next to a hedgerow or scrub habitats. In the absence of any survey work it will not be possible to make informed assessments of the potential impacts on bats. The interpretation of this guidance in the EIS is concerning, since it states that “no known” bat roosts are present within 50m and there are no suitable habitats features in the vicinity of each turbine and therefore it is not necessary to follow the guidance. Whereas in fact the southern boundary of the proposed development site, which forms the northern boundary of our nature reserve, is dominated with scrub, and as such is suitable foraging habitat for bats. According to the provided maps turbines 1, 2 and 3 are located immediately adjacent (within 1m) to that scrub habitat, and therefore if bats are using the site the risk of significant impact would be high.

Paragraph 4 states that “No features of wildlife interest have been identified in the immediate vicinity of the turbines proposed” although it does acknowledge the “area of tidal margins that is in a flood zone and is also likely to attract wildlife”, which forms part of the SPA, Ramsar and SINC to the south.

The above statement regarding “the lack of any features of wildlife interest in the immediate vicinity of the turbines proposed” is evidently incorrect. For example, as we have already stated, the location plan appears to show two of the proposed turbines being located directly on the SINC and three of them along the boundary of our nature reserve, which also forms part of the SINC. Given that the SINC has been designated for its nature conservation value at county level it will presumably support features of wildlife interest, as does our nature reserve. The northern tip of the SSSI, SPA, Ramsar which is a site that has been designated for its nature conservation value at national and international level is located less than 100m from the nearest proposed turbine.

As we have already stated this application is not supported by any ecological survey work or assessments of potential impacts other than statements included within the EIS. These statements appear to attempt to use the fact that the RSPB have installed wind turbines at their Sandy Lodge HQ and on their visitor centre at Rainham Marshes as justification for these turbines in this sensitive location. Whilst the RSPB may indeed be installing wind turbines on some of their sites, as have we in the past, we suspect that they would have carried out detailed survey work in order to ensure that the locations of their turbines would have the least impact on wildlife, which is not the case with this application.

It is also worth noting that in January 2006, HIWWT and the Environment Agency responded to an application (05/62192/010) for the provision of extra car parking to the west of the building on this Penner Road site. There were concerns that the proposals would impact on the adjacent internationally important wildlife sites and therefore the application was amended to include a buffer zone of tree planting between the proposed car park and the designated sites. As a result of this buffer we raised no objections to the proposals. These proposals seek to erect moving structures that are likely to extend above the height of the existing buffer zone that screens the building and car park, and as such will have the potential to displace/disturb birds and bats that are currently using the designated sites for feeding and/or roosting.

Conclusion

We object to these proposals due to the lack of supporting ecological information with regard to European protected species and habitats. It is our considered opinion that these proposals should be supported by bird and bat surveys following the recommended best practice guidance and survey protocol, they should also be assessed through the Habitats Regulations.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful in determining this application and if you wish to discuss these matters further, then please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours sincerely



Trevor Codlin MCIEEM
Strategy Lead for Planning

