

**STATEMENT OF PAUL BENNETT TO THE EXAMINATION IN PUBLIC  
INTO THE  
HARTLEPOOL LOCAL PLAN  
RELATING TO MATTER 12**

NB. Only the text in blue will be read out. Black text is for reference purposes only and used as a pointer to guide the audience.

1. I make this statement on behalf of INSPECTOR'S MATTERS, ISSUES AND QUESTIONS (MIQs)

I speak on behalf of the Seaton Wind Turbine Action Association (SWTAA), likeminded residents of Seaton Carew (SC) and others who object to the inclusion of policy CC4 in the local plan (HLP01\_7\_Submission\_draft\_Local\_Plan\_\_FINAL\_March\_2017).

The tenets of a town council are by my research

- Representing the local community.
- Delivering services to meet local needs
- Striving to improve the quality of life in the local area

And the purpose of a local council is by these terms of reference, to improve the lives of people in their local community and give that community a voice and the means to achieve those objectives.

Encouraging and accommodating urban localised wind farms does none of the aforementioned, especially improvement in the local quality of life, and I will reflect on that a little later in relation to the inspector's Q8 and 10.

Of the publication stage version of the proposed local plan, there is in the view of SWTAA some undue over-focus on renewable energy provision. There are no less than 69 references to wind or wind energy alone, which some might deem a little excessive compared to other content for a small town local plan.

Wind energy in operation does not provide significant value in terms of permanent employment in its locale, and nor does WT construction. It is served by dedicated specialist construction and maintenance teams that cover large territories. Albeit some local employment in civil works would arise at construction.

Hartlepool Borough Council (HBC) consultation doc section 8.44 cites a 2020 government target of 15% renewable by 2020. But in the UK second quarter of 2015, renewable electricity generation exceeded 25%.

Seems like the target is already met. Why do we need more, especially small scale?

Matter 12 – Strategic Wind Turbine Developments

Policy CC4

Issue 1 - Whether the proposed sites at Brenda Road and High Volts are justified, effective and consistent with national policy.

The Inspector notes that there are considerable volumes of representations both for and against the proposed strategic wind turbine development area at Brenda

Road. The vast majority of these representations use standard template contents but have been treated as separate representations. The Inspectors questions focus on the key points raised in these submissions and the relevant national policy including the content of Written Material Statements. It is noted that the Council has provided a comprehensive response on representations to Policy CC4 within the Consultation Statement (document HLP01/4).

*The inspector noted the amount of support for and against WTs. In the 2014 cases it was clearly shown that support for WTs west of Brenda Rd. was predominantly from outside the immediate affected community and area. In the same vein, in 2017 prior to the Local Plan (LP) submission, a group of pro-wind energy activists whose canvassers claimed to be from Nottingham no less, campaigned in the centre of Hartlepool town for WTs, not polling people in the potentially immediately affected areas. I will later touch on SWTAA's independent findings.*

Re. Q1 What is the rationale for the proposed sites? Is it economic strategy, a reflection of demand/interest from the industry in these sites and a need to manage development consistent with national policy, part of a Borough commitment to addressing climate change or a combination of all of these factors?

*Re. Brenda Rd, Tofts road West, Graythorp proposals.*

*It is for HBC to explain their rationale to the inspector's satisfaction, but it is clear that as new housing land use is expanding in south SC, the buffer between residential areas and industrial areas is being eroded. Whilst new housing build advances, industrial areas do not seem to be retreating proportionally, bringing domestic and industrial premises even closer together to the detriment of residential amenity.*

*Failure to maintain or enhance the buffer zones might be considered as unsound policy and practice.*

*In reference to LP 7.41 and 9.5. Albeit that Contract for Difference payments to operators for new onshore wind farm generation has ceased the proposal still carries no assurance of the old £5000/MW of capacity since contributions cited in the LP are deemed voluntary or payable by work in kind, by comparison the assured income from the already established new housing developments via council tax at approx. £1200 pa per household for say 100 newest homes is likely to exceed that of and ground rental fees from the one HBC owned site. That far exceeds the theoretical income from proposed WT developments at Est £25k pa.*

*A decline in residential and commercial amenity derived from a deliberate council policy may even attract claims for a reduction in council tax from immediately located businesses and a significant proportion of the local residents. Thereby the policy might be deemed as unsound.*

*Compared to the >1000MW power density of the local EDF nuclear power station, and EDF windfarm in the bay at 62MW, the contribution from this site will be irrelevant except to those who will profit from it, .... and at the community's expense in terms of amenity and the misery and stress to nearby residents.*

*The north of Britain due to its fuel resources has traditionally been a net exporter of energy to the main load centres in the midlands and the south. That picture is changing with more, very large windfarms offshore and further south. There is no need for additional local generation of this scale, else EDF with their expert resources and ample funding would have built a bigger inshore wind farm. The NGC are already struggling to stabilise the grid at night due to excess windfarm operation on the system.*

*Other than reasons unknown, and given the significant implementation hurdles and reduced returns, we suggest there is little to recommend small scale, intermittent generation of the type proposed at these sites, and therefore the plan may be unsound.*

*SWTAA recommend removal of policy CC4 from the LP and re-designate the land for general employment or world class sports facilities, vs low to zero employment WT sites.*

Q3 In relation to Brenda Road, what is the evidence to support the identification of this particular area? Have alternative locations for strategic wind turbine developments been considered south-east of Hartlepool?

*The council's proposal for land use west of Brenda Rd for WTs is likely based on the convenience of grid substation on the TATA Steel site and seems to entirely ignore a THIRD round of negative opinion and letters of objection sent in by the residents of SC.*

Q4 Is seven wind turbines with a potential installed capacity of 2MW each an appropriate basis on which to consider Policy CC4? Is the evidence clear that this would be the maximum number of turbines?

*SWTAA does not think such numbers are finite and should this go ahead, commercial developers may try to make a case to increase the numbers.*

Q6 The Planning Practice Guidance 9 refers to community backing and this is reflected in the wording of Policy CC4. In this context is community backing necessary for the identification of suitable areas in Plans or is it specifically a criteria when considering development proposals?

*I suggest it follows if there is insufficient community support for WT development then it is somewhat futile to offer land for such a purpose, unless it simply pays lip service to a statutory requirement or government policy and simply ticks a box.*

*I would offer that of the 1100-plus letters of objection to the inclusion of policy CC4 (I reiterate this was a third instance of mass objection on the topic of WTs) and that this was not a census of opinion in the south of SC, but that it simply represents the opinion of a significant proportion of the residents.*

*The result implies a resurvey of 100% would likely increase the number of objections raised.*

Q7 In respect of the proposed site at Brenda Road, what does the level of community comment (both for and against) indicate in terms of whether Policy CC4 proposal at Brenda Road would be deliverable? Consequently, would the policy be sound, in terms of being effective?

*Independent survey of opinion on the acceptance of WT in the proposed area has been almost exclusively negative. Only about 2% polled at the doorstep were in favour. The remaining majority objected due to the unquantified risk of transmitted noise and blade noise amplitude modulation phenomena.*

*Residents also agreed there was insufficient work by the council to explore tidal solutions to power generation.*

*I would draw the inspector's attention to three approved applications in 2014 for three large WTs on the same site that were on call-in and deemed invalid due to insufficient community consultation. SWTAA doorstep research and submitted proforma letters of objection clearly indicate that the community within the immediate area (south and south west Seaton Carew) are strongly opposed to WT development. The poll represents an estimated 70% of dwellings on the south side of SC.*

*This suggests the policy will be ineffective and therefore not sound.*

*Noise is a big issue for residents represented by SWTAA and there are many case histories on wind farm propagated noise, particularly low frequency blade noise - a significant issue for nearby residents, whether it is AM or subsonic infrasound. There are many such cases recorded and details publicly available.*

*Indeed, one of our own members visited a home some 900M from a WT cluster and where the effects of infrasound were being felt. That person also experienced an atmospheric pressure change and discomfort, similar to that when a plane drops altitude to land. The discomfort dissipated on driving away from the house.*

*Until one becomes involved in these matters, it is not apparent just how many hundreds of people across the UK oppose WTs near their homes due to noise nuisance causing physiological and psychological health issues and also impact on visual amenity. The same pattern exists across Europe and other developed countries. Surely, all these people cannot be wrong.*

*The evidence strongly suggests that WT farms and people do not mix.*

**Q8 Has it been satisfactorily demonstrated that on-shore wind turbine structures can be accommodated at Brenda Road without significant adverse impact on residential amenity and the amenity of those employed in the Southern Business Zone (primarily relating to noise and flicker)?**

*This has not been satisfactorily demonstrated. In past communication regarding projected WT noise levels, the council said that they could not rule out acoustic effects in some dwellings and the emergence of hot spots could not be predicted with any certainty.*

*SWTAA say any undesirable effect on any dwelling must be seen as significant and an impact on the quality of life.*

*If these effects do occur it's a bit late once WTs are funded and built. Without full scale tests under all conditions (not just modelled) as in previous invalid planning applications (rejected in 2016), the answer cannot be known for sure and otherwise places residents' amenity at risk.*

*In addition, many new build residents spoken to by SWTAA commented the pre-purchase searches by their legal representatives yielded nothing in relation to WT developments, and had they done so they would not have bought. This is an early indication of the potential effect and follow-on decline in desirable residency that WTs can bring to their surrounding areas. In combination with the windfarm view in the bay, the cumulative effect would give the impression of being surrounded.*

*It has already been established not only in HBC reports (i.e. those supporting approved planning applications (then rejected by PI inspector as invalid refs H2015/0252, 253 and 254) but also by independent survey and montage production, that WTs based at Tofts Road West and Graythorp will project the industrial nature of the TF industrial estate into the residential area of SC and could impact on the visual amenity of the SC conservation area and be detrimental to the amenity of the south side of SC. . For residents, WTs will be seen from their homes, gardens and the public roads boldly silhouetted against the open sky.*

*The inspector has a copy of such a montage (already mentioned) scaled for 99M turbines (montage A). A perceptual eye view photograph of the bay-sited EDF windfarm taken from Elizabeth Way looking East and corrected to eye view has also been provided (photo 1). Combined they illustrate the potential is there to creating a cumulative effect by the addition of a wind farm to the West of Brenda Rd.*

*In addition, police aviation pilots have expressed concern over the hazards presented since they are compelled to navigate visually by the roads and must maintain at least 60 seconds of forward flight view, - difficult at night. That would have an impact on law and order effectively creating no go areas for helicopters.*

*WT Blade tips move at the speed of a light aircraft and beacons are only fitted to the central mast.*

*The above could be an indication the CC4 policy is unsound by creating potential for these undesirable situations and threatening the amenity of both residents and workers alike.*

Q9 What would be the harm to local character? In what visual context do the turbines need to be considered?

*There is potential harm to the amenity of South SC and to the southern part of the SC conservation area. The Seaton Development Plan is a defined plan to improve the ambience and effectively brand SC as a local day-trip destination. Industrial visual intrusions into that arena would detract from the intended outcome and negate the considerable and praiseworthy effort already expended by HBC.*

Q10 Is there evidence that the Brenda Road proposal would 'sterilise' or inhibit employment proposals within the Southern Business Zone? Conversely, is there evidence that wind turbines at this location could have a positive impact on employment and businesses in the area?

*Evidence from other WT developments indicate a negative outcome.*

*Scandinavia is one of many areas finding problems with WTs and are notable for their research and government moratorium on onshore windfarms. Denmark as an example halted the approval of new wind parks due to "health concerns" from infrasound.*

*Infrasound is defined as low frequency sound under 20 Hz – below the threshold of human hearing. Wind farms generate these potentially harmful sub-audible frequencies. It is said that infrasound can be sensed as pressure to the ears or to the stomach, or as a slight vibration. Some Danish wind power companies have had to concede that there are associated health issues and to negate the problem for affected residents have taken to buying up homes and small villages to compensate residents, and demolishing them.*

*An article in the Swedish medical journal, *Läkartidningen* by Dr Hakan Enbom ( a neuro-otologist medical specialist – a hearing specialist and neurologist to the likes of me) entitled "Infrasound from wind turbines: An overlooked health hazard," (In Swedish with English translation)*

*Very importantly this learned article states that Infrasound propagates over very long distances. It affects the inner ear and is a potential health risk for people with migraine or other type of central sensitization.... And infrasound pressure affects the inner ear, although no sound is perceived by the individual. The sound can also form eddies where it can be more prominent than in other places.*

*Another article Noise is a big issue (Preben Maegaard, Advisor, Nordisk FolkeCenter, Denmark: 02 November 2015) cites low frequency blade noise a significant issue for nearby residents.*

*Closer to home and more recent, new local first-hand information from the Lamb's Hill windfarm surrounding area in County Durham/ Stockton on Tees borough boundary suggests there are significant health impacts for some individuals in respect of visible turbine movement inducing feelings of nausea and vertigo. Whilst others, working on the land have experienced unexplained nose bleeds.*

*In the opinion of Dr John Yelland, a respected UK acoustic engineering consultant, with whom I have corresponded, these symptoms are consistent with general exposure to low frequency sound (or infrasound).*

*If that were to be the case at the Brenda Rd, TATA Steel and Graythorp sites, then workers and residents could be affected, and in theory, might sue for their injuries and include the council as a party to the causal factor. Potentially, a class action scenario that could apportion blame to the Council for openly facilitating the development of the cause of their malaise.*

*Further, a Supreme Court ruling (Coventry vs Lawrence) in 2015 established that compliance with conditions, controls and regulations was not a defence against litigation for nuisance caused by operation of the business. Which means that a windfarm that causes nuisance, despite compliance with all regulations and planning constraints, would still allow the operators and owners and other involved parties to sued in court.*

*How can such risks and uncertainties contribute to the improvement in the quality of life by threatening the amenity of local residents and workers?*

*Again, with such doubts and potential for harm and litigation, we believe the CC4 policy is unsound and therefore should be removed.*

*The Borough Council probably has better things to do than be drawn into costly legal actions that would likely drag on for extended periods.*