

IUCN comments on the assessment of impacts from the proposed Navitus Bay Wind Park on the Dorset and East Devon Coast World Heritage Site (United Kingdom of Great Britain and Northern Ireland)

Introduction

On 17 February 2014, the State Party of the United Kingdom submitted to the World Heritage Centre a number of documents pertaining to the proposed development of an offshore wind farm, called Navitus Bay (the Project), off the South coast of England, to the South-West of the Isle of Wight and to the South-East of the World Heritage property of Dorset and East Devon Coast (the property). The World Heritage Centre forwarded the documents to IUCN, as the official Advisory Body on World natural Heritage, for review, in accordance with Paragraph 175 of the *Operational Guidelines*. The following documents were submitted by the State Party:

- a) A letter from the Department for Culture, Media and Sport (DCMS) to the Director of the World Heritage Centre, dated 17 February 2014;
- b) Navitus Bay Wind Park Environmental Statement, Volume D Project Wide Assessment, Chapter 5 World Heritage Site, January 2014. Pre-application version for English Heritage and DCMS;
- c) Navitus Bay Wind Park Environmental Statement, Volume D Project Wide Assessment, Appendix 5.1 An Alternative Approach to Assessing the Setting of the Jurassic Coast World Heritage Site;
- d) A map showing the "Boundary Evolution (with Indicative 6 MW Turbine Layout)" of the Project, prepared by Navitus Bay Development Ltd (NBDL);
- e) Navitus Bay Wind Park Proposed Development: Potential impact on the Dorset and East Devon Coast World Heritage Site. Steering group position paper for DCMS. Date 23/12/2013;
- f) The Statement of Outstanding Universal Value (SOUV) of the property, and the Attributes for the Dorset and East Devon Coast World Heritage Site, Agreed by Steering group meeting of 26/09/2012.

In addition, IUCN received a report prepared by a third party dated 3 March 2014, including publicly available supporting data for a Visual Impact Simulation, in the shape of static photographs and a video file. All this information has been assessed internally by IUCN experts and externally by independent experts working on World Heritage issues.

Conclusion

In conclusion, IUCN considers that the Project is likely to have some adverse impacts on the underlying geomorphological processes in the setting of the property that are essential for the long-term maintenance of its OUV, although further data, information and analysis are required in that regard. Furthermore, IUCN considers that the Project will have a significant impact on the natural setting of the property, in that it would adversely impact on important views from the property, including views from the main visitor centre at Durlston Castle towards the Isle of Wight, where the Project would

replace the Isle of Wight as the dominant feature on the horizon. This is likely to significantly impact on visitors' experience and appreciation of the property in its wider natural setting, which could in turn compromise the long term sustainability of the management of the property, through a loss of revenue and reduced opportunities to present the property in its natural setting to a wide audience. Any potential impacts from the Project on this natural property are in contradiction to the overarching principle of the World Heritage Convention as stipulated in its Article 4, as the completion of the Project would result in the property being presented and transmitted to future generations in a form that is significantly different from what was there at the time of inscription and until today. Specifically, the property will change from being located in a natural setting that is largely free from man-made structures to one where its setting is dominated by man-made structures.

Outstanding Universal Value (OUV) of the property

The property is inscribed on the World Heritage List on the basis of natural criterion (viii): *“to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features”*. Key excerpts of the SOUV of the property that are particularly relevant to the assessment of potential impacts of the Project on the property are presented below:

From the justification for inscription of the property under criterion (viii) (emphasis added): *“The [...] Dorset and East Devon coast [...] includes a range of globally significant fossil localities [...] which have produced well preserved and diverse evidence of life during Mesozoic times. It also contains textbook exemplars of **coastal geomorphological features, landforms and processes**. [It] has helped foster major contributions to many aspects of geology, palaeontology and geomorphology and has continuing significance as a high quality teaching, training and research resource for the Earth sciences.”*

From the statement of integrity (emphasis added): *“The property contains all the key, interdependent elements of geological succession exposed on the coastline. It includes a series of coastal landforms whose **processes and evolutionary conditions are little impacted by human activity**, and the high rate of erosion and mass movement in the area creates a very dynamic coastline which maintains both rock exposures and geomorphological features, and also the productivity of the coastline for fossil discoveries. The property comprises eight sections in a near-continuous 155km of coastline with its boundaries defined by natural phenomena: on the seaward side the property extends to the mean low water mark and on the landward side to the cliff top or back of the beach. This is also in general consistent with the boundaries of the **nationally and internationally designated areas that protect the property and much of its setting**. [...].”*

From the statement of Protection and management requirements (emphasis added): *“The property has strong legal protection, a clear management framework and the strong involvement of all stakeholders with responsibilities for the property and its setting. A single management plan has been prepared and is coordinated by the Dorset and Devon County Councils. There is no defined buffer zone as **the wider setting of the property is well protected** through the existing designations and national and local planning policies. [...]. The main management issues with respect to the property include: **coastal protection schemes** and inappropriate management of visitors to an area that has a long history of*

*tourism; and the management of ongoing fossil collection research, acquisition and conservation. **The key requirement for the management of this property lies in continued strong and adequately resourced coordination and partnership arrangements focused on the World Heritage property.***

The attributes that contribute to the property's OUV, as agreed by the Dorset and East Devon Coast Steering Group on 26 September 2012, are grouped in five categories:

1. Stratigraphy (the rock record) and structure;
2. Palaeontological record;
3. Geomorphological features and processes;
4. Ongoing scientific investigation and educational use, and role in the history of science;
5. Underlying geomorphological processes in the setting of the Site.

Comments

IUCN makes the following observations in relation to the assessment of potential impacts of the Project on the property, based on the above documentation. This is without prejudice to any future observations that may be made as further information is made available.

1. IUCN considers that due to the significance of this project and its potential impact on a World Heritage natural property it could have been more appropriate to commission the preparation of an Environmental Impact Assessment (EIA) to an independent consultant instead of being prepared by the proponents of the development. In addition to the concerns raised below, this raises questions on the credibility and objectivity of the assessment.
2. IUCN notes that the methodology used by NBDL for its assessment of impacts on the property has been informed by the ICOMOS Guidance on Heritage Impact Assessments (HIA) for Cultural World Heritage Properties (2011), which NBDL "*considered to contain guidance appropriate for the assessment of natural heritage assets (especially in the absence of an equivalent or comparable IUCN guidance document)*". It is surprising that NBDL chose to base its assessment methodology on the ICOMOS guidance, which is adapted to cultural heritage. In fact, NBDL refer to IUCN's *World Heritage Advice Note: Environmental Assessment* (2013), which provides guidance on integrating natural World Heritage sites within Environmental Assessments, but does not consider this further in its assessment.
3. In adopting the ICOMOS Guidance on HIA instead of IUCN's Advice Note, it appears that NBDL have not adhered to all eight World Heritage Impact Assessment Principles as outlined in IUCN's Advice Note. Notably, the principle that reasonable alternatives to the proposal must be identified and assessed with the aim of recommending the most sustainable option to decision-makers, including the possibility of the 'no project' option, does not appear to have been addressed nor considered.
4. IUCN notes that the National Wind Power Programme of the Government of the United Kingdom anticipates that offshore wind farms may eventually contribute up to 40 GW peak capacity,

much of which would be generated by large offshore wind farms (so-called Round 3). For this purpose, nine zones were identified around the UK (Navitus Bay is located in zone 7), the target capacity of which is 32.2 GW. Navitus Bay accounts for up to 970 MW, or 0.97 GW, which is equivalent to 3% of the total Round 3 capacity. Given that Navitus Bay is expected to achieve that target in only a small portion of zone 7 (22%), it appears that there is ample opportunity to relocate the Project to other offshore Round 3 zones where any adverse impacts on the property and other sensitive coastal areas (such as the Dorset AONB, which directly contributes to the protection of the property and its setting) could be entirely avoided. The rationale for proposing this development project in an area linked to a World Heritage property instead of other feasible areas is therefore neither clear, nor consistent with the spirit and objectives of the World Heritage Convention.

5. IUCN notes that there appears to be a perception of inadequate timing of public consultation, which should ideally have taken place earlier in the process. Notably, it appears that there has been no public consultation during the selection of Round 3 zones in 2009. In addition some changes proposed through this consultation process appear not to have been adequately addressed, particularly concerns raised by the Dorset County Council on the methodology used for the Seascape and Landscape Visual Impact Assessment.
6. Notwithstanding the above, the assessment of potential impacts on OUV – based on available information and existing evidence – does not appear to leave any major gaps. However, while NBDL's HIA concludes that there will be no significant impact from the Project on the property, the Dorset and East Devon Coast World Heritage Site Steering Group raise a serious concern about a lack of information provided about 'high magnitude low frequency events'. IUCN considers that the Project is likely to have some impact on geomorphological processes in the setting of the property, which are essential for the long-term maintenance of its OUV. Further attention should be paid to the long-term assessment of magnitude and frequency of physical ocean properties (waves and currents) and how the natural erosion processes may be directly or indirectly impacted.
7. IUCN notes with concern the potential impacts of the Project on aspects of the protection and management of the property. In particular, the adequate protection of the wider setting of the property, recognized by the World Heritage Committee to justify at the time of inscription the lack of a defined buffer zone, will be compromised. The current Dorset and East Devon Coast World Heritage Site Management Plan 2009-2014 notes that the potential impact on the setting of the property and coastal landscape from offshore developments, including wind farms, is an issue, the implications of which would become clearer over the life of the management plan. The revision of the management plan (i.e. the Dorset and East Devon Coast World Heritage Site Draft Management Plan 2014-2019) includes Policy No 1.8 (emphasis added): "*Protect the OUV and seaward setting of the Site from adverse impacts of offshore oil or gas exploration and exploitation, or renewable energy developments, particularly regarding the infrastructure needed to bring oil, gas or power onshore*". The Project clearly is in contravention to this Policy.

- In addition, the 2014-2019 draft management plan notes that *“artificial structures that obscure the geology and hinder natural processes are the greatest threat to maintaining the World Heritage Site’s OUV and integrity”*. Furthermore, according to the HIA prepared by NBDL, Circular 07/09 of DCMS (2009) on the Protection of World Heritage Sites states that *“Planning authorities must have special regard for the protection of a WHS and its setting, including any buffer zone, from inappropriate development”*.
8. NBDL’s HIA considered that the Project would not *“result in a significant impact to the experience of visitors to the area, including those that visit the WHS [...] to experience and appreciate the geological values inscribed within the OUV.”* It goes on to say that *“[the] Recreational Assessment identified no perceptible effects in relation to nature study or recreation walking [...]”*. However, the HIA adopts a narrow definition of visitor experience, focused entirely on the observation and appreciation of the attributes of OUV present within the property. It concludes that *“the visibility of the Project would not obscure or interrupt (i.e. lie between the viewer and object) the important views associated with [...] the OUV.”* What it does not take adequately into account is the visibility of the Project within the setting of the property, which is DCMS, in Circular 07/09, defines as (emphasis added) *“the area around [the World Heritage Site] in which change or development is capable of having an adverse impact on the World Heritage Site, including an impact on views to **and from** the Site. [...]”*. The HIA does not adequately address impacts on views from the property. Particularly, views from the main visitor centre at Durston Castle will clearly be impacted by the Project, which would become a dominating feature on the horizon, which would be 1.8x wider and up to 2.8x higher than the currently dominant feature of the Isle of Wight. This clearly has the potential to distract visitors from views on the cliffs of the Isle of Wight, which are a direct continuation of the cretaceous chalk of the eastern part of the property. Consequently, IUCN considers that the impact of the Project on the visitors’ experience and appreciation of the property in its wider natural setting is likely to be significant.
 9. Considering the concern raised under point (8) above, and noting the clear local opposition to the Project (as expressed by individuals, local community groups, the National Trust, and others), there appears to be a significant potential impact from the Project on the local tourism industry, which could start to see lower levels of visitation. Furthermore, stewardship by local communities may also be adversely impacted. In turn, these factors could negatively impact the long term sustainability of the management of the property, including through a loss of revenue, and by reducing opportunities for management to present the site to a wide audience. As noted above this would interfere with the State Party’s *“duty of ensuring the [...] presentation and transmission to future generations of the [...] natural heritage [...] situated on its territory [...]”*, as stipulated in Article 4 of the *World Heritage Convention*.
 10. IUCN further notes that the location of the project, at a minimum distance of 14km from the property, is in contradiction to national government guidance for offshore wind farm development, which recommends that large offshore wind farms (>100 MW) should be located

at a minimum distance of 12 nautical miles (22km) from the shore. Currently available information indicates that 80 to 90% of the Project will be located at less than 22km from the shore.

In conclusion, IUCN considers that the Project is likely to have some adverse impacts on the underlying geomorphological processes in the setting of the property that are essential for the long-term maintenance of its OUV, although further data, information and analysis are required in that regard. Furthermore, IUCN considers that the Project will have a significant impact on the natural setting of the property, in that it would adversely impact on important views from the property, including views from the main visitor centre at Durlston Castle towards the Isle of Wight, where the Project would replace the Isle of Wight as the dominant feature on the horizon. This is likely to significantly impact on visitors' experience and appreciation of the property in its wider natural setting, which could in turn compromise the long term sustainability of the management of the property, through a loss of revenue and reduced opportunities to present the property in its natural setting to a wide audience. Any potential impacts from the Project on this natural property are in contradiction to the overarching principle of the World Heritage Convention as stipulated in its Article 4, as the completion of the Project would result in the property being presented and transmitted to future generations in a form that is significantly different from what was there at the time of inscription and until today. Specifically, the property will change from being located in a natural setting that is largely free from man-made structures to one where its setting is dominated by man-made structures.