

POOLE AND CHRISTCHURCH BAYS' ASSOCIATION

PROPOSED NAVITUS BAY WIND FARM

WRITTEN REPRESENTATIONS

EXECUTIVE SUMMARY

INTRODUCTION

This document summarises the key issues forming the 16 Objections raised by Poole and Christchurch Bays' Association (PCBA) against the proposed Navitus Bay wind farm. Affiliated residents' associations (RAs) are, in the main, strongly opposed to the project.

The proposal to erect a wind energy generating station in Poole Bay represents the largest planning issue to confront the local community in decades. The overriding concern of RAs is that the Government propose the siting of a giant offshore wind farm and its onshore connection works in one of one of the most treasured and environmentally sensitive areas in the UK.

PCBA was formed to bring together the views of many residents reporting concerns to their own associations about the proposed Navitus Bay development. PCBA represents 50 affiliated RAs covering the area from Purbeck to Highcliffe. It has acted for the RAs in making representations to, and seeking information from, the developer during the Community Consultation stage as well as making representations to the Planning Inspectorate (PINS) and Examining Authority (ExA) during the formal stages of the planning process. Regular updates are provided to members through a cascade email system and associated website.

The Association provides a route for residents' views to be fed into the Examination process; this is efficient for both objectors and, in due course, the ExA. This consolidation should in no way be thought of as a dilution of a widely held message but rather an effective way of amassing a wealth of information, experience and expertise and channelling the same into a vehicle able to match the massive resources of a developer.

Shortly, PCBA contends that the proposal is a disaster for Bournemouth and the surrounding area, some of the most spectacular and sensitive parts of the UK. These views are supported by local MPs, key local authorities and a number of significant NGOs. The views are further supported by around 90% of around 2,700 Relevant Representations registered on the PINS web site.

The project should be recommended for refusal.

PCBA REPRESENTATIONS

Overview The proposal to erect a wind energy generating station in Poole Bay is the largest planning application to confront the local community in decades although, since the project represents national infrastructure, local politicians will not decide the application.

It is in this context that a feeling has grown amongst residents that the project is ‘being done to us’ starting from contentions that:-

- (a) PCBA can find no evidence of the Government’s Round 3 Offshore sites identified by Crown Estates being subject formally to either local authority or public consultation;
- (b) the proposals now before ExA render the Government in breach of the Aarhus Convention;
- (c) there is no need for the project in order for the government to achieve its 2020 targets for energy derived from renewables;
- (d) Community Consultation was not carried out in accordance with the developer’s Statement of Community Consultation (SOCC); and
- (e) the Application is made by the developer purely for commercial reasons whereas the significant environmental and economic risks would be shouldered by local communities and businesses.

The proposed turbine area is located in one of the most spectacular and yet environmentally sensitive areas in the UK. People are both baffled and angry that Crown Estates could have contemplated recommending a zone that is so obviously unsuitable. This is reflected in the volume and strength of opposition to many aspects of the proposal.

If a site had to be sought for such a development around the UK coastline, it would be hard to find a more environmentally sensitive location for a wind farm than the Jurassic Coast the New Forest National Park and the two areas of outstanding natural beauty (AONB). The area ranks with similar locations on the continent and beyond, for example the south coast of France, south and west Portugal and the west coast of Italy. Further afield, the Jurassic Natural World Heritage Coast ranks with sites such as the Great Barrier Reef and the Grand Canyon.

People have identified the proposal as the senseless destruction of our natural heritage by industrialisation of the bays when the need is not justified and the project fails to comply with the objectives of Government planning guidance concerning climate change. More appropriate alternative sites are available much further offshore, for example, in the North Sea.

If the Navitus Bay project were approved, the offshore turbines and onshore cable connection works would mean that around five years of construction disruption, noise and pollution would be followed by 25 years of environmental intrusion and economic damage.

Objection 1 – Planning and Policy Failures. PCBA contends that the proposal has achieved its current status in contravention of Article 7 of the Aarhus Convention. This is based on a case in Argyll, Scotland where the public had been denied information on alleged benefits in reducing carbon dioxide, the harmful emissions from wind power and the negative effects of wind power on health, environment and the economy. The UN Economic Commission Europe (UNECE) upheld the complaint.

The policy need for the project has not been demonstrated. Whilst some wind farms that are already consented have yet to be built, there is already a projected surplus of wind power capacity above 2020 targets for onshore generation. Since this is officially recognised, it is unlikely that there would be any shortfall were Navitus Bay not to proceed.

The project fails to comply with planning guidance for national infrastructure. The objective of the Government's renewable energy planning strategy is for projects to contribute to the reduction in CO₂ emissions at the same time as providing an alternative energy stream to the conventional nuclear, coal and gas fossil fuel alternatives. PCBA contends that this strategy is breached by the Navitus Bay project in that for the worst case scenario, the wind farm would add to CO₂ emissions rather than reduce them.

Additionally, the ratio of the benefits to the costs of the project is so small that no reasonable decision could be taken to proceed with such a scheme. PCBA contends that the policy for renewable energy should not override net scheme merits.

Objection 2 – Visual Impact. The visual impact of the turbines is the most obvious and intrusive aspect of the project. This would occur during construction as well as when the plant is in operation. Many observation points around the coast are reported by the developer as being significantly affected. Unlike many offshore wind energy projects, the adjacent coastline is not straight but has a unique 'horseshoe' shape that magnifies the intrusion as the viewer moves from the centre of the horseshoe (Bournemouth) further round the coastline and closer to the turbine area (Isle of Wight and Purbeck).

The length of densely populated coastline affected is, proportionately, much longer than at other UK wind farms. The prominence would be increased in an intrusive and ugly fashion by the sun's backlighting of the industrial structures comprising not just the turbines but three sea based electricity sub-stations each resembling an offshore oil platform. Moreover the eye would be caught by the movement of up to 582 rotating blades.

Furthermore, these landscapes of the highest designation require special protection under National Policy Statement for Energy (EN-1). The wind farm would give rise to a trilogy of detrimental effects; unacceptable visual intrusion, impact on the setting of the Jurassic Coast and AONB and these two driving a detrimental effect upon the local tourism led economy.

Objection 3 – Distance Offshore. The Government rightly acknowledges that the construction of giant wind farms in the sea can have significant environmental impact. Its response has been to commission Offshore Energy Strategic Environmental Assessments (OESEA) in 2009 and again in 2011. Both OESEAs recommend that such developments should be separated from the shore by at least 12 nautical miles and, in certain sensitive locations (such as those in this case), a greater distance is appropriate. PCBA concurs with those recommendations in principle as sensible restrictions.

Nevertheless, despite drawing this to the attention of the developer during consultation, he has continued to produce plans showing a turbine area, at least 85% of which infringes the 12 nautical mile limit. So concerned are local residents and politicians that one local MP has tabled a Private Member's Bill to increase the minimum separation distance from shore to 17.4 nautical miles.

PCBA contends that, on the basis that the proposal breaches the 12 nautical miles separation recommendation in OESEA, the project should be refused.

Objection 4 – Jurassic Coast. This area is, unquestionably, one of outstanding natural beauty, a refuge for many tourists looking to spend hard earned vacation time in some of our most beautiful coastal countryside. The jewel in the crown is the Jurassic Coast, the UK's only mainland UNESCO Natural World Heritage Site (WHS) featuring 95 miles of spectacular fossil rich coastline with breath-taking marine views.

Adverse reports on the wind farm proposal in relation to the WHS have been made by UNESCO, the WHS Steering Group and the Dorset AONB team. Specifically, UNESCO has stated that:

“Any potential impacts from the Project on this natural property are in contradiction of the overarching principle of the World Heritage convention as stipulated in Article 4.”

PCBA supports this view and concludes that the magnitude of the effects on the Jurassic Coast results in a **very significant environmental impact** and that there is an unacceptable risk that the World Heritage status of the site would be lost.

Objection 5 – Bournemouth's Sense of Place. The developer's visualisations have totally ignored the high social value of the wonderfully integrated town, seaside and country in this place. The carefully planned evolution of Bournemouth and its setting, has created a most attractive and special 'Sense of Place' that would be ruined by a huge industrial wind farm in the bay.

The proposal leads PCBA to question the level of aesthetic sensibility to the need on the one hand to preserve a fine example of early Nineteenth Century maritime townscape of Poole, Bournemouth and Christchurch and, on the other hand, to ensure the absolute separation of these phenomena from centres of industrial production such as the proposed wind farm.

Objection 6 – Tourism and the Economy. The coast and sea area around the proposed wind farm and the whole of the route of the onshore cables are both central to the local tourism and recreation offering. The seaside resorts in particular have managed to 're-invent' themselves after the advent of cheap package trips to the 'Costas' in the latter half of the twentieth century and they now represent essential local economic contributors.

The largest coastal resort, Bournemouth, has also attracted important alternative businesses such as financial services and popular English language colleges as well as its own university. Nevertheless, the tourism industry in Bournemouth alone still represented annual turnover in 2011 of £462 million and 11,700 jobs. The risks of even slight damage to this industry dwarf any suggested local economic benefits such as the 160 new jobs at one or more of 4 ports in the region suggested by the developer.

The towns of Swanage, Poole, Bournemouth and particularly Christchurch are well known retirement locations and benefit greatly from the 'grey pound'. They often figure in 'best towns for retirement' league tables. Retirees have a choice on where to settle; that choice would be adversely affected by the project leading to further economic downturn.

Visitor surveys carried out by Bournemouth Council and also by the developer both indicate a significant drop in visits: 32% during the 4-5 years construction period and around 14% thereafter. Even if these numbers were overestimates, the loss of just a small proportion of these visits would be catastrophic for the economy of the area.

Objection 7 – Noise. Wind turbines are noisy; many grouped together are very noisy. The sea surface is an excellent reflector of sound. Nevertheless, the in air noise generated by the proposed wind farm in operation is dismissed by the developer in his Environmental Statement on the basis that the noise generated by the plant would decay rapidly to a level of 32dB at a contour close to the plant. This is not correct.

Regrettably, despite a number of requests, the developer has resisted providing any calculations to support his conclusions on noise decay. These are challenged by experts who calculate that the whole coastline facing the plant will experience noise levels much greater than the Government's maximum permitted noise level of 35dB. A population of well over 400,000 would be affected.

In addition, there are major concerns about the noise nuisance from up to 5 years of construction pile driving and the serious health damage which can be caused by low frequency noise and infrasound from operating the turbines. These are further examples of environmental damage that have been understated by the developer.

Objection 8 – Sailing and Shipping. The wind farm is located in one of the busiest shipping areas in the world: the English Channel. The site has passing traffic to and from some of Europe's largest ports including Southampton, London Gateway, Felixstowe, Zeebrugge, and Hamburg. This is in addition to frequent local cross Channel ferry traffic from Poole, Weymouth, Southampton and Portsmouth. The turbine area would also be in the heart of a location popular for national and international competitive sailing and a magnet for motor and sailing leisure craft with important centres including Cowes, Lymington, Yarmouth, Christchurch and Poole.

Not only is the wind farm site, with the potential for nearly 200 new obstructions, in a very busy marine area, it is also an area which has challenging conditions of strong tides and sudden changes in visibility. The prospects following a major shipping emergency are dire. The turbine area and layout would add significantly to the risk of collisions at the same time hampering air and sea rescue. Recent history is populated with serious incidents in the Channel; examples include the Torrey Canyon and Napoli incidents and consequent environmental disasters and the Canberra dragging its anchor which could have led to massive loss of life.

Objection 9 – Birds. The proposed Navitus Bay wind farm is located in one of the most internationally important bird movement areas. The numbers of bird species and movements seen in the area over many years, mean that the assessment of risk to birds from any development demands the highest quality analysis. PCBA contends that the developer has not achieved this standard and hence the risks are understated.

Aspects of the developer's Environmental Statement are flawed and therefore the conclusions drawn relating to birdlife are underestimated. In particular, the developer failed adequately to consult local experts and his survey methods were inadequate. Accordingly, the results of the theoretical modelling do not reflect the abundance of birds in the area and thus inadequately assess the risk of harm to the abundant resident bird life, foraging species and the substantial numbers migrating through the turbine area.

Objection 10 – Onshore Works. The proposed onshore cable connection works threaten another area of outstanding natural beauty, the New Forest National Park and surrounding heathlands. This would see an eight lane motorway swathe of earthworks at least 40 metres wide cutting through the countryside from Barton-on-Sea to Three Legged Cross north of Ringwood. The activity would irrevocably destroy flora and fauna over the 22 miles of its length together with noise disruption and damage to the mainly minor roads crossed by the cable route and used for access to working sites. The wide ugly scar and central hard surfaced haulage road would remain along the cable route for at least the 25 year life of the project.

In addition, there are a number of unresolved construction issues such as whether the cable route earthworks would have to be 65 metres wide for reasons of good engineering practice and the risk of a complete cliff collapse at the Taddiford Gap beauty spot, designated for cable landfall.

Objection 11 – Aviation Radar and Night Visuals. Despite the very lengthy consultation period, there appear to be environmental risks that remain unassessed regarding night visuals and safety risks due to interference with radar that remain unresolved.

The lighting for the wind farm at night would prove intrusive; this could be reduced by the Obstacle Collision Avoidance System (OCAS). There could be a risk to aviation caused by wind farm interference affecting flights to and from Bournemouth and Southampton Airports. Spinning turbine blades can make radar much less effective with all that implies for safety.

PCBA requests the ExA to seek clear answers at the Examination. The issues are too important to be resolved after any Consent might have been given.

Objection 12 – Microclimate. Bournemouth has been famous since its earliest days for a microclimate giving warmer temperatures, clearer horizons and skies than occur in the surrounding area. That microclimate could be put at risk by the scheme.

It is very possible that the fog banks and temperature variations that have been reported as associated with operating wind farms could have an adverse effect on Bournemouth and the surrounding area. If so, the whole area would become blighted in the minds of both residents and visitors. These risks should be examined and impacts on costs and benefits established before any recommendation on the project is given.

Objection 13 – Public Opposition. Throughout the consultation period and later, we have encountered very few supporters of the wind farm proposal. Most of the residents and visitors we have spoken with and emailed are shocked at the very idea of a huge wind farm in this completely unsuitable location.

Opposition has been registered by PCBA on behalf of its 50 affiliated associations, Challenge Navitus, five local MPs, several local authorities, and a great number of individual residents.

Substantial opposition was also manifest at a number of public meetings. Around 2,700 Interested Parties have registered Relevant Representations with PINS; far and away the largest number in any wind farm proposal to date; around 90% oppose the Navitus Bay plans.

This level of opposition is unprecedented and ExA is urged to recognise this public opposition under Planning Act 2008 in making its recommendations. The magnitude of the effects of the project on the public demonstrates a **very significant environmental impact** and the Application should be recommended for refusal.

Objection 14 – Compulsory Powers and Property Depreciation. Were Navitus Bay to be approved, a very wide and densely populated area would suffer excessive noise so making properties less attractive and less valuable. In view of the sheer scale of the problem, it is likely that there would be more than 100,000 claims.

The first stage would be for residential property owners to object to the granting of Compulsory Powers during this Examination. However, if a Development Consent Order were to be granted, a second stage would take place. Owners could make depreciation claims for the effects of turbine noise under the Land Compensation Act 1973.

PCBA contends that since a large population of well above 400,000 would suffer noise levels above the protection limit, claims would be very difficult to resist and potential property depreciation on such a scale justifies a recommendation to refuse the Application.

Objection 15 – Consultation Adequacy. Throughout the consultation period and later, PCBA has noted that the developer's Statement of Community Consultation was not followed in respect of public notices and information gaps remain notwithstanding requests for further detail having been made. Many other stakeholders have told us of similar experiences.

The detailed Objection gives examples of consultation failures and gaps in information. The developer has not provided clear and adequate details of his proposals.

PCBA contends that the developer has significantly underperformed his obligations in the important task of community consultation and no recommendation should be given until such failure is rectified and information gaps are filled.

Objection 16 – Bats. Bats are one of the most endangered and hence heavily protected species of mammal in the UK. They are present along the onshore cable corridor and are known to forage at sea and migrate from northern Europe southwards in winter.

They are protected by EU and UK law and it is a criminal offence to kill or capture bats, or to interfere with bats or their roosts. The law requires that bat surveys are carried out in the area of works, reported to the planning authority and considered concurrently with other aspects of a project.

The developer has failed to complete a full bat survey for the onshore works or to carry out any bat survey in relation to the turbine area. Accordingly, the ExA is not in a position to examine the Application.

The developer notes the use of derogations and licences as works proceed to enable the destruction of species that would otherwise be illegal. Destruction would only be permitted if there were no alternatives; clearly this is not the case for Navitus Bay.

PCBA concludes that the magnitude of the effects on bats results in a **very significant environmental impact**.

IN CONCLUSION

The question remains. Why try to build an industrial offshore wind farm, bigger than any yet existing in the world, in this exceptionally beautiful and environmentally sensitive area; one that ought to be preserved for the future? In making these objections, the residents seek to act as guardians of this environment.

It is not up to objectors to propose alternatives to a planning proposal. Suffice it to say that there is spare capacity in other sites earmarked in the Round 3 North Sea zones to accommodate the 970MW capacity represented by the Navitus Bay project and the environmental impacts would be minimal by comparison. Dogger Bank for example has 1,800 MW of unused allocation.

This proposal does not achieve the aims of the Government's Renewable Energy strategy and is phenomenally poor value for money. It is a bad idea in totally the wrong location. Even ignoring visitors to the area, approaching 500,000 local people are expected to suffer the risks and impacts.

PCBA contends that just one or two of the objections in these Written Representations would be enough to justify rejection of the proposals. The cumulative effect of so many downside risks and negative effects mean that it would be a colossal planning mistake. The project cannot reasonably be recommended for approval.

Poole and Christchurch Bays' Association

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