

THE PURBECK SOCIETY

Affiliated to The Dorset Branch of the
Campaign to Protect Rural England

Chairman : Michael Stollery, Dip Arch, RIBA

Please reply to :
52 Victoria Avenue
Swanage
BH19 1AP

6 March 2013

Navitus Bay Developments Ltd
Units 3&4 Athena Court
Tashbrook Park
Warwick CV34 6RT

Dear Sirs

NAVITUS WIND PARK - *OBJECTION*

In response to the Phase Three Community Consultation, The Purbeck Society, after due consideration of the revised proposals, submits its formal objection to them and lists below the reasons for doing so.

- The Purbeck Society, a community based group with over 350 members, has traditionally been involved in the study of the natural environment in the historic Isle of Purbeck, i.e. that area of South East Dorset bounded to the north by the River Frome and to the south by the coast. More recently, with the various threats to the natural and built environment, the Society has concerned itself with conservation and planning. Due to our very particular geographical sphere of interest, our comments are confined to the perceived impact on this area. We, therefore, do not feel we should comment on the cable route or the proposed substation – leaving it to others with specific local knowledge and involvement in these areas to register their particular concerns.
- We welcomed the designation of the Jurassic coast as a World Heritage Site as recognition of the outstanding coastline that we are fortunate to have in Purbeck. It is because of the latter that the Society feels it should concern itself with the proposed Navitus Bay Wind Park.
- We understand the world-wide concern about climate change, the finite resource of fossil and other fuel sources and the world's increasing demand for energy, believing it right that alternative forms of 'natural' energy are being researched. As a Society we are not necessarily

against harnessing wind power as a method of electricity generation. However we do strongly object to the current, revised, proposals by Eneco/EDF for the proposed Navitus Bay Wind Park.

- Within the Society's membership there will many shades of opinion but the Committee, after due deliberation, is confident that the objection to the NBDL's proposals, and the reasons for it, represents the views of the overwhelming majority. Whatever individual their views may be, individual members have been encouraged to make their own views known.

The reasons of the Society's objections are as follows:

1. Purbeck has a fragile tourist based economy. The beauty of the coastline, beaches and cliff walks are essential to this and are indeed the fundamental basis of it. We do believe that the construction of this wind 'park' so close to the shore cannot be other than detrimental to it.
2. We are concerned that the designation of the Jurassic Coast as a World Heritage Site would be threatened and note that abroad extensive exclusion zones have been created around sites of similar importance so that they are not blighted. Eneco's own wind farm development off the Dutch Coast is at a distance of some 24km (15 miles) from shore. This however does not obstruct any views except that of the open sea, the turbines are 11 km (6 miles) further away than those proposed for Navitus, are less than half the height, and there are only 60 turbines in less than 1/10th of the area proposed for the Navitus Bay 'Park'.
3. We note that due to the strength of public protest, the nearest turbines of the proposed 'Park' has been moved further away from the coast by 1.4 km or 0.9 mile – However they are still much closer than the Needles at 16 miles (26km) and therefore will be seen more clearly than the Needles and the entire western coast line of the Isle of Wight.
4. Much play has been made by the Developers that the number of turbines has been reduced, as has their height. This is a piece of 'developer spin' as a range of 188 to 333 turbines with heights up to 210 metres was previously proposed. That these have now been narrowed down to a number of "up to 218 turbines" with heights up to 200 metres makes no significant difference to the overall impact of the scheme. These claims are, therefore, seriously misleading.
5. Also seriously misleading are the visuals. Whatever the claimed scientific methodology used by NBDL, the effect has been to reduce the visual impact of the Isle of Wight when seen from various locations along the Purbeck coastline and, even more so, that of the proposed 'Park'. The tallest turbines are still twice as high as the Needles and the nearest of them at a little over half the distance. Common sense indicates that something twice the height of the Needles and a shade over half the distance to them will appear to be four times the height of the Needles. By being closer they will also appear much clearer. It is also noted that the height to the tip of the rotors of the smallest (5MW) turbines at 177metres is still taller than the 141metre spot level of the downs immediately behind the Needles.
6. Respondents to the Phase two consultation clearly registered concerns to the whole site of the proposed 'Park' but most critically to areas F, G and H. Quite clearly therefore if the developers really wished to respond to the public, they would remove all turbines from those areas. To do so would significantly reduce the Society's opposition, especially if no turbines were located within the

Government's recommended 12 mile exclusion zone for coasts of high sensitivity, which due to its World Heritage designation, the Purbeck coastline undoubtedly is.

7. While we acknowledge that it was the geology of the coast that gained the coveted World Heritage status, it is that same geology that extends out to the sea and it is as yet unknown what the effect may be to the coast line of such a huge development, with so many deep foundations needed to support the turbines so close to the shore. The cliffs along this coastline in some areas are notoriously unstable as evidenced by the recent landslips. The effect of such a large wind farm on wind patterns and the local climate so close to these cliffs also gives rise to concern as to whether greater erosion might be caused.

8. The site is also overlooked by two Areas of Outstanding Natural Beauty and a National Park. It does not seem that this has been taken into account at all. There are also a significant number of National Trust properties in the area, one of the most significant being Corfe Castle.

9. Eneco have used as an example of their wind farm development off the Dutch coast. However this is some 24km (15 miles) from shore and does not obstruct any views except that of the open sea. The turbines are 11 km (6 miles) further away than those proposed for Navitus Bay, are less than half the height, and there are only 60 turbines in less than 1/10th of the area proposed for Navitus Bay.

10. The Navitus Bay site is particularly bad as it is situated in the mouth of a bay surrounded by hills and cliffs which, due to their height all along this stretch of Heritage coast, the full height of the turbines would be visible.

11. We have concerns as to maintenance of the turbines and that, if constructed, whether they will be maintained to a good standard, not only as to their functionality but also their visual appearance in the corrosive marine atmosphere. Two hundred rusting turbines so close to shore would be intolerable.

12. We have concerns as to the impact on wildlife, not least the migratory patterns of birds. Due to its proposed extent, the development would be a considerable danger to migrating birds attempting to pass through it, the turbulence caused by the rotors tending to disorientate them. There is mounting evidence in Europe and elsewhere that wind farms kill thousands of birds. We understand that the 'Park' would, if given consent, lie on a major migration route.

13. The area is home to many colonies of seabirds and other maritime species, for example Dolphins are regularly seen in these waters. We are concerned as to the possible impact of such a huge development on them, their feeding patterns and their habitats. Additionally, the dolphins - are a visitor attraction and will surely be disorientated during piling operations, the shock waves from which will cover a considerable area. It is a concern that they might never return.

14. The turbulence caused by up to 200 turbines so close to the shore could affect wind patterns coming on shore and thus the micro-climate of the coastal area. This in turn could have an adverse effect on tourism and consequently also on the economy of the area.

15. The area in question is in an area of high shipping usage, ferries, freighters and leisure craft. Such a large number of turbines would pose a considerable danger to all shipping, especially in storms and high winds, likely to be exacerbated by the turbines themselves (if able to operate in such conditions). Obstructing leisure craft would pose another threat to the viability of the area for boating, again at some loss to the local economy.

16. There is also the issue of light pollution, a growing concern in the UK and the world in general. No mention is made by the developers of the warning lights which will undoubtedly be required on top of each turbine. 200 flashing warning lights on each windmill destroy the view to the Needles at night when viewed from the beach and cliffs and be a serious distraction to the astronomers who meet at Durlston observatory especially for the dark sky.

We believe there are many more sustainable and less damaging ways of meeting the declared objectives of these proposals. The NBDL's scheme is ill founded for the reasons stated, with the potential for blighting a historic and beautiful area. In short, the proposed 'Park' is much too close to shore, has too many turbines of which even the smallest is too tall to be acceptable. We submit that relocating the wind farm further out to sea would not jeopardise the future of the planet. However, accepting what is currently proposed would jeopardise the well-being and future of Purbeck by destroying its priceless historic views and coastline, and risking its World Heritage Site designation.

Yours faithfully

Mike Stollery

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Cc Richard Drax MP, Ashley Fox MEP, Chief Executive DCC, Chief Executive PDC, Town Clerk STC, Natural England, RSPB, National Trust, the Maritime & Coastguard Agency, The Royal Yachting Association. CPRE. Dorset AONB