

THE PURBECK SOCIETY

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

www.purbecksociety.co.uk

Chairman : Michael Stollery, Dip Arch, RIBA

Please reply to :
52 Victoria Avenue
Swanage
BH19 1AP

COPY

2 October 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 Four Community Consultation, The Purbeck Society, after due consideration of the current proposals, sees nothing in them to reverse our previously expressed opposition. We therefore, submit herewith the Society's formal objection to the current proposals with our comments arising from the latest round of consultation exhibitions, together with a resume of the points made previously which we consider to be equally valid now.

It would appear that the only new element in this consultation is the work done on the Environmental Impact Assessments (EIA), with which we have continuing serious concerns set out below. We also take issue with the presentation of the visuals still being used by NBDL. These take no account of the work done by Stirling University, which has shown that the so called 'industry standards' used by NBDL are thoroughly misleading.

Considering the EIAs - Offshore, Section 5 of the Consultation Document

5.2 NBDL admit that water quality may be affected during construction. This would seem to be highly likely and would impact on tourism, so much of it based on the sea. No mitigation is proposed and we object to the glib acceptance of this as '*minor to negligible*'. We do not accept this, nor the lack of any appreciation on how tourism and the local economies of the coastal communities would be adversely affected. Similarly, we do not accept that the impacts during de-commissioning would be '*not significant*'.

5.3 We are not convinced by the claims that impacts on air quality would be '*not significant*'.

5.4 We do not accept the claims made that impacts on in-air noise would be '*not significant*'. It is well known that low frequency noise travels furthest and the impact of 200+ turbines generating such low

frequency noise travelling across water, would have a serious affect on passing shipping and on the coastal communities.

5.5 We are not convinced by the claims that impacts on Benthic Ecology would be '*not significant*'. The impact of constructing the foundations for so many turbines will cause major impacts during construction. Will the long term impacts really be '*negligible*' as claimed?

5.6 Similarly, we are not convinced by the claims that impacts on Fish and Shellfish ecology would be '*not significant*'. We do not accept the statement that '*the potential for lethal effects and physical injury is minor*' and that behavioural effects are only assessed as '*negligible to moderate*'. It would appear from the preceding paragraph that this refers to 'the spatial ranges of noise predicted'. What about the actual impacts caused by construction vessels, plant and machinery including drilling rigs etc? Is this dismissed in the last paragraph (p25) as 'all other impacts', which are assessed as '*negligible to minor*' and '*not significant*'? These glib dismissals of the likely real impacts are unbelievable and we cannot accept them as truthful or accurate statements under any rational criteria.

5.7 Similar comments apply to Marine Mammals and Megafauna. We do not accept that throughout all stages of the proposed project that impact would be '*not significant*'.

5.8 One of the Society's concerns throughout has been the potential impact on birds and, in particular migratory, birds. With such a large expanse of the proposed wind farm, it will inevitably lead to massive deaths of birds which will still endeavour to follow their traditional migratory routes – the numbers affected could run into tens of thousands. While work is still being done by experts on these migratory patterns, experience on-shore as well as off-shore supports sufficient evidence to show that the effect wind farms have on birds is catastrophic. So we reject outright NBDL's bland statements that impacts during the proposed project would be '*negligible*'.

5.9 At least there is some recognition of the visual intrusion that this development would make, with the statement that 'impact on receptors at various points on the coast of the mainland and the Isle of Wight' have been assessed as '*major*' and '*major moderate*'. We do not accept, therefore, the concluding paragraphs that the remaining 'sub units are considered to experience a moderate and *very low significance of impact*'. Nor that 'overall the landscape and visual attributes of the Jurassic Coast is considered to experience a *moderate significance*'.. or that on 'the Dorset AONB...*moderate-minor*' and that the final claim that 'these are considered to be *not significant*..' These claims, we submit are totally untrue whether under EIA regulations or any other.

5.10 – 5.18 We do not accept that the claims made under these headings are any more acceptable, being generally being dismissed as '*negligible*', '*minor*' or '*not significant*'. But then the developer would try and get away with such claims – however that does not mean they are either true or acceptable.

We have argued persistently that the claims made by NBDL in particular regarding visual impact and the amount of visual intrusion have been consistently played down with the aim of trying to dupe the public into accepting the proposed development. NBDL's visuals have also been discredited and shown to be misleading, we believe that these claims are similarly flawed. The impact along the Jurassic Coast will be massive as will the impacts on commercial shipping, pleasure boating, air and water quality with consequent serious adverse consequences on the local economy.

We do not accept the claim that many jobs will be created in the local economy. NBDL is a consortium of Dutch and French firms who will doubtless place contracts for manufacture of equipment and construction

with firms in their own countries. The relatively small number of jobs that might be created during construction and in future maintenance would be far outweighed by the loss of employment in the tourism and service sectors which, locally, are so reliant upon tourism. Research by Bournemouth Council has shown that even a small percentage drop in visitor numbers would have a disastrous effect on the fragile local economies.

A further point raised by our members is the possible effect such a large group of turbines could have on TV and mobile phone signals. There seems to have been little or no research into this, or if so, none stated.

We abhor the process which seems designed to wear down valid opposition to these proposals, which NBDL are, understandably, exploiting for their own commercial benefit. However, this must not be at the expense of the priceless natural environment, recognised by the World Heritage designation. There are other methods of generating energy which are environmentally acceptable (and we don't mean 'fracking'!) and it is these that should be developed for the future.

Wind power in the form proposed by NBDL is totally unacceptable. If the developer really wished to take on board public opinion, the development would be moved much further away from the Coast. That NBDL has not done so demonstrates that the process and their participation in it is a sham.

Summary of Points previously submitted:

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. The construction of this wind 'park' so close to the shore will be highly 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.
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. The Developers claims that the number of turbines has been reduced, as has their height. This is a piece of '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. Common sense indicates that turbines twice the height of the Needles and a shade over half the distance to them will appear to be four times their height. 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.

7. The geology of the coast 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 the 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, little recognition of the impact on them appears to have been made.

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 the impact on wildlife, not least the migratory patterns of birds. (see above)

13. The area is home to many colonies of seabirds and other maritime species, (see above)

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.

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.

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.

Yours faithfully

Mike Stollery

M A Stollery

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