

Written Representation by the National Trust

– Interested Party No: 10028761

Re: DEADLINE VII - 5th March 2015

As stated in our holding response of 5th February to Deadline VIa, The National Trust committed to review the additional information including visualisations relating to the Mitigation Option and clarify our final position. The National Trust would like to take this opportunity to make a number of general comments before addressing those comments relating to our reconsideration.

1. Comments on procedure

The Trust wishes to state its broad concern with the reasoning behind the decision and procedure carried out which the Crown Estates followed as the Crown Estates use their own MaRS GIS tool, Marine Resource System. Whilst it is quite a powerful tool, the resulting data is only available to Crown Estates themselves and to R£ registered applicants. The difficulty arises as there is no public consultation on the GIS outcome which causes widespread concern especially in areas subject to high environmental sensitivity. Perhaps in hindsight, more detailed consideration should have been given in this particular zoning given the close proximity of such a highly designated coastline and the potential high level of environmental impact as the impacts of off-shore marine development proposals will affect both off-shore and on-shore. We would suggest that these initial zonings should be reviewed as soon as it is expedient or at least a commitment to review given within a reasonable amount of time given the continued pressure for off-shore renewable energy generation. We suggest that the South Marine Plan is an appropriate mechanism through which to begin to address the issue.

The Trust also wishes to highlight the need to have clarity over the 12nm limit, its purpose and relevance to such planning decisions. At present there seems to be vagueness surrounding the understanding and application of the 12nm limit with interpretation being subjective and when considered in relation to our European neighbours the UK often seem to take a different interpretation as to its relevance. Clear UK policy and a criteria-based definition of when it applies are needed to address this issue and consistency is required in its application within the decision-making process.

The Trust would wish to express their concern with the process and procedures adopted in relation to this overall application with particular reference to the perceived lack of transparency over the mitigation option which was introduced extremely late in the day and yet was deemed admissible to run in parallel with the original proposal. This is contrary to the spirit of the Nationally Significant Infrastructure Planning process and the emphasis placed on the pre-application part of that process. It has resulted in much questioning of the process both from professionals and the general public alike, calling into question the intentions of the applicant to submit two versions of the proposal to run in tandem. The National Trust along with other parties has been expressing serious concerns about the original proposal since 2012 and there has been ample opportunity for the applicant to bring forward and consider alternative proposals in response to these concerns. In our opinion it

would have been better practice to withdraw the original application and focus on the Mitigation Option - if this was a genuine offer - rather than play safe with an alternative option as a safeguard if the first was unsuccessful. We fully recognise that the Examining Body must take into consideration the information set before them but perhaps in terms of lessons learnt the procedural policies should be reviewed in order to ensure that this situation does not occur again. The net result is that consultees are now expected to 'compare and contrast' between two options and this is unreasonable and should not be the case.

It was noted during the Mitigation Hearings that the applicant made reference to the Rampion proposal on a number of occasions in terms of similarities. However, care must be taken that a precedent is not allowed to occur as the procedure of allowing a tandem application is, in our opinion far from good practice as each application must be deemed on its own individual merits and although there were some similarities between the schemes there were also significant differences and therefore, the risk of misinterpretation becomes even greater.

We recognise that the applicant has spent much time in providing a comparison of both the Mitigation Option and the application scheme and we agree that comparatively the Mitigation Option is better. However, if the Mitigation Option is taken as a stand - alone scheme and not considered as a comparison, on its own it is still a large development in the open seascape and given the findings of our previous LUC research submitted at deadline VI we would suggest that options to offer further design or siting advice are very limited for a scheme of this scale.

2. The National Trust: clarification of its final position in relation to the original proposal and the Turbine Mitigation Option.

As stated in our holding response of 5th February 2015, the Trust has reconsidered the original and the additional Mitigation Option information including the complete suite of visualisations as presented by the applicant and have made our final conclusions as to our position. **In relation to the original application, the Trust remains opposed to the proposal** and reiterates our previous grounds of objection as outlined in our written representation re: Deadline V, in relation to the visual impact of the original proposal on both the landscape and seascape in this particular location.

As stated in our previous representations, the Trust strongly supports renewable energy generation and wish to see the best possible scheme which will provide a sustainable energy supply without causing a detrimental impact on this precious coastal landscape and seascape. Although we recognise that the applicant introduced a Mitigation Option with the intention of reducing the impact of scale, the information made available from the applicant and our commissioned research by LUC indicates that the Mitigation Option as presented by the applicant does not remove nor resolve the visual intrusion of the proposal. We reconfirm that our supportive evidence submitted at Deadline V concludes that the Mitigation Option would still negatively impact on the character, setting, protection and management and ultimately public appreciation of this valued landscape and seascape especially at a number of locations under the ownership and/or management of the National Trust. Our Outdoor (and in particular our Coastal properties) are of special value to this highly designated south west coastline which provide both the local community and visitor alike with an appreciation of unspoilt long distance sea views across this part of the English Channel.

In terms of site specific comments although we recognise the Mitigation Option increases the distance and reduces the horizontal spread of the array from our highly sensitive coastal properties, we note that the Mitigation Option does not overcome all the significant negative impacts of the scheme and the applicant themselves recognise that significant impacts remain on part of the Dorset Coast (AONB) between Old Harry Rock to St. Aldhelm's Head (largely NT coastline) and at key viewpoints. Our supporting evidence previously submitted and reviewed by LUC confirms that there will be significant impact upon the Isle of Wight AONB and Tennyson Heritage Coast with particular significance in respect of the western promontory of the Island from Freshwater Bay to the Needles. Furthermore, although the applicant states that there are no significant effects on the Isle of Wight we remain of the opinion that given the very high sensitivity of the South West Isle of Wight coastline that some significant landscape and visual impacts will remain. We believe that the Mitigation Option will still have a significant impact upon the Isle of Wight AONB and Tennyson Heritage Coast, its setting and the constituent character of its landscape and seascape and on the enjoyment and appreciation of these. We believe that both the original application and the Mitigation Option represent unacceptable impacts on the Isle of Wight AONB and Tennyson Heritage Coast, their character, appreciation and in the case of the AONB its statutory purpose.

In conclusion, **the National Trust reaffirms its objection to the original proposal** and although we would welcome mitigation **we do not consider that the Mitigation Option, as presented by the applicant goes far enough to resolve our concerns** within this highly designated landscape and seascape. Therefore, **the Trust objects to the Mitigation Option as well as the original proposal.**

We would hope that the comments we have made in relation to process and procedures would be seriously considered as we strongly believe that a best practice approach will be beneficial for all involved. The integration of terrestrial and marine planning should act as a complementary decision making process and we believe with the review of process and procedures this decision-making will become more effective.