

Written Representation by the National Trust – Interested Party No: 10028761

Introduction

The National Trust, established over 115 years ago, is a leading conservation charity with over 4 million members. The Trust has a statutory duty under the National Trust Acts ‘to promote the permanent preservation of places of historic interest and natural beauty, and their enjoyment by the public, for benefit of the nation, forever, for everyone’. To achieve this aim, the Trust manages over a quarter of a million hectares of land, more than 700 miles of unspoilt coastline and estuary, several hundred historic houses, gardens and parks, and 6 World Heritage Sites. More than 100 million visits are made every year to the properties in the Trust’s care.

Our core purpose is to look after special places, for ever, for everyone. This applies to off-shore and coastal places as much as it does to inland sites especially in relation to the National Trust’s direct ownership of land within The Isle of Purbeck, Dorset, and the Isle of Wight (please see Annex 1) and to the Trust’s wider remit to protect environmental interests and respond where there are impacts on the natural and historic environment. We are deeply concerned about the visual impact on the setting of UNESCO designated World Heritage Jurassic coast, on two major Areas of Outstanding Natural Beauty, the Heritage Coast and the New Forest National Park.

The Director of the Culture Sector of the World Heritage Centre of UNESCO wrote to the UK Government on the matter. The letter dated 02/05/14 included an annex with details of possible impacts as set out by their designated advisors on natural World Heritage Sites, the International Union for Conservation of Nature (IUCN). IUCN raised a number of serious concerns. IUCN concluded that, “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.”

The Trust therefore, do not consider that sufficient weight has been given to the status of the area’s designated assets which are of exceptional visual and amenity value. This area is highly accessible to large parts of both the South West and South East regions including the London area. Its proximity to a large population base makes this a popular and highly valued area for recreation and tourism. The National Trust is a key partner in the development of the Heritage Coast and aims to work collaboratively to improve visitor engagement. The extent of urbanisation of the south coast means that it is increasingly important to retain the remaining open, unspoilt, expansive views including sea views.

As an island nation our coastline matters, it gives us our uniqueness both for its aesthetic qualities, our cultural heritage and as home to our many coastal communities. Our coast is a place which generates an emotional connection for almost all of us whether it is fond memories of childhood seaside holidays or those who wish to experience the rugged natural beauty and remoteness of the unspoilt coastline. We have strong concerns over the potential change to the view of the sea and horizon from the NT locations that we are responsible for. Once altered, it will be impossible to derive the same degree of benefit.

The National Trust acknowledges national policy Para 3.4.5 of Overarching National Policy Statement for Energy (EN-1), July 2011 which states that to meet UK commitments to sourcing 15% of energy from renewable sources by 2020, "it is necessary to bring forward new renewable electricity generating projects as soon as possible". The Trust is committed to the transition to more sustainable forms of energy generation, but we believe that the location and design of all energy generation schemes should take account the full range of environmental considerations, including the protection of valued landscapes, and that developments must be in acceptable locations and of an appropriate scale and design for their setting to avoid unacceptable harm and produce a net environmental benefit. However, the Trust does not support proposals that would seriously damage the beauty of our coastline.

We are not convinced that this method of energy generation is the most environmental appropriate for this specific location. There is little evidence of the applicant addressing alternative energy technologies which may be less environmentally harmful;. Should this proposal be approved we believe that given the cumulative visual impact of extant, approved or pending decision on-shore and further off-shore wind turbines will have a dramatic impact on the visual amenity of this coastline potentially resulting in panoramic views of industrial scale structures into a unspoilt seascape. We believe the developer has not taken sufficient account of the seascape and landscape impacts on the designated highly sensitive island environment found on the Isle of Wight and the nearby coastlines of Purbeck; the south-west of the Isle of Wight and the south east of the World Heritage Site of Dorset and East Devon Coast.

The National Trust is committed to supporting sustainability energy generation and have commissioned our own independent research on the potential alternatives to the current scheme (please see Halcrow Report - Annex 2). Following this initial research we would propose that it would be possible to relocate the scheme further out to sea within the Round 3 designated zone. We therefore, feel there is scope for a more appropriate scheme to be developed here but not in the current location proposed.

Visual Impact on Landscape and Seascape Character

Whilst the Trust welcomes the recent revisions to the proposal namely the decrease in the proposal's boundaries, however, in our opinion these measures do not go far enough to successfully mitigate the potential harm to the environment and should be moved back within the 12nm limit. The Trust still has a number of serious concerns, particularly relating to the visual impact of the proposals on the amenity and enjoyment of Trust property, on the Isle of Purbeck, Dorset, and the Isle of Wight and in particular, along the Jurassic/Heritage Coast.

The National Trust commissioned LUC to undertake a review of the Environmental Statement (ES) for the Navitus Bay Offshore Wind Park in relation to the National Trust's direct ownership of land (within The Isle of Purbeck, Dorset, and the Isle of Wight) and to the Trust's wider remit to protect environmental interests and respond where there are impacts on the natural and historic environment. (Please see full report - Annex 3). This report considers National Trust properties within 30km of the turbine area where there is theoretical visibility of the turbines. There are a number of other National Trust properties located across the wider study area (defined as 45km of the turbine area within the SLVIA) with theoretical visibility which have been studied as well.

This report provides an assessment on the scheme in relation to seascape, landscape and visual resources, historic seascape character and terrestrial heritage assets and concludes that the final ES indicates the proposed Navitus Bay offshore wind farm is predicted to have significant impacts on National Trust interests as follows:

The Purbeck Coast Regional Seascape Unit is the only seascape unit in the study area which is predicted to be subject to significant impacts. This is an area of seascape related to National Trust coastal properties at Studland, including Old Harry Rocks and the Purbeck Estate. Our primary concerns are noted here with reference to key omissions and inconsistencies

- Significant impacts on the landscapes of the Dorset AONB and the Dorset Heritage Coast which relate to NT properties at Studland and the Purbeck Estate.
- Significant impacts on the landscapes of the Needles Headland, Tennyson Down and Afton Compton and Brook Downs running eastwards are part of and relate to the Isle of Wight AONB and Tennyson Heritage Coast.
- Significant impacts on three specific land based viewpoints on NT property, the Needles and Tennyson Down within West Wight and Old Harry Rocks at Studland.
- Significant visual impacts on sections of the South West Coast Path National Trail which passes through National Trust Property within Studland and the Purbeck Estate.
- The ES does highlight significant impacts in relation to NT interests within Dorset and the Isle of Wight. It is considered that in a number of instances the ES method has not provided a full understanding of potentially significant impacts on seascapes, landscapes and visual amenity of the area. In addition associated visualisations in relation to National Trust Properties are less than helpful in two instances.

In relation to the Landscape and Seascape Baseline, the report highlights:

- The combination of assessing both generic seascape types and geographically specific RSUs, which form two overlapping layers, means that impacts are sometimes double counted and a confusing set of results are presented to the reader.
- The use of county level landscape types rather than district level character area means that the baseline is broad brush and variations in sensitivity, magnitude of effect and significance of impacts across different parts of the area are not captured in the SLVIA.

In reference to Visual Baseline the report identifies the following:

- Visual impacts on the viewpoint on the southern cliff top of Brownsea Island, promoted in National Trust literature and marked on OS maps, are not considered in the assessment. We believe there is potential for significant impacts on this viewpoint.
- There is theoretical visibility from St Catherine's, where the array will be visible in views of the lighthouse as part of the backdrop. These views are not considered in the assessment and the Viewpoint 33: Blackdown Car Park does not provide an indication of the nature of the change in view experienced from this area, as it is poorly located behind vegetation and is positioned at a greater elevation to the National Trust Land at St Catherine's Point.

In reference to the Assessment of Impacts:

- The NT do not agree that there will be a low magnitude of change on the character of the Sandy Beaches SCT as they occur in the Dorset AONB.
- The NT do not agree that a medium-low magnitude of change will occur for the Swanage Bay RSU (which includes the headlands of Old Harry Rocks and Durlston Head).
- The magnitude of effect recorded for the Dorset AONB between Old Harry Rocks Poole Harbour (Studland and Poole Harbour) are likely to be higher than low due to the influence the development will have on the views along the coast to Old Harry Rocks from Studland Heath and the beaches to the north.
- It is considered that there is considerable inconsistency between the judgements of magnitude of effect along the coastal areas of the Isle of Wight, in particular the Needles Headland, Tennyson Down and Afton Compton and Brook Downs running eastwards which are part of and relate to the Isle of Wight AONB and Tennyson Heritage Coast.
- NT considered it likely that there will be significant impacts on the northern part of Studland Beach and the heath, where the turbines will be seen in the context of Old Harry Rocks, and on visitors to the Purbeck Estate.
- The NT do not agree that only a moderate impact on users of National Trust Land within the Isle of Wight will occur.

This report indicates that there are significant impacts on the NT land on the Isle of Purbeck's coast and within Studland – which includes Old Harry Rocks, Ballard Down, Studland beach and the heathland that back it. The confused landscape and seascape baseline combined with seeming inconsistencies with how they have assigned magnitudes of effect, make it very difficult to establish where impacts will occur.

No significant impacts are predicted on the seascape/landscape associated with the Isle of Wight. Again, the way the area has been split up and the overlapping areas and types do not help us to understand how they have arrived at this conclusion. In our opinion the magnitude of change is not judged very consistently.

We believe the visual impacts along the coast will be higher than the ES predicts, particularly around the south towards St Catherine's point, where we believe the development will be affecting views along the undercliff towards the lighthouse (which is NT owned).

We note the new revised guidance on visualisations for wind farms that has been announced by Scottish Natural Heritage, author of the old guidance used by the developer (NBDL) during the consultation on the Navitus Bay wind farm. We would support the revised photomontages provided in evidence by Challenge Navitus and concur with their findings.

SEA Policy of 12NM

We believe that the proposal is contrary to policy in that it ignores the Government's own SEA policy of the 12n miles limit which is the minimum for sensitive coasts. Our opinion is based upon interpretation of the following:

The Department for Energy and Climate Change, quoting from the June 2009 DECC's Offshore Energy Strategic Environmental Assessment (OESEA) post-consultation report, "Reflecting the relative sensitivity of multiple receptors in coastal waters, it is recommended that the bulk of this new generation capacity should be sited away from the coast, generally outside 12 nautical miles (some 22km). This recommendation is not intended to exclude OWF from this area, since there may be scope for further offshore wind development within this area. It is proposed as mitigation for the potential environmental effects of development of the scale and technological uncertainty which may result from this draft plan/programme. The environmental sensitivity of coastal areas is not uniform, and in certain cases new offshore wind farm projects may be acceptable closer to the coast. Conversely, siting beyond 12nm may be justified for some areas/developments. Detailed site-specific information gathering and stakeholder consultation is required before the acceptability of specific major Round 3 or subsequent wind farm projects close to the coast can be assessed."

In comparison to the UK, other European examples such as the wind farm proposal in the vicinity of Mont St. Michel in France, the French government protected the site by excluding wind farms from the region. In IUCN's words, "...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... could be entirely avoided". In the Netherlands, government policy is to avoid permanent structures within 12nm of the coast to preserve views to a clear horizon. Prinses Amalia wind farm off the Dutch coast, the developer Eneco posted on its website. "In the North Sea off the Dutch coast of Ijmuiden we have developed and constructed Prinses Amalia Wind Park. Situated 23km out to sea, in deep waters, this generates energy for approximately 125,000 households without spoiling the uninterrupted sea views enjoyed so much by beach goers. With this project we have shown that offshore wind farms can be safe and profitable".

Conclusion

In conclusion, The National Trust does not consider that sufficient weight has been given to the status of the WHS. The area contains a large population relative to other coastal regions and is highly accessible to large parts of the south coast region. We believe the harmful effects of the project in

terms of impact on landscape, seascape and visual impact are likely to outweigh the benefits and as a result the proposal is contrary to government policy as set out in NPS EN1 and EN3.”

The Trust remains steadfast in that if this proposal is to gain approval it will require further mitigation in order to successfully reduce its impacts on this special place otherwise the environmental harm caused by the current proposal, without further mitigation, will outweigh any economic and environmental gain and should be refused.

We would urge the Inspector to undertake site visits to a number of locations along the coastline which we have indicated in answer to their specific question.