

MIKE HOLMES

Director: Planning, Transport & Regulation Services

Your ref:
Our ref:

Jackie Anderson
Case Manager
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Bristol
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Dear Jackie

Re: Application by Navitus Bay Ltd for an Order Granting Development Consent for Navitus Bay Park - Adequacy of Consultation Request

Thank you for your letter dated 11th April 2014. In this response the Council notes that Navitus Bay Development Limited (NBDL) has in general terms followed the consultation requirements set out in the Statement of Community Consultation and the requirements of the relevant Planning Acts. However, a number of issues with the information provided as part of the consultation means the Council finds itself unable to describe the consultation as fully adequate.

In particular the Council considers that the visualisations provided by NBDL did not provide sufficient information. Nor were methodologies employed which would have assisted consultees in understanding how the human eye would assess the impact. The choice by NBDL to avoid visualisations allowing consultees to compare the proposed turbines with the natural landmarks visible from Bournemouth is considered significant.

The Council also believes that presentation of the potential significant effect on jobs and the local economy within NBDL's public consultations was sufficiently misleading that it may well have led to misinformed responses.

The Council is further disappointed that NBDL did not engage fully with the Council's Tourism Officer and local Tourism agencies regarding the impact on local tourism and the economy.

The Council feels too that, in the light of challenges to the information provided by NBDL, insufficient evidence was included in the consultation to allow consultees to understand the possible noise impacts. A similar view is held in relation to the information provided on the likely impact on wildlife.

In more detail I set out the reasons for these considerations below. At the outset this Council made it clear that the visualisations were critical to a proper and effective consultation exercise and that the identified potential tourism impacts needed to be comprehensively assessed with industry engagement. Whilst in the Council's view NBDL have carried out their statutory consultation responsibility, the Council has not been fully satisfied on these two main issues.

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The visualisations are not realistic insofar as they do not represent the full perception of the impact. While the Council does not mean to imply endorsement of the opinions contained within the Adequacy of Consultation representations of Challenge Navitus and Poole and Christchurch Bays' Association, those documents highlight the inadequacy of the photomontages produced by NBDL to support the consultation process, and the Council would urge the Inspector to read those representations in full. The representations also clearly demonstrate that the "industry standard" used in NBDL's literature is inadequate and outdated. The resultant images are of poor quality, with a tendency to lessen the impact. It is particularly disappointing that NBDL chose, despite urging from the Council since 2011, not to include any visualisations which would include the obvious natural comparators of the Purbecks or the Isle of Wight. The understatement of the visual impact of the turbines to consultees is likely to distort considerably the responses received in many, if not all of the surveys.

An important aspect which will have affected many consultees' opinion of the project is the potential effect on the local economy and jobs. The Council considers that the sections about "Boosting the Local Economy" in the Phase 3 and Phase 4 consultations are misleadingly optimistic. Again the Council would draw the Inspector's attention to the representation of Challenge Navitus which addresses this in some depth. It is particularly relevant that the consultation documents point to "more than 2,000 local jobs" (during construction), without reference to the fact that this is just one of the scenarios contemplated by the developer - the other two scenarios providing for 225 and 60 jobs respectively. In contrast, little or no indication was given in the Phase 4 consultation of the potential detrimental impact on the local tourism economy if the result of the NBDL Summer 2012 and Spring 2013 Visitor Surveys should prove to be predictive of visitor losses. Even the presentation of these surveys within Phase 4 (for some reason NBDL chose to delay release of the Summer 2012 survey for a full year until after Phase 3 was complete) seems extremely biased, stating as it did that the impact on Tourism businesses "would be not significant". This claim was made to consultees despite the report showing that both visitors and businesses expected significant deterioration. The Council would also ask the question whether these negative indications from the surveys would have been worse had realistic photomontages been shown to them by those carrying out the surveys. The bias in these sections leads the Council to question the quality of the parts of the consultation that they comprise as they will likely have led to misinformed responses.

Bournemouth is a major tourism destination, which provides considerable employment is the local economy. In the Council's view NBDL has not engaged adequately with the Council's Tourism Officer and the Destination Management Organisation (the Bournemouth Tourism Management Board). See separate report attached (Appendix 1)

In PEI (Preliminary Environmental Information) 3, issued in September 2013, some details were published of the NBDL Noise Assessment. However, these details fell far short of the level which would enable the verification necessary for informed consultation response as the assessment does not take into account how sound travels across water, rather than land. The Council is aware of alternative Noise Assessments commissioned by Poole and Christchurch Bays Association, which come out with very different results to those provided by NBDL and the Council does not feel able to consider the consultation adequate while those differences remain

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largely unexplained.

Similarly the Council is aware of the view of local wildlife groups that the quality of surveys undertaken and their interpretation does not reflect local circumstances including known migratory patterns.

NBDL's SoCC stated the intention to use Public Notices at key points to inform local residents, businesses and visitors of the proposals. Whilst the additional efforts to publicise the proposals, for example in local media are welcomed, the failure to implement this proposal of the SoCC is disappointing as it is likely to have been particularly effective at informing visitors to the area.

The Planning Act recognises the key role that local authorities play as bodies with both expert knowledge of the local community and with responsibility for place shaping in the local area. Therefore the Council consider that NBDL should have gone further to try and satisfy the Council's and other interested parties requirements.

On a separate matter, I am very concerned that NBDL has decided not to provide the local Planning Authorities with hard copies of their application for an Order Granting Development Consent. This approach is unusual for a large planning proposal, and very unhelpful. In effect NBDL are failing to provide information in a format which will allow a full and proper assessment of the application by Local Authorities.

If you have any queries or require any clarification on the points above, please do not hesitate to contact me.

Yours sincerely



Mike Holmes
Director Planning, Transport & Regulation Services

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Adequacy of Consultation between NBDL and Tourism regarding the Navitus Bay off shore Wind Farm Development

Tourism Liaison Group

From the outset of the project the Tourism professionals offered to help with the preparation of research into the effects that the project will have on the Tourism industry in Dorset. This offer was made to the developers at a special meeting between the joint Bournemouth and Poole Tourism Management Boards, local councillors and MPs at the Premier Inn Westover Road in August 2012. NBDL agreed at this meeting to work closely with the industry to ensure that the tourism research would be designed with the benefit of full consultation with the industry professionals. This would contribute to providing the most accurate and robust information possible about the potential industry impact –

“ We (NBDL) are committed to talking to you about your specific concerns and suggestions on the tourism survey, in particular the inclusion of the new visuals showing the range of options and the timing duration and structure of the survey” – 21.8.2012.

After this meeting the Tourism Liaison Group was formed as a key part of the consultation process on the understanding that NBDL would use it as the conduit for all Tourism related issues. This did not happen.

The Tourism Liaison Group was not consulted on the main visitor research or business research methodology. When the consultation commitment was made at the meeting in August 2012 the tourism industry should have been informed that NBDL had already commissioned the research and it was already underway at that time so the industry could not be involved in shaping the structure of the survey.

The Tourism Liaison Group has only met once which was in January 2013. At this meeting participants were asked to review and comment on large documents, which they had not had sight of prior to meeting. The minutes of this meeting have not been agreed and a second meeting was set up but cancelled with a promise that it would be re arranged. NBDL have emphasized the importance of this group . The NBDL website includes the following statement (10th April 2014):

TOURISM LIAISON GROUP

As part of Navitus Bay's commitment to working with representatives from the region's tourism industry, it has established a Tourism Liaison Group to engage with tourism officers from each of the authorities in the study area. This has the following objectives:

- ***To engage local authorities and other stakeholders across the study area in the tourism research programme and other assessments***
- ***Ensure the tourism research programme includes suitable approaches to capture the area's varied markets, seasonality, and the potential effects of the Navitus Bay Wind Park development on them***
- ***Ensure a consistent approach across the study area as a whole***

- ***Provide a forum to present the revised visuals and scheme details as they are available, receive considered professional input from each member of the group and, as and when appropriate, consider a co-ordinated approach to any mitigation measures which may be required***
- ***Provide access to the most recently available data sets from stakeholders***

Navitus Bay will continue to work with local and regional recreational tourism organisations to identify those activities that people enjoy in the area which might be affected by the wind park. This will help Navitus Bay understand the potential concerns of recreational users and give it the best chance to address them.

Mike Unsworth NBDL Project Director was questioned about his feelings of the success of this group at a meeting of Local Council Leaders at Dorset, Hampshire & Isle of Wight Leaders Meeting with NBDL at East Dorset Council offices on 25 September 2013 and he acknowledged that it had been limited and more could have been done to coordinate other meetings. This cannot be seen as being adequate consultation between NBDL and a business that generates £1.46 billion per year for the area and directly provides over 24,000 jobs (with many more depending on it indirectly).

NBDL have not referred to the existence of this group in any of the documents published on the 10th April 2014 which suggests that either they do not understand the importance of Tourism to the local economy, or that they choose to ignore it as much as possible as it presents a barrier to their ambitions.

They state in Applicant responses that:

It is worth noting that the majority of the comments were very generalised and no evidence or justification was provided by any of the consultees to substantiate their concerns that the project would have a detrimental impact on the tourism sector.

At no time did NBDL have all the tourism professionals in one room through the agreed consultation mechanism to share the economic impact implications of the proposed development and facilitate reasonable constructive feedback from the tourist industry.

There is also an impression that NBDL are intent on splitting the tourist destinations i.e. Isle of Wight, Solent, New Forest, Hampshire, Christchurch, Bournemouth, Poole, Purbeck, Lulworth, Swanage, Jurassic Coast, Weymouth etc. when the interdependence of tourism business across the area justifies collective consultation with the destination managers. Visitors to this part of England want to experience many of these unique locations during a holiday to the area. Despite many offers to act as consultees on the project, the tourism professionals have been largely ignored and the consultation process has been seriously deficient in this respect.

Visitor Surveys

There are concerns regarding the partial nature of the visitor research components, the timing and the methodology used for these surveys. However, the results of the studies undertaken are considered to be generally acceptable in that they give a clear indication of the scale of visitor

economy impact. Although the methodology could be questioned as contributing to an understatement of the actual effect (see the main response), the severity of the findings for the tourism industry is sufficiently clear to make further evidence unnecessary. Given that the results of the NBDL survey indicated a substantial loss of tourism business to the Dorset/Hampshire/Isle of Wight area during the construction phase of the project, it was surprising that there was no attempt to quantify this loss and no offer of any further industry consultation to see how this dramatic fall in visitor numbers could be averted. The timing of the release of that critical business data - almost one year after it was gathered and in the peak summer right at the end of the long consultation process, again calls into question the developer's real commitment to open and meaningful consultation.

The survey results for Bournemouth, where the Tourism industry directly provides 11,000 jobs, are even more extreme with 32% of respondents indicating that they would be put off visiting during the 4-5 year construction period. Yet again there has been no further industry consultation about how this could be addressed.

Tourism Business Surveys

The validity of the results from the Tourism Business Surveys is limited for two main reasons. Firstly, they were planned without the promised advance industry consultation and without testing. Secondly, they were conducted over the telephone with the interviewee being asked to open up the Navitus Bay website and make comments on the visuals on the site. In practice none of the businesses could have accessed the visuals as they were not available on the Navitus Bay website at the time of the surveys. The risk is that this error will seriously understate the genuine strength of feeling about the proposal.

Regarding using the visualisations, NBDL state:

It is very important to view the photomontages in the correct way so that the scale of the development is accurately presented. For accurate viewing, these sheets should be printed at a size of 297mm x 841mm and viewed from a distance of 450mm.

As such this survey cannot be considered as being fit for purpose. Had NBDL worked more closely with the local Tourism professionals a more robust and usable survey could have been produced. Requests for details of the methodology including a breakdown of the respondents have not been forthcoming. Businesses which do not rely on the current sea views to achieve a premium rate on hotel rooms, restaurants, wedding venues etc. would be more inclined to dismiss the effects than those who are within the 10km strip. Two surveys should have been done to produce more meaningful data.

Visual Calibration Surveys

From NBDL's responses it would seem that great weight has been given to the reaction of the participants who were not at any of the coastal locations to the project as a whole rather than concentrating on the differences in the two sets of visuals. Therefore these comments should be disregarded.

Reference to other public consultations

All references to On Shore wind farms are very misleading and are out of context with the offshore wind farms. Comparative data should also have differentiated between wind farms located in final destinations and those sited in other rural or en-route locations.

Public S47 Consultation.

The collation and validity of the responses from the public consultations must be questioned as approx. 90 duplicate contact IDs have given the same comment i.e.

'I would like to see you set up a visitor centre onshore to maximise the educational and tourism opportunities from this development'