

The Many Faults of the NAVITUS Wind Farm.

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NAVITUS is widely regarded by the people of Dorset as the worst possible inshore wind farm in the UK and in the worst possible position. Here, we just list the objections without detailed discussion, quoting relevant numbers where they are available. All of the objections are either not addressed at all or dismissed by the developer's own 'studies'. Almost all the evidence and opinions submitted by the developer are open to contradiction and should be set aside in favour of a more open and thorough process.

ASSESSMENTS

1. **Non-cooperation** by Eneco, the principal developers. They have consistently delayed, obfuscated, given false data, and been incredibly rude to various groups. Can they really deal with the public in such a derisory manner? The developers have achieved a 100% loss of trust with the public. NAVITUS should be put on hold till acceptable Public Consultations have been carried out.
2. **Resentment** of the way citizens and all their representatives are rudely excluded from the decision making process and limited to the least substantial objections. There is no **Appeals** process available or any method of **Recall** as new information emerges for these projects.
3. **Local MPs**, MEPs and Councillors were almost 100% opposed to the NAVITUS scheme based on some or all of the objections listed below. A recent community discussion was held by Bournemouth Council and videos of many good presentations should be available to the Assessment team.
4. There is no overwhelming **NECESSITY** for NAVITUS which would give a low 35% duty factor as the same real capacity, of about 350MW, can be easily provided elsewhere. It is unreasonable of the Department of Energy to support its own flawed planning in face of so many obvious problems.
5. Several large offshore wind farm projects have been recently **abandoned** for mainly financial reasons and some technical or wild life issues brought in for good measure. This clearly increases the pressure for DECC to approve a new project, any new project. DECC itself has a very low trust rating in many communities. This may be a chance to appear more principled.
6. **Sweeteners** in the form of Village Halls and other amenities have been offered around to persuade local Councillors to fall in line. These actions are as cynical as offering beads to native Indians. This petty bribery is an offence, to be taken into account when evaluating the performance of the NAVITUS enterprise so far.

OBJECTIONS: TOURISM

7. Huge damage would be inflicted on the local economy during 3 years of construction, reducing **Tourism by 24%**.
8. The reduction in Tourism would continue at **14% for the 20-25 year** lifetime of the wind farm.
9. Far more **jobs and businesses** will be lost in Tourism than the puny 200 or so permanent positions likely for NAVITUS. A surge of itinerant construction labour is not a benefit to Dorset.

10. The area faces a loss of income on the scale of the cost of the wind farm, **~£3Bn**, a bigger penalty than for any other wind farm in the UK. This should be sufficient to **disallow NAVITUS**.

OBJECTION: WORLD HERITAGE LOCATION

11. The proximity to the **World Heritage Jurassic Coast** is sufficient to **exclude the NAVITUS** site as has been done by France and others when special areas are needlessly threatened.

OBJECTIONS: MARINE & MARITIME

12. NAVITUS stands squarely in the path of **13000 vessels a year**, including cruise liners, oil tankers, ferries, sail boats, fishing vessels, cargo ships, yachts and super yachts. NAVITUS outrageously declares that all these can simply steer around.
13. Cruise ships heading for Southampton will need extra clearance in poor weather, pushing them closer to the main English Channel shipping lanes, the busiest in the world.
14. A full analysis of shipping records by Lawrence Crapper, Commodore of the Christchurch Yacht Club gives all the details from an expert viewpoint.
15. **Marine conservation** is a UK and European disaster area and is only further damaged by NAVITUS in such a sensitive spot.
16. The threat to human life and major shipping disasters should be sufficient grounds for **rejecting NAVITUS**.

OBJECTIONS: WILDLIFE

17. NAVITUS stands squarely in the path of over **10 million birds**, bats, and insects for which the area between Weymouth and the Isle of Wight are the primary route for hundreds of species which feed, nest, rest, winter, or immigrate each year from Africa and the Mediterranean. This threatens the worst ecological damage of any UK wind farm and should be rejected on these grounds alone.
18. **Impact Assessments** are made by the developers and their hired experts. They are accepted by organisations like RSPB, the British Trust for Ornithology and Dorset Wild Life Trust, all of whom have taken a favourable or neutral stance on the killing of wildlife in some twisted version of 'remaining apolitical'. Their views are contrary to all other experts and to their own mission statements. Their representations should be seen as biased and therefore set aside.
19. **Natural England** is a licencing Agency of government which issues licences on request. It is in no way a conservation or protection agency, limited solely by the rules of DECC and DEFRA. It may be required to issue licences to NAVITUS to kill protected species without penalty, as is already done in Ontario.
20. **Jonathan McGowan**, renowned wildlife expert in Bournemouth, is featured in a YouTube video, "Bird Kill by NAVITUS Poole Bay Wind Farm" outlining the scale of damage to many protected species. A supporting document by Brendan McNamara, with world-wide references, is on the web.

OBJECTIONS: CONSTRUCTION, ENGINEERING, & DECOMMISSIONING

21. **Construction** will do enormous damage to the 38,000 acres of seabed and cover the entire marine area of Poole Bay in silt with corresponding damage to marine life. The nearby

protected zone of Studland bay, home to a unique species of sea horses, will be affected as tides wash silt and pollution into their habitat. They deny this.

22. **Construction** will cut off English Channel sea bass eggs from the shore line and Poole Harbour and impact mackerel spawning in the harbour, Lymington, the Solent and the Isle of Wight . Sea bass have all but vanished between Weymouth and the IoW and mackerel, a favourite food, have expanded. Fisheries management on our coastline is pathetic and NAVITUS would be just another ill-considered contributor to the losses.
23. The high voltage **Grid Connection** would be the width of an 8 lane motorway, wriggling 25km round Bournemouth to the National Grid link at Three Legged Cross. Permanent access will be needed to the buried cables. Many mature trees will be felled and habitats dissected as part of the ecological damage inflicted on England by every wind farm. This should be given **due consideration and accounting** in the Assessment process for NAVITUS.
24. **Grid Connections** are a hidden cost of the whole wind farm programme and are not included in the DECC analyses of comparative generation costs. Intermittency and the potential simultaneous failure of all wind and solar farms in the UK demand even more 'Super grid' connections to the rest of Ireland and Europe in the hope of balancing total output. The people of Dorset are not permitted to criticise this subterfuge.
25. The £2-3Bn worth of so called **Smart Grid** meters are only necessary because of the unreliable nature of wind energy supply. They will provide the Grid with detailed statistics of local usage so curtailment orders can be issued to the best effect. They would be unnecessary in a mainly nuclear powered system.
26. The costs of grids, smart grids, and super grids are not included in the overall costings for power in the DECC analyses (2014). These cost have yet to appear on consumer bills, lowering the value for money of wind farms still further.

OBJECTIONS: NOISE & APPEARANCE

27. **Noise** from the construction and operation of NAVITUS is a major health problem for people, marine life, and wild life in nearby nature reserves. This is simply denied by NAVITUS. No hard data is presented on the prevalence of noise from existing and recent offshore wind farms. A simple denial with no comprehensive evidence is not sufficient to pass appraisal. NAVITUS should **present their evidence** for the selected wind mill designs before any Assessment is completed.
28. The **appearance** of NAVITUS is a permitted grounds for objection, but this is easily and often dismissed even in the most lurid scenes of windmills closely dominating villages and towns . NAVITUS has consistently issued false and misleading graphics of the appearance, often grossly mismatched to reality. The looming presence is a major deterrent for Tourists and nature lovers who will simply pick other destinations. **NAVITUS should fail this assessment** round for failure to communicate properly with the region.
29. NAVITUS occupies less than 1/3 of the **seabed** assigned by Crown Estates. Promises that NAVITUS will never be expanded have the same value as those of any other property developer. All the problems outlined here would be extended.

OBJECTIONS: ENGINEERING & DECOMMISSIONING

30. The exact **design of windmill** has not yet been chosen by NAVITUS. This implies that the final choice will have had minimal testing, far short of that applied to new aircraft or automobiles. The whole reconstruction of the wind farm may have to be repeated well before the nominal lifetime of 25 years. We, the taxpayers have no inkling of how any contracts

awarded would address these issues, but the past history of government departments suggest that we will bear any shortcomings.

31. NAVITUS should be required to **underwrite any engineering defects** or failures of its wind mills without compensation from DECC.
32. None of the **equipment** is to be designed or manufactured in England. All the high quality jobs will be held abroad, along with all profits to be set against the project loans. There is no apparent financial benefit to the UK from NAVITUS.
33. **Decommissioning** of the wind mills on failure or at the end of their working life should be guaranteed by NAVITUS. The possible proper principles of irrevocable letters of credit, bonds, and other forms of guarantee are listed by DECC but there are no statements of how these requirements have been applied so far. Based on the devious and defiant behaviour of NAVITUS so far it should be required that their decommissioning finance be seen to be in place before any final approval were granted.

THE NUCLEAR ALTERNATIVE

As nuclear advocates, EfN-UK sees the whole wind farm programme to be totally inappropriate to this, the most crowded country in Europe. The Hinkley Point nuclear site will cover some 450 acres. The equivalent offshore wind energy needs about 5 NAVITUS wind farms covering 190,000 acres of seabed. The nuclear plant will run for 60-80 years during which the NAVITUS-s would be decommissioned and replaced 3 times. Equivalent Onshore wind would use about 230,000 acres and somewhat smaller windmills.

The Wind energy programme will create very few full time jobs, most of them unskilled. There is a healthy nuclear supply industry in this country for both Nuclear and Fusion systems and thousands will be trained by and for the nuclear programme.

As I showed repeatedly from 2006, the UK already owns enough depleted Uranium to run an all-electric Britain for 500 years. The UK is totally energy self-sufficient but lacks the processes and procedures needed to implement this immense benefit.

There is no contest between Nuclear and Wind energy on any technical or economic grounds. It is up to DECC and our government to change the rhetoric and change horses. Nuclear power is 99% carbon free and easily qualifies as the major part of the effort to reduce emissions. Commitments to the EU can be readily adjusted to better goals, especially as Germany, the fox with no tail, is rapidly abandoning the renewables commitments in favour of a lot more coal power.

The Department of Energy is using the non-existent and fabulously expensive 'Carbon Capture & Storage' as an excuse to continue with coal and gas. This is a delusion and a deception.

As environmentalists we see nothing but a ruthless willingness to kill any local ecologies, creatures, woodlands, or marine life in the interest of the energy objectives and for the benefit of foreign corporations.

Many video presentations, articles, interviews, and lectures on all the issues raised are offered on the EfN-UK.org/Renewables/NAVITUS web pages. These also link to other protest groups in Dorset.

A **Twitter** site, @NAVIToff gathers data and comparable problem sets from around the world and most of the twitter active wind farm UK sites. More computer minded groups in Canada and the US are able to muster 10,000 to protest meetings and marches. They are winning many of the more suits with the most egregious projects.

