

Helen Cassini
Navitus Bay Developments Limited
c/o Eneco
Units 3 and 4 Athena Court
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Warwick
Warwickshire
CV34 6RT

30 July 2012

Dear Helen

**Navitus Bay Offshore Wind Park
Consultation under Section 42 of the Planning Act 2008
Preliminary Environmental Information 2 (PEI 2) June 2012**

Thank you for your letter of 29 May 2012 advising us of consultation on the Navitus Bay Wind Park, a proposed wind park approximately 8.1 miles offshore of Durlston Head, and occupying up to 77 square miles of sea bed.

The wind park may comprise up to 333 turbines, with a maximum generating capacity of 1200 MW. As such it is classified as a Nationally Significant Infrastructure Project (NSIP) for which a Development Control Order will be sought, possibly in 2013.

The DCO will seek the following:

- Permission to construct and operate up to 333 wind turbines;
- Construction of an offshore monitoring mast;
- Construction of up to 3 offshore sub stations and links;
- An electrical connection, offshore cables, onshore cables and onshore substation.

The consultation is made under Section 42 of the Planning Act 2008, and comments are sought from a range of statutory, non-statutory and other interested parties.

History of RSPB involvement

The RSPB has previously commented on Preliminary Environmental Information 1 (PEI 1) in December 2011. This letter should be read in conjunction with that response. We also attended meetings with Eneco and its advisers in February 2010, April 2010 and April 2012.

On each occasion, the RSPB highlighted its general support for renewable energy developments, subject to the important proviso that environmental harm is not caused. Our general policy may be viewed at:

http://www.rspb.org.uk/Images/rspboffshorewindfarmsfinalbriefingnov2008_tcm9-203499.pdf

Since April 2012, we have had no further engagement with the Eneco project team, despite requests for information made by email to APEM Limited on 6 June 2012.

Our comments

We understand the PEI 2 represents a snapshot of project activity being undertaken by the project team, including activities relating to ornithological interests. As a snapshot, and a work in progress, it is necessarily brief and time limited.

Having considered PEI 2 and the Baseline Ornithology Report (provided in draft in April 2012), concerns remain over the assessment of potential ornithological impacts, in particular:

- Adequacy of survey efforts to inform possible impacts on migrating birds;
- Adequacy of survey efforts to inform possible impacts on seabird passage movements;
- Ability to link behavioural and other collected data to explain bird distribution;
- Ability to link terrestrial and offshore observations;
- Ability to provide robust explanations of temporal and spatial distribution and density of birds recorded relative to both the entire Round 7 zone and other offshore areas.

The RSPB has not had the opportunity, due to the considerable volume of Round 3 offshore wind casework currently being progressed, to fully assess the contents of the draft Baseline Ornithological Report. We have however been provided with comments made by Natural England dated 2 May 2012 to APEM Limited. We support these observations.

We have not had detailed discussions with the Eneco project team regarding the onshore works. These were briefly mentioned at the meeting of 12 April 2012, at which APEM advised us that the onshore and offshore investigations were being led on by different consultants.

We did however highlight at that meeting our headline concerns with the onshore works, namely impacts on terrestrial SPAs, notably the suite of designated sites comprising the Dorset Heathlands and the Avon Valley.

We have in the meantime discussed the onshore elements with Natural England, who have advised us of their concerns, and understand that these will be communicated to Eneco as part of this Section 42 consultation.

We also understand that these discussions have sought to identify a cable route and construction program 'solution' which seeks to mitigate by design as far as possible, selecting a cable route and substation location(s) so as to avoid harm to designated sites and protected species.

Natural England advise us that they have had extensive and useful discussions with various Eneco advisers over survey methodologies, construction techniques and land management, in liaison with the Environment Agency and other stakeholders. We recognise and welcome this collaborative approach to project planning. Principal issues raised by Natural England included possible direct and indirect impacts on the Dorset Heathlands SPA, Dorset Heath SAC and Dorset Heathlands Ramsar site, the Avon Valley SPA and River Avon SAC.

In connection with the onshore works, a Habitats Regulations Assessment (HRA) will be required, given there is a likelihood of a significant effects on the internationally designated sites.

Similarly, we consider that the offshore elements of the project will also require HRA. We are unclear presently as to whether there will be a single project HRA or two HRAs for the on and offshore elements. We would strongly recommend the former. It is clear that there exists the potential for on and offshore elements to work in combination.

Critical elements of the HRA(s) will include treatment of mitigation and compensatory measures, the treatment of cumulative effects and the consideration of in-combination effects with other plans and projects, including other Round 3 proposals.

We trust our comments are useful. Please do not hesitate to contact me should you require any clarification or further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Henderson', written in a cursive style.

Renny Henderson
Dorset Conservation Officer