

**Summary Written Representation
by the
Royal Society for the Protection of Birds**

20 October 2014

Planning Act 2008 (as amended)

In the matter of:

**Planning Application for the Proposed Navitus Bay Wind Park located
approximately 14 km off the Dorset Coast**

Planning Inspectorate Ref: EN010024

Registration Identification Ref: 10029429



SUMMARY WRITTEN REPRESENTATION BY THE ROYAL SOCIETY FOR THE PROTECTION OF BIRDS

1. INTRODUCTION

1.1 The RSPB has been involved in pre-application discussions with the Applicant, and has provided comments on draft ornithological information. The RSPB's Relevant Representation highlighted our outstanding concerns with the Application at the time of submission.

1.2 The RSPB's Written Representation covers three main issues. First, the need for further modelling for some migrants, second, the need for further assessment of potential impacts on gannet, and third, concerns over possible onshore impacts on protected wildlife sites due to the construction of the cable route. We also raised concerns over three fish species. The Applicant is aware of all these concerns.

2. THE RSPB

2.1 The RSPB's principal objective is the conservation of wild birds and their habitats. The RSPB attaches great importance to environmental law, policy and guidance in attaining this objective.

2.2 Climate change is the most pressing threat to UK wildlife and wind energy has a role in countering this, subject to it not presenting significant risks to habitats and species. For birds, the available evidence suggests the main risks to birds from offshore wind farms are collision, disturbance/displacement, barriers to movement, habitat change, and in combination effects of these across developments.

3. THE NATURE CONSERVATION INTEREST OF THE AREA

3.1 The Application is sited approximately 14km from the Dorset coast. The Dorset and Hampshire coasts and their hinterland contain a number of important and protected wildlife sites. The area is well known for its diverse ornithological interest.

4. THE RSPB'S CONCERNS ABOUT OFFSHORE ORNITHOLOGY

Treatment of offshore migrants

- 4.1 The RSPB does not support the use of Migropath modelling for dark-bellied brent geese, bar-tailed godwit, great skua, arctic skua, common tern and sandwich tern, and recommends an alternative apportionment methodology be adopted. The outputs of this modelling should then inform the collision risk modelling for these species.

Treatment of gannet

- 4.2 The RSPB considers that insufficient evidence has been presented by the Applicant to enable a robust assessment of potential impacts on the gannet population of the Alderney West Coast and the Burhou Islands Ramsar site. We advise the development of a revised population viability analysis in order to determine the potential impacts.

5. THE RSPB'S CONCERNS ONSHORE

Damage to internationally designated habitats

- 5.1 The RSPB considers that insufficient consideration has been given to less damaging alternatives for the cable construction within the West Moors MOD site. The current cable route proposal leads to unacceptable damage to internationally designated habitats.

Displacement of recreational disturbance

- 5.2 The RSPB considers that the implications of constructing the cable route within Hurn Forest has not been adequately examined, given the possible displacement of visitors to other internationally designated sites, increasing recreational disturbance to wildlife.

6. OTHER CONCERNS

- 6.1 The RSPB has concerns over possible piling noise impacts on three fish species. We have deferred representations on these species to others with the requisite expertise.

7. THE EXAMINATION

7.1 The RSPB understands that the Applicant will be submitting further information on all of the above issues to the Examination. The RSPB will review and comment on this new information at the next available opportunity and we therefore reserve the right to add to or amend its position.