

From: [Larry Haas](#)
To: [Rampion2](#)
Cc: [East Beach](#); [The Littlehampton Society](#); [Constructive Heritage](#)
Subject: Fwd: Question to PINS - Draft
Date: 05 August 2021 14:25:40

Planning Inspectorate Case Team
Rampion2@planninginspectorate.gov.uk
0303 444 5000

Dear Case Team,

We previously wrote the Planning Inspectorate with Rampion 2 questions before your Case Team was established, including “*Mr Lawrence Haas and Faye Christensen - anon. 23 April 2021*” cited under section 51 advice on your website.

We understand the Planning Act 2008 and EIA Regulations applicable to NSIP applications permit and even encourage the public and Interested Parties to offer suggestions to identify reasonable alternatives, during the DCO process.

May we therefore ask for your guidance again:

1. Can you please confirm that it is possible to offer ideas on what the Applicant may study as Reasonable Alternatives in the pre-application EIA, as defined in the EIA 2017 Regulations, and more broadly.

Are there any guidelines on how to offer reasonable alternatives during the formal pre-application stage. And if not please explain how we would submit one.

2. If the Applicant declines to take up the recommendation to include a suggested reasonable alternative in the EIA analysis, does the Planning Inspectorate have a role in requesting the Applicant to do so.

We assume that would be during the 28- day Acceptance Stage anticipated in Q1 2022. . May we aske of you can confirm this or explain what can be done to require the applicant to take this up or to appeal.

3. During the Examination stage, can members of the public or any Interested Party register to make the case for any excluded reasonable alternatives suggested, or offer a representation to challenge the rationale for exclusion of specific reasonable alternatives.

We look forward to your early response latest by Friday 20th August 2021. We are holding the Community-led public meeting 24th August on Rampion - the meeting we offered in our 23 April Community Input to the SoCC captured on your website under S51 advice.

Finally, may we take this opportunity to invite a member of the Planning Inspectorate Team to the Community-led public on the 24 Aug meeting as an observer.

An invitation and the venue is noted below. We do appreciate it may not be possible for your Team to speak at that Public meeting or offer comment.

A summary of the Public Meeting aims and format is provided in the invitation . We will

also provide you with a copy of the Meeting Outcome Report, which in parallel we will submit to the Applicant before the formal consultation ends 16 September 2021 .

Kind Regards,

Lawrence Haas and Faye Christensen
Littlehampton

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Planning Inspectorate Case Team:

Invitation: 24th August Community-led Public meeting on the Rampion 2 Windfarm Proposal

Civil society groups are organising a community-led Public Meeting to observe presentations on and openly discuss the Rampion 2 Wind Farm proposal.

The venue is:

Tuesday 24th August
7:00 PM - 9: 00 PM (opens 6:30)
New Millennium Chamber
The Manor House, First Floor
Littlehampton

In order to keep track of numbers we are asking if you can **kindly RSVP if you can attend by Tuesday 10 August**. email: [REDACTED]@yahoo.co.uk

We promise to keep it interesting. A brief summary of the purpose and format of the Meeting is noted at the end of this email.

Community organisations with a professional support group are working very hard to ensure clear, balanced and insightful presentations to improve local awareness of what is actually proposed, followed by discussions of a quality not possible in the virtual-only public consultations offered through the Rampion 2 Consultation Team.

Yours sincerely,

Invitation extended on behalf of:

The Littlehampton Society (TLS) and East Beach Residents Association (EBRA) Officers and Committees

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Summary:

Littlehampton Community-led Public Meeting on Rampion 2, Tuesday 24 August

The Purpose:

Community organisations are highly supportive of offshore wind power developments that fully respect Government policy and guidance.

Given that the official pre-application public consultations led by the Rampion 2 Team are virtual-only (computer screens and devices), not face-to-face; and given this is the only formal public consultation in the Development Consent process; as a host Community we feel that meeting together now to

discuss and exchange of views on the commercially preferred development scheme and all reasonable alternatives is essential. We are inviting Councillors at the three levels, area residents and community representation from along the coast on a RSVP basis.

The Outcome Report from this Public Meeting will be fed into the Rampion 2 statutory consultation process ending 16 Sept and will be circulated more widely.

The Format:

David Warne, Chairman of East Beach Residents Association (EBRA) and Elizabeth Marognan, Hon Secretary the Littlehampton Society (TLS) will co-chair the community-led public meeting on 24th August.

After welcome remarks and introductions:

Part 1: Three presentations of up to 20 minutes each, starting with a video stream of the Rampion 2 Team's virtual consultation and their related overheads. Supplemented by interpretation.

Part 2: A "speaker's panel" to address public questions and have discussion and exchanges in an open Q&A session moderated by the co-chairs.

Part 3: Time for community organisations and others to offer views or position statements (as they may wish) and for participants to offer resolutions or key questions to consider.

Dr Colin Ross of Protect Coastal England (PCE) is an invited in-person presenter. Other presentations for Part 1 include one on the Development Consent Order process for Rampion 2 and the likely timelines, illustrated by lessons from the Navitus Bay Wind Park application further along the coast and the steps that Bournemouth Borough Council took in 2014 to prepare a local impact report to better inform the Navitus Examination stage.

From: [Larry Haas](#)
To: [Rampion2](#)
Cc: [East Beach](#); [The Littlehampton Society](#)
Subject: Request for Advice: Rampion 2 Windfarm - Invitations to Prepare Local Impact Reports
Date: 08 August 2021 15:37:19
Attachments: [Bournemouth Council LIR of Navitus Bay Windfarm 2014.pdf](#)

Planning Inspectorate Case Team
Rampion2@planninginspectorate.gov.uk
0303 444 5000

Dear Case Team,

Further to our email request 5 Aug 2021 for advice on Interested Parties proposing "reasonable alternatives" during NSIP pre-application consultations, and previous requests to the Inspectorate on the Rampion 2 Wind Farm pre-application made before your Case Team was established, including "*Mr Lawrence Haas and Faye Christensen - anon. 23 April 2021*" cited under section 51 advice on your website, we ask additional guidance as noted below.

We understand that the Adur & Worthing Councils were invited to submit Local Impact Reports (LIRs) on the original Rampion Windfarm scheme after it was accepted for NSIP Examination in 2013; as noted on the Council website. <https://www.adur-worthing.gov.uk/regeneration/rampion-offshore-wind-farm> " **Following submission of the application for a Development Consent Order, the Councils have been invited to submit a Local Impact Report, giving details of the likely impact of the proposed development on the area**".

We also understand that Section 104 of the Planning Act 2008 requires Secretary of State to have regard to LIRs in deciding applications.

May we therefore ask your guidance as follows:

1. Can you kindly confirm it is correct to assume that the invite to local authorities in the case of Rampion 1 in 2013 came from the Planning Inspectorate (PINS)? Secondly, will a similar invite be made to our local authorities, specifically to ADC and WSCC, to submit a Local Impact Report if and when the Rampion 2 Wind Farm application is accepted for Examination, likely in Q1 2022?

Also that the invitation will apply to both the inshore and land based infrastructure components of the proposed Rampion 2 scheme.

2. Are there any standards or formats we should be aware of on the scope, level of effort and focus of Local Impact Reports on NSIPs and on coastal wind farms specifically? If so could you kindly share those with us, or point to where we can find them.

The context for our request is that we are sharing the comprehensive Local Impact Report that Bournemouth Borough Council prepared for the Navitus Bay Wind Park Application in 2014 (copy attached for information). We are sharing that now with Cllrs and Planning Officers in our local authorities and obviously would like to be sure the invitation to prepare a LIR on Rampion 2 would indeed be made and is routine.

As we plan to discuss this matter in our community-led Public Meeting in Littlehampton on 24th August (as part of Community input to the Rampion 2 SoCC and consultations) we again would appreciate it if your Case Team can let us know as soon as possible and convenient, before 24th Aug. Also we renew our invited for the Case Team to observe the Public Meeting made in our 5 August correspondence.

With respect and kind regards,

Lawrence Haas and Faye Christensen
Littlehampton

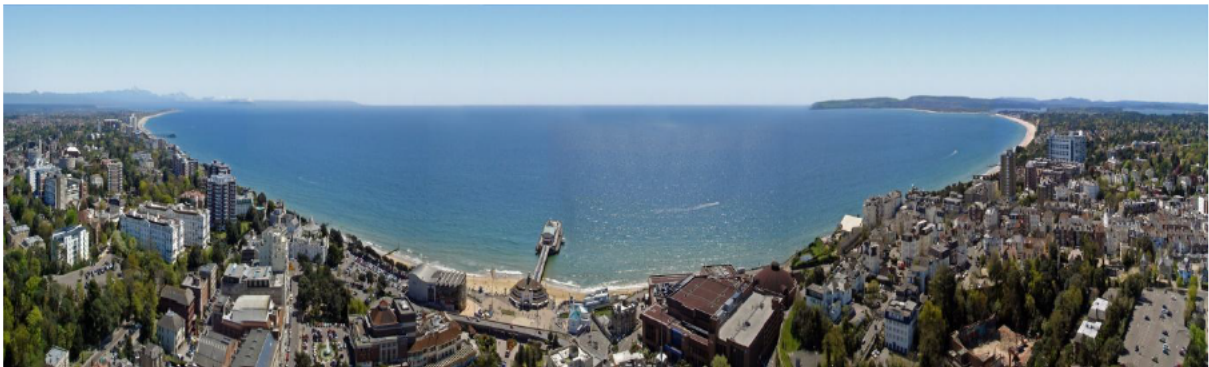
In conversation with the Committees and Officers of the East Beach Residents Association and
Littlehampton Society

Navitus Bay Wind Park Local Impact Report

Bournemouth Borough Council

PINS Reference Number: EN010024

6/10/2014



Building a Better Bournemouth

CONTENTS

Executive Summary

1. Introduction
2. Local Impact Report terms of reference
3. Relevant planning & other policies
4. Local area characteristics
5. Environmental context of the Bournemouth LIR
6. Tourism impact analysis
7. Impact on noise and vibration
8. Impact on recreation and water quality
9. Impact on wildlife
10. Impact on environmental management
11. Consideration of the impact of the proposed articles and requirements within the draft Development Consent Order

Appendices

- 1 'Ambition 2020' Bournemouth Borough Council's Corporate Plan for 2014/15
- 2 Poole and Christchurch Bays Shoreline
 - Management Plan Review Sub-cell 5f
 - Hurst Spit to Durlston Head (pdf attachment)
- 3 South West Research Company 2013 Value of Tourism to Bournemouth
- 4 Bournemouth Borough Council Seafront Research - July / August/ September 2013

EXECUTIVE SUMMARY

- This Local Impact Report (LIR) for Bournemouth sets out the most significant changes for the resort as a result of the proposed Navitus Bay Wind Park development. There are three major impacts that must be adequately addressed to protect the economic performance and future prosperity of Bournemouth as a world class destination:

- 1. Environmental damage** The unprecedented scale of the proposed wind farm in such a beautiful and sensitive coastal location will have a significant and detrimental impact on the visual amenity and intrinsic appeal of the area. The report identifies the deficiencies in the visual assessments including the static nature of all the simulated images and highlights the unique impact on the appearance of the bay. There is a serious concern that the proposal would introduce an alien ‘industrial landscape’ to an area that has natural beauty as its core socio economic value.
- 2. Harm to tourism industry** The adverse impact on the tourism industry in Bournemouth has been inadequately and inaccurately assessed in the Environmental Statement. Tourism underpins the local economy and is considered to be the key local economic driver for jobs, investment and income. The project has failed to properly quantify the net impacts. It has also failed to adequately engage with local industry experts to ensure that correct research and modelling could properly inform the development proposals and minimise the negative impacts on the tourism economy. This LIR explains why the developer would need to provide annual mitigation or compensation of just over £100 million p.a. or £2.5 billion over the life of the project to offset the expected loss of trade.
- 3. Investment damage** The significant decline in trade forecast as a result of the scheme will translate into reduced business confidence and lower

profitability. This will make it difficult to attract future private capital investment and frustrate the ambitions for economic growth and enhancement of the environment set out in the Bournemouth Borough Council Corporate Plan.

This LIR also identifies four other important impacts that Bournemouth Borough Council would expect to be resolved satisfactorily for the scheme to be deemed fit for approval:

- **Reduction in recreational appeal** The potential impact on water quality and associated recreational uses within the area both during the construction phase of the turbine area and offshore cable array and subsequently during the operational phase of the project.
- **Noise impact** The potential deterrent effect of excessive noise during construction and the potential longer term implications for those resident in, and visiting, Bournemouth who will be in direct line of noise transmitted from the array across water and vibrations transmitted through the substrata. Whilst the guidance on noise is not universally accepted, if the latest guidance was used in the Environmental Statement then the development would breach acceptable levels. Limitations need to be clear regarding permitted working periods and intensity of working.
- **Harm to wildlife** The Council believes that the potential threat to wildlife within the area during both the construction and operational phases of the proposal remains an unknown due to the significant limitations of the information available.
- **Environmental management and monitoring** There needs to be a clear environmental management plan for both the construction and operational phases. This should be supported by a 10 year, independently assessed environmental monitoring programme of delivery against original targets for the economy, visibility, noise and wildlife.

1. INTRODUCTION

- 1.1 This Local Impact Report (LIR) has been prepared on behalf of Bournemouth Borough Council in response to an application by Navitus Bay Development Limited (NBDL), a joint venture between Eneco Wind UK Ltd (Eneco) and EDF Energy Renewables, for a development consent order (DCO) under the 2008 Planning Act to construct and operate the Navitus Bay wind farm.
- 1.2 The application is for development consent to construct and operate the proposed Navitus Bay wind farm, which comprises up to 194 wind turbine generators with a maximum tip height of up to 200 metres and associated onshore and offshore infrastructure, with an installed capacity of up to 970 MW (the project). The project would be located on the bed of the English Channel approximately 20 km from Hengistbury Head in Bournemouth. The turbine area occupies an area of 153 km².
- 1.3 The Navitus Bay wind farm is considered a nationally significant infrastructure project (NSIP) because the project involves the construction of an offshore generating station with a capacity of more than 100 MW, thereby falling within the definitions set out in section 14(1)(a) and 15(3) of the Planning Act 2008 (as amended by the Localism Act 2011). Since this is a nationally significant infrastructure project, the application for development has been submitted to the Planning Inspectorate (acting for the Secretary of State for Communities and Local Government).
- 1.4 The application for development consent was made by NBDL on 10 April 2014, and accepted for examination by the Secretary of State on 8 May 2014. The Council, as one of a number of local authorities affected by the development, has been invited by the Planning Inspectorate to submit a LIR to form part of its considerations in making a recommendation to the Secretary of State.

2 THE LOCAL IMPACT REPORT TERMS OF REFERENCE

- 2.1 Section 104 of the Planning Act 2008 ('the Act') requires the Secretary of State to have regard to LIRs in deciding applications. The Act defines a LIR as "a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)" (section 60(3)).
- 2.2 The LIR should set out the local authority's view of likely positive, neutral and negative local impacts, and give its view on the relative importance of different social, environment or economic issues and the impact of the scheme upon them.
- 2.3 This LIR has been prepared taking into account the legislative limits, and the Planning Inspectorate's guidance. Accordingly, it seeks to assist the Planning Inspectorate by presenting Bournemouth Borough Council's views on the likely impacts of the project, based on local information, experience, and evidence.
- 2.4 The Navitus Bay Wind Park proposal is in two parts - offshore and onshore. Each can then be broken down into further elements. For offshore these include the turbine area (including the substations and met mast) and export cable corridor. For onshore, these include the cable landfall, onshore cable corridor and the onshore substation.
- 2.5 For each element of the proposal an Environmental Statement (ES) has been produced by the applicant. These documents appraise the impacts likely to result from this development and identifies whether the impacts are considered to be significant or not significant. It also considers whether further work could be undertaken, including mitigation measures, to address issues identified as being significantly negative.

- 2.6 This LIR will, however, only concentrate on the offshore elements of the proposal that are of particular concern to Bournemouth Borough Council (the onshore operations being matters considered by the other relevant local authorities).
- 2.7 A series of Statements of Common Ground are being prepared separately. These will identify those issues not covered in this document where the Council is in agreement with the supporting evidence submitted by NBDL.
- 2.8 In preparing the LIR Bournemouth Borough Council has been mindful of the advice set out in the Overarching National Policy Statement for Energy (EN-1) produced by the Department of Energy and Climate Change. This highlights that the Examining Authority should assess the application on the basis that the Government has demonstrated that there is a need for this type of infrastructure. Therefore, Bournemouth Borough Council's LIR does not challenge the overall need for renewable energy but sets out what it considers will be the local impacts. However, it must be remembered that Bournemouth's local prosperity has always been based on its ability to attract visitors nationally and internationally. Therefore the defining characteristics that create this appeal are also by definition the same characteristics that underpin the resort's success as a national and international asset.

3 RELEVANT POLICIES AND RESEARCH

3.1 Bournemouth Borough Council is very aware of the importance of Nationally Significant Infrastructure Projects and appreciates that other local and national policies do not take precedence in decision making. However, decision makers are required to have regard to the relevant documents in reaching a reasonable and balanced conclusion. The Council is suggesting that there are a number of relevant planning and general policies that fall into this category and that merit due consideration. The following documents are considered relevant to a proper assessment of the local impact of the wind farm and will be covered in this section:

PLANNING

- **Overarching National Policy Statement for Energy**
- **The National Planning Policy Framework (March 2012)**
- **Bournemouth Local Plan - Core Strategy and Town Centre Area Action plan**

GENERAL

- **'Ambition 2020' Bournemouth Borough Council's Corporate Plan**
- **Bournemouth Seafront Strategy A Vision for Bournemouth's Seafront 2014**
- **Bournemouth, Dorset and Poole Renewable Energy Strategy to 2020 January 2013**
- **Poole and Christchurch Bays Shoreline Management Plan**

TOURISM

- **Bournemouth Visitor Satisfaction Survey 2013**

3.2 The National Planning Policy Framework (March 2012)('the NPPF') is also an important material consideration, though paragraph 3 of that document states that it does not contain specific policies for nationally significant

infrastructure projects, and goes on to reiterate the requirements of the Planning Act 2008 (see paragraph 6.1). However, paragraph 162 states that “Local planning authorities should work with other authorities and providers to: take account of the need for strategic infrastructure including nationally significant infrastructure within their area.”

3.3 The following paragraphs from the NPPF are considered to be of relevance to the proposal:-

- 18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.
- 19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.
- 97. Bullet point two - maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.
- 109. Valued landscapes are to be protected and enhanced.
- 110. Development needs to be met whilst minimising adverse effect on local and natural environment.
- 114. Maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as

Heritage Coast, and improve public access to and enjoyment of the coast.

- 115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.
- 116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
 - The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 138. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under

paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

- 170. Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.
- The impact of the proposal on the National Planning Policy Framework focuses on economic growth, visual impact, protection of local and natural environment and public benefits. These impacts are explained later in this LIR.

3.4 Development Plans

The development plans within Bournemouth are the Bournemouth Local Plan - Core Strategy and Town Centre Area Action Plan. Both are relevant in considering the Navitus Bay proposal.

3.4.1 The Bournemouth Local Plan: Core Strategy

The Bournemouth Local Plan: Core Strategy was subject to an Examination in Public in March 2012. It was adopted in October 2012 and covers the period 2006 until 2026. The Core Strategy provides the spatial strategy for the Borough. It has had regard to the Sustainable Community Strategy and the procedural requirements for public consultation for Development Plan Documents. It has been subject to a Sustainability Appraisal, Equalities Impact Assessment and Habitats Regulations Assessment. The Core Strategy sets out the overall planning framework for Bournemouth Borough but cannot refer to offshore wind farms as they lie outside the Borough's boundaries and, therefore, planning remit. Nevertheless, the Bournemouth Local Plan - Core Strategy is a significant consideration as it illustrates the importance placed on the environment quality, tourism and the economy.

First the vision of the Core Strategy will be explained followed by the objectives.

3.4.2 The following are the most relevant extracts from the Core Strategy vision:

Bournemouth will retain and enhance its function as the coastal garden town of the south, with people enjoying a network of open green spaces and beaches. By 2026 Bournemouth will have accommodated sustainable growth without compromising the quality of the built, natural and historic environment and the quality of life for Bournemouth's residents will be high.

The town will continue to be a premier tourism destination with first class facilities and accommodation to attract a wide range of visitors.

Encouraging family friendly and evening economies that make our centres welcoming places for visitors and residents of all ages.

Bournemouth will be a town where the economy is buoyant, employment levels are high and where businesses are encouraged to start and grow.

Bournemouth will be a greener town in terms of development, energy consumption and generation, transportation, biodiversity and how we deal with waste, reducing the Borough's CO2 emissions and mitigating against and adapting to the impacts of Climate Change.

3.4.3 The selected objectives from the Core Strategy that have most bearing on the NBDL proposals are:

Objective 1

Ensure that the quality of the built, natural and historic environment is high and that the necessary physical, social and green infrastructure are provided to support current needs and future growth and development.

Objective 3

Maintain and enhance the town centre and other local centres as thriving, attractive and accessible places to be for all residents and visitors. Ensuring that tourism and conferencing remains an important part of the economy.

Objective 5

Encourage the economy to be healthy and provide a range of well paid employment opportunities. Ensure our centres are vibrant places with a range of retail, culture and leisure options to meet local needs.

Objective 6

Encourage sustainable development by the use of sustainable construction and drainage methods and the increased use of renewable and low carbon energy sources.

3.4.4 Relevant Core Strategy Policies

ENCOURAGING THE PROVISION OF RENEWABLE AND LOW CARBON ENERGY SOURCES AND INFRASTRUCTURE

Policy CS3 Sustainable Energy and Heat

The Council will encourage the provision of decentralised renewable*/low carbon energy generation and heat technology and the installation of the necessary supporting infrastructure. The wider environmental, economic and social benefits of all proposals for decentralised renewable and low carbon energy projects will be weighed against other policies in the Plan and will be favourably considered provided that:

- The technology/infrastructure is suitable for the location and does not unreasonably detract from local amenity;
- It would not, individually or cumulatively, have an unacceptably adverse impact on ecology, wildlife, or the integrity of protected habitats;
- It would not cause interference to radar or telecommunications;

- It would not cause harm to local amenity from noise, vibration, overshadowing, flicker or other harmful emissions.
[*‘decentralised renewable’ energy generation technology in this policy does not cover off-shore wind farms which lie outside the onshore planning system].

3.4.5 A Borough wide approach to tourism

Bournemouth’s economy relies heavily on tourism trade. A strategic approach to promoting tourism needs to balance the economic benefits of spreading tourism across the Borough with encouraging sustainable travel. The town centre will continue to be the focal point of tourism in Bournemouth and has proved broadly successful in retaining an appropriate stock of tourism accommodation and other facilities.

3.4.6 Policy CS28 tourist accommodation

Development or change of use to form new hotels or guest houses will be granted planning permission providing there are no unreasonable effects on the character of the area or the amenities of local residents.

Development resulting in the loss of sites or premises used, or last used, as tourist accommodation will only be considered acceptable where it can be demonstrated that the:

- business is no longer viable and has no reasonable prospect of continuing; and
- loss of the tourist accommodation will not harm the function of the area in relation to the tourism industry and the local community.

3.4.7 Retaining tourism and cultural facilities

Policy CS29 protecting tourism and cultural facilities

Development resulting in the loss of sites or premises used, or last used, as a tourist or cultural facility will be resisted except where:

- it can be demonstrated that the current use is no longer viable;
- there is no reasonable prospect of the use continuing; and
- it has been actively marketed with a guide price reflecting its market value for a period of 12 months.

In allowing a change of use from a tourist or cultural facility the planning authority will have regard to maintaining:

- the function of the area in relation to the tourism industry and the local community; and
- the character and appearance of the area.

3.4.8 Natural environment, sport, recreation and green infrastructure

The provision of a high quality sustainable environment, with a range of open spaces, habitats and natural features, including ecosystem services, encourages biodiversity and significantly contributes towards creating places where people want to live, work and visit. In providing for such an environment it is essential to strengthen the relationship between the local population, the natural environment and the range of open and green spaces. Existing and emerging national, sub-regional and local policies recognise the need to plan for sustainable communities and encourage the provision of a range of infrastructure and facilities as urban density increases.

3.4.9 Policy CS30 promoting green infrastructure [relevant extract]

The Council, through its own strategies and work programmes, and working with developers and other partners, will provide for a well connected and distributed multi-functional green infrastructure network, identifying the Borough as an urban greening zone and the coastal strip as a coastal enhancement zone, that:

- Retains and enhances Bournemouth’s attractiveness as a tourist destination and as a location for economic investment;
- Assists in the mitigation of, and adaptation to, climate change;
- Improves sustainable access through improved walking and cycling routes to key destinations, the coast and open spaces;
- Connects and enriches biodiversity and wildlife habitats;
- Promotes a healthy population through environmental enhancements, and increased access to open space, formal and informal recreation and sport opportunities;
- Enhances the townscape, landscape, historical and cultural identity of the Borough;
- Enhances the coastal strip including the beach, chines, cliffs, cliff top and Christchurch Harbour;

3.4.10 Designated heritage assets

A conservation area is defined under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as –an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

Statutorily listed buildings and their settings are protected under national legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990, which places special controls on the works that may be carried out on them. These are buildings of intrinsic architectural or historic interest. There are more than 250 statutory listed buildings in the Borough and they include many forms of structural development from Victorian villas, shops and churches to farmhouses.

Designated heritage assets are not limited to buildings but may also include historic parks and gardens, as recorded on the English Heritage Register of Parks and Gardens of Historic Interest. Historic parks and gardens form an important part of Bournemouth's heritage and character. The NPPF indicates

that they form a material consideration in the assessment of applications for development that could affect them.

Designated heritage assets also include Scheduled Monuments. These are monuments considered to be of national importance by the government and English Heritage takes the lead in identifying sites in England. Those in Bournemouth can be found at Hengistbury Head and Wick.

3.4.11 Policy CS39 designated heritage assets

The local planning authority will seek to protect designated heritage assets from demolition, inappropriate alterations, extensions or other proposals that would adversely affect their significance. Proposals for development likely to result in substantial harm to, or loss of, Grade II listed buildings or parks and gardens will only be approved in exceptional circumstances, and for a Grade I or II* listed buildings or parks and gardens only in wholly exceptional circumstances.

Where a proposal for alteration, extension or demolition is likely to affect a designated heritage asset or its setting, the developer will be required to submit an assessment of that asset and indicate the impact of the proposal on the asset.

3.4.12 Local heritage assets

Local heritage assets are those assets positively identified by the local planning authority as having a degree of significance. Their interest may be archaeological, architectural, artistic or historic. The NPPF indicates that the presence of such a heritage asset is a material consideration in determining a planning application.

3.4.13 Policy CS40 local heritage assets

The local planning authority will seek to protect local heritage assets by only supporting development that sustains or enhances the significance of the heritage assets.

Where a proposal for alteration, extension or demolition is likely to affect a local heritage asset or its setting, the developer will be required to submit an assessment of that asset and indicate the impact of the proposal on the asset.

- The impact of the proposal on Bournemouth's Local Plan: Core Strategy focuses on the environment, tourism and economy. These impacts are explained later in this LIR.

3.5 Bournemouth Town Centre Area Action Plan

3.5.1 The Area Action Plan (AAP) for Bournemouth Town Centre forms part of the emerging Local Plan for Bournemouth. The AAP forms part of the statutory development plan for the Borough and the policies contained within it provide an holistic approach to guide change, acting as the basis for development management decisions across the Town Centre to 2026.

Sustainable Economy

3.5.2 As a resort town, tourism is extremely important to Bournemouth's economy. However, unlike many other coastal towns, Bournemouth's tourism trade is quite diverse, catering for the conference trade, international education and learning related visits as well as traditional visitors. This has proven to be a strength and helps to maintain an all year round tourism industry that appeals to a broad range of ages, albeit still with significant seasonal variation. It is important that the Town Centre

continues to contribute to this diversity, support the tourism industry and increase out of season activity.

3.5.3 For the Town Centre to have a sustainable economy it will also need to offer a range of employment opportunities alongside the tourism sector, for example in the office-based financial services and the green knowledge economy sectors. Providing jobs in the retail, leisure and entertainment sectors will also be important. While physical changes are taking place, there will also be opportunities in the construction industry. Expansion across these sectors and the introduction of new investment is likely to attract more people into the Town Centre which would support existing and new businesses.

3.5.4 AAP Vision and Objectives

3.5.5 Vision:

By 2026 Bournemouth Town Centre will be rejuvenated so it will be even better, more competitive and renowned as a place of high quality for residents, visitors, businesses and students.

All changes in the Town Centre will be driven by the need to raise its image and profile as a high quality coastal garden town. Doing this will ensure the Town Centre is: A better place to live; A better place to visit; A better place to work; A better place to invest; A better place to learn; and A better place to socialise.

3.5.6 Objectives: [relevant extracts]

1. *Celebrate the town's heritage by protecting and enhancing the historic gardens, quality buildings and general appearance.*
2. *Ensure new development is sustainable, well designed, and responds to the positive characteristics of the Town Centre.*

8. *Increase and improve the quality and relationship between retail, leisure, cultural and entertainment uses so that the Town Centre has activities for everyone to enjoy both during the day time and evening.*
9. *Strengthen the role of the Town Centre as a key focal point for employment and tertiary education, and encourage stronger links between enterprise and local colleges, universities and schools.*
10. *Ensure that tourism and conferences remain a key part of the Town Centre economy.*

The AAP includes a range of policies that will help to realise the Vision and Objectives.

These policies are interrelated and should be read together and alongside national planning policies, the Bournemouth Local Plan: Core Strategy, other new Local Plan documents and any relevant ‘saved’ Local Plan policies (until they are superseded). The policies are designed to be flexible to accommodate change over the lifetime of the Plan.

3.5.7 Chapter 2 Spatial strategy

Develop a world class seafront

The seafront, cliff tops and their relationship with the town help to distinguish Bournemouth from other towns and the environment created by these assets is frequently cited as the principal reason for attracting people to visit, live, work, study and stay in Bournemouth. These features merge together at the Pier Approach making this area one of the most important public spaces in the Town Centre.

Due to the importance of the seafront and the Pier Approach it is vital that the appearance and experience on offer in these areas is first class.

Key objectives for this area are:

- Make better use of the beach for attractions, events and activities, and expand the water sports offer

- Ensure sites that come forward for development in the area contribute to expanding and diversifying the leisure and cultural offer
- Upgrade the public space at Pier Approach and the promenade
- Improve access to the beach and the distribution of people along the seafront
- Provide high quality basic amenities such as toilets and a litter free beach

The Town Centre area has a varied character and the Town Centre Urban Design and Character Study (2010) identifies nine distinct character areas. These areas are illustrated in figure 3.1 and are briefly described below.....

- **Seafront:** Characterised by a wide sandy beach and promenade, backed by steep cliffs, the seafront has a consistent appearance and is a key part of Bournemouth's character. Buildings in this area are typically beach huts or other small scale commercial properties nestled in the base of the cliff fronting out over the promenade.

Policy D3: character areas

Development proposals and other Town Centre projects should respect and take opportunities available to improve the existing character of the different parts of the Town Centre.

- The impact of the proposal on Bournemouth Town Centre Area Action Plan focuses on the environment, tourism and economy. These impacts are explained later in this LIR.

3.6 'Ambition 2020' - Bournemouth Borough Council's Corporate Plan for 2014/15

- 3.6.1 The Corporate Plan 2014/15 (Appendix 1) was adopted by Bournemouth's cabinet at its meeting on 28 May 2014. It reinstates the Council's commitment to the four priorities with a minor change to the community

action priority, to reflect its commitment to designing services with the community's input:

- a. An efficient council
- b. An active community
- c. An improving environment
- d. A thriving economy

3.6.2 The more detailed priorities and measurable targets relevant to the consideration of this proposal are included in Appendix 1 of this LIR.

3.6.3 Key relevant aspects for this LIR include the commitments in this Corporate plan to:

An improving environment

Providing high quality infrastructure for residents, businesses and visitors while protecting and enhancing our beautiful environment.

IE1 Building a world-class seafront

We will continue to ensure that our prime, natural asset remains a focus for the town. We will develop our ambitious long-term plan to provide a world-class seafront for Bournemouth that will enhance the natural assets of the coastline and create public spaces and amenities to inspire a new generation of visitors.

As well as providing enhanced facilities for local people to enjoy, the Seafront Strategy will help to secure and grow Bournemouth's £501m per annum tourism sector (Appendix 3), and aspire to meet new generations' expectations of the great British seaside. Some aspects will be delivered by the Council, but much of the aspirations will be achieved through private sector investments and partnership.

IE5 Protecting Bournemouth's parks and natural open spaces

We will preserve our unique and beautiful natural environment which we recognise as being one of the key reasons that people come to live in, work in and visit Bournemouth. We will maximise the use of these assets whilst protecting them from the effects of development and other environmental factors. Raising the profile of these spaces is a key element in promoting the town as a place to live, work and visit.

We will take steps to attract investment in new technologies to help minimise the potential negative environmental effects of an increasingly busy and vibrant town. This includes exploring renewable energy sources such as geothermal heat and voltaic power generation in a way which protects the area's natural beauty.

A thriving economy

Strengthening our key industries and creating new opportunities for growth and development

TE4 Playing our part in a thriving conurbation

As part of the Dorset Local Enterprise Partnership, we will play a key role in supporting initiatives that provide a wider economic benefit to the region. This includes supporting the Growth Fund proposals and European Union Structural and Investment Fund delivery.

We will encourage jobs and growth in the area, and will work with staff to be more commercially focussed and business friendly. We will embrace our diverse population base and take advantage of the variety of skills, knowledge and interests to develop new employment opportunities. We will work in partnership across the public, private and third sector to attract major inward investment. The Recession Fund will support initiatives that help to stimulate growth and jobs in the local economy.

TE5 Investing in our tourism economy

We will continue to work with our tourism partners to invest in and improve the town's major economic sector. A vibrant tourism economy is a condition of economic success and essential to maintaining the town's status as the UK's premier coastal resort. The Council has a key role in promoting the sector via its tourism marketing role, its events programmes, seafront activities, festivals and facilities such as the Russell Cotes Museum.

- The impact of the NBDL proposal in respect of Bournemouth Borough Council's Corporate Plan focuses on the environment, tourism and economy. These impacts are explained later in this LIR.

3.7 Bournemouth Seafront Strategy A Vision for Bournemouth's Seafront 2014

- 3.7.1 This document sets out the medium to long term plan for the development of the seafront. Bournemouth's seafront is the town's prime asset: its shop window to the world. Five and a half miles of seafront cliffs, promenades, beaches and facilities attract seven million UK, European and global visitors every year.
- 3.7.2 The seafront is also an extremely important public leisure and recreational amenity for local residents in the Bournemouth, Poole and Christchurch conurbation. Bournemouth Borough Council is the guardian of this stunning asset and works with a range of public, commercial and voluntary partners to manage it.
- 3.7.3 Bournemouth Borough Council has adopted an ambitious long-term strategy to develop a world-class seafront for Bournemouth that will enhance the natural assets of the coastline and create public spaces and facilities to inspire new generations of visitors.

3.7.4 The Seafront Strategy has been developed in consultation with the local tourism industry together with seafront groups, organisations and statutory bodies, and proposes sympathetic regeneration of the area from Alum Chine to Southbourne.

3.7.5 As well as providing enhanced facilities for local people to enjoy, the Seafront Strategy sets out a road map which will help to secure and grow Bournemouth's £501M tourism sector, which currently employs over 11,000 people. Some aspects will be delivered by the Council, but many of the aspirations will be achieved through external funding bids, private sector investments and partnership.

- The impact of the proposal on Bournemouth's Seafront Strategy focuses on the environment and tourism. These impacts are explained later in this LIR.

3.8 Bournemouth, Dorset and Poole Renewable Energy Strategy to 2020 January 2013

3.8.1 To support the Council's corporate priorities of 'Growth in the Green Economy' and 'increased activity to respond and adapt to the effects of climate change', Bournemouth Borough Council agreed to 'support the vision and aims of the Bournemouth, Dorset & Poole Renewable Energy Strategy to 2020 and the broad approach laid out for achieving it.' This Strategy is a non-statutory document which aims to set out a clear, shared ambition for renewable energy in Dorset and identify where local action should focus to maximise the benefits for Dorset while protecting and enhancing our unique environment.

3.8.2 The current strategy, which supersedes the original one adopted in 2005, seeks to: promote a common awareness of the latest situation; provide an updated understanding of potential local renewable energy resources; identify an aspirational target for renewable energy generation for 2020 and

outline the key actions necessary to realise Dorset's renewable energy potential.

3.8.3 The strategy sets the principles for renewable energy installations in local authority areas but does not include projects on the Crown Estate, such as off-shore developments.

3.8.4 The strategy vision is 'For the community of Dorset to play our part in mitigating climate change by using energy more efficiently and harnessing our viable renewable energy resources. We wish to maximise the local economic, environmental and community benefits that doing this can bring.'

3.8.5 The Strategy aims are to:

- Maximise the potential for local economic benefit and diversification.
- Facilitate renewable energy development, which is appropriate to Bournemouth, Dorset and Poole's environment and communities.
- Encourage a high degree of community involvement, understanding and benefit from using energy more efficiently and developing Bournemouth, Dorset and Poole's renewable energy resources.
- Enable Bournemouth, Dorset and Poole to play its part in reducing the greenhouse gas emissions in line with local, regional, national and international targets.
- Provide local, affordable and secure renewable energy supplies.

3.8.6 By endorsing the strategy the Council agreed to make the above vision and aims the guiding principles for all future renewable energy development locally, confirming that renewable energy development should be environmentally, socially and economically sustainable.

3.8.7 The Policy makes reference to the Navitus Bay proposals noting that:-

'Role of offshore wind

Offshore wind, such as the major wind farm being proposed off the Dorset Coast (Navitus Bay), is considered a ‘national’ renewable energy resource by the Government. As a national infrastructure project not subject to a local planning application, there will be limited local influence over whether or not Navitus Bay will be approved.

3.8.8 The strategy also emphasises the need to appraise potential adverse landscape and visual impacts carefully and makes the following statement regarding the consideration of onshore wind farms: *‘The potential visual impacts of wind turbines within Dorset’s unique environment has been raised as an issue of particular concern. Individual planning applications will continue to be considered on a case-by-case basis, with consideration given to the appropriateness of a project’s scale and design in that location. The landscape sensitivity analysis methodology developed within Dorset to understand whether sensitive areas are capable of accommodating the visual impacts of renewable energy installations should be used to ensure wind developments are appropriately sited in the landscape. Smaller schemes or schemes with limited visual impact tend to be more readily accommodated in sensitive landscapes.’*

- The impact of the proposal in light of Bournemouth, Dorset, and Poole’s Renewable Energy Strategy focuses on the environment and economy. These impacts are explained later in this LIR.

3.9 Bournemouth Visitor Satisfaction Survey 2013

3.9.1 In 2013 Bournemouth Borough Council commissioned Visit England to conduct a major visitor survey to provide fresh insight into the resort’s visitor profile and to give a better understanding of the visitor experience.

3.9.2 The survey revealed the following information that is relevant to this LIR:

- Visiting the beach is the most common activity amongst visitors to Bournemouth with **69% of visitors coming to Bournemouth specifically for the Beach / Seaside - compared to an average of 35% in other seaside resorts in the rest of England.**
- People are attracted by the beaches, clean and well maintained with a good range of water activities. These all scored above average compared with other seaside resorts in England.
- The impact of the NBDL proposal in light of the findings from this survey is to affect Bournemouth's tourism appeal and future economic performance. These impacts are explained in greater detail later in this LIR.

**3.10 Poole and Christchurch Bays Shoreline Management Plan Review
Sub-cell 5f Hurst Spit to Durlston Head Bournemouth Borough Council
2011 (see Appendix 2 for the full document).**

The Shoreline Management Plan

3.10.1 A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, a Shoreline Management Plan is a high-level document that forms an important part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence (Defra, 2001).

3.10.2 This SMP document, developed on behalf of Bournemouth Borough Council and supporting Client Steering Group (CSG), sets out the results of the first revision to the original SMP for the area of coast extending from Hurst Spit to Durlston Head.

3.10.3 The Shoreline Management Plan is a non-statutory policy document for coastal defence management planning. It takes account of other existing planning initiatives and legislative requirements, and is intended to inform wider strategic planning. It does not set policy for anything other than coastal defence management. However, from this perspective, it aims to provide the context to, and consequence of, management decisions in other sectors of coastal management. Following the adoption of the SMP, the operating authorities develop strategy studies which identify the nature and type of works required for implementation which then lead to the scheme delivery.

3.10.4 Section 4. Policy Development Zone 2 Christchurch Harbour and Central Poole Bay Friars Cliff to Flag Head Chine.

This section covers the area including the seafront at Bournemouth. As has been indicated above the Shoreline Management Plan is a non statutory document but it does include an assessment of the important features/information that are used to derive its recommendations.

3.10.5 For this section of the Shoreline Management Plan the document draws attention to:

‘Heritage and Amenity:

Hengistbury Head and its associated area is an important archaeological area (scheduled monument (SM)), with examples of Iron Age settlement. This area has various earth works and barrows, including the Double Dykes.’

‘Amenity, both for local recreation and tourism, underpinning the regional economy, is a very important aspect of the area. There are important recreational moorings and a marina within Christchurch Harbour. Over the whole frontage there are car parks and access points to the coast..... The promenades are an essential feature of the coast together with amenity beaches. Access along the sea front is now continuous between Mudeford Quay through to Friars Cliff and along the whole Poole and Bournemouth

frontages. In each area there are management plans, zoning use and providing pedestrian, cyclist and disabled access.

The landscape provides an important aspect of the recreational and tourism values, with important long shore views, as well as seascape views to the Isle of Purbeck and the Isle of Wight. Christchurch Harbour provides an essentially different and less developed landscape.'

Nature Conservation:

Christchurch Harbour is an SSSI, with further designation of the River Avon system and the Purewell Meadows. Hengistbury Head is designated SPA and SAC (Dorset Heathlands and Dorset Heath), with the River Avon and Avon Valley, extending from Christchurch up river, being SPA, SAC and Ramsar. There are discrete sections of cliff designated SSSI for its geological exposures along the Poole Bay frontage. These include areas at Southbourne, adjacent to Boscombe Pier, along much of the central section of Bournemouth and through to Canford Cliff Chine. There are areas both along the Poole Bay frontage and at Mudeford Spit and Quay designated SNCI for cliff top grasslands and for the dunes and shingle beaches. Within Christchurch Harbour here is a Field Studies Centre, important for research and monitoring of habitats as well as providing nature conservation educational services. There is also a bird observation and ringing centre to the rear of Hengistbury Head. Christchurch Harbour and the associated area of Hengistbury Head provide a very important nature conservation area generally, contrasting but complementing the more developed open coast sea front.'

3.10.6 The SMP then goes on to set out a series of key values

'Notwithstanding the major conurbations situated on the coast and within Christchurch Harbour, an essential feature of the area is the varied natural and dynamic value of the coast and harbour area. The open coast

represents that quintessence of the British seaside, with the expectation of open access, sea, sand, history and landscape; supported by facilities for recreation, activity and enjoyment.'

*'While varying in character, area by area, the Poole Bay seafront is strongly developed as a high quality seaside attraction, **enticing more visitors than any other coastal area of the UK**. The vision is that "The seafront will become an environmental showcase for the town, promoting environmental values to our visitors". (Bournemouth Seafront Strategy 2007 - 2011.) The values of the area are, therefore, as much about the overall setting of the coast and its landscape as it is about maintaining open access and facilities on the sea front. This varied context is provided in the value of the semi-natural cliffs and open space at the cliff crest and in the more natural unobtrusive development of Christchurch Harbour. In many ways Hengistbury Head typifies this interaction as an iconic part of the landscape, valued for both its natural and historic environment. It plays an important role in being the closest and most accessible natural 'green space' area for much of the eastern part of the Bournemouth area.'*

'These local values of the coastal area contribute fundamentally to the regional value of the two conurbations, in maintaining a vibrant sustainable sense of community and economic well-being. While maintaining this economic well-being of the developed coast is seen as a primary driver, this is inextricably linked to maintaining the natural conservation values, the historical perspective and environment, high quality landscape and varied use of the area.'

3.10.7 These values are brought together as an interrelated set of management objectives. Those of relevance to this LIR are:

- Protect economic viability of Bournemouth, Poole and Christchurch;
- Maintain important heritage values with Christchurch;
- Support management of heritage interests around Hengistbury Head;

- Retain and improve the width and amenity value of the intertidal (beaches) area in Poole Bay;
 - Maintain essential sea front facilities;
 - Maintain the opportunity for commercial, recreational and sports use of the water, in particular the use of shore-based facilities such as Mudeford Quay;
 - Maintain open space and recreational use of such space;
 - Minimise net loss of species/habitat (identify compensatory habitat if any net loss occurs);
 - Maintain opportunity for natural development of the mosaic of habitats, particularly within Christchurch Harbour;
 - Maintain the outstanding landscape and the views and appreciation of the varied coastal environment.
- The impact of the proposal in light of the Shoreline Management Plan focuses on the environment. These impacts are explained later in this LIR.

4.0 LOCAL AREA CHARACTERISTICS

4.1 Bournemouth's unique offer

Much inspiration and distinctive character can be found upon exploration of Bournemouth's seafront. Its status as one of the UK's premier coastal destinations has been secured since the beginnings of the town in the mid 19th century. There is a strong sense of a green and natural seafront, a place where the town meets its coast in many dramatic ways. The wealth of hidden nature within the Chines and the wooded green valleys are stunning in their seclusion and majesty; the drama of the cliffs and the over-cliff routes greet the horizon beautifully. The golden sands that stretch the length of Poole Bay offer the ultimate recreational destination. The combination of these, and many other natural elements, allied with a wealth of heritage, history and visitor footfall during warmer months, combine to create a unique coastal experience - an experience that acts as

a backdrop to both seafront and town life and is arguably the defining characteristic of the resort.

- 4.1.1 Six of the Borough's 21 conservation areas include properties/land on the cliff top and will be adversely affected by the wind farm proposal.
- 4.1.2 The conservation areas contain nine listed buildings, including the Grade II* Russell-Cotes Art Gallery & Museum and the Royal Bath Hotel, whilst a number of other listed buildings lying outside conservation areas, for example the Pier Head building at Boscombe Pier, will have their current sea views altered by the construction of the wind farm. The seascape forms part of the setting of the listed buildings and Conservation Areas located in a coastal location and as such in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990 special attention must be paid as to the impact the development will have on the setting heritage assets. The NPPF is clear at paragraph 134 that even where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 4.1.3 'Scheduled Monuments' are monuments considered to be of national importance by the government and English Heritage takes the lead in identifying sites in England. Those in Bournemouth can be found at Hengistbury Head and Wick. The site at Hengistbury Head will be adversely impacted by the proposed development.
- 4.1.4 Bournemouth has a number of sites designated for their biodiversity and geodiversity interest, with internationally important heathland on Hengistbury Head, Turbary Common and Kinson Common. The Borough has 10 Local Nature Reserves (LNR) totalling 304 hectares, 14 Sites of Nature Conservation Interest (SNCI) totalling 135 hectares, four Sites of Special Scientific Interest (SSSI) totalling 185 hectares and three heathland sites designated as a Special Area of Conservation (SAC), Special Protection Area

(SPA) or Ramsar Site totalling 76 hectares. The Christchurch Harbour SSSI is split between Bournemouth and Christchurch, and consists of the estuary servicing the internationally designated sites along the River Avon. In addition species of native plants and animals are present beyond the protected sites that are protected by international and national legislation. Sites of Special Scientific Interest, Local Nature Reserves, Sites of Nature Conservation Interest and sites with geodiversity interest have an essential role to play in encouraging biodiversity and contributing to the quality of life in the Borough. The national and international significance of much of the area explains the popularity and appeal of Bournemouth to people with a particular interest in wildlife and the environment.

4.1.5 Blue Flag, Quality Coast Awards and Entente Florale Gold Award.

Bournemouth has retained the international Blue Flag award status since it was first introduced in 1996 and in 2014 the Borough secured four Blue Flag awards for Alum Chine beach, Durley Chine beach, Fisherman's Walk beach and Southbourne beach. Bournemouth also secured two Quality Coast awards for Bournemouth and Boscombe beaches. These awards recognise the highest standards for water quality, environmental management, safety and services and environmental education. Combined with Poole's four Blue Flags, the bay that the proposed wind farm will overlook holds more Blue Flags than any other beach destination in Britain. Bournemouth has also been awarded the highest environmental award by the European Entente Florale 2014 judging panel. The collection of environmental awards sets Bournemouth in a unique position in relation to other UK resorts.

- The potential damage to the distinctive environmental character of Bournemouth is covered in the next section.

5.0 ENVIRONMENTAL CONTEXT OF BOURNEMOUTH LOCAL IMPACT REPORT

5.1 Over-arching comments

5.1.1 Before dealing with each of the potential impacts that Bournemouth Borough Council considers the NBDL proposal will have upon its area, the Council would like to make it absolutely clear that it is not against proposals for the development of appropriate renewable energy projects per se. This is evidenced by its commitment to the Bournemouth, Dorset and Poole Renewable Energy Strategy to 2020.

5.1.2 Bournemouth Borough Council also demonstrated its genuine environmental concern when it became the first local authority in the UK to show its practical backing for sustainability and ecological integrity by endorsing the Earth Charter in 2008. The adopted Bournemouth Local Plan (Core Strategy) seeks to encourage the provision of decentralised and renewable/low carbon energy generation technology. Policy CS3 Sustainable Energy and Heat indicates that ‘The Council will encourage the provision of decentralised renewable/low carbon energy generation ... and the installation of the necessary supporting infrastructure’. The current Navitus Bay proposal does not fall within the definition of a ‘decentralised renewable energy project’ for the purposes of the Local Plan, since it would be located outside the Borough’s jurisdiction. Having said that, the policy continues by indicating that that ‘The wider environmental, economic and social benefits of all proposals for decentralised renewable and low carbon energy projects will be weighed against other policies in the Plan and will be favourably considered provided that:

- The technology/infrastructure is suitable for the location and does not unreasonably detract from local amenity;
- It would not, individually or cumulatively, have an unacceptably adverse impact on ecology, wildlife, or the integrity of protected habitats;

- It would not cause harm to local amenity from noise, vibration, overshadowing, flicker or other harmful emissions.'

5.1.3 It is Bournemouth Borough Council's contention that the Navitus Bay proposal fails the first and second of these tests and there is substantial doubt about whether it would pass the third. This means that if the proposal had fallen within the Council's area of responsibility, it would not have been able to support it and, therefore, is unable to do so even though the Council's role is only as a consultee.

5.1.4 Bournemouth has worked with its partners in both the Borough and wider county to develop the Bournemouth, Dorset and Poole Renewable Energy Strategy the second version of which it adopted in 2013.

5.1.5 Although the Strategy does not specifically cover the Navitus Bay proposal, which lies outside the direct remit of local authorities, it is clear that to be considered an appropriate form of development it should be 'appropriate to Bournemouth, Dorset and Poole's environment and communities' and 'environmentally, socially and economically sustainable'. Indeed, national and local policy documents all emphasise the need to minimise the impacts of development upon the landscape/seascape particular in relation to areas of value. This leads into the first of the three major impacts:
Environmental damage to the coastal area.

5.2 Environmental Damage / Visual Impact

5.2.1 The development is proposed in an area that is recognised for the beauty and quality of its environmental setting including a number of nationally designated sites and 1466 heritage assets. These include:

- a) The New Forest National Park;

- b) Two AONB's; (defined by Natural England as 'an area of high scenic quality which has statutory protection in order to conserve and enhance the natural beauty of its landscape');
- c) Two Heritage Coasts (defined by Natural England as 'stretches of our most beautiful, undeveloped coastline, which are managed to conserve their natural beauty....');
- d) The Dorset and East Devon Coast World Heritage Site (Jurassic Coast);
- e) 245 scheduled ancient monuments (within the 30 km study area);
- f) 93 conservation areas (within the 30 km study area);
- g) 2,524 listed buildings (within the 30 km study area);
- h) 15 registered parks (within the 30 km study area);
- i) 10 Blue Flag beaches.
- j) Four Heathland SPA's with 43 component SSSIs and two Special Area of Conservation (SAC) on account of rare or vulnerable heathland and associated habitats and some individual species.

5.2.2 Bournemouth Borough Council's concern is a specific one; it is considered that the proposed development is totally inappropriate in terms of its location and scale. It is Bournemouth Borough Council's opinion that the current proposal would not have met the criteria of either the Bournemouth Local Plan or the Dorset and Poole Renewable Energy Strategy had it been proposed within an area where those policies held sway. Therefore, whilst it would otherwise have been able to view the construction of a wind farm as a 'positive' development, Bournemouth Borough Council feels that even after the revisions undertaken to the project since the PEI3 submission, the current proposal will have a significant **negative** impact on the Borough. The Council is also highly concerned that the duration of this negative environmental impact has not been adequately clarified.

5.2.3 Lifespan of the Navitus Bay development proposals

Bournemouth Borough Council is concerned that there is uncertainty concerning the lifespan of the project in general and the period of time that

at least some of the array will be present offshore. Clarification of this matter has been sought from NBDL in the discussions on the Statement of Common Ground but none has been forthcoming.

- 5.2.4 Whilst the draft DCO does set time limits for the commencement of the development proposed neither the draft DCO, nor the IPC Scoping Opinion give any indication of the likely date by which all the proposed turbines will have been decommissioned and removed. The Scoping Opinion (Document 6.4 paragraph 2.48) indicates that ‘The decommissioning process comes into effect either at the end of the TCE lease or at the end of a particular wind farm’s lifecycle. The Scoping report does not state the anticipated length of the TCE lease or the operational lifespan of the proposed development.’
- 5.2.5 The term ‘commenced’ is defined for both the onshore and offshore activities as effectively the carrying out of activities either on or offshore. However the project length is just generally referred to throughout the submission as being for a period of 25 years with no start date for that time period being given.
- 5.2.6 In the ‘Non technical summary’ (Document 6.3 Page 14) in describing the offshore elements it is indicated that the ‘Project would be operational for a period of 25 years’ (para 5.1.2). The term ‘project’ as set out at the beginning of that document (para 1.3) covers all the onshore and offshore aspects of the application.
- 5.2.7 By using this definition, and the timetable set out in the IPC Scoping Opinion (document 6.4 paragraph 2.45), this would suggest that the 25 year ‘project’ life would commence in 2016 and would run until 2041. This paragraph also gives an indication that the wind farm would be operational in 2020 which would suggest that the first turbine would be erected in 2020 and the last one decommissioned and removed in 2041 an operational life of 21 years. This would be in line with the assessment made in Volume B chapter 13 Seascape, Landscape and Visual (document 6.1.2.13)

5.2.8 However, in the 'Offshore Project Description' (document 6.1.2.2 P 39) in the decommissioning section it is stated that the 'operational life of the development is assumed to be up to 25 years.' The term 'operational life' is not defined. This leads to two possibilities. Firstly that the first turbine would be 'operational' in 2020 and that the last turbine would be decommissioned and removed by 2045. Again this would be in line with the assessment made in Seascape, Landscape and Visual Chapter of the ES (Volume B chapter 13 document 6.1.2.13).

5.2.9 Secondly the term refers to the 'operational life' of each turbine being 25 years or, in other words, that the 25 years only starts when the last of the proposed turbines is operational. This would mean that there would be turbines on site from 2020 until at least 2047 (evidence included in the Socio- economic and tourism chapter of the ES does suggest that there may be delays in sourcing the blades etc. for such a major project so later tranches of installation may go over the three years that are currently suggested). This would mean that at least some of the turbines would be in place between 2020 and 2047 and possibly longer. This approach would be in line with the evidence submitted in the Socio-economic and tourism chapter of the ES. (Volume D chapter 3 (socio economics and tourism) (document 6.1.4.3).

5.2.10 These three options of the definition of the term '25 years' give a range of possible dates during which at least some turbines will be present for between 21 and 27 years with the possibility that it may be longer. As will be seen later this has a direct bearing on the evidence submitted within the ES which appears to have used different definitions of the potential lifespan of the project to reach assessments of potential impact.

5.2.11 Bournemouth Borough Council is concerned with this lack of clarity on the projects lifespan and feels that it should be resolved during the Examination and then through the inclusion of a definition of the 25 year lifespan within

the DCO. In particular, it will be necessary to impose a requirement to require decommissioning in line with the assumptions set out in the Environmental Statement in order for any DCO that is granted to be lawful. The Council will also address within the tourism impact section a further concern regarding the variability of the construction period since this has the potential to exacerbate the negative impact on the visitor economy.

5.2.12 Visual Impact

As has been indicated before part of Bournemouth's unique offer is that there is a strong sense of a green and natural seafront, a place where the town meets its coast in many dramatic ways. This contrast between the built environment of the town and the natural setting of the beach and cliff tops with their view out to the Needles/St Catherine's Point and Old Harry Rocks is considered vital for both the continued success of its tourist offer but also as a unique selling point for those wishing to set up business or move to the area. Unlike some other coastal areas the view of the sea from Bournemouth is in effect framed and consequently more sensitive to visual impact from development. The value of these types of area is specifically recognised in the Overarching National Policy Statement for Energy (EN-1) which states that '.....Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast'. (paragraph 5.9.18).

5.2.13 The concern is that the proposed introduction of the wind farm will have a significant **negative** impact on the area.

5.2.14 Bournemouth Borough Council remains seriously concerned with two aspects relating to the visual impacts of the proposal. Firstly it is considered that the visualisations currently supplied by NBDL are not an accurate representation of the true impact of the proposal and secondly there is concern that the methodology used to assess the potential impact as set out in Volume B chapter 13 Seascape, Landscape and Visual (document 6.1.2.13)

and chapter 15 Setting of Heritage Assets (document 6.1.2.15) has led to an underestimate of the potential impact on the coastal views in general and our nationally recognised buildings/landscapes.

5.2.15 Bournemouth Borough Council considers that, in the absence of more realistic visualisations as requested in our representation of 19th October 2011 and July and August 2012 (summarised in volume B chapter 13 Seascape, Landscape and Visual), there remains concern that the impact will be considerably greater than is currently estimated by NBDL. This issue was picked up in the IPC Scoping report (included as document 6.3 in the NBDL ES). In paragraph 3.63 it is pointed out that ‘The Applicant’s attention is drawn to the comments of Bournemouth Borough Council (see Appendix 2), in particular with regards to using horizon reference points such as the Needles and Old Harry Rocks to allow the observer to compare the dimensions of the proposed development against well known landmarks, and to giving scale to visualizations. It is considered that the **negative impact** caused by the establishment of an ‘industrial landscape’ into a currently pristine environment will be to the detriment of the Borough’s aims and intentions as set out in ‘Ambition 2020’ Bournemouth Borough Council’s Corporate Plan.

5.2.16 In Volume B chapter 13 Seascape, Landscape and Visual (Document 6.1.2.13) of its ES NBDL has assessed the likely impact upon the views from various parts of the Borough and has concluded that the impact of the proposed wind farm would be ‘not significant’ in terms of an Environmental Impact Assessment. Bournemouth Borough Council fundamentally disagrees with this conclusion as it considers that the adverse impact of the new wind farm will be very significant. The visualisations used throughout the consultation period were deficient and served to understate the visual impact. This was in part the result of not using the latest guidance on visuals that would have given a more realistic indication of size, but also the consequence and limitations of using static representations for what is a dynamic facility where the movement of the rotors and the operation of the lights are a

significant element of the visual intrusion in the seascape. The Council is concerned with a number of aspects of the methodology used by NBDL in its ES and the weight given to some key aspects of assessment within the methodology adopted.

5.2.17 The ES quotes extensively from GLVIA3 'Guidelines for Landscape and Visual Impact Assessment' and DTI (2005) guidance (DTI Assessment of the Impact of Offshore Wind Farms: Seascape and Visual Impact Report'. Bournemouth Borough Council considers that NBDL has deviated from the guidance when developing its methodology for assessing the potential impact of the proposed wind farm on the landscape and seascape setting of the area in general and Bournemouth in particular.

5.2.18 The ES quotes from the Landscape Character Assessment - Guidance for England and Scotland which indicates that;
'key characteristics are those combinations of elements which help give an area its distinct sense of place.....If the key characteristics which are identified were to change or be lost there would be significant consequences for the current character of the landscape.'
Bournemouth Borough Council agrees that this is the approach that should have been taken but feels that the subsequent assessment of impact has **not** adequately sought to define or correctly measure that project's likely impact on the distinct sense of place that is to be found within the Borough.

5.2.19 Whilst it is agreed that an assessment needs to be made of the potential impact that the proposed development will have on individual areas within the area, the concern lies with the level 'the bar' has been set to obtain a 'significant' impact.

5.2.20 The Council draws attention to a number of places where it considers that the ES has done this within the Seascape, Landscape and Visual chapter (document 6.1.2.13)

5.2.21 Assessment of the sensitivity of visual receptors document 6.1.2.13
(paragraph 13.3.81)

The ES introduces this topic by indicating that ‘for visual receptors judgments of susceptibility and value are closely interlinked considerations; for example the most valued views are those which people go and visit because of the available view, and it is at those viewpoints that their expectations would be highest.’

5.2.22 Whilst the Council would not disagree with this statement, it is felt that the concentration solely on ‘visitor’ perceptions to determine whether the impact should be in the ‘highest’ division (paragraph 13.3.82 defines the highest division as ‘high - visitors to panoramic viewpoints marked on maps, or valued viewpoints which people might visit purely to experience the view, e.g. promoted or well-known viewpoints, or key designed views’), has downplayed the importance of the visual impact of the proposal on those living on the cliff tops. GLVIA3 does not set a wording for these divisions so this is a NBDL derived approach.

5.2.23 GLVIA3 does, however, in its introduction to the topic (Paragraph 6.32 - 6.36) place at least as much emphasis on the importance of the visual susceptibility of residents as it does on tourists so it seems inappropriate that its sensitivity to change is not placed in the highest division.

‘6.32 Susceptibility of visual receptors to change.

The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

- The occupation or activity of people experiencing the view at particular locations; and
- the extent to which their attention or interest may therefore be focused on the view and the visual amenity they experience at particular locations.’

5.2.24 However at least as relevant is paragraph 6.33 which indicates that :

‘6.33 The visual receptors most susceptible to change are generally likely to include:

- Residents at home (but see Paragraph 6.36);
- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- Communities where views contribute to the landscape setting enjoyed by residents in the area.’

GLVIA3 does cross reference to paragraph 6.36 which reads;

‘6.36 The issue of whether residents should be included as visual receptor and as private viewpoints has been discussed in paragraph 6 17. If discussion with the competent authority suggests that they should be covered in the assessment of visual effects it will be important to recognise that residents may be particularly susceptible to changes in their visual amenity - residents at home, especially using rooms normally occupied in waking or daylight hours, are likely to experience views for longer than those briefly passing through an area. The combined effect on a number of residents in an area may also be considered, by aggregating properties within a settlement, as a way of assessing the effect on the community as a whole. Care must, however, be taken first to ensure that this really does represent the whole community and second to avoid any double counting of the effects.’

5.2.25 There are two aspects to this.

- Firstly, assuming that in this instance Bournemouth Borough Council would be considered as a ‘competent authority’, it is not aware that it was ever asked whether residents should have been included in this aspect of the consultation. Had Bournemouth Borough Council been approached it would

have said yes. This seems a serious omission.

- Secondly this omission has the scope to then skew the findings when considering potential impact as more importance appears to be given to the opinions of visitors than residents. The potential impact on the tourists and visitors to the Borough are key concerns of the Council so we would not seek to substitute one group for the other just to give more appropriate weight to the adverse impact upon those who will always be able to view the wind farm. In essence this concern reaffirms Bournemouth Borough Council's opinion that its cliff top areas are 'valued viewpoints which people might visit purely to experience the view' placing them within the highest division of potential impact.

5.2.26 Magnitude of effect (document 6.1.2.13 paragraph 13.3.83)

The definitions used for scale in GLVIA3 indicates that judgements are needed about the size or scale of change in the landscape that is likely to be experienced as a result of each effect. The process used to form such judgements should be described and also categorised on a verbal scale that distinguishes the amount of change but which is not overly complex. For example the effect of both loss and addition of new features may be judged as major, moderate, minor or none, or other equivalent words. The judgements should, for example, take account of:

- The extent of existing landscape elements that will be lost, the proportion of the total extent that this represents and the contribution of that element to the character of the landscape - in some cases this may be quantified;

5.2.27 Whilst it is accepted that NBDL has followed this approach, the choice of wording to define each division within the assessment are those of NBDL. It is Bournemouth's opinion that the impact will be the same whether the new array is described as being 'dominant, commanding and unmistakable and, being the foremost feature, easily seen' ('highest' division) or that the wind farm will be 'conspicuous, well defined, clearly visible and catches the eye'

(medium scale division). It considers, therefore, that the definitions have been arbitrarily set, and operate so as to reduce the potential significance of the impact of the new array when applied.

5.2.28 Extent of the effect document 6.1.2.13 (paragraph 13.3.86)

In paragraph 6.40 of the GLVIA3 detail is given on how to assess geographical extent. Three separate categories are included

- angle of view;
- distance viewpoint to proposed development; and
- extent over which the change would be visible.

5.2.29 The ES quotes the GLVIA3 paragraph as its reference point but has then mixed all these three into one measure and just four bullet points. Bournemouth considers that each of the implications of the GLVIA3 bullet points is different and should have been considered separately as by not doing so it has left the current banding confusing.

5.2.30 The ES divisions are:

- Limited - site, or part of site, or small part of receptor area (< approx. 10%);
- Localised - site and immediate surroundings, or part of receptor area (up to approx. 25%);
- Intermediate - up to approx. 25km, or around half the receptor area;
- Wide - beyond 25km, or more than half of the receptor.

The divisions appear to have been placed in the wrong order as diagram 13.1 seems to indicate that a placement in the 'wide' category has the highest impact.

5.2.31 None of the terms used is defined in the ES which does not help understanding. For example in the 'wide' category does the 'beyond 25km' mean that the viewer is able to see 25km from where they are standing and

so can see much of the new array? It would be Bournemouth Borough Council's contention that this will be the case from the majority of the cliff top areas within the study area. It is not clear what the second element of this division 'or more than half of the receptor' means. Is it a distance measurement? Is it a percentage figure of the amount of the array that can be viewed from a single point? If the latter then no definition of the boundaries has been included.

5.2.32 Bournemouth Borough Council's concern is that NBDL has undertaken this assessment in such a way as to make it difficult to challenge where they have placed each view. This is a serious concern as this element forms one third of the assessment of magnitude of effect which has a knock on importance when measuring significance of impact.

5.2.33 Duration and reversibility of the landscape effects document 6.1.2.13 (paragraph 13.3.91).

GLVIA3 paragraph 5.51 indicates:

'Duration and reversibility of the landscape effects

These are separate but linked considerations. Duration can usually be simply judged on a scale such as short term, medium term or long term, where, for example, short term might be zero to five years, medium term five to ten years and long term ten to twenty-five years. There is no fixed rule on the definitions and so in each case it must be made clear how the categories are defined and the reasons for this.'

5.2.34 The ES para. 13.3.91 introduces a fourth category 'permanent'. No justification is included for this, contrary to GLVIA3 advice which indicates that studies should include an explanation of the choices of division. Further unlike the rest of the divisions this 'highest' category is not time based. GLVIA only uses three categories and so it is difficult not to conclude that this fourth 'higher' category has not been introduced simply to ensure that the scheme was not assessed as being in the highest category as this would

have had consequences for ‘significance’ in diagram 13.2 of the ES.

5.2.35 Notwithstanding the concern with the approach adopted, Bournemouth Borough Council challenges NBDL’s assertion that its project should only be placed within the long term i.e. 10 - 25 year timeframe. The timetable for the project is set out in volume D Project Wide Assessment appendix 3.2 (document 6.2.4.3.2). Assuming the project is deemed to have started when the first turbine comes into operation this appendix indicates that this could be as early as 2020 with the last one decommissioned in 2047. This 27 year timetable is in line with NBDL’s view that each turbine has an operational life of 25 years and that if all goes well they will get them operational in three annual tranches, although they do caveat that the tranches may be further apart. NBDL’s approach in document 6.1.2.13 is in contrast to the approach taken in document 6.1.2.15, paragraph 15.3.39, where for the purposes of the consideration of the impact on heritage assets it is viewed as ‘permanent’ in relation to ‘this current generation.’

5.2.36 If, as Bournemouth Borough Council has contended earlier in this LIR, the project is longer than 25 years, it would mean that it would be longer than the timetable set out in the ‘long term’ category but still would not fall within the ‘permanent’ category as this is defined as only being for projects where there is ‘no intention for [*the development*] to be reversed.’

5.2.37 It is Bournemouth Borough Council’s contention that these definition/methodological issues within this chapter of the ES have led to an under recording/assessment of the potential impact of the proposed wind farm on the landscape and seascape views from Bournemouth. Bournemouth Borough Council’s view is that, using worst case scenario principles, if any of the measures fall into the highest impact category then that should be deemed as placing the project into the ‘major significance of impact’ category in diagram 13.2 of document 6.1.2.13. Any one of the issues raised above would have had the potential to do so, in combination there seems a compelling case for doing so.

5.2.38 It is considered that that these definition/methodological issues within this chapter of the ES have led to a failure to recognise the value that is afforded by views from both the cliff top and beach area. This then has consequential impacts on the ES findings of the impact upon Bournemouth Bay, VP 18 West Cliff Bournemouth, VP 19 Undercliff Drive and VP 20 Hengistbury Head. Additionally it is considered that far from being diminished by these views being from an urban/built up area, as the ES contends, it is considered that the contrast makes them all the more important, and, therefore, susceptible to the introduction of a non natural element into a currently natural environment.

5.2.39 The ES seeks to imply that the potential negative impact of the array is mitigated by the presence of shipping in the seascape between The Needles and Old Harry Rocks. This conclusion is not accepted. The visual presence for a short time period of ships and sailing yachts cannot equate with or diminish the permanent negative visual impact of the turbine array, especially as the turbine blades will not be static and their movement will increase their prominence. The passage of these vessels will be transitory and short lived whilst the wind farm will be fixed and 'permanent' for the lifetime of the project. Further the majority of deep sea shipping movements will lie within the English Channel beyond the southern edge of the proposed array. It appears inappropriate, therefore, to indicate as the ES does that the presence of one diminishes the impact of the other.

5.2.40 It is considered that the ES under records/reports the number of days that the array is likely to be visible from the Cliff Tops in Bournemouth. The ES uses the distance from the airport to the nearest part of the array to record the number of days that the array will be visible. This approach is flawed for two reasons, firstly the airport lies approximately 5 km inland and would never be able to directly view the array and secondly the use of visibility data from Bournemouth International airport, which lies in a microclimate

area of its own, does not reflect the visibility at the coast.

5.2.41 If, however, it is accepted that Hurn Airport is an appropriate location for judging visible distances then it is considered that it should be used only as an indicator of the range of potential visibility. The nearest point of the array to the coast in Bournemouth is under 20km (heritage settings assessment document 6.2.2.15.1) which would suggest, from table 13.6, that the array will be visible for 63% of the time. Informal reports from local residents, living approximately 22km from the Needles, indicated that over the months of June, July and August this year on all but one day they were visible from the Bournemouth Coastline. This would suggest that the visibility data from Hurn, which suggests that for a distance of 22km the array would only be visible for 48% of the year in total, is significantly underestimating the number of days on which the array will be visible. For other locations in the study area, for example Durlston Head at 14.4 km the same visibility range would make the array visible for 77% of the time. This is not mentioned in the accompanying paragraph which seeks to downplay the number of days the array will be visible.

5.2.42 Volume B chapter 15 Setting of Heritage Assets

Throughout document 6.2.2.15.1 (Appendix 15.1 of the Setting of Heritage Assets chapter), reference is made to the potential impact of the wind farm on the scheduled ancient monument at Hengistbury Head, six conservation areas that include cliff top areas and the grade II* and grade II listed buildings in the vicinity of the cliffs or coastline. This is wholly in line with the requirements of paragraph 138 of the NPS which makes reference to the the potential loss of a building, or other element, which makes a positive contribution to the significance of a conservation area. In this instance the 'other element' that should have been treated as causing substantial harm to the designated areas is the positive contribution provided by the current natural views from the cliff top conservation areas and Hengistbury Head scheduled ancient monument. Although mention is made of the importance of these natural views it is considered that the ES has, by setting the level

by which a significant impact/potential harm is recorded at too high a position, failed to adequately address this aspect of the NPS.

5.2.43 Phrases used include:

‘Overall, the proposed wind farm will alter the character of the focal points of the conservation area, i.e. the extensive sea views to the south. The proposed turbines will be visible in the centre of the seascape view, in the distance towards the horizon. This will alter the sea views which serve as a strong focal point within the Conservation Area....’ *West Overcliff Drive Conservation Area*

‘Overall, the setting of Hengistbury Head contributes to its significance through the aesthetic value of the prominence of the Iron Age ramparts especially and the headland generally, the aesthetic and associative historical value of the headland's relationship with the seascape to the south and harbour to the north, as well as with other historic features on the headland and beyond, and the aesthetic value of the appreciation of the panoramic views from the headland's highpoint including extensive sea views and views of Christchurch Harbour. The significance of the asset, however, is primarily derived from its evidential value.’

‘The proposed wind farm site is located c. 19.6 km south of Hengistbury Head, and will be visible centrally on the horizon within the extensive sea views that extend from the foreshore immediately south of the asset to the horizon (Viewpoint 20: Hengistbury Head). The proposed wind farm will therefore fragment the seascape vista south of the asset.’ *Hengistbury Head Ancient Monument*

‘The turbines will be visible as a distant, horizontal array. From this viewpoint, the development will be viewed along its long axis, meaning that the leading, northern, area of Turbines will be its most visible aspect. As such, the proposed wind farm will introduce a distant built element into the uninterrupted seascape vista to the south. The proposed wind farm will

feature directly to the south of the pier, with the pier walkway aligned upon the development. As such, the proposed turbines will feature as a focal point approximately 19 km beyond the pier, which effectively 'points' towards the proposed wind farm site.' *Neck or Entrance Building at Boscombe Pier (Listed Building)*.

5.2.44 The ES considers, however, a 'significant' impact to equate to 'substantial harm to or loss of' a designated heritage asset. It is considered that a significant negative impact on a heritage asset can/will occur at a much lower tolerance level than is indicated.

6 TOURISM IMPACT ANALYSIS

This section of the LIR is divided into four parts. The first will consider the methodology and the sources of data used in the Environmental Statement. The next will highlight the key findings from the data collection including the impact of the proposed development on tourism visits. The third section will look at the way these changes impact on tourism income and jobs. The final section will cover the impact on future investment in the visitor economy.

6.1 Methodology and data sources

6.1.1 NBDL has calculated the economic impact based on its assessment of the local and wider economy. This approach is in line with that suggested within EN-1 The Overarching National Policy Statement for Energy. The term 'economic impact' is not defined in EN-1 nor is it specifically defined within the main socio-economics and tourism chapter of the ES. EN-1 does, in paragraph 5.12.2 indicate that 'Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES.' In paragraph 5.12.4 a suggestion is given as to the definition of 'local' where it is indicated that 'applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.' This would seem to suggest that the definition of 'local' should, therefore, be for a smaller area than is indicated in appendix 3.2 to the socio-economics and tourism chapter (document 6.2.4.3.2) which defines the term as covering the counties of Dorset, Hampshire and the Isle of Wight. This is considered to be a much wider area than would normally be deemed 'local'. The use of such a wide area of definition has the potential to mask potentially significant

issues at the district or conurbation level. It is considered that to be in line with the provisions of EN-1 the ES should have looked in more detail at the potential for impact on local employment levels than they have done.

6.1.2 Research limitations

The Council is concerned that some of the conclusions reached in the ES Volume D Chapter 3 (Socio economics and Tourism) (document 6.1.4.3) which are directly relevant to the consideration of potential impact on tourism in Bournemouth are erroneous. These methodological failures will be explained later in this section.

6.1.3 Tourism professional research engagement requested

Bournemouth Borough Council requested from the outset (Nov 2011) that comprehensive research should be undertaken across a full year and across all markets. The fact that this did not happen as it should have done in 2012, removed the opportunity for a full and properly informed tourism industry consultation in 2013.

6.1.4 NBDL commissioned research in Bournemouth

NBDL commissioned research in summer 2012 and spring 2013 in several locations in the area to assess the potential impact of the wind farm on visitors to the area. The 2012 summer research had a larger sample size. Respondents were asked about their motivations for visiting the area.

6.1.5 Visit England 2013 Visitor profile research

In 2013 Bournemouth Borough Council commissioned Visit England to conduct a major visitor survey providing fresh insight into the resort's visitor profile, how and when visitors plan their trips, what they do, how much they typically spend and what they think of the experience.

6.1.6 Summer 2013 Visitor research in Bournemouth

In August and September 2013 Bournemouth Borough Council commissioned research on the seafront to quantify the visitor reaction using a sample size of over 1,000 visitors. Visitors to Bournemouth included day visitors coming from home on the day of their trip, tourists staying in Bournemouth and day visitors from other holiday destinations around Bournemouth. The 1,120 people interviewed included a good cross section of each of these three groups. Interviews took place before, during and after the main school holidays.

6.1.7 Value of Bournemouth visitor economy

The South West Research Company has gathered income and employment data for Bournemouth up to 2013. This information is collected in a format that is consistent with other tourist destination research across South West England (Appendix 3).

6.1.8 Bournemouth's brand value definition

In 2008/2009, the Bournemouth Tourism Management Board* commissioned Bournemouth University to facilitate a thorough analysis of the Bournemouth brand across all sectors of the visitor economy. This identified the key brand values making the essence of Bournemouth in appealing to visitors.

6.1.9 Sheffield Hallam Research

Sheffield Hallam University has collected data on all seaside resorts to provide a clear indication of absolute and relative economic value. This includes visitor numbers, income and employment in seaside tourism.

** The Bournemouth Tourism Management Board draws its representation from seven separate sectors actively connected with the visitor economy. These are Accommodation, Attractions (including restaurants), Transport, Town Centre, International Education, Culture and Conferencing. The Bournemouth Tourism Management Board has overall responsibility for the development and management of tourism in Bournemouth.*

6.1.10 Imperfect model

Table 3.7 of the ES (volume D chapter 3 (Socio economics and tourism) (document 6.1.4.3)), seeks to define the potential magnitude of effect of its proposals on tourism. To fall into the ‘high [impact]’ category three criteria have to be met:

- 1) Effects are of long-term duration (i.e. greater than five years);
- 2) Where the perceived impact on turnover/customer base is considered by more than half of the business survey respondents to be high (i.e. greater than 15% reduction or increase) or moderate (i.e. greater than 10% but less than 15% reduction or increase); and
- 3) Where the assessed level of impact remains consistent with the perceived level of impact.

The serious deficiencies of this model are explained below

6.1.11 Flawed criteria

Bournemouth Borough Council considers that these criteria are fundamentally flawed and do not reflect the potential impact on the ground. Firstly, there was no weighting applied to the businesses most affected by the development i.e. closest to the compromised views. Secondly, a significant loss of income will adversely affect a business in a much shorter time than five years especially since the recession has resulted in very slim margins of profitability and the NBDL data indicates an even higher negative impact during the construction phase of up to five years. Business lost during this period will not all return so will compound future losses. In addition, using an overall figure for the local economic area masks pockets of adverse impact within a specific area or sector. Finally the third test is inappropriate since it would be impossible to assess this properly in advance of the construction work on the turbines commencing.

As will be indicated later, a perception that the wind farm will have an adverse environmental impact (risk of noise disturbance, visual intrusion etc.) would be expected to stop some visitors coming to the area. Whether in the long term the perceived impact has actually occurred will not be relevant as the choice will have already been made by a potential visitor to go elsewhere.

6.1.12 Low NBDL 2013 sample

It should be put on record that Bournemouth Borough Council feels that the 507 interviews in NBDL Visitor Survey 2 in March and April 2013 across seven sampling points including Bournemouth, represented a very low sample for Bournemouth. Bournemouth alone has 1.05m staying visitor trips and 6.04m day visits each year. The Bournemouth visitor survey 2013 undertaken by the National Coastal Tourism Academy had a sample size of 1,120 in Bournemouth alone and so should be accorded greater weight as should the findings from the 2012 NBDL Summer Visitor Survey where the sample was over three times the sample size of the 2013 NBDL Visitor Survey. The findings from the small sample taken by NBDL cannot be considered robust and should not be used in preference to the 2012 survey. Furthermore, Bournemouth Borough Council has previously raised concerns about the nature of the visualisations used in the NBDL main visitor survey which, if not sufficiently clear and accurate, will have potentially distorted the opinion of those being interviewed. These are addressed further below.

6.1.13 Lack of transparency

The late delivery of all the vital tourism impact research at the very end of the consultation period and at the busiest time for tourism businesses has frustrated meaningful dialogue with the industry. This frustration was compounded by the subsequent knowledge that NBDL commissioned the main visitor research 'secretly' in 2012 at exactly the same time as the Council, tourism industry and the local MP were being promised by NBDL's Project Director in a public meeting in Bournemouth on 13 August 2012, that

they would now be fully involved in the specification of this visitor research to make sure that the results could be as robust and meaningful as possible. This commitment was confirmed in a follow-up email from Mike Unsworth, NBDL Project Director to Bournemouth's Director of Tourism on 21 August 2012 :

"We are committed to talking to you about your specific concerns and suggestions on the tourism survey, in particular the inclusion of new visuals showing the range of options and the timing, duration and structure of the survey."

This was a deception. Less than three weeks after the public meeting promising full involvement, NBDL revealed that the main visitor survey had not only been specified without local industry involvement but it had already been commissioned and completed. This was confirmed in an email note the next week on 29 August 2012 from the same Project Director:

"The original tourism survey that we had commissioned TSE to undertake had already commenced, to capture the peak summer season, and it made no sense to cancel it as it was so close to completion."

This information was disclosed over nine months after Bournemouth first requested to be engaged in the comprehensive research required to make a proper assessment of the tourism impact. The late delivery of the research results and the developer's default on this promise to incorporate professional advice from the local tourism industry and Council has made it difficult to achieve agreement with NBDL on the full severity of the tourism impact and to determine the Realistic Worst Case Scenario (RWCS). It is a particularly poor example of transparency in the assessment process and of engagement with stakeholders.

6.1.14 2013 Visitor Survey

Bournemouth Borough Council's own survey of visitors gained feedback from those who were staying in Bournemouth in 2013. Visitors were interviewed in the main holiday season and in September. They were shown two different images showing what the wind farm would look like, one prepared by NBDL and the other by a group opposed to development that had been independently assessed as being a more realistic visual representation. The results confirmed that the more realistic visual representation created more adverse reaction from visitors.

6.1.15 Deficiencies in the NBDL tourism modelling

NBDL has stated that the impact of the proposed development upon tourism can be measured through a combination of the **sensitivity of the receptor** and the anticipated **magnitude of effect**. (Volume D chapter 3 (Socio economics and tourism) (document 6.1.4.3)). Bournemouth Borough Council believes that this pseudo-scientific model, a creation of NBDL, has no accreditation or foundation in established econometrics. It is, therefore, important to carefully examine the validity of the model for assessing such an important factor as tourism - particularly when there is actual data available to build estimates.

6.1.16 Sensitivity

The sensitivity (importance) of the receptor is established against:

- 'Tourism businesses' relative attraction to customers from outside the study area and the Project's potential to influence broader perceptions of the area. Where a majority of trade is non-local this is more likely to be the case;
- The relative importance of tourism as a business sector. Where tourism is more important relative to other sectors, impacts may have a potential to be broader in nature.' (Paragraph 3.3.29 (document 6.1.4.3))

Sensitivity is considered to be high if more than 50% of the customer base is drawn from outside the regional area and where the proportion of tourism related employment is higher than the GB average. Using its model, NBDL has correctly assessed the area including Bournemouth as high sensitivity.

6.1.17 Magnitude

The magnitude (scale) of effect is gauged by estimating the amount of change on the receptor and is measured by the perceived impact on turnover/customer base by respondents to business survey.

6.1.18 The weakness of the model is evident as it ignores actual volume of impact and substitutes the proportion or percentage of respondents indicating loss as the metric. This is a very serious flaw in the methodology. It results in the real impact being very significantly understated because the scale of turnover adversely affected is not factored into the assessment.

6.1.19 But even using the flawed model, in terms of magnitude of effect, 25% of businesses in Bournemouth, Poole and Christchurch are identified as expecting a high or medium negative impact on business. This is then classified by NBDL as low level of impact. Using the NBDL Significance of impact table (table 3.8), combining high sensitivity with low magnitude places Bournemouth in either moderate or minor significance rating. NBDL has chosen to use minor which then leads them to suggest that tourism impact is **not significant** where as a moderate rating of significance would lead to the impact being rated as **significant**. As the sensitivity is so high, i.e. 15% employed in tourism compared to 8% GB average, Bournemouth Borough Council contends that, at the very least, the moderate rating should have been used which would more correctly describe the impact on tourism as **significant**.

6.1.20 Understating the significance of the tourism businesses impact

NBDL has also given unreasonable weight to the proportions of businesses and customers who are indicating that they will not be affected by the development. This derives in part from the mistakes made in sampling where insufficient weighting was given to those tourism businesses closest to the development. The use of a 10 Km distance inland for the business survey sample area on the basis that the development could still be seen is

indicative of the poor reasoning behind this methodology. Accepting that NBDL had made this error, Bournemouth Borough Council would still have expected NBDL to understand that the emphasis in going forward with the local impact assessment should have been directed towards a better understanding of the needs and issues of those affected. This required a full appreciation of the scale and nature of the potential impact so that it can be properly mitigated. An impartial observer might be forgiven for concluding that there has been no real pursuit of a genuine understanding of the impact on the visitor economy in order to downplay the impacts and / or any mitigation required to address them.

6.1.21 This submission will highlight the reasons why the ‘non significant’ rating for the project is invalid.

6.1.22 The ES indicates in the main visitor survey that 20% of summer visitors interviewed said that they were likely, or very likely, to take their business elsewhere during the construction phases of the development. This construction period is estimated to take four and a half years, although as is indicated in Volume D Project Wide Assessment appendix 3.2 (document 6.2.4.3.2) this may be extended. Although NBDL states that this behaviour was conditional on there being some negative impact from the construction work, the concern is that knowing that the work is going ahead will deter people from starting their journey/planning their holiday to Bournemouth and instead they will choose to go elsewhere. They will not take the risk and the economy will be harmed.

6.1.23 Dismissal of negative economic impact through inappropriate comparisons

Bournemouth Borough Council believes that it is unreasonable and over-simplistic of NBDL to dismiss the predictions of visitor losses that derive from both the business and visitor surveys (22% & 20 % forecast downturn in turnover respectively) by making a comparison with other wind farm development locations. The exceptional success of Bournemouth as a

leading visitor destination should indicate that it is not identical to other destinations (Turning the Tide report - Centre for Social Justice August 2013). In particular it can be seen that the exceptionally high rates of visitor concern and predicted visitor losses are much greater than those found from previous wind farm developments which should signal cause for particular attention by NBDL. The nature of the visitor appeal in Bournemouth and the resort's success is more heavily reliant upon natural beauty than the majority of other resorts where wind farms have been developed. Rhyl, Clacton, Blackpool and Great Yarmouth have built their reputations on man-made, exciting mechanical attractions on land rather than the natural beauty of the coastline. There is little conflict between the small wind farm developments and the intrinsic offer. Similarly, on-shore wind farm developments in Cumbria, Wales and Scotland have avoided AONB areas to ensure that the core offer to visitors of natural scenic beauty is not compromised in key locations such as Ambleside, Snowdonia and Loch Lomond.

6.2 Key findings from the data

6.2.1 Bournemouth's brand value definition

The 2009 Bournemouth Tourism Management Board brand development work established that the offer was multi faceted and multi dimensional serving several markets and target audiences. The brand values making the essence of Bournemouth were agreed to be:

- **Warmth;**
- **Beauty;**
- **Different experiences.**

6.2.2 Importance of beauty

The key significance of the 'Beauty' characteristic to the 'brand' values was that it was considered to be the main area of distinctiveness. The other two values were important but were judged easier to replicate by competing destinations at home and abroad. It is the beauty of

Bournemouth and its coastline that gives it its distinctiveness as a tourist destination and thus advantage over most of its competitor destinations.

6.2.3 Negative impact consensus

The research methodology is questioned in other parts of this report suggesting that the potential impact may have been underestimated. However, all the research (NBDL visitor surveys, business surveys and Bournemouth Borough Council visitor survey) are agreed that the forecast effect of the development will be a marked, material reduction in visitor numbers as a result of the wind farm with a greater reduction in the construction phase.

6.2.4 NBDL visitor research identifies importance of coast

The NBDL commissioned visitor research in summer 2012 and spring 2013 confirmed the main motivation was the seaside, beaches and coast and in addition sea views were a motivating factor mentioned by 48% in the 2012 survey and 46% in the 2013 survey.

6.2.5 NBDL visitor research also identifies strong appeal of coastal views

The importance of sea views was backed up by a later question when respondents were asked to rate how important various criteria were in relation to their overall enjoyment on a five point scale with five being most important. 89% of respondents in 2012 and 91% in the 2013 survey rated 'the views out to sea and along the coast' as four or five.

6.2.6 Visit England research confirms higher appeal of Bournemouth coast

A total of 66% of visitors interviewed in the 2013 Bournemouth visitor survey conducted by Visit England agreed or strongly agreed with the statement - 'Bournemouth offers a better combination of coast and countryside than other resorts.' This Visit England survey found the importance of coastal assets in Bournemouth to be almost double the national average for seaside resorts. In Bournemouth 69% of visitors say they come specifically for the seaside compared with 35% on average for all seaside resorts in England.

6.2.7 Businesses stress importance of coast and likely impact

NBDL's survey of businesses also identified the particular importance of sea views in Bournemouth with 75% of businesses mentioning sea views as being a significant reason for visiting the area. A quarter of all businesses believed that the development would cause a serious loss in trade averaging 22%.

6.2.8 Bournemouth Council's understanding of primary visitor motivation

The beach is the main reason that visitors come to Bournemouth, even for those who have not been before. Typically Bournemouth's visitors are regular and loyal customers. Their main motivation to visit is to experience the beach and the distinctive scenic beauty of the bay, even for those who have not been before. However, they also consider a number of competing destinations to visit - Torquay, Weymouth or Cornwall as well as other destinations within Dorset.

6.2.9 Bournemouth Seafront visitor survey confirms beach is main attractor & wind farm deterrent

As the Bournemouth Visitor Survey shows, the majority of Bournemouth's visitors have visited before and their main motivation is the beach. It is Bournemouth Borough Council's contention that there will be a reduction in visitors to Bournemouth as a result of the visual impact (and possibly noise) of the construction and operation of the wind farm. This estimated reduction is corroborated by the findings of the NBDL research conducted in 2012 and 2013.

6.2.10 NBDL visitor research confirming construction losses

In the survey commissioned by NBDL in Summer 2012, having viewed the controversial photomontages, 14% of respondents said they may be put off visiting the area and 32% said they would be likely or very likely to visit elsewhere during the construction phase. The corresponding figures in the much smaller and less reliable 2013 survey were 6% and 10% in the

construction phase. Bournemouth Borough Council does not believe that the photomontages used in this survey presented a true picture of the scale of the project in which case these findings, although already severe, would be understating the negative reaction.

6.2.11 Wind farm development reduced visitor numbers during construction

Of those interviewed in the Bournemouth Seafront Visitor research in July/August/September 2013, between 21% and 33% said they would definitely not return whilst it was being built. Other questions supported the view that the wind park would have a negative impact on visitor numbers. (Appendix 4)

6.2.12 Important tourism data withheld

The NBDL research confirms that the proposed development will deter people from visiting the area. Using the Rochdale Envelope principle, Bournemouth Council had expected NBDL to provide an estimate of the negative jobs and income effect of the proposal based on their research findings. This should have been used to facilitate informed discussion with the Council and tourism industry during the main consultation period. (This process was suggested by Bournemouth Borough Council in November 2012). In contrast, the estimated jobs and income gains from construction and operation were provided by NBDL relatively early in the consultation. This has resulted in an unbalanced and under-informed consultation on this important issue.

6.2.13 Bournemouth employment in visitor economy

Using the standard ONS definition for tourism, 11,800 are shown to be employed directly in the tourism sector in Bournemouth representing 15% of all employment. However the true scale of tourism employment is likely to be at least 5% higher as these figures do not include:

- Self employed people working in tourism - 20% of the businesses responding to an NCTA survey in 2013 were owner operators. If NBDL's estimate of 653 businesses is taken as correct, this would equate to an additional 130 people in the sector.
- Staff employed in the retail sector - a recent report by FSP showed that 20% of retail spend in Bournemouth Town Centre was attributable to tourists. It would be logical therefore to include 20% of employees in the retail sector in the town centre within the total figure. This would add an additional 600 employees.
- Public sector employees whose jobs are dependent on tourism - Bournemouth Borough Council employs 144 full time staff in the tourism department plus an additional 100 seasonal staff between April and October.

6.2.14 Impact on tourism - direct loss of income and employment within the Borough's tourist related industries

The ES accompanying the submission includes a number of matters relevant to the consideration of the potential impact of the proposed development on tourism within the area. This LIR deals primarily with any impact that the proposal will have on the national and international designations within the wider area. Impacts that will deter tourists from visiting will have a negative impact on the number of staying visitors within the Borough, the income generated for the visitor economy and the employment supported.

6.2.15 Volume and value of Bournemouth's visitor economy

Recent figures released by the South West Research Company estimate that 6.7 million visitors came to Bournemouth in 2013 of whom 10.6% were from overseas. There were 1.061m staying tourists who spent more than £277m in Bournemouth on accommodation, visiting attractions, food and drink and shopping. There were 5,669m day visits to Bournemouth that generated expenditure of £203.1m. These day visit figures do not include those who are staying locally (e.g. in the New Forest, the Purbecks) who come to Bournemouth for the day. With estimates of additional expenditure related to tourism activity, the total value of tourism in Bournemouth in 2013 is calculated to be £501m. (Appendix 4 - South West Research Company)

6.1.16 The scale and nature of Bournemouth's visitor economy

It is Bournemouth Borough Council's contention that NBDL has not fully recognised the significance of the visitor economy in Bournemouth. The value of tourism in Bournemouth is ranked second only to the financial sector and much of the footloose financial services relocation is known to have been influenced by the high quality of life on offer in the area. In other words, the appeal of a high quality, distinctive tourism offer is a key factor in attracting tourism and non-tourism business to the area. Anything that harms that appeal is likely to have a serious and adverse economic effect locally.

6.1.17 Understanding Bournemouth's visitor profile

Bournemouth is essentially a seaside resort attracting both overnight tourists and day visitors in large numbers. The recently updated report by CRES at Sheffield Hallam University lists Greater Bournemouth as the third largest seaside destination in England and Wales in terms of year round employment in seaside tourism. The nature of tourism in Bournemouth is diverse with year round business supported by the three main pillars of leisure tourism, business tourism and international education. Bournemouth Town Centre is a key part of the visitor offer and a recent survey suggests

that 20% of all retail trade in the Centre is due to tourists. Many visitors come specifically for major events such as the Air Festival - which attracts more than 1.1 million visitors per year, Wheels Festival and Arts by the Sea. The conference and business events market is important too and conference research by the Bournemouth International Centre has shown that the high quality coastal views are a distinctive asset that differentiates Bournemouth from its competition. The Bournemouth International Centre hosts an estimated 180,000 conference visitors annually. The Language School market in Bournemouth is Britain's largest outside of Greater London, measured as 190,591 student weeks in 2012 according to English UK.

6.2.18 Bournemouth's function as a national and international asset

It is Bournemouth Borough Council's contention that NBDL has not fully recognised the national and international role played by the tourism industry. Some 89.4% are domestic visitors attracted from all over Britain and 10.6% are from overseas (South West Research Company 2013). The beauty of the natural environment and in particular the seafront aspect, is known to be the main attractor for this tourism business to the town. This is particularly important to leisure market but also to both the international education market and conference market where Bournemouth has to differentiate itself from other major competitors in larger industrialised cities such as Greater London, Birmingham and Manchester. Bournemouth also has an international reputation for staging spectacular event displays located in this exceptional seafront setting. The economic boost from these signature events is critical to the town's current and future prosperity. These events take place as a result of financial support from businesses locally and nationally because of the volume of people attending. Thus, if a reduction in numbers of attendees were to occur as a result of the wind farm this would impact on the ability to run such events. Bournemouth currently competes successfully in a worldwide market for tourists, conferences and language school students, but it must be acknowledged that this is a highly competitive market and the quality of the coastal setting has always been a USP for these markets. To illustrate this, even

the major town conference sales campaign had adopted 'Conference Coast' as its main platform. Anything, therefore, that will potentially damage this key element of the offer and dissuade visitors from coming has to be viewed as having a **negative impact** on the Borough. The scale of this potential damage to the local economy is covered in more detail in the following points.

6.3 Impact on tourism visits, income & jobs

6.3.1 Double figure percentage losses in business turnover cannot be 'minimal impact'

Before getting into a more detailed analysis of the tourism modelling data provided by NBDL, it is useful to pause and consider the sense and validity of the overall proposition being made by the developer. The suggestion is that, even when its own research identifies that a large number of visitors will not come if the wind farm is built and its own research says that many businesses will lose significant trade (over 20% reduction in turnover), the idea is that somehow this can result in minimal economic impact.

Bournemouth Borough Council believes that this is an illogical, unrealistic and unsubstantiated conclusion. The Council also believes that it is an unacceptable omission for the ES not to have estimated the absolute levels of income and employment loss and instead to have relied upon percentages and spurious economic modelling. Within its ES, NBDL has indicated that the tourism sector in the local area (here defined as including Isle of Wight, Christchurch, Bournemouth, Poole and Purbeck) accounts for approximately 26,700 jobs and that the proportion of employment accounted for by tourism in Bournemouth is 12% (para. 3.4.7 volume D chapter 3 (Socio economics and tourism) (document 6.1.4.3). No attempt has been made to quantify the loss of jobs against this overall current employment level even though the data is available to make this calculation without having to rely on an economic model.

6.3.2 To assess the possible impact in terms of visitor numbers, spend and associated job losses the Council has looked at the range of potential job losses that would result from the different forecasts of the loss of tourism trade and income.

6.3.3 The figures are based on the most recent estimate of Bournemouth's tourism value of £501 million in 2013 (Appendix 3 - SWRC).

6.3.4 **NBDL forecast loss of income**

Using the figure of 20% loss of trade during the construction phase (taken from main NBDL summer visitor survey 2012) the reduction in income terms would be £100 million. If the forecast loss in trade NBDL from the business survey is used (22%) then this loss would increase to £109 million p.a.. It should be noted that this business becomes the new base level since this loss will be sustained first and it cannot be expected to return when construction is complete.

6.3.5 It is considered, therefore, that there will be a **significant negative** impact on the likely income from tourism in the Borough which has the potential to adversely affect a number of businesses supplying services to them

6.3.6 **Reduced return on investment**

Analysis of the hotel room rates along the seafront in Bournemouth suggests that on average a 30% premium can be charged for a room with a sea view. This earning potential would be compromised if the development was to proceed.

6.3.7 Businesses closer to development expect medium to high negative impact

The business survey commissioned by NBDL invited 1,242 tourism businesses in the area to give their opinions on how they thought the NBDL proposal could impact on their business. 304 responses were received, 117 of which were in Bournemouth although figures are not available at Bournemouth specific level. 36% of businesses based in Bournemouth, Poole or Christchurch stated that the wind park would have an adverse impact on their business with 25% suggesting this would be a medium or high impact. Across all business interviews, the impact was considered to be significantly stronger for those that had a sea view - with 51% expected to see a medium or high impact. For those expecting adverse effects the average turnover reduction anticipated was 22%. If the businesses on the front i.e. with a seaview are significantly affected they could close. If they close then that will have significant ramifications for the attractiveness of the front. It is the front that attracts the visitors. Thus by failing to focus on seafront business the NBDL approach fails to capture the potential significance of the impact.

6.3.8 Data not shared with businesses

It should be remembered that when these business surveys were carried out, NBDL already had the results of the visitor survey indicating that large numbers of tourists would chose to holiday elsewhere if the wind farm was constructed. Bournemouth Borough Council believes that this information should have been provided to the businesses as part of the business survey to allow a better informed judgement. The failure to share the information is likely to have created an understated negative response.

6.3.9 In the ES, NBDL estimates that there are 664 tourism-related businesses in Bournemouth, of which 45% are either restaurants or cafes and more than 20% are hotels or similar accommodation providers. NBDL's own evidence suggests that 28% of businesses considered the project would have either a

medium or high adverse impact on their business. For those expecting adverse effects the average turnover reduction anticipated was 22% (para 3.5.77 volume D chapter 3 (Socio economics and tourism) (document 6.1.4.3)). As identified in the next section - this would equate to a loss in turnover of approximately £110 million p.a. for Bournemouth.

6.3.10 Tourism jobs in Bournemouth

Using the standard ONS definition for tourism, a figure of 11,800 is shown to be employed directly in the tourism sector in Bournemouth representing 15% of all employment. However the true scale of tourism employment could be significantly higher as these figures do not include:

- Self employed people working in tourism - 20% of the businesses responding to an NCTA survey in 2013 were owner operators. If NBDL's estimate of 653 businesses is taken as correct, this would equate to an additional 130 people in the sector.
- Staff employed in the retail sector - a recent report by FSP showed that 20% of retail spend in Bournemouth Town Centre was attributable to tourists. It would be logical therefore to include 20% of employees in the retail sector in the town centre within total figure. This would add an additional 600 employees.
- Public sector employees whose jobs are dependent on tourism - Bournemouth Borough Council employs 144 full time staff in the tourism department plus an additional 100 seasonal staff between April and October.

6.3.11 These additional employees suggest that up to 12,700 people work in the visitor economy in Bournemouth and are dependent on the continuous influx of visitors. This higher figure is still likely to be conservative since it does not factor in those jobs provided by the multiplier effect of recirculating tourism income.

6.3.12 Figures produced using the Cambridge Economic Impact Model, which is recognised across the country as a reliable and comparable system, indicates that the actual tourism jobs in Bournemouth alone is calculated at 12,234 which is much closer to the figure calculated above.

6.3.13 Finally, if the calculation of employment uses the figures in the Deloitte report produced in November 2013 entitled Tourism: Jobs and Growth, the Economic Contribution of the Tourism Economy in the UK, which calculated that £54,000 of additional visitor expenditure is required to create one job in the visitor economy, then the job losses in Bournemouth resulting from a fall in trade of £109 million would be 2,018 jobs.

6.3.14 However, although the NBDL figures have significantly underestimated those employed in the tourist related sector, the definition used in table 3.6 of the ES (volume D chapter 3 (document 6.1.4.3)), correctly places Bournemouth in the 'high sensitivity' category as tourism related employment in the Borough lies at just less than 150% of the GB average of 8.2% (NBDL figures) or 182% (ONS figures).

6.3.15 Anticipated job losses

It is Bournemouth's view that if these levels of impact are experienced within the Borough's tourism related industries this would have a significantly **negative** impact on employment levels in the Borough immediately placing over 2,000 jobs at risk in the tourism sector alone during the construction phase and resulting in multiple business failures.

6.3.16 Net effect on job creation

The ES indicates that a number of businesses were anticipating beneficial impacts on trading and the local economy attributing this to workers coming to the area during the construction period. The reality for Bournemouth is that the majority of the potential bases are over a one hour drive from the

Borough and, as is pointed out below, these offer the potential of only a small number of jobs being created for a short period of time during the onshore construction phase of the scheme. The potential benefit to hoteliers to 'off set' the potential loss of 'visitor bednights' by replacing them with 'worker bednights' is greatly reduced (Para 3.5.78 volume D chapter 3 (Socio economics and tourism) (document 6.1.4.3).

6.3.17 Consequential impact of the loss of income and employment from visitors

The Council also considers that the proposed development will have a significant negative impact upon tourism and the wider economy within the Borough. Bournemouth Borough Council does not agree with NBDL's assessment that the impact of the wind farm on tourism will be 'not significant'. There are two aspects to this:

- Firstly, because the scale of tourism in the Borough is so significant even a very small decrease in the visitor numbers will have a significantly negative effect on the local visitor economy.
- Secondly elements of NBDL's own assessment model have not been constructed or interpreted correctly.

6.3.18 It is considered that no matter which ports, including Poole, are chosen then the potential for any employment 'benefit' from the proposal would not be capable of offsetting the potential losses in employment that are likely to occur in the tourist industry in any specific area. A finer grained approach would have shown that for a number of the potential employment scenarios the impact arising in Bournemouth from the net loss of tourism employment will be 'significant' and **negative**.

6.3.19 The potential employment generation of the proposed scheme is set out in Appendix 3.2 (document 6.2.4.3.2) of the ES. It highlights that at peak activity in 2019 it is estimated that the project will be supporting nearly

1,300 FTE annual employees in the UK. However, the study goes on to indicate that 'in most cases, such as turbine or foundation fabrication or installation vessels, employees will be working in existing facilities and the proposed Navitus Bay wind farm will be part of a pipeline of projects.' The appendix goes on to show where these existing assembly plants are currently located. None lie within the ES definition of the 'local area' with the exception of a transfer vessel manufacturer on the Isle of Wight. From this information it has to be concluded that few if any of the manufacturing jobs are likely to arise in the local area.

6.3.20 The ES in Volume D Appendix 3.2 (document 6.2.4.3.2) summarises the potential for employment generation under three scenarios. The 'Low Scenario' table two, which is the one Bournemouth Borough Council considers the most likely outcome owing to the low specialist skill base in the area, indicates that, at its peak employment levels in 2018, only 55 FTE will be employed by the project primarily on the onshore construction project. Scenario two (table three) indicates that should the turbine installation port and maintenance base be established in the local area, then some additional 'offshore' jobs could be located near to the port chosen for installing and maintaining the array. However, as four of the five ports detailed in the ES (document 6.1.4.3) (figures 3.3a -e) lie within or over a one hour drive time there is only a 20% chance that any of the new employment opportunities could be readily taken up by those resident in the Borough even if they had the necessary technical expertise to do so. Notwithstanding this view, this figure still only increases to a peak gross annual FTE of 200 jobs. For the reasons set out by NBDL in appendix 3.2 it is not considered that the levels of employment indicated in scenario three are realistically going to be delivered in the local area, however, widely defined.

6.3.21 It appears that at most the likely employment generation benefits for Bournemouth if the project goes ahead, would be a share of the few onshore jobs during the laying of the cables to Mannington. However, as

explained earlier in this report, the potential loss of employment in the area is considerably greater by a ratio of at least ten jobs lost to every one gained. A finer grained approach would have shown that for the majority of the potential employment scenarios the impact arising in Bournemouth from the net loss of tourism employment will be **'significant'** and **negative**.

6.4 Impact on capital investment

6.4.1 Falling industry confidence

The uncertainty created by the potential impacts of the proposal will adversely influence future capital investment within the area. This uncertainty will occur whilst existing and potential future businesses await the impact of the project on profitability before committing to further investment. Bournemouth Borough Council, through its Corporate Plan, Local Plan (Core Strategy), Town Centre Area Action Plan and Seafront Strategy is seeking to provide enhanced facilities to secure and grow Bournemouth's employment base some of which will be delivered through external funding bids, private sector investments and partnership.

6.4.2 Damage to unique and distinctive qualities

This uncertainty will commence if the DCO is allowed/confirmed through to the completion of the construction and early parts of the operational phase a period of up to 10 years. The unique combination of close proximity to London, the presence of two universities in the Borough, employment land for development/expansion in a beautiful location with excellent local recreational resources, gives Bournemouth a unique selling point for attracting in new employers. The significant **negative** impact to the natural setting of views from the cliff top and on local recreational facilities could lead to a reduction in the perception of these unique qualities which could dissuade potential investors from doing so, to the long term detriment of the Borough's employment base.

6.4.3 Threat to Seafront Strategy investment

It is considered that the proposed wind farm could have a direct and significant **negative** impact on the Council's ability to deliver the seafront strategy adopted in 2013. The Seafront Strategy seeks to deliver a world class Seafront over the next 20 years and is intended to enable the Council to establish a long term programme of investment in the seafront which will underpin the future vibrancy of the resort. This approach becomes harder to sustain without a comprehensive long term investment strategy.

Improvement opportunities have been identified across the seafront in excess of £90m to meet these aspirations. It is expected that the projects would be funded via a mixture of private / institutional investment, external grants and some limited Council investment.

6.4.4 Reduced turnover and profits making investment less attractive

It is Bournemouth Borough Council's fear that the potential for loss of income identified by NBDL in its ES will cause a loss of confidence in the future economic prospects for the area at exactly the time external investment is required for projects such as those identified by the seafront strategy. It is the Borough's view therefore, that the proposal will have a significant **negative** impact on future investment opportunities both in tourism and the wider employment market.

6.4.5 Reduction in bedstock

The scale of forecast reductions in business from the damaging construction period presents a real risk of planning blight on the resort. This would particularly affect the main properties enjoying sea views as a result of the uncertainty and predicted visitor losses during construction and operation. This is likely to manifest itself in increased applications for tourist accommodation change of use. Since future viability is a key test for such applications (Bournemouth Borough Council - Tourism Supplementary Planning Guidance 2004) the town would be likely to see a serious reduction in bedroom capacity and corresponding loss to the visitor economy.

6.4.6 In summary, Bournemouth Borough Council considers that the uncertainty created by the potential impacts of the proposal will adversely influence future capital investment within the area and will therefore have a significant **negative** impact.

7 NOISE AND VIBRATION

7.1 Bournemouth Borough Council remains concerned that there are potential long term implications for those resident in, and visiting, Bournemouth who will be in direct line of noise transmitted from the array across water.

7.2 It is considered that the lack of research currently published in relation to low frequency noise propagation over water, leads to uncertainty over the potential impact of the proposal on those resident in and visiting Bournemouth and the wider area. At best it is felt that the modelling and assessment of the noise impact only provides an indication and not a realistic and reasoned appraisal of the impacts.

7.3 It is noted that there is now a guideline (SGN 6) for how to treat noise from turbines travelling across water. This was designed to be used for on-shore turbines rather than off-shore but the guideline is closest to a usable guideline until the off-shore one is published. There seems to be no scientific reason why the propagation of noise from sea-based turbines over water should differ from that for land-based. A precautionary approach, or even a “best guess” approach, would lead to the use of SGN 6. If it were applied to NBDL, the noise levels would be seen to significantly exceed thresholds.

7.4 This concern is compounded by the inclusion, in the draft DCO, of a section which makes the development exempt from challenge under section 82(1) of

the Environmental Protection Act 1990 and section 79(1) of that Act which relates to noise emitted from premises so as to be prejudicial to health or a nuisance. No justification for the inclusion of this clause, in relation to the offshore element of the proposal, has been supplied. If, as has been claimed by NBDL in its evidence, there is no likelihood of noise generated either during the construction or operational phases adversely impacting on those living in or visiting the area then the need for this request is superfluous. Bournemouth Borough Council asks that this exemption be **NOT GRANTED**.

- 7.5 Bournemouth Borough Council considers that, in the light of the immunity from future action arising from a noise nuisance and the seeming impossibility to introduce mitigation measures once the array is operational, the potential for noise emission during the construction and operational phases of the proposal remains a potential **negative** impact on those resident living in and those visiting the area.
- 7.6 The modelled levels of noise included within the ES are not definitive. Therefore to ensure that the proposed threshold noise limits will be achieved, Bournemouth Borough Council requests that an appropriate noise monitoring programme is introduced to keep noise levels within the SGN 6 guideline. This will provide adequate information on noise levels in the event of complaints being received by the councils. This information will also be available should it prove necessary to enforce conditions in the marine licence. The Council has proposed a memorandum of agreement between the Marine Management Organisation (MMO) and the Councils to identify cooperation in the event of complaints.
- 7.7 The Council also requests that conditions be attached to the Marine Licence to protect residents from unwanted noise pollution.

8 THE POTENTIAL IMPACT ON RECREATION AND WATER QUALITY

- 8.1 Bournemouth Borough Council still has some concerns that there could be an impact on water quality in the area during the construction and operational phases of the offshore proposals, especially the export cable linking the proposed turbines/substations to the shore at Taddiford Gap.
- 8.2 Bournemouth's beaches are some of the best in the world. It has four Blue Flag designated beaches stretching from Southbourne beach in the east to Alum Chine in the west. In practice Poole's 4 Blue Flags should be added to Bournemouth's Blue Flags, which means that Poole Bay holds more Blue Flags than any other beach destination in the UK.
- 8.3 Bournemouth Borough Council is concerned that the installation of inter-array cables could cause disturbances that would result in sediment to become re-suspended, which would prejudice water quality and impact on its bathing beaches.
- 8.4 At this time Bournemouth Borough Council is not entirely satisfied that there will be no material risk to water quality. It is however accepted that further mitigation could be achieved by the careful timing of the cable laying works nearest to the shore line in order to avoid the holiday seasons when the sea is most used the most for recreational purposes such as swimming.
- 8.5 In the context of the impact on bathing water quality it is considered that **subject to suitable controls** being imposed in respect of the timing of the offshore cable laying operation within close proximity to the shoreline the impact of the proposal will be likely to be **acceptable**.

9 IMPACT ON WILDLIFE

- 9.1 Bournemouth has 10 Local Nature Reserves (LNR) totalling 304 hectares, 14 Sites of Nature Conservation Interest (SNCI) totalling 135 hectares, four Sites of Special Scientific Interest (SSSI) totalling 185 hectares and three heathland sites designated as a Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site totalling 76 hectares. The Christchurch Harbour SSSI is split between Bournemouth and Christchurch and consists of the estuary servicing the internationally designated sites along the River Avon.
- 9.2 Bournemouth Borough Council is concerned that there is a serious lack of knowledge on the number of birds feeding and birds/bats migrating through the area of the proposed array. It is concerned that NBDL has been unable to supply the information necessary to enable it to properly determine what the potential impacts are likely to be.
- 9.3 The publication *Wind Farms and Birds: an updated analysis of the effects of wind farms on birds, and best practice guidance on integrated planning and impact assessment 2013* by the Convention on the conservation of European wildlife and natural habitats highlights the limits of knowledge. The publication advises that collision mortality for example presents a potential risk as species groups such as terns and gulls do not appear to exhibit avoidance responses. Critically however the publication explains that empirical evidence of flight avoidance responses to wind turbines remains sparse.
- 9.4 Under these circumstances Bournemouth Borough Council raises a concern that the new array will have a **negative** impact on migrating birds and bats travelling through the area. There is a general concern that all wildlife will potentially be impacted either through the noise and disturbance of the construction phase and/or the potential for the turbines to act as a barrier either when foraging for food or in the route of bird migration.

- 9.5 This concern is compounded by the number of species that migrate to this area whose numbers are either small or in decline. The potential negative impact on heathland migrants such as nightjar, hobby, merlin and hen harrier is of particular concern given the proximity of the proposed array to potential nesting and/or resting places during migration.
- 9.6 Whilst other bodies and organisations are better placed to submit more detailed evidence relating to the accuracy of data included within the ES by NBDL, Bournemouth Borough Council considers that the potentially serious negative impact on our local wildlife will need to be carefully examined during the inquiry.

10. IMPACT ON ENVIRONMENTAL MANAGEMENT

- 10.1 With so many physical, environmental and economic changes resulting from this project, Bournemouth Borough Council believes that there will be a consequential impact on future environmental management. This has been partially considered for the onshore development but not fully for all aspects of the offshore activity.
- 10.2 Although the precise extent of this impact will not be known until the project is underway, the Council believes that NBDL should be responsible for ensuring the environmental impacts are monitored independently and in a comprehensive manner with the results being shared with Local authorities and other interested parties. This will not only ensure that the true extent of changes is understood but also help to manage those changes through prompt action and also guide future wind farm applications.
- 10.3 Bournemouth Borough Council believes that such environmental impact monitoring should establish accurate baseline information on all areas within the ES and have separate monitoring regimes for the construction and operation phases lasting until at least five years after the operating life begins.

11 CONSIDERATION OF THE IMPACT OF THE PROPOSED ARTICLES AND REQUIREMENTS WITHIN THE DRAFT DCO

- 11.1 As detailed earlier Bournemouth Borough Council is concerned with the lack of clarity on the potential period in which NBDL's proposals will be in place if approved. It feels that, for the avoidance of confusion or misunderstanding, the DCO should include a definition of the term '25 years' when measuring the lifespan of the project.
- 11.2 Whilst Bournemouth Borough Council welcomes the proposal to monitor the construction of the scheme (schedule 13 clause 16) it is concerned that this information is only to be shared with the Marine Management Organisation (MMO) rather than the local authorities in the area, and that the need to undertake further noise monitoring will rest with the MMO alone. The Council is concerned that, in seeking to introduce clauses in defence of proceedings in respect of statutory noise nuisance, should a problem subsequently arise neither Bournemouth Borough Council nor any other affected local authorities will be able to take action to remedy the situation.
- 11.3 The draft DCO includes detailed construction hours for the onshore aspects of the proposal but does not do so for offshore work. Bournemouth Borough Council considers that similar provisions should be included for the offshore element of the project. It is during the night time hours, when background noise is at its lowest, that the potential for the transmission of noise and visual intrusion will be at its greatest.
- 11.4 Finally no restrictions are currently proposed by NBDL on the times of year when construction work can be undertaken. There is concern that if the work on the cabling linking the array to the shore takes place at times of the year when those visiting Bournemouth go into the sea (primarily late spring to early autumn) any disturbed sediment making the water cloudy

could give a negative impression of the water quality in the area. Consideration must be given, therefore, to restricting this activity to those months when the use of Poole Bay for bathing and other water based activities are at their least.

Appendix 1

1. 'Ambition 2020' Bournemouth Borough Council's Corporate Plan for 2014/15

An improving environment

Providing high quality infrastructure for residents, businesses and visitors while protecting and enhancing our beautiful environment

IE1 Building a world-class seafront

We will continue to ensure that our prime, natural asset remains a focus for the Town. We will develop our ambitious long-term plan to provide a world-class seafront for Bournemouth that will enhance the natural assets of the coastline and create public spaces and amenities to inspire a new generation of visitors.

As well as providing enhanced facilities for local people to enjoy, the Seafront Strategy will help to secure and grow Bournemouth's £462m per annum tourism sector, and aspire to meet new generations' expectations of the great British seaside. Some aspects will be delivered by the Council, but much of the aspirations will be achieved through private sector investments and partnership.

Our outcome targets:

- Increase the percentage of residents satisfied with the seafront services provided or supported by Bournemouth Borough Council.
- Increase the percentage of residents who have used the seafront at least once a month
- Increase in absolute numbers taking part in water based activities by 10%
- Maintain the number of Blue Flags
- Achieve at least 6,200 participants in all organised activities on the beach and in the water
- Increase in participation rates in light, organised and water based activities by at least 5%

- Maintain the number of Quality Coast Awards

IE5 Protecting Bournemouth's parks and natural open spaces

We will preserve our unique and beautiful natural environment which we recognise as being one of the key reasons that people come to live in, work in and visit Bournemouth. We will maximise the use of these assets whilst protecting them from the effects of development and other environmental factors. Raising the profile of these spaces is a key element in promoting the Town as a place to live, work and visit.....

A thriving economy

Strengthening our key industries and creating new opportunities for growth and development

TE3 Growing a vibrant digital and creative business sector

We will explore the huge opportunity to attract and support the digital and creative business sector. As a result, we will attract substantial investment from companies working in this sector and Bournemouth will be recognised as the best place to establish a business of this nature.

We have two world class universities with global reputations for providing excellent courses of study and producing top class graduates. We will provide those graduates with the right conditions and infrastructure to set up their own businesses. We will also attract talent from elsewhere; be they graduates or established individuals or companies looking to run their business from a smart, innovative town equipped for the future.

Our long-term commitment to supporting digital and creative industries and making Bournemouth a focal point for them is set out in our Digital Manifesto with

partners. This focus will create jobs and growth in Bournemouth.

Our outcome targets: [relevant extract]

Increase the number of digital and creative industries in Bournemouth

Increase the percentage of graduates that found work locally.

TE4 Playing our part in a thriving conurbation

As part of the Dorset Local Enterprise Partnership, we will play a key role in supporting initiatives that provide a wider economic benefit to the region. This includes supporting the Growth Fund proposals and European Union Structural and Investment Fund delivery.

We will encourage jobs and growth in the area, and will work with staff to be more commercially focussed and business friendly. We will embrace our diverse population base and take advantage of the variety of skills, knowledge and interests to develop new employment opportunities. We will work in partnership across the public, private and third sector to attract major inward investment. The Recession Fund will support initiatives that help to stimulate growth and jobs in the local economy.

Our outcome targets:

- Increase Bournemouth and wider conurbation (GVA) Total Gross Value Added
- Increase employment figures in the conurbation
- Increase the amount of government investment, through the Local Economic Partnership, in the conurbation
- Secure increased EU Structural and Investment Funding

TE5 Investing in our tourism economy

We will continue to work with our tourism partners to invest in and improve the Town's major economic sector. A vibrant tourism economy is a condition of

economic success and essential to maintaining the Town's status as the UK's premier coastal resort. The Council has a key role in promoting the sector via its tourism marketing role, its events programmes, seafront activities, festivals and facilities such as the Russell Cotes Museum.

Our outcome targets:

- Increase attendance at major festivals
- Increase customer satisfaction from Seafront Visitors Survey and Visit England Destination Satisfaction Survey
- Increase the volume and value of tourism economy
- Improve visitor figures at the Russell Cotes Museum by 2% per annum from the 2013/14 baseline.

Appendix 2

Poole and Christchurch Bays Shoreline Management Plan Review

- **Sub-cell 5f Hurst Spit to Durlston Head Bournemouth Borough Council 2011 (see attached pdf).**

Appendix 3

South West Tourism Company - Bournemouth Tourism Volume and Value 2013

Bournemouth

Year	UK		Year on year change	Nights	Year on year change	Spend	Year on year change
	Trips						
2005	1,088,000			3,547,000		£239,727,000	
2006	895,000	-18%		2,646,000	-25%	£148,574,000	-38%
2007	744,000	-17%		2,142,000	-19%	£127,418,000	-14%
2008	882,000	19%		2,750,000	28%	£181,640,000	43%
2009	958,000	9%		2,972,000	8%	£200,295,000	10%
2010	925,000	-3%		2,587,000	-13%	£167,491,000	-16%
2011	1,051,000	14%		2,940,000	14%	£198,187,000	18%
2012	917,000	-13%		2,732,000	-7%	£184,793,000	-7%
2013	890,000	-3%		2,625,000	-4%	£190,923,000	3%
3 year rolling average	952,667			2,765,667		£191,301,000	

Year	OVERSEAS		Year on year change	Nights	Year on year change	Spend	Year on year change
	Trips						
2005	121,000			1,025,000		£54,361,000	
2006	145,000	20%		1,417,000	38%	£55,137,000	1%
2007	134,000	-8%		1,502,000	6%	£68,906,000	25%
2008	132,000	-1%		1,327,000	-12%	£76,984,000	12%
2009	151,000	14%		1,245,000	-6%	£84,587,000	10%
2010	118,000	-22%		933,000	-25%	£55,226,000	-35%
2011	116,000	-2%		1,032,000	11%	£78,074,000	41%
2012	136,000	17%		1,309,000	27%	£84,985,000	9%
2013	171,000	26%		1,357,000	4%	£85,876,000	1%
3 year rolling average	141,000			1,232,667		£82,978,333	

Year	DAY VISITS		Year on year change	Spend	Year on year change	METHODOLOGY CHANGE - NOT COMP/
	Trips					
2005	3,099,079			£132,053,720		
2006	3,183,120	3%		£139,217,649	5%	
2007	3,198,602	0%		£144,655,508	4%	
2008	3,454,125	8%		£163,780,094	13%	
2009	3,777,138	9%		£177,182,908	8%	
2010	3,824,000	1%		£179,144,000	1%	
2011	5,286,000	38%		£169,329,000	-5%	
2012	6,041,000	14%		£192,193,000	14%	
2013	5,824,000	-4%		£208,934,000	9%	
3 year rolling average	5,717,000			£190,152,000		

KEY POINTS SUMMARY

TOTAL VALUE OF TOURISM	£501,090,000	<u>NOTES</u> Staying plus day visitor spend plus other tourism related spend
TOTAL EMPLOYMENT (ACTUAL)	12,345	Estimated actual jobs regardless of whether full or part time.
DIRECT EMPLOYMENT (ACTUAL)	9,190	
INDIRECT/INDUCED EMPLOYMENT (ACTUAL)	3,155	
TOTAL EMPLOYMENT (FTE's)	9,057	Full time equivalent jobs
DIRECT EMPLOYMENT (FTE's)	6,290	
INDIRECT/INDUCED EMPLOYMENT (FTE's)	2,768	
% OF ALL EMPLOYMENT	15%	Tourism employment as a % of all employment in area.
ESTIMATED GVA	£360,022,000	Gross Value Added - Gross value added is the difference between output and intermediate consumption for a
TOTAL TOURISM SUPPORTED BUSINESS TURNOVER	£644,801,000	Business turnover arises as a result of tourist spending, from the purchase of supplies and services locally by and as a result of the spending of wages in businesses by employees whose jobs are directly or indirectly sup

UK STAYING VISITORS

Average nights per trip	2.95
Average spend per trip	£214.52
Average spend per night	£72.73

OVERSEAS STAYING VISITORS

Average nights per trip	7.94
Average spend per trip	£502.20
Average spend per night	£63.28

DAY VISITS

Average spend per trip	£35.87
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Appendix 4 Bournemouth Borough Council Seafront Research
- July / August/ September 2013

Wind Farm Survey

October 2013

1. Background	92
2. Methodology.....	92
3. Results	92
Wind Farm Images	93
Construction phase	96
4. Summary.....	97

By Joanne Hansell

Consultation and Research Team



Background

In 2013 survey work was undertaken to establish the likely impact of a proposed offshore wind farm on Bournemouth's tourism trade. Previous work had been carried out by the developer and by a campaign group opposed to the scheme.

Methodology

During July and August surveys were conducted among visitors as part of the wider seafront survey. The wind farm questions were only put to visitors who were staying in Bournemouth, not to residents or day visitors. Further survey work was carried out in September, this time asking fewer questions and focusing mainly on the wind farm, in order to compare peak season and out-of-season visitors.

During the course of the survey, respondents were shown two different images of the proposed wind farm. The first image (Z1) was produced by the developer and shows a more favourable view of the wind farm. The second image (Z2) was produced by a campaign group opposed to the wind farm and is less complimentary, showing the wind farm looking more prominent than in the first image. After each image respondents were asked the same set of questions to gauge whether the wind farm would affect their decision to return to the area.

The peak season survey had 332 respondents while the September group was slightly smaller with 252 respondents.

Results

Respondents were told about the wind farm proposal and asked how this might affect their decision to stay in Bournemouth in the future. At this stage they have not seen any images of the proposal.

There are plans to build an offshore wind farm a minimum of eight miles out to sea from here. If you had known before you booked your holiday that there was going to be a large wind farm located in Poole Bay, which includes the Bournemouth seafront area, would it:

	July/Aug	Sept
Encourage you to stay more frequently in the future	1%	0%
Possibly encourage you to stay more frequently in the future	1%	1%
Have no effect on your decision to stay in the future	77%	80%
Possibly discourage you to stay in the future	15%	12%
Definitely discourage you to stay in the future	6%	7%

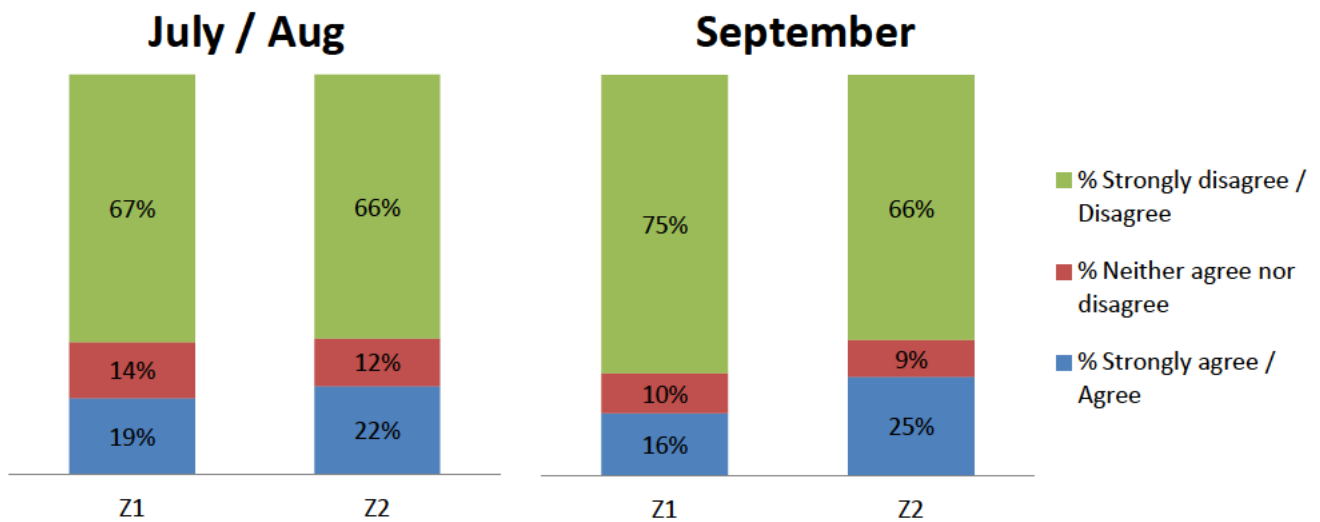
Around 80% of respondents said that they would not be put off visiting the area if they knew about the wind farm.

September visitors were marginally less concerned than summer visitors.

Wind Farm Images

Next the respondents were shown picture Z1 and asked to rate their agreement with four statements. They were then shown picture Z2 and asked about the same four statements.

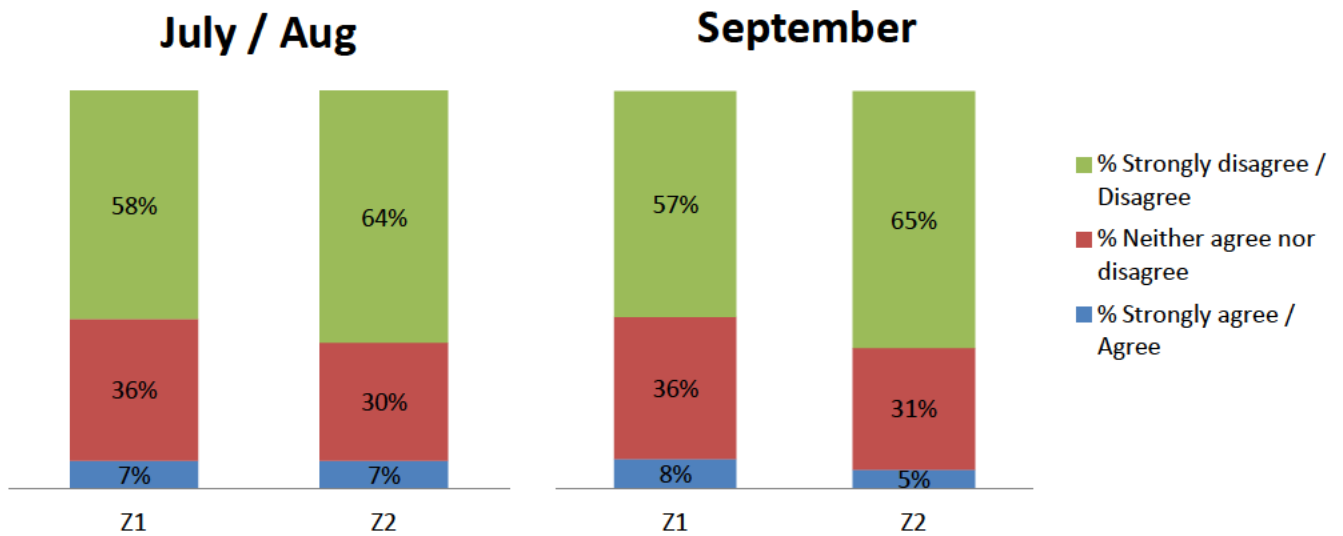
Statement 1: The wind farm is likely to put me off visiting the area, I'm likely to visit elsewhere



The peak season visitors showed little difference in their agreement to this statement no matter which picture they were shown. Approximately two thirds were unlikely to be put off visiting the area in future while around one in five agreed that it was likely to put them off visiting again.

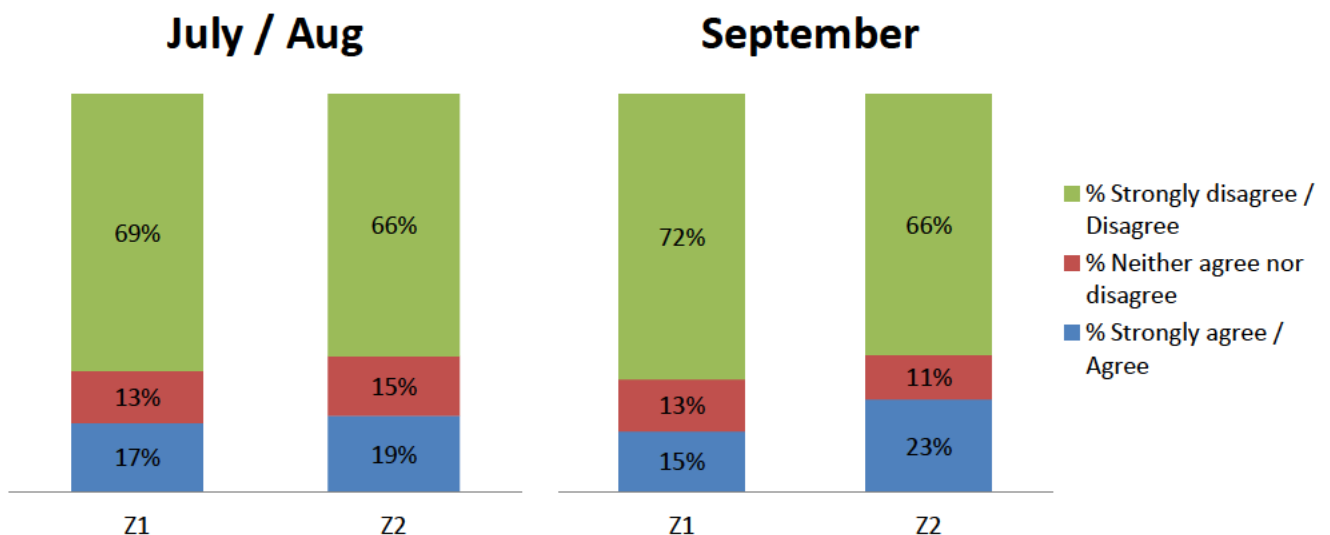
The September visitors did have a different attitude to the Z1 image with three quarters saying that they would not be put off visiting the area. The response to the second image was similar to the peak season group in terms of those saying they would not be put off. However September visitors were more likely to agree that they would be put off after seeing the Z2 image, with fewer people giving a neutral response. A quarter of this group agreed that the wind farm is likely to put them off visiting the area.

Statement 2: The wind farm will enhance the appeal of the area, increasing my interest in visiting again.



There was little agreement with this statement from either group, regardless of which image was shown. Both groups gave similar responses, with a marked difference between the two images. Respondents were more likely to disagree with the statement after seeing the less favourable image.

Statement 3: The wind farm is likely to shorten the amount of time I would want to spend in the area

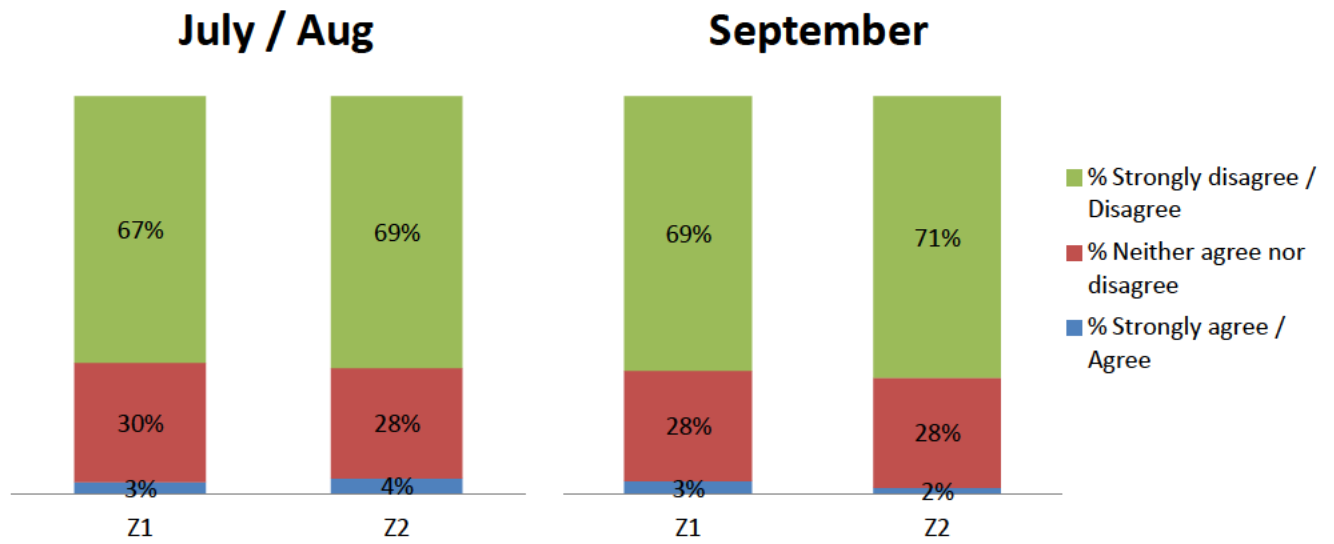


Again the September group were more likely to disagree with this statement when shown the first picture though the difference is less marked than for the first statement. After seeing the second

picture the September group were considerably more likely to agree with the statement compared to their reaction to the first picture and to the peak season group.

Statement 4: The wind farm is likely to increase the amount of time I would want to spend in the area

There is little agreement with this statement. Results are similar across both groups and when



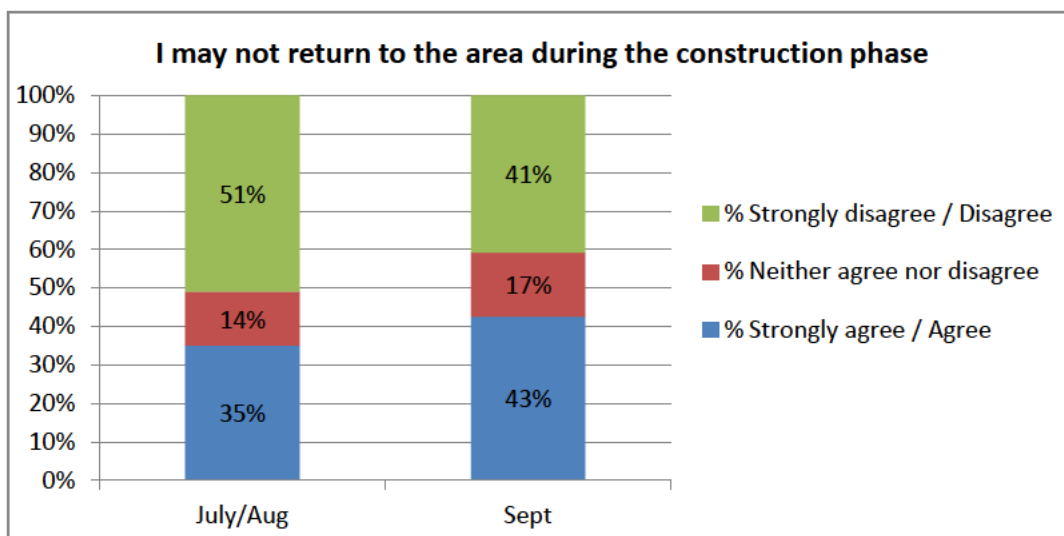
shown both images.

Construction phase

Respondents were told that the construction phase would take up to three years and could mean 24 hour work on pilings, cable laying and installation of turbines. They were then asked to rate their agreement with a series of statements about their likelihood to visit during the construction phase.

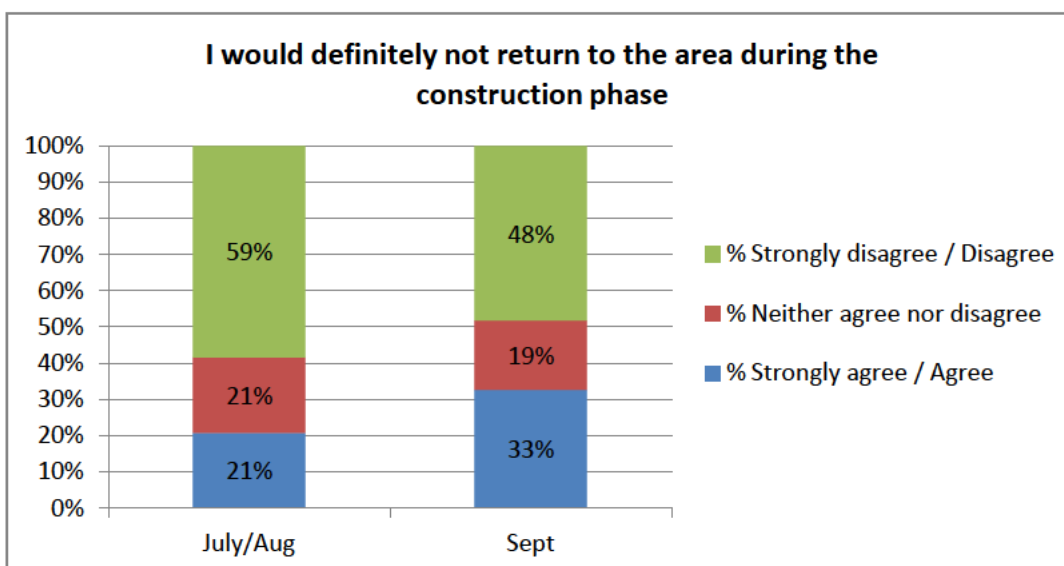
Very few people said that they would be likely to visit more often during the construction phase, with 30% giving a neutral response and almost two thirds disagreeing with this statement. Both groups gave very similar responses to this statement.

The second statement *'I may not return to the area during the construction phase'* drew different responses from the two groups with the September visitors appearing more likely to be deterred than the July / August visitors. During the peak season 35% of visitors agreed with this



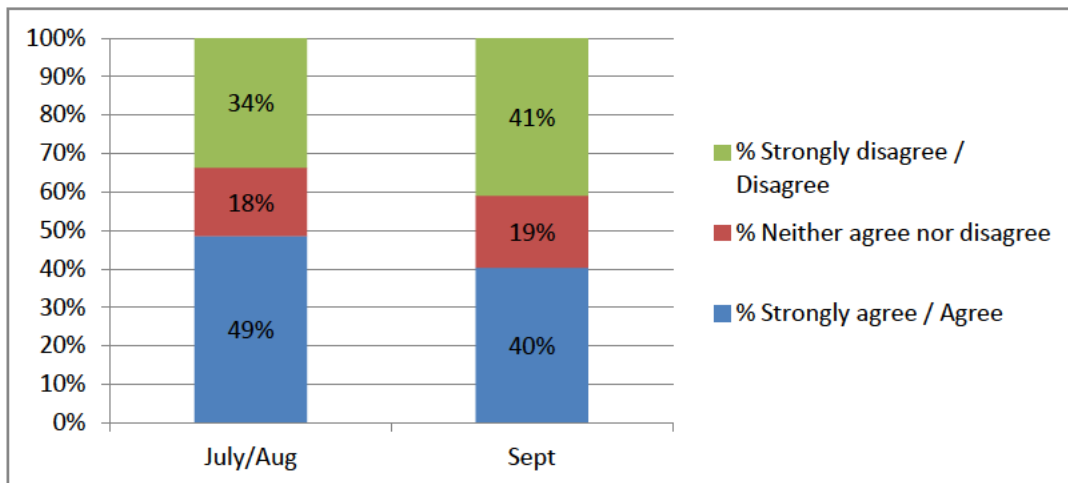
statement and 51% disagreed. In September 43% agreed and 41% disagreed.

The third statement was stronger: *'I would definitely not return to the area during the construction phase'*.



Again the September group were considerably more likely to agree than the peak season group. In both groups there were fewer people in agreement with this stronger statement than with the previous one.

The final statement was more neutral: *'The construction phase of the wind farm will have no effect on my returning to the area'*.



Half of the peak season visitors agreed with this statement with a further 18% giving a neutral response. Fewer September visitors agreed, with 40% in agreement and 41% disagreeing.

Summary

- Before seeing any images of the wind farm around 20% of visitors said that they would possibly or definitely be put off visiting again.
- After seeing image Z1 the September group were slightly more favourable (16% agreed they would be put off visiting) but after seeing image Z2 this increased to 25%. There was little difference among the peak season group after seeing the images.
- Visitors were more concerned about the construction phase of the project with the September group more likely to avoid the area during construction than the peak season group.



Poole and Christchurch Bays Shoreline Management Plan Review Sub-cell 5f

Hurst Spit to Durlston Head

Bournemouth Borough Council

2011

Report V3

9T2052



Poole & Christchurch Bays Shoreline Management Plan Review

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Document title Poole and Christchurch Bays Shoreline
Management Plan Review Sub-cell 5f
Hurst Spit to Durlston Head

Document short title Section 1

Status Report V3

Date 2011

Project name Poole and Christchurch Bays SMP2


Project number 9T2052

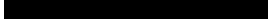
Client Bournemouth Borough Council

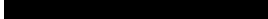
Reference 9T2052

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Checked by T-L Eggiman

Date/initials check 

Approved by H Hall 

Date/initials approval 

GLOSSARY OF TERMS

Term	Definition
AONB	Area of Outstanding Natural Beauty: A statutory designation by the Countryside Commission. The purpose of the AONB designation is to identify areas of national importance and to promote the conservation and enhancement of natural beauty. This includes protecting its flora, fauna, geological and landscape features.
Adaptation	Implies that there may be some actual change in the way a feature, such as a habitat or a community, functions. In supporting adaptation, management has to recognise certain principles: <ul style="list-style-type: none"> • That adaptation may take time and may evolve slowly so that change to the overall community does not happen immediately. • That management should not encourage a progressively more vulnerable situation to develop, where there is a sudden change from one condition to another. • That specific aspects of a feature, such as individual properties or elements of habitat may change or be lost, but without substantial loss to the value of the community or the overall ecological function of the feature.
Anthropogenic	Impacts that originate from humans.
AA	Appropriate Assessment. Also referred to as a Habitats Regulations Assessment (HRA). The AA is an independent check of the potential impacts of policies being put forward by the SMP with specific reference to designated European nature conservation sites (such as SACs, SPAs, etc.)
ATL	Advance the Line. Policy decision to build new defences seaward of the existing defence line where significant land reclamation is considered.
Beach nourishment	Artificial process of replenishing a beach with material from another source.
Benefits (related to issue)	The service that a feature provides. In other words, why people value or use a feature. For example, a nature reserve, as well as helping to preserve biodiversity and meet national legislation, may also provide a recreation outlet much like a sports centre provides a recreation function.
Berm crest	Ridge of sand or gravel deposited by wave action on the shore just above the normal high water mark.
BAP	Biodiversity Action Plan. An element of UK environmental legislation, aimed at enhancing and protecting biodiversity within key habitat areas.
Brackish water	Freshwater mixed with seawater.
Breaker zone	Area in the sea where the waves break.
CSG	Client Steering Group. The CSG is comprised of representatives from the key operational bodies and statutory consultees involved with coastal and estuarine management within the SMP area. They provide an overseeing steer and guidance role to technical consultants and generally oversee the consultation and approvals activities required within the SMP2 programme.
Coastal squeeze	The reduction in habitat area that can arise if the natural landward migration of a habitat under sea level rise is prevented by the fixing of the high water mark, e.g. a sea wall.
Defra	Department for Food, Environment and Rural Affairs

Term	Definition
Defra Procedural Guidance	The Shoreline Management Plan (SMP) Procedural Guidance produced by Defra to provide a nationally consistent structure for the production of future generation Shoreline Management Plans.
Downdrift	Direction of longshore movement of beach materials.
Ebb-tide	The falling tide, part of the tidal cycle between high water and the next low water.
Ecosystem	Organisation of the biological community and the physical environment in a specific geographical area.
Enhance (improve)	The value of a feature increases.
EIA	Environmental Impact Assessment. Detailed studies that predict the effects of a development project on the environment. They also provide plans for mitigation of any significant adverse impacts.
EMF	Elected Members Forum. The EMF is comprised of elected council members from within the SMP area. They are consulted with at key stages of the SMP programme. Endorsement of the preferred plan is sought from the EMF prior to public consultation.
Epoch	The three periods of time in which the Shoreline Management Plan is reviewed in. The first epoch is 0-20 years, the second epoch is 20-50 years and the third epoch is 50-100 years.
ESA	Environmentally Sensitive Area. A non-statutory designation for an area where special land management payments are available through agreement with Defra to provide farming practices which are beneficial to the environment.
Feature	Something tangible that provides a service to society in one form or another or, more simply, benefits certain aspects of society by its very existence. Usually this will be of a specific geographical location and specific to the SMP.
Fetch	The distance that the wind has passed across the water in one direction (the greater the fetch, the larger the wind-driven waves will be).
Flood-tide	Rising tide, part of the tidal cycle between low water and the next high water.
Flood Zone	A geographical area officially designated subject to potential flood damage. The Environment Agency uses Flood Zone 2 and Flood Zone 3.
Foreshore	Zone between the high water and low water marks.
Geomorphology/ Morphology	The branch of physical geography/geology which deals with the form of the Earth, the general configuration of its surface, the distribution of the land, water, etc.
GIS	Geographic Information System. Software which allows the spatial display and interrogation of geographical information such as ordnance survey mapping and aerial photography.
Groyne	Shore protection structure built perpendicular to the shore; designed to trap sediment.
HTL	Hold the Line. Policy decision to maintain or upgrade the level of protection provided by defences or natural coastline.
Heritage Coast	A non-statutory designation by the Countryside Commission for coasts of scenic quality, their largely undeveloped nature and their special wildlife and historic interest. Local authorities assist with the management of Heritage Coasts often with Heritage Coast officers.
Integrated	An approach that tries to take all issues and interests into account. In

Term	Definition
	taking this approach, managing one issue adds value to the way another is dealt with.
LNR	Local Nature Reserves. A statutory designation for sites established by local authorities in consultation with Natural England. These sites are generally of local significance and also provide important opportunities for public enjoyment, recreation and interpretation.
Maintain	That the value of a feature is not allowed to deteriorate.
MA	Management Area. A collection of Policy Units that are interdependent and should therefore be managed collectively.
MDSF	Modelling and Decision Support Framework. Mapping linked computer tool used in the evaluation of assets at risk from flooding or erosion.
Mean sea level	Average height of the sea surface.
MHW	Mean High Water. The average of all high waters observed over a sufficiently long period.
MLW	Mean Low Water. The average of all low waters observed over a sufficiently long period.
MR	Managed Realignment. Policy decision to manage the coastal processes to realign the 'natural' coastline configuration, either seaward or landward, in order to create a future sustainable shoreline position
Natura 2000	European network of protected sites which represent areas of the highest value for natural habitats and species of plants and animals which are rare, endangered or vulnerable in the European Community.
NAI	No Active Intervention. Policy decision to not to invest in providing or maintaining defences or natural coastline.
NNR	National Nature Reserves. A statutory designation by Natural England. These represent some of the most important natural and semi-natural ecosystems in Great Britain and are managed to protect the conservation value of the habitats that occur on these sites.
Objective	A desired state to be achieved in the future. An objective is set, through consultation with key parties, to encourage the resolution of the issue or range of issues.
Offshore zone	Extends from the low water mark to a water depth of about 15 m (49 ft) and is permanently covered with water.
Policy	In this context, "policy" refers to the generic shoreline management options (No Active Intervention, Hold the Existing Line of Defence, Managed Realignment, Retreat or Advance the Existing Line of Defence, and Hold the Retired Line).
PDZ	Policy Development Zone. A length of coastline defined for the purpose of assessing all issues and interactions to examine and develop management scenarios. These zones are only used in the procedure of developing policy. Policy Units and Management Areas are then used for the Final definition of the policies and the management of the coast.
Policy Scenario	A combination of policies selected against the various feature/benefit objectives for the whole SMP frontage.
Policy Units	Sections of coastline for which a certain coastal defence management policy has been defined. These are then grouped into Management Areas for management purposes.
PV	Present Value. The value of a stream of benefits or costs when discounted back to the present day. For this SMP the discount factors

Term	Definition
	used are the latest provided by Defra for assessment of schemes, i.e. 3.5% for years 0-30, 3.0% for years 31-75, and 2.5% thereafter.
Ramsar	Designated under the, "Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat" 1971. The objective of this designation is to prevent the progressive encroachment into, and the loss of wetlands.
RIGS	Regionally Important Geological/Geomorphological Sites. A non-statutory designation identified by locally developed criteria and are currently the most important places for geology and geomorphology outside statutorily protected land such as SSSI's.
SAC	Special Area of Conservation. This designation aims to protect habitats or species of European importance and can include Marine Areas. SACs are designated under the EC Habitats Directive (92/43EEC) and will form part of the Natura 2000 site network. All SACs sites are also protected as SSSI, except those in the marine environment below the Mean Low Water (MLW).
SM	Scheduled Ancient Monuments. A statutory designation under the Ancient Monuments and Archaeological Areas Act 1979. This Act, building on legislation dating back to 1882, provides for nationally important archaeological sites to be statutorily protected as Scheduled Ancient Monuments.
SEA	Strategic Environmental Assessment. In SMP terms an SEA is an independent audit of the SMP process and the policies it puts forward. SEA assesses policies for potential impacts against a series of environmental themes.
Setback	Prescribed distance landward of a coastal feature (e.g. the line of existing defences).
SLA	Special Landscape Area. A non-statutory designation for an area usually identified by local authorities as having a strategic landscape importance.
SMA	Sensitive Marine Area. A non-statutory designation for nationally important locations around the coast that require a cautious and detailed approach to management. They are identified by Natural England for their important benthic populations, spawning or nursery areas for fish, fragile intertidal communities, or breeding, feeding, and roosting areas for birds and sea mammals.
SMP	Shoreline Management Plan. A non-statutory plan, which provides a large-scale assessment of the risks associated with coastal processes and presents a policy framework to reduce these risks to people and the developed, historic and natural environment in a sustainable manner.
SNCI	Site of Nature Conservation Importance. A non-statutory designation defined by the Wildlife Trusts and Local Authorities as sites of local nature conservation interest. These form an integral part in the development of planning policies relating to nature conservations issues.
SPA	Special Protection Area. A statutory designation for internationally important sites, being set up to establish a network of protected areas of birds.
SSSI	Sites of Special Scientific Interest. A statutory designation notified by Natural England representing some of the best examples of Britain's natural features including flora, fauna, and geology.

Term	Definition
Storm surge	A rise in the sea surface on an open coast, resulting from a storm.
Sustain	Refers to some function of a feature. A feature may change, but the function is not allowed to fail.
Swell	Waves that have travelled out of the area in which they were generated.
Tidal prism	The volume of water within an estuary between the level of high and low tide, typically taken for mean spring tides.
Tide	Periodic rising and falling of large bodies of water resulting from the gravitational attraction of the moon and sun acting on the rotating earth.
Topography	Configuration of a surface including its relief and the position of its natural and man-made features.
Transgression	The landward movement of the shoreline in response to a rise in relative sea level.
Updrift	Direction opposite to the predominant movement of longshore transport.
VMCA	Voluntary Marine Conservation Areas. A statutory designation to protect the marine conservation importance of a site and to provide a focus for liaison, co-operation and education for a sustainable marine environment.
Water table	The upper surface of groundwater; below this level, the soil is saturated with water.
WFD	Water Framework Directive. European legislation which seeks to improve the quality of both freshwater and coastal water bodies.
Wave direction	Direction from which a wave approaches.
Wave refraction	Process by which the direction of approach of a wave changes as it moves into shallow water.
WPM	With Present Management. The WPM scenario essentially describes the current regime of management which exists for a given frontage. WPM scenario assumes that defences will be maintained in their present position and other management practices, e.g. beach re-nourishment, will continue as at present.

ACKNOWLEDGEMENTS

Royal Haskoning acknowledge the contribution of their sub-consultants ABP Marine Environmental Research Ltd (ABP Mer) who prepared the Estuary Assessment (refer Appendix I).

Royal Haskoning acknowledge the contribution of the Channel Coastal Observatory (CCO) who prepared the flood and erosion mapping (Tasks 2.2 and 2.5) along with the baseline economics (refer Appendix C).

Royal Haskoning acknowledges the work undertaken through Futurecoast and SCOPAC Sediment Transport Study (2004), contents from which have been used in preparing Appendix C.

1 INTRODUCTION

Document title	Poole and Christchurch Bays Shoreline Management Plan Review Sub-cell 5f Hurst Spit to Durlston Head
Document short title	Section 1
Status	Report V3
Date	2011
Project name	Poole and Christchurch Bays SMP2
Project number	9T2052
Client	Bournemouth Borough Council
Reference	9T2052

CONTENTS

	Page
1 INTRODUCTION	1
1.1 The Shoreline Management Plan	1
1.1.1 SMP Principles	2
1.1.2 SMP Process Objectives	3
1.1.3 Key Principles	4
1.1.4 Policies	4
1.2 Structure of the SMP	6
1.2.1 SMP Report Structure	6
1.2.2 The Supporting Appendices	7
1.2.3 GIS and Databases	8
1.3 The Plan Development Process	8
1.3.1 The Need for Revision	8
1.3.2 Review and Development Procedure	9
1.3.3 Reasons for not including a summary	10

1 INTRODUCTION

1.1 The Shoreline Management Plan

A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, a SMP is a high-level document that forms an important part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence (Defra, 2001). Locations of the SMP's across the country are shown in Figure 1.1.

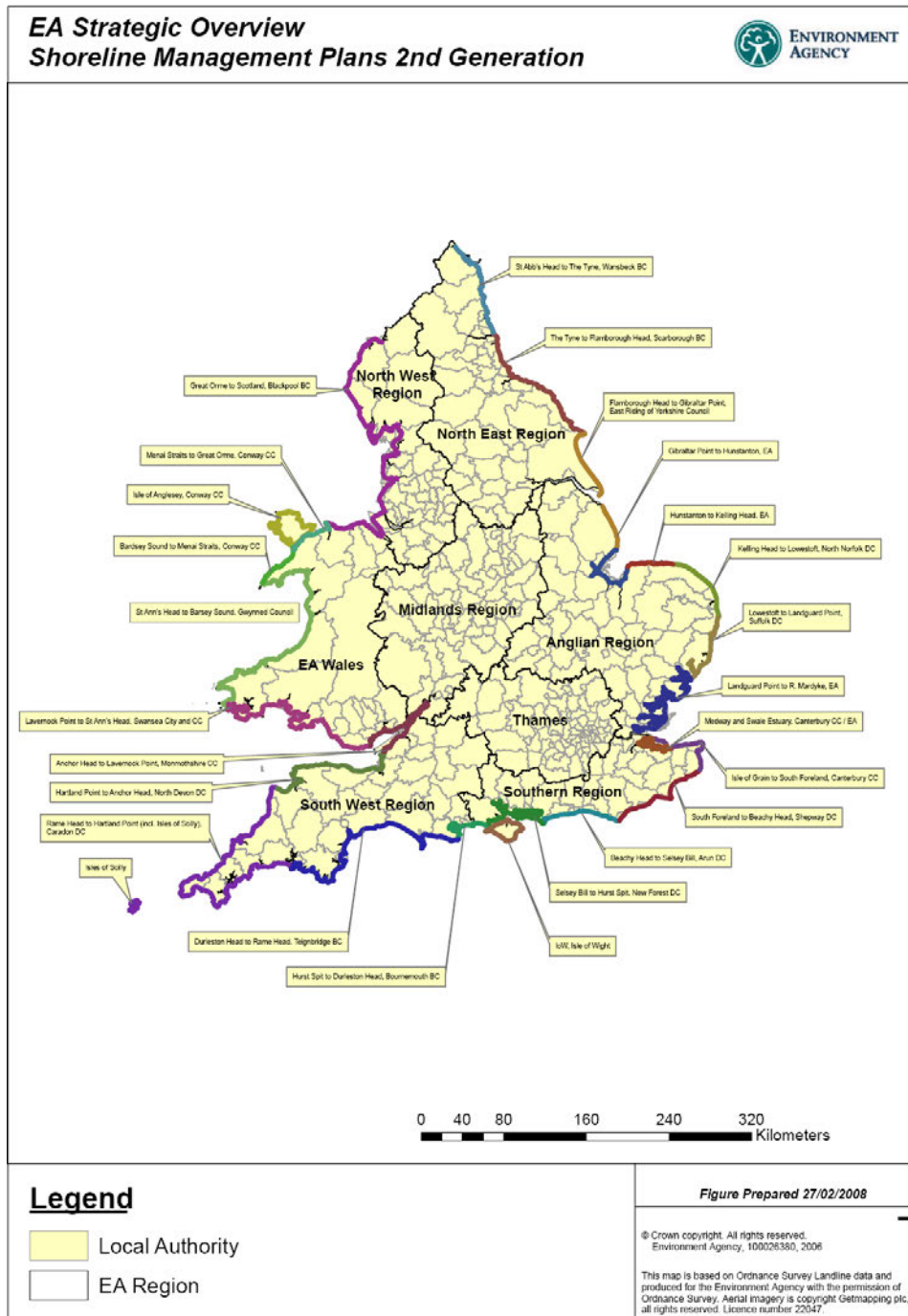


Figure 1.1: Environment Agency Strategic Overview SMP's 2nd Generation
<http://www.defra.gov.uk/environment/flooding/documents/who/cgsmp2.pdf>

The plan provides both a broad scale assessment of these risks but also quite specific advice to operating authorities in their management of defences. Through this and through the identification of issues covering a wide spectrum of coastal interests, the SMP supports the Government's aims, as set out in Defra's strategy "Making Space for Water" (Defra 2005):

- To reduce the threat of flooding and coastal erosion to people and their property; and
- To deliver the greatest environmental, social and economic benefit, consistent with the Government's sustainable development principles.

This SMP2 document, developed on behalf of Bournemouth Borough Council and supporting Client Steering Group (CSG), sets out the results of the first revision to the original SMP for the area of coast extending from Hurst Spit to Durlston Head (Figure 1.1). This SMP2 collates information from the original SMP for sub-cell 5f and subsequent strategies and studies.

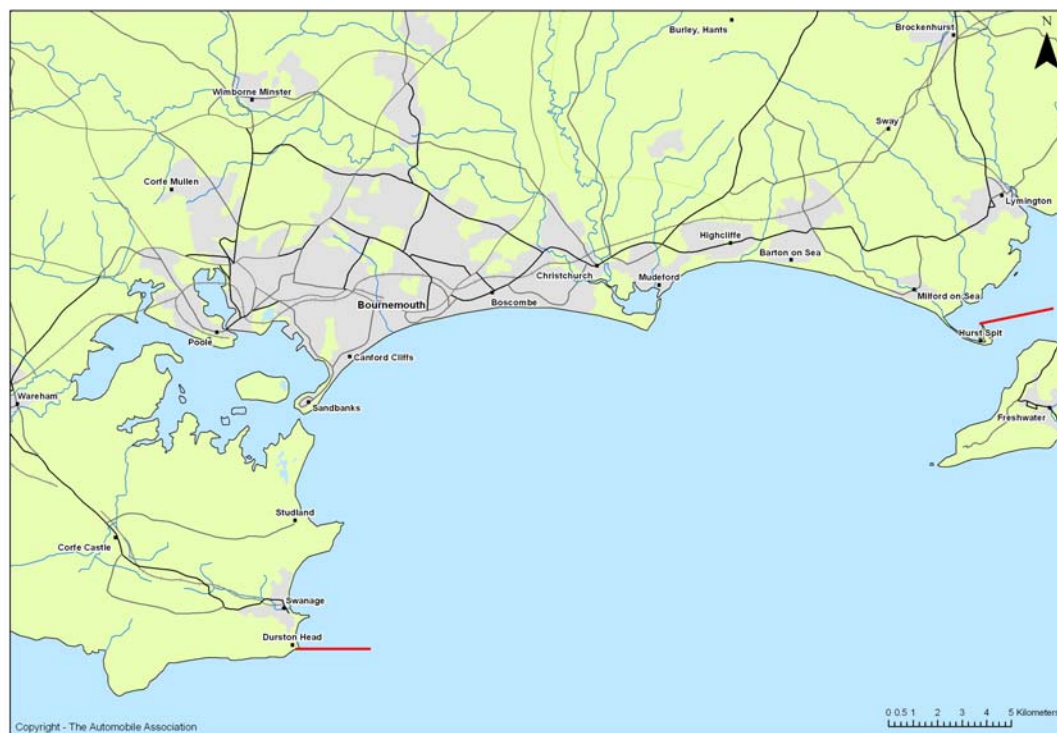


Figure 1.2: SMP Coastline from Hurst Spit to Durlston Head

1.1.1 SMP Principles

The SMP is a non-statutory policy document for coastal defence management planning. It takes account of other existing planning initiatives and legislative requirements, and is intended to inform wider strategic planning. It does not set policy for anything other than coastal defence management. However, from this perspective, it aims to provide the context to, and consequence of, management decisions in other sectors of coastal management. Following the adoption of the SMP, the operating authorities develop strategy studies which identify the nature and type of works required for implementation which then lead to the scheme delivery (the design, construction and maintenance of the defences).

The SMP promotes management policies for a coastline into the 22nd Century that achieve long-term objectives without committing to unsustainable defence. It is, however, recognised that due to present day objectives and acceptance, wholesale changes to existing management practices may not be appropriate in the very short-term. Consequently, the SMP provides a timeline for objectives, policy and management changes; i.e. a 'route map' for decision makers to move from the present situation towards the future.

The first SMP for Poole and Christchurch Bays was completed in 1999 and worked from west to east along the coast. Since that time, more detailed strategy studies have been undertaken over large sections of the coastline and these, together with academic research and monitoring by the responsible authorities, have improved our understanding of how the coast behaves. In addition many lessons have been learnt with respect to how the SMP should be conducted and indeed how we should be viewing the management of the shoreline. Defra (2001, 2003) undertook a review of the results from SMP1, considering their strengths and weaknesses. This has led to revised guidance. Some of this guidance is targeted at achieving greater consistency in the assessments and presentation of the plans, but there are more fundamental issues that have been identified, which this and other SMP2s must address.

One significant issue is the inappropriateness of certain policies which, when tested in more detail with a view to being implemented, may be found to be unacceptable or impossible to justify; either in terms of economics or from a perspective of what communities need from the coast. It is, therefore, important that the SMP must be realistic given known legislation and constraints. There will be no value in a long-term plan which has policies driven by short-term politics or works that prove to be detrimental when considered several decades into the future.

Equally, the plan must also remain flexible enough to adapt to changes in legislation, politics and social attitudes. The plan, therefore, considers objectives, policy setting and management requirements for 3 main epochs; from the present day, medium term and long term, corresponding broadly to time periods of 0 to 20 years, 20 to 50 years and 50 to 100 years respectively. There is a need to have a long-term sustainable vision, which may change with time, but the SMP must demonstrate that defence decisions made today are not detrimental to achievement of that vision.

This plan covers an area of significant environmental value, but also has a strong history of human settlement and present use. These uses and interests are not inherently opposed. In reality it is the natural attraction combined with the historical coastal use, which gives this area its distinct and considerable value to man in the present day. While individual core objectives or aims may, therefore, be set, and indeed are set, with respect to each specific aspect of the area, the aim of the SMP2 must be to develop policy where, as far as possible, these specific objectives are not set in conflict. The underlying principle for the development of the plan has been to consider the specific circumstances of the differing sections of the coast and through this understanding, attempt to deliver the greatest benefit to the totality of coastal communities in an area.

1.1.2 SMP Process Objectives

The objectives of the SMP process (as distinct from the objectives for management of the coast) are as follows:

- To provide an understanding of the coast, its behaviour and its values;
- To define, in general terms, the risks to people and to the developed, natural and historic environment within the SMP area over the next century;
- To identify the likely consequence of different management approaches and from this;
- To identify the preferred policies for managing those risks or creating opportunity for sustainable management;
- To examine the consequences of implementing the preferred policies in terms of the objectives for management;
- To set out procedures for monitoring the effectiveness of the SMP policies;
- To inform others so that future land use and development of the shoreline can take due account of the risks and preferred SMP policies; and
- To comply with international and national nature conservation legislation and biodiversity obligations.

1.1.3 Key Principles

The following list of principles reflects the aspirations of all stakeholders. It will be used together with stakeholder objectives identified for each area of the coast and will aid policy development and identification of specific objectives. These objectives have been developed by consulting the CSG, Elected Members Forum (EMF) and key stakeholders, and are presented as aggregated objectives for each area. It is important to note that these come from the values that stakeholders place on the issues and features in each area. Some of these objectives therefore conflict with others. Because of this, the SMP will not be able to achieve all of these objectives. It should be noted that these principles have been set out in no particular order.

- To avoid the loss of life through flooding;
- To manage the risk to people's homes from flooding and erosion;
- To protect the local economy;
- To contribute to a sustainable and integrated approach to land use planning;
- To support adaptation by the local coastal communities;
- To avoid damage to and enhance the natural heritage and historic environment where practicable;
- To support the historic environment and cultural heritage where possible;
- To maintain and improve landscape designations and features;
- To reduce reliance on defence.

1.1.4 Policies

The generic shoreline management policies considered are those defined by Defra; they are represented by the statements:

- **No Active Intervention (NAI):** a decision not to invest in providing or maintaining defences or natural coastline.
- **Hold the Line (HTL):** maintain or upgrade the level of protection provided by defences or natural coastline.
- **Managed Realignment (MR):** manage the coastal processes to realign the 'natural' coastline configuration, either seaward or landward, in order to create a future sustainable shoreline position.

- **Advance the Line (ATL):** build new defences seaward of the existing defence line where significant land reclamation is considered.

Further information to clarify these policies is provided below:

No Active Intervention

The policy of NAI has developed from two distinct sets of circumstances. In the first, the SMP has identified the need for the coast to be allowed to develop naturally. Typically, it may be that erosion of a frontage is providing sediment to other sections of the coast and therefore, it may be important that the coast is allowed to continue to erode if sustainable intervention is to be achieved elsewhere. Where this or some similar condition applies, this is discussed in the SMP. The other situation where the policy of NAI is defined may arise, is where it is unlikely that operating authorities would provide funding for defence. It may be that works have a benefit/cost ratio which is not high enough, or there may not be priority funding. Where appropriate, the SMP introduces caveats to make this distinction. The SMP has identified that privately funded works may still be permissible, however, there may be conditions associated with this such that private works do not result in negative impacts on other interests.

Hold the Line

The intent of this policy is to maintain defence protection to important assets or interests at the coast. This does not necessarily mean that the existing defences would be maintained in exactly the same form as they are at present. There may be a need to adjust the local alignment in the future or to replace, or add, structures. In this way, constructing cross shore or shore linked structures, such as groynes or breakwaters, may be the approach adopted in the future under this policy, in specific cases. The proposed policy therefore sets the intent to maintain defence of the important features in an appropriate manner. In areas where HTL has been recommended, it is possible that funding may not be forthcoming from the Flood and Coastal Erosion Risk Management (FCERM) budget, the main source of Government funding. The SMP has highlighted this and also identified what additional opportunities and benefits may be gained from a HTL policy. Caveats are made in these circumstances highlighting the need for collaborative funding to achieve the proposed management plan. It may be difficult to deliver the HTL policy if neither Government nor alternative funding can be secured.

Managed Realignment

This policy may arise from a series of different circumstances and objectives. The ethos of this policy is that management of the shoreline would be improved by either allowing for and/or creating the conditions for the coast to realign. A very obvious example of this is in moving a linear flood defence back from the active coastal zone, providing a more secure position for such a defence while the shoreline re-adjusts. Other examples are where intervention at the coast may be less onerous if the coast is allowed to retreat before intervention is undertaken. This may, for example, create the opportunity to retain a beach in front of a set back hard defence. A further example of MR is in considering how adjacent policy units function together. For example there could be a situation where in one unit there is a HTL policy and by implementing this, the coast in the adjacent unit is allowed to function more naturally. In summary, MR is used where there is a need for continued intervention either locally or more remotely, so as to achieve a specific outcome.

Advance the line:

An ATL policy may be adopted where advancement of the shoreline would assist in creating a more robust defensive position and provide additional opportunity for

increased intertidal width and/or land reclaim. Advancement of the line may not necessarily require the construction of structures seaward of the existing shoreline. Examples include the construction of tidal barriers or outer harbour walls where this provides a more sustainable solution based on the objectives and core values of a given community or settlement. Alternatively, advancing the line can be used in order to introduce variation into the plan shape of a coastal frontage and encourage the accumulation of sediment and promote sustainable management of the intertidal width.

This defines the level of detail required by the SMP. However, in developing these generic policies there is also a basic requirement to state the intent of the policy such that it is the intent, not the definitions given above, that drive future management.

1.2 Structure of the SMP

The preferred plan and policies presented in this SMP are the result of collating and interpreting information from all the available studies and assessments of how the coast behaves physically. There is, therefore, a need to draw these threads together to provide clarity for different readerships. To this end, the documentation to communicate and support the plan is provided in a number of parts. At the broadest level these are divided into two; the SMP itself, and a series of supporting appendices. In addition, information is collated in a database linked to a geographical information system (GIS), allowing information to be taken forward in implementing the plan for future users.

1.2.1 SMP Report Structure

This document provides the plan for the future and the policies required for this plan to be implemented. This is intended for general readership and is the main tool for communicating the intention of future management. Whilst the justification for decisions is presented, it does not provide all of the information behind the recommendations, this being contained in other documents. The plan is presented in seven parts:

- | | |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Section 1 | Gives details on the principles, aims, structure and background to the development of the plan. |
| Section 2 | Provides details of how the SMP meets the requirements of an Appropriate Assessment (AA) and Strategic Environmental Assessment (SEA). |
| Section 3 | Presents the basis for development of the Plan, providing a broad overview of the Plan area, describing the concepts of sustainable policy and providing an understanding of the constraints and limitations on adopting certain policies. |
| Section 4 | It has been frequently stated that there is as much value in the thought process of developing the SMP as there is in the actual policies themselves. This section, therefore, aims to lead the reader through this process. The section starts with a discussion of large segments of the coast (called Policy Development Zones; PDZs). Within these zones the coast is described and the way in which the coast might behave is explained if: <ul style="list-style-type: none">• A) no further defence work was undertaken (the NAI scenario);• B) present management is continued into the future (the WPM scenario). |

These are defined as the two baseline scenarios in undertaking the review. Consideration of these scenarios develops an understanding of the pressures which may develop on the coast under different approaches to management. It allows an assessment to be made of whether, under each scenario, objectives are or are not achieved.

From this assessment, alternative approaches or scenarios are examined and from this the preferred Plan is developed. To achieve this Plan individual policies for sections of the coast are derived (Policy Units; PU). These units are finally grouped into areas of management (Management Areas; MA), pulling together policy units which have a basic interdependency.

For each MA, statements are prepared setting out a summary of the intent, the necessary actions over different time scales, and the impacts of the preferred policies. Starting from an initial four PDZ's, the coast is defined by fifty three PU's which are drawn together as fifteen MA's.

- Section 5 Brings together the overall plan, highlighting important issues in relation to the future management of the coast.
- Section 6 Provides a brief summary of policies. It is appreciated that many readers will focus upon the local conclusions of the SMP. However, it is important to recognise that the SMP is produced for the coast as a whole, considering issues beyond specific locations. Therefore, this summary should be read in the context of the wider-scale issues and policy implications, as reported and developed in Section 4 and supported by information in the Appendices.
- Section 7 Presents the Action Plan providing a programme for future activities which are required to progress the Plan between now and its next review in 5 to 10 years time. A summary of this action plan for each MA is presented in Section 4 within the MA statements.

1.2.2 The Supporting Appendices

The accompanying documents provide all of the information required to support the Plan. This is to ensure that there is clarity in the decision-making process and that the rationale behind the policies being promoted is both transparent and auditable. This information is largely of a technical nature and is provided in thirteen Appendices:

- A. SMP Development: This reports the history of development of the SMP, describing more fully the plan and policy decision-making process.
- B. Stakeholder Engagement: Details of the stakeholder involvement process are provided here, together with information arising from the consultation process.
- C. Baseline Process Understanding: Includes baseline process report, defence assessment, NAI and WPM assessments and summarises data used in assessments.
- D. Natural and Built Environment Baseline (Thematic Review): This report identifies the environmental features (human, natural, historical and landscape) in terms of their significance and how these need to be accommodated by the SMP.

- E. Issues and Objective Evaluation: Provides information on the issues and objectives identified as part of the Plan development.
- F. Strategic Environmental Assessment: Provides a systematic appraisal of the potential environmental consequences of high-level decision-making.
- G. Scenario Testing: Presents the policy assessment and appraisal of objective achievement for the No Active Intervention scenario and the Preferred Plan.
- H. Economic Appraisal: Presents the economic analysis undertaken in support of the Preferred Plan.
- I. Estuary Assessment: Examines both the requirement and geographical extent to which estuaries are included within the SMP2 process.
- J. Habitat Regulation Assessment – Appropriate Assessment: Sets out the support information for an AA of the SMP.
- K. The Metadatabase, GIS and Bibliographic Database is provided to the operating authorities on CD. This will be provided with the final SMP.
- L. Water Framework Directive (WFD): Presents the assessment as developed by the Environment Agency with respect to the SMP policies.
- M. Review of Coastal Processes and Associated Risks at Hengistbury Head.

1.2.3 GIS and Databases

The SMP2 provides a future management framework. It is accepted that our understanding of the coast can be improved, addressing the many areas of uncertainty that we are presently confronted with. There will also be changing circumstances not only as the coast evolves but as our use of the coast changes. During the development of the SMP, information on issues, on processes and our assumptions with respect to different aspects, such as the condition of defences or erosion rates, have been recorded.

This information is held within databases linked through to a GIS. This system is provided in association with the actual plan so that, as new information emerges, this may be used to update the management system. The intent is two-fold. First, that information is recorded and may be compared with our existing knowledge such that better informed coastal management decisions can be made. Second, when SMP3 is commissioned, information is readily available to this review process.

One important feature of this information is in the responses and issues which were raised during the consultation process. This data is recorded in the issues, features and objectives database used for developing and appraising policy. Management of this information will help those managing the coast in the future to identify issues at a local scale, ensuring that views can be readily identified during the actual implementation of the Plan. The degree of effort all consulted have put in to developing the Plan is fully appreciated. The storage of issues information should help ensure that people's concerns are recognised in the future.

1.3 The Plan Development Process

1.3.1 The Need for Revision

The original SMP1 for sub-cell 5f was completed in 1999. It has always been recognised that part of the SMP process is that plans should be reviewed on a regular basis. The review undertaken through SMP2 has been part of this process.

Very much initiated by the findings of the SMP1, a considerable effort has been put in place over the last three years to ensure that we have been in a better position to make

judgements with respect to the coast. There have also been changes in legislation and guidance. In this first revision, therefore, the development of the Plan has been able to draw upon and has had to take account of:

- Latest studies and modelling undertaken since the last SMP such as that provided by Futurecoast and the SCOPAC Sediment Transport Study (2004);
- Issues identified by most recent defence planning (i.e. the several coastal defence strategy plans which have now been produced to cover most of the SMP area between Hurst Spit and Durlston Head);
- Changes in legislation (e.g. the EU Directives, guidance with respect to the Water Framework Directive (WFD), PPS25);
- Changes in national flood and coastal defence planning requirements (e.g. the need to consider 100 year timescales in future planning, modifications to economic evaluation criteria etc.);
- Improved information from strategic flood risk assessments; and
- The emerging thinking on Integrated Coastal Zone Management.

The period between the development of SMP1 and SMP2 has, therefore, been one of quite rapid change. With the manner in which the SMP2 has now been organised and the further understanding that has been developed, shoreline management has to be seen as an ongoing process providing a platform for more local decision making. It is anticipated that subsequent reviews may be undertaken in 10 years time. This timescale would ultimately be driven by the scale of change on the coast itself.

1.3.2 Review and Development Procedure

The CSG for this sub-cell comprises representatives from the six operating authorities (voting members) and five associate partners (non-voting members). The operating authorities include; Bournemouth Borough Council (Lead Authority), New Forest District Council, Christchurch Borough Council, Borough of Poole, Purbeck District Council and the Environment Agency. The associate partners include Natural England, National Trust, Dorset County Council, Hampshire County Council and Poole Harbour Commissioners. In addition to the above organizations, English Heritage has also contributed through the CSG. Together with Royal Haskoning, the CSG have managed the necessary stages of the SMP2 process to produce this management plan.

The SMP development process has sought involvement from over 150 organisations or individuals, with principal periods of consultation being conducted during the Scoping Report (December 2007 and July 2008) and Spring 2009, with consultation on the draft Plan being undertaken over the period between November 2009 and February 2011.

The main activities in producing the SMP have been:

- Development and analysis of issues and objectives for various locations, assets and themes;
- Thematic reviews, reporting upon human, historic and natural environmental features and issues, evaluating these to determine relative values of the coast;
- Analysis of coastal processes and coastal evolution for baseline cases of not defending and continuing to defend as at present;
- Agreement of objectives with the CSG, EMF and through public consultation, and from this determining possible policy scenarios;
- Development of policy scenarios which consider different approaches to future shoreline management;

- Examination of the coastal evolution in response to these scenarios and assessment of the implications for the human, historic and natural environment; and
- Determination of the preferred plan and policies through review with the CSG, prior to compiling the SMP draft document.

This will be followed by:

- Consultation on the proposed plan and policies;
- Consideration of responses and finalising the SMP; and
- Dissemination of the findings and policy contained within the Plan
- The development of an action plan to take forward in the future strategy studies.

1.3.3 Reasons for not including a summary

The SMP2 does not contain an executive summary because the development of the Plan, described above, has been a long complex process, which proceeds throughout the document. The CSG agreed that a summary could not do justice to the detail considered in the process. Additionally, a summary may provoke controversy by not referring to all the factors and issues considered in developing the preferred policies.