From Chris Radford:   26 Walrond Rd, Swanage, BH19 1PD.

I run a holiday property business in Swanage [www.purbeckholidays.co.uk](http://www.purbeckholidays.co.uk/)  I am also a committee member of the Swanage and Purbeck Hospitality Association. I have read the 512 page report in detail on behalf of the SPHA and visited the consultation events.

My summary is the development will be very damaging to the economy and the environment, it is in the wrong place and does not need to go ahead in the form it is proposed to meet government targets.  The capacity should either be absorbed by other developments that are less damaging or at least moved further away from the coast to reduce the visual impact.

**The impact on tourism will be considerable for Swanage**and much greater than the publicity put out by NBDL  (see notes on surveys attached).

* 77% of Purbeck business owners surveyed by NBDL believe the impact will be negative.  This is not mentioned by NBDL.
* The main reason people come to Swanage and Purbeck is the coast, the beaches, the scenery, the walks.  NBDL's survey confirms this but they do not mention it in their publicity.  This is also confirmed in surveys by Purbeck DC and SW tourism alliance.
* NBDL confirms there will be a major impact on walkers along the Durlston Coast in its report
* NBDL cites 14% of visitors who say they will not return.  This is for the whole survey area, it is clear that the impact in Swanage and Purbeck will be far greater than some parts of Bournemouth, Poole, IOW, and New Forest that are included in this assesment.

**The consultation is not comprehensive or reliable**

1. The images used by NBDL to represent the visual impact use discredited protocols (reference [Challenge Navitus website](http://www.challengenavitus.org.uk/visualisation-standards.html)) and are not giving a true impression
2. The consultation by NBDL has not included SPHA members in any representative way.  (we can find only 2 members out of over 150 who were asked an opinion via survey)
3. Anecdotal evidence undermines a number of NBDL's claims e,g.
* NBDL claim there are only 99 business in Swanage and Purbeck that might be affected by the development.  This is a massive underestimate
* NBDL say business owners are optimisitic about their prospects (yes, but they were asked this question in a general sense not in the context of if the wind farm goes ahead)
* NBDL estimate there are 3000 divers diving in the area.  We know that one business has recorded 7282 divers from Swange Pier Alone. yet the Diving businesses would have to completely closed during the construction period
* The mention a lot of estimates in their report rather than hard evidence.
* NBDL documents are detailed and hard to follow.

**There other impacts that are covered by the consultation but the NBDL asessments are complex and hard to follow**. I do not have detailed assessment of these points.   In summary

* It is sited in bird migration routes
* There is navigational risk in strong tides in a very busy area
* Each Turbine makes a lot of noise,  I have seen claims of over 100db  (a loud rock band) there is no precedent for measuring the cumulative effect of over 100 Turbines.
* They will have flashing lights on the turbines at night.  This will be devastating to the night sky.  Over 100 flashing red lights all visible from the coast

**Even if you believe in offshore wind as a viable solution to our national energy needs, the development is simply too close and too big.**There is no precedent for this.

* These turbines are twice the size and nearly half the distance of ENECO wind farms built off the Dutch Coast.  This development would not be permitted off the Dutch Coast by ENECO's own Dutch Government.
* UNESCO have blocked a development of just 2 turbines off the French Coast near Mont St Michel on the grounds it would ruin a world Heritage site
* Our own government guidelines say it should be at least 12 miles offshore
* Despite its size, this development is just 3% of the Round 3 target for offshore wind and could easily be absorbed or tacked onto the larger North Sea developments where no-one can see them

In summary, the development will be very damaging, in the wrong place and does not need to go ahead in the form it is proposed.  the capacity should either be absorbed by other developments that are less damaging or at least moved further away from the coast.

*Possibly offshore wind like this should be scrapped altogether but that is a separate and national political argument. There is mounting evidence that offshore wind is so expensive that it is driving massive fuel price inflation.  This will be responsible for an increase in fuel poverty and making British Industry un-competitive as well as desecrating sites of national significance like the Jurassic Coast.  It is also an unreliable means of production and unlikely to meet its targets*

Regards

Chris Radford

## NBDL statements and our observed response

The reports are extensive, but top line findings reveal a degree of optimism or neutrality about the tourism prospects for the region. They show that:

**The vast majority (92%) of the tourism businesses interviewed expect their business to increase or remain stable …..**

*This observation is not really relevant. The question was not asked in the context of “if the wind farm goes ahead”. It was a general question reflecting current conditions. This makes the observation not valid in relation to the Navitus Bay development. It is merely an expression of current sentiment taking everything into account including the possibility that the wind farm will not go ahead.*

**….. and most (72%) believe Navitus Bay Wind Park would have little or no impact on their business prospects(i).**

*Little impact is defined as less than a 10% reduction. 10% reduction is not a small impact on a business. So this claim of 72% is misleading. In the survey 40% think it will have a negative impact, 54% think it will have no impact, 6% think it will be positive,*

*However the picture is very different in Purbeck 77% think the impact will be negative, 20% think it will have no impact, 3% think it will be positive. The main reasons were around the visual impact and appeal of the Jurassic Coast.*

**This optimism was shared by visitors to the region – 86% of Summer-season visitors said the development would not put them off visiting the region in the future.**

*However 14% said they would be put off coming and 20% put off during the construction phase. And when asked what mattered the vast majority of respondents said these factors were important or very important to them.*

1. *Views out the sea and the coast 90%*
2. *Cleanliness of the beach 90%*
3. *Cleanliness of the sea water 75%*
4. *Access to the beach 75%*
5. *Well maintained footpaths 73%*

*And for 67% of respondents the coast, beach, landscape, peace, tranquillity are the reasons they come to the area.*

*All these attributes of the area will be affected by the development. It is hard to know who well respondents grasped the likely impact on them. The photomontages shown use discredited protocols and we should question if respondents really grasped the impact of the development.*

**The assessments also estimate that the wind park has the potential to add economic value to the region of up to £1.85 billion over the lifetime of the project, and support a minimum of 2,000 jobs during peak construction years.**

*None of these benefits (if they occur) will accrue to Swanage. Swanage will suffer to a greater degree than other resorts on the area due to being closer to the wind farm and being more reliant and the Jurassic Coast as an attraction.*

**Mike Unsworth, Project Director at Navitus Bay, said: “Tourism is an important part of the local economy and culture and there is an understandable desire to know how the project may affect the industry. The evidence we’ve gathered has shown that tourism is largely unaffected by projects of this nature and in some instances enhanced.**

*The previous observations would challenge this statement*

**We’d like to replicate the tourism success enjoyed by other offshore wind park locations in the UK and provide support to enhance the region’s tourism offer – which may be through a visitor centre or funding additional tourism resources.**

*There is no evidence these suggestions will offset the damage inflicted on the tourist economy. The anticipated reduction of tourism in Purbeck would be greater than the 14% suggested by the NBDL survey (hard to estimate) since Purbeck is more badly affected by the development.*

*Navitus cite a figure for Tourism in Purbeck of £150m based on SW tourism alliance. But this significantly under-estimates the impact of a reduction in tourist numbers as it does not identify the related service jobs that would be affected by a reduction in tourist numbers. Every tradesman, all retail staff, taxis, busses etc are not deemed as tourist businesses. These trades would also suffer with fewer tourists.*

## NBDL acknowledge the following in their report

Navitus have predicted an impact to walkers of between major and Major-Moderate in this area. ‘All are deemed to constitute significant effects upon the receptors’. Major-Moderate impacts are also predicted to be experienced by recreational walkers, visitors to beaches and cyclists

Navitus say ‘it is recognised that the views from, and towards these designations/ defined areas will be altered to varying degrees and that such views are an important element of these areas’

Navitus say ‘When just considering the stretch of the designation between Old Harry Rocks and St Aldhelm’s Head, it is acknowledged that the importance and availability of coastal seaward views would prompt a locally higher magnitude of effect upon its visual attributes than for the Jurassic coast as a whole. This would result in a localised stretch of the designation experiencing a significance of impact upon its visual attributes of Major-Moderate.

Navitus say ‘Overall, the landscape and visual attributes of the Juraasic Coast is considered to experience a Moderate significance of impact’.

## Impact on visitors

The thrust of the argument from NBDL is that there will be little negative impact on tourism as a result of this development and that there is the possibility to increase visitor numbers through a visitor centre or other tourism investments

## Observations promoted by NBDL

86% of Summer-season visitors said the development would not put them off visiting the region in the future.

Mike Unsworth quote

*“Tourism is an important part of the local economy and culture and there is an understandable desire to know how the project may affect the industry. The evidence we’ve gathered has shown that tourism is largely unaffected by projects of this nature and in some instances enhanced. We’d like to replicate the tourism success enjoyed by other offshore wind park locations in the UK and provide support to enhance the region’s tourism offer – which may be through a visitor centre or funding additional tourism resources.”*

What do the NBDL surveys tell us?

The value of tourism to the area

Tourism is valued in the report at £1bn and supports 17000 jobs across the areas affected by Navitus Bay (SW tourism alliance 2008) . The numbers for Purbeck are £150m and around 2000 jobs.

But this significantly under-estimates the impact of a reduction in tourist numbers as it does not identify the related service jobs that would be affected by a reduction in tourist numbers. Every tradesman, all retail staff, taxis, busses etc are not deemed as tourist businesses. But all these trades are significantly boosted by the presence of tourists who visit shops, restaurants and whose accommodation needs servicing by trades people. These trades would reduce with fewer numbers.

Conclusion: The impact of tourism on Purbeck must be greater than £150m suggested here.

## Visitor profile

* 25% of visitors were day trippers and the remaining were staying on holiday for 1 night or more.
* 70% were first time visitors to the area
* 18% of respondents were staying in Swanage and Purbeck

Conclusion: this survey is skewed to Bournemouth and Poole (52%) which has a different character from Purbeck

## Reasons for visiting area

The primary reason people visit this area is the beaches coast and landscape. (about two thirds of visitors offer this as their reason)

* 67% of respondents reported that the main reasons for visiting the area are related to a feature that will be affected by this development (i.e. either the seaside beaches and coast, sea views peace and tranquillity cultural landscape and heritage)
* 62% of all reasons offered to visit this area are related to beaches coast sea views peace landscape and heritage

It is highly likely these % are much higher for Purbeck. (this data will be in the survey but is not released in the report)

N.B. The survey makes a distinction between sea views as a reason and seaside beaches and coast as a reason. It is hard to see how this distinction can be valid as the view is a part of the seaside experience

The Views out the sea and along the coast are the most important things that help them enjoy their trip. The ranking of the reasons to come here

% of respondents said this was important or very important to them.

1. Views out the sea and the coast 90%
2. Cleanliness of the beach 90%
3. Cleanliness of the sea water 75%
4. Access to the beach 75%
5. Well maintained footpaths 73%

This reinforces the coastal environment is the overwhelming reason

Respondents who had experience of seeing offshore wind farms before had largely seen them off Norfolk and Kent coasts and 90% of them reported that it had had no effect on their intention to visit the area

## Impact of seeing pictures of the development

After seeing the photomontages

* 14% said they it would put them off coming again
* 20% said they would visit somewhere else in construction phase (worried about pollution)
* 89% disagreed with the idea that it would enhance the area
* 14% said they would shorten their stay

## Is the survey valid?

The tourism survey has a very large number of respondents (2027) respondents of which 19% were recruited in Purbeck at Durlston Visitor Centre. There is no analysis of the responses for Purbeck visitors. But these numbers are big enough to draw conclusions.

There are observations about how wind farms have not had a negative effect in Great Yarmouth. These observations must be mitigated by the higher importance of coastal natural beauty to Purbeck. Also the proximity and scale of this development is larger than seen in any other offshore development so far. So experience in other places is not likely to be a good predictor of what will happen here

We do not know precisely which photomontages were used or at what size. This would obviously affect the response. The respondents were instructed to view the photos at the correct distance. Andrew Langley has challenged the NBDL images as using protocols that have been discredited. This questions whether respondents really grasped the full impact of the development.

## Business survey: Impact on tourism business

NBDL state that the vast majority (92%) of the tourism businesses interviewed expect their business to increase or remain stable. This is true. But the question was not asked in the context of “if the wind farm goes ahead”. It was a general question reflecting current conditions. This makes the observation not valid in relation to Navitus Bay. It is merely an expression of current sentiment taking everything into account.

NBDL also state that 72% believe Navitus Bay Wind Park would have little or no impact on their business prospects. Little impact is defined as less than a 10% reduction. 10% reduction is not a small impact on a business. This claim is misleading. The correct figures are

* Total sample 40% think it will have a negative impact, 54% think it will have no impact, 6% think it will be positive,

However the picture is very different in Purbeck

* In Purbeck 77% think the impact will be negative, 20% think it will have no impact, 3% think it will be positive

The main reasons were around the visual impact and appeal of the Jurassic Coast.

## The validity of the survey

There are 304 businesses in the survey of which 34 are from Swanage. They only approached 99 businesses in Swanage. There are many more businesses in Swanage that would be affected.

The photo montages were viewed on screen which means that we are unsure what they actually saw and whether it is an accurate representation.

This survey is much weaker and less reliable than the tourist survey. But it indicates the business community in Purbeck is worried about the potential impact. Given that the visuals they saw probably understate the impact. This concern may be even more muted than it will be if the development goes ahead.