

MONT SAINT MICHEL and ITS BAY **Overall Summary of Wind Farms in its panoramic Cone Views**

Mont Saint Michel, which has been featured in UNESCO's World Heritage List since 1979, is an emblematic site in terms of heritage, culture, religion and panoramic views, and is known and recognized around the world. It attracts over 3.2 million visitors every year. It constitutes an essential economical driver, both for the Administrative District of 'La Manche' where it is located, and also, and perhaps more importantly for the Administrative District of 'Ille et Vilaine' which it is very close to. In March 1995, the French State decided to accompany a maritime rehabilitation project for Mont Saint Michel with a GRAND SITE operation that covers two regions, Brittany and Lower Normandy and two Administrative Districts, 'La Manche' and 'Ille et Vilaine'. Mont Saint Michel is set to re-become an island in 2014 and to this end the sea wall that has linked it to the mainland since the 19th Century will be destroyed. A large program of consultations has been undertaken around this project, which has been coordinated by the Miscellaneous Union of the Mont Saint Michel Bay area and financed by the French State and the Brittany and Lower Normandy regions (estimated cost of works 200 M €).

In parallel with this undoubted improvement of this historic site, certain positions are being taken concerning the location of parking areas and the flooding of various grassy plants; **BUT THE MAIN ISSUE HERE is the development over at least the last 5 years of industrial wind farms within a 17 to 22 kilometres radius of the Mont Saint Michel.**

All these projects are to be developed on the forefront of the highest crests, ranging between 80 and 100 metres in altitude, with the installation of very tall windmills, usually 150m in height when measured from the end of the blades. All the projects in the East and the South are located in the historic area of 'Marches de Bretagne', the old borders of the Brittany Duchy, and are situated in close proximity to the renowned valley of Couesnon, the long walking tracks ending at the Mont Saint Michel and the final portion of the Saint Jacques de Compostelle trail to MSM (*Mont Saint Michel*).

Generally speaking, the promoters behind these projects tend to deny or minimize the impact these wind farms would have on the Mont Saint Michel, in order to make them acceptable. They estimate the size of the windmills according to their distance from MSM, while totally overlooking the fact that they are white and that they emit light signals. Initially, this latter feature did not even rate a mention. It is only through the vigilance of local associations and the neighbouring population that, in every instance, and due to the fact that these inhabitants know their region well, these windmills have been denounced as being visible from MSM.

Indeed, how could it be otherwise?

These projects are located on the forefront of any significantly high crests, at an average height of 100m, to the South-East, South and South-West of the Bay of MSM in a continuous flat landscape.

This flat landscape stretching out to infinity through the countryside does not to date have any high constructions of any kind on it, so that the eye can travel a very long way without identifying any obstacles. The only blemish in this panoramic vista is the current MSM parking area, which is scheduled for removal at a later date. The altitude curves that we have drawn using Google software confirm that without a doubt and in every case studied, there is currently no visual obstacle such as a hill for example that could serve to hide the windmills when you look towards the horizon from the mainland.

Because I have witnessed it myself, I can testify that in fact this is what most tourists standing on the Western terrace are interested in doing: they peer towards the horizon with their camera scanning the horizon for any visual obstacles. My personal experience would indicate that there is in fact one white blob in this panoramic view and this is a something that all the visitors have mentioned it to me: Having researched it, I found that this 'white highly visible blob' was in fact a white 'Super U' supermarket building in Saint James, in the 'Manche' region; it is only 10 metres high and is located 20 kilometres away from MSM (*Mont Saint Michel*).

Conversely, from every proposed wind farm site, an individual can easily see MSM, its renowned outline being easy to spot. Often, one can also see the coast of 'La Manche' in the background. All the local inhabitants also know the famous Montjoie areas well: these are areas located on heights and are spots from which the pilgrims, after a long arduous trek, at last discovered the horizon and the Mont Saint Michel and shouted out for joy (*Translator's Note: 'Montjoie' in French means 'Mount of Joy'*).

The main ones can be listed here: Montjoie Saint Martin, in the 'Manche' region and those located on the D175 main road, referred to as the historic MSM road, between Tremblay and Antrain, as well as those on the D155 main road from Fougères, in the municipality of Tremblay, before reaching Antrain. There are also many others that the local inhabitants know very well and indeed they are very proud of them.

These findings on the ground are quite consistent with the findings of the influence study of MSM and its Bay panoramic vista undertaken by M. Porchon and further corroborated by the National Commission for Sites and Panoramic Vistas in 2009. This study was presented during the 2009 Heritage Fair and establishes an exclusion zone for large scale works (ZEGO) of 30 kilometres around MSM.

Such a distance would seem totally justified to us in order to preserve the exceptional long ranging views that one has of MSM.

ANALYSIS OF ONGOING PROJECTS IN THE PANORAMIC VISTAS AROUND MONT SAINT MICHEL

From East to West, in the rough shape of a belt around MSM, there are 7 wind farms comprising 31 windmills planned. ALL THESE PROJECTS, WITHOUT EXCEPTION, ARE LIKELY TO BE BUILT IF NOTHING IS DONE TO PREVENT IT.

1. In the Administrative District of 'La Manche', ARGOUGES: 3 x 100m windmills (HEBP)

The EPURON Company submitted an application for a Building Permit for a wind farm comprising 7 windmills in Argouges and Carnet on 27/07/2006. The investigator handed down an unfavourable decision for the whole farm on 18/08/2007 (many dwellings within less than 500 metres, proximity of the A84 road in the case of Carnet, view of MSM – *these windmills are located on 125 metre heights* for both planned farms and can be seen in the views of MSM, from Mont joie St Martin, etc...) The Administrative Head of ‘La Manche’ rejected the application for a permit for the 4 windmills of Carnet on 27 November 2007, stating that the countryside and the panoramic views of MSM would be impacted, and that both MSM and the windmills could be seen from Montjoie Saint Martin, the Saint Denis Chapel and the American Cemetery in Saint James. However, he did approve a permit for the Argouges windmills on the same date, even though the two sites are only 1.5 kilometres apart and are located at the same altitude. The neighbouring population initially lodged a conciliatory followed by an adversarial appeal, which was dismissed by the Administrative Court of Caen on 11 June 2009. This decision was confirmed by the Administrative Appeals Court of Nantes on 22 June 2009. On the solicitors’ advice, an appeal was then lodged before the ‘Cour de Cassation’ (*Higher Court for Appeals in France*) but was not sustained because of the legal view that it had no real chance of success. All the options for appeal have thus been exhausted and the 3 windmills of Argouges can now be built without any further delay. They are located between 19 and 20 kilometres of MSM and will undoubtedly be visible from MSM, just as MSM is clearly visible from the site on which they are to be built.

2. **SAINT-OUEN LA ROUËRIE: 5 x 153m windmills (HEBP), (Ille et Vilaine Administrative District).**

On 31 March 2009, the Aérowatt Company lodged an application for a building permit for 5 x 153m windmills. The investigator handed down an unfavourable decision on 17 December 2009 (due to the views being spoiled, their impact on MSM, their impact on Historical Monuments and in particular the Castle of Balue, their impact on an important reproductive site for bats, and the absence of a ZDE (*Economic Development Zone*). The SDAP (*District Architecture and Heritage Services*) also handed down an unfavourable decision (due to the impact on MSM, the views being spoiled, the spoiling of the panoramic views on the historical monuments.)

This building permit was rejected by the Administrative Head of ‘Ille et Vilaine’ on 22 January 2010, solely for reasons related to the views (the potential impact on the panoramic views around the Castle of Balue, “taking into account the fact that the project is also within the field of vision of MSM”, the spoiling of the countryside views).

The promoter from Aérowatt (Eole Saint Ouen la Rouërie Company) lodged an appeal against this Rejection Order on 19 March 2010. Our association, along with a number of local inhabitants, must now become involved in these proceedings without delay and submit a Voluntary Defence Argument in support of the Administrative Head of ‘Ille et Vilaine’.

This wind farm could thus reappear.

These windmills would tower at 250 metres (the average altitude of the installation site is 100 metres) and would be located only 4 kilometres away from those of Argouges. From the installation site, there is no doubt whatsoever that MSM can clearly be seen.

3. **TREMBLAY: 4 x 140m windmills (HEBP), ‘Ille et Vilaine’ Administrative District**

The request for a building permit dates from 21 June 2010 and was lodged by the VSB énergies nouvelles promoter. This project is similar on all counts to the St Ouen la Rouërie project, and the two projects are only 3 kilometres apart. The same impacts on the marshy landscapes of ‘Marches de Bretagne’, the valleys of the Couesnon River and its tributaries as well as historic monuments apply here. Given the Ministerial Decree dated 23 April 2007, the site has been acknowledged as a fragile ecological site in terms of the local bat colonies and this alone should guarantee that the project is rejected. Even though it is located approximately 23 kilometres from MSM, the site will be visible from there because of the flat landscape and also due to the fact that the windmills will be installed at an altitude of 230 metres. There is also the cumulative effect of the 3 wind farms to consider, a total of 9 windmills which would have a catastrophic impact on the overall views from MSM.

This is an opinion shared by SDAP 35 (*local Architecture and Heritage Commission*) who also handed down an unfavourable decision. The public enquiry into the matter ended on 17 December 2009 and led to local and national mobilization against this project. All the opinions recorded in the Enquiry Ledger are unfavourable to the project, the only favourable opinion being that of the Municipality of Tremblay. As in Saint Ouen, no ZDE (*Economic Development Zone*) has been granted to date. However, we are waiting for the decision of the Administrative Head (*Préfet*) of ‘Ille et Vilaine’ and are very worried, as the elected officials of the collective municipalities are determined to have this wind farm set up and are strongly pressuring the French State to this end.

Therefore, this wind farm may well be approved and even if it is rejected, an appeal may still be lodged by the promoter.

The 3 proposed wind farms of Argouges, Saint Ouen la Rouërie and Tremblay were subjected to computer generated images in terms of the views from MSM by the ARTHA Architects Company on the basis of the farms’ GPS coordinates. The computer images clearly show the visual impact that these 3 wind farms would have when viewed from MSM and their strong negative impact on local panoramic vistas.

4. **WIND FARM DU BAZOUGEAIS, 13 x 150m windmills located in the municipalities of Bazouges la Pérouse, Noval sous Bazouges and Marcillé Raoul in the ‘Ille et Vilaine’ Administrative District.**

This large scale project, located on both sides of the major 796 road between Bazouges and Combourg has been developed by the ENEL ERELIS Company; the application for a building permit was lodged on 27/06/2007. In this instance

also no ZDE (*Economic Development Zone*) has been set up by the Administrative Head (*Préfet*)'s office. The public enquiry was undertaken with the utmost discretion at a time when our association had not yet been established; the investigator who was biased towards the project gave a favourable decision. The District Equipment Headquarters and SDAP 35 handed down unfavourable decisions. The project will definitely be visible from MSM which is located 20 kilometres away, at least in the case of the 7 windmills located in Bazouges and Noyal. The permit was rejected overall on 10 April 2008 by the Administrative Head (*Préfet*)'s office but very weak reasons were provided in support of his decision: "The project would damage the character and interest generated by neighbouring sites". Insofar as the Marcillé wind farm is concerned, the refusal provides stronger grounds, citing the impact on the Castle of Combourg and the fact that the two parts of the wind farm of Trémeheuc will be visible from one another. Trémeheuc comprises 6 x 120m windmills located along the same major road before arriving in Combourg. The impact on the views from MSM are unfortunately never mentioned, even though it is beyond doubt and indeed is even acknowledged by the promoter, specifically during a sub-district heads' meeting in Fougères on 15 May 2008 which I attended, where he stated that "they are not a nuisance" and that he "wishes to negotiate with the Administrative Head's (*Préfecture*) office". Enel Erelis then lodged an appeal before the Administrative Court of Rennes against the decision handed down by the Administrative Head of 'Ille et Vilaine'; the hearing should take place shortly. Our association was established after the building permit lodgement date and was therefore unable to intervene in these proceedings, which is why I do not have any further information on this issue, even though I imagine the promoters have tried to negotiate by offering to slightly lower the height of the windmills. **This wind farm comprising 13 x 150m windmills may therefore be newsworthy again in the very near future.**

5. **WIND FARMS OF BAGUER-PICAN AND LA BOUSSAC: 6 x 150m windmills.**

This project was developed by the same promoter Aérowatt as in the case of Saint Ouen la Rouërie, and at the same time. It is located 17-18 kilometres away from MSM, towards the West and will undoubtedly be visible from MSM. It will have a negative impact on a number of historical monuments such as the Dol Cathedral in Brittany and other exceptional sites such as Mount Dol. The permit application was lodged on 29 June 2009 in the form of 2 building permits for 3 windmills each. The investigator handed down a favourable decision in both instances, but the DIREN (*Local Environmental and Land Planning Organization*), SDAP 35 and the DDTM (*District Office of Territories and the Sea*) handed down unfavourable decisions.

The 2 building permits were refused by the Administrative Head's office in 'Ille et Vilaine' on 22 January 2010 and the reasons for the refusal were well documented, stating in particular the visibility of MSM from the site and the visibility of each wind farm from the other.

The computer generated images created by the Artha Architects Company at my request clearly show that these 6 windmills will be visible from MSM. The promoter lodged an appeal before the Administrative Court of Rennes, similar to the one he lodged for Saint Ouen la Rouërie. Therefore, these 2 wind farms comprising 6 windmills in total may well reappear. It should also be noted that in relation to this site, the local population has hardly been mobilized at all.

This is the worrying context documented by our association to date in relation to very tall windmill projects around the area of the Mont Saint Michel.

NB: COMMENTS AND OBSERVATIONS IN RELATION TO THE WIND FARM OF Trémeheuc ('Ille et Vilaine' *Administrative District*).

This wind farm comprising 6 x 120m windmills HEBP (80m for the mast and 40m for the blades) was finally installed in March 2008 by VSB Energies nouvelles, although it had been authorized to begin the installation on 22 September 2005.

Located to the South-West of Mont Saint Michel, it is regularly quoted as an example. In actual fact, this wind farm exhibits very different features from all the others referred to above. Contrary to what is being said, it is in fact visible from MSM, and is also visible from Avranches, but because it is located in a South-Western direction, one often sees it poorly in the afternoons due to the sun's glare. Located at 100 metres of altitude, it is 26 kilometres away from MSM, which is much further than any of the other projects planned around MSM. The geographic location of the wind farm is also quite different since this site is located behind a large plateau at 100 metres of altitude and spreads out over several kilometres.

Its main impact may be felt around the Castle of Combourg, which is where the French writer Chateaubriand was born. The Trémeheuc wind farm, which is only 4 kilometres away from the castle, would be highly visible from the top of the castle's towers. The SDAP (*Administrative District Architecture and Heritage Services*) has in fact issued an unfavourable decision due to this very impact.

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