Comment by F.J.R.Brown IP No. 20044329 For submission by Deadline 4 of the EN010117 Rampion Wind Farm Examination

Comment:

This representation is made in response to the discussion around Item 6, and in particular sub-sections (b), (c) and (d) of the Item Specific Hearing on Thursday 16th May.

The South Downs National Park has concentrated on its list of Special Qualities, but discussion has been largely concerned with experiences available INSIDE the park.

And as its remit is within the boundaries of the park, it is proper that the Authority is concerned principally with how external pressures and operations as well as interventions inside the park would impact on the Special Qualities and also on how visitors and residents would experience the Park.

But this fails to recognise fully one aspect of the Primary Special Quality of the Park – "Diverse, inspirational landscapes and breathtaking views" - that probably accounts for a large part of the Park's Appeal:-

The Qualities of the Park as viewed at a distance from outside its boundaries.

These are the Qualities that have been particularly pointed out and identified by the keenest proponents of these landscapes and coastlines. It applies in a very significant way to the Heritage Coast.

And they are the Qualities that are most sensitive to degradation of the Setting of the Park.

The Applicant was at pains to point out how the view FROM the Heritage Coast had influenced the design approach, but it was clear that the appearance of the edge of the Park, the actual Heritage Cliffs, that Iconic feature that gives the coast such meaning and appeal - just did not figure.

The existence of the Internationally Significant views TOWARDS the Park, from the sea and from the air - was completely ignored.

This is the coastline loved by Rudyard Kipling (of Rottingdean) and Hilaire Belloc ("*The great hills of the South Country, They stand along the sea*") including the hilltop above Goodwood and at Halnaker Mill - the location of another of Belloc's poems.

And then there is the Land Side of the Park, the northern escarpments and hilltops viewed from the Weald.

The shock of seeing the simulated outlooks from Viewpoints 26 Low Weald, 31 Butser and 47 High Weald is particularly unsettling because the (pulsing) red navigation lights visible in the night views are mounted at little more than half the total height of the sweep of the turbine blades - which are bound to be visible and, thanks to their rotation, noticeable at least part of the time.

Viewpoint 47 is very close to what Hilaire Belloc would have seen from his windmill at Shipley, which is just a few miles to the west.

What always seemed to be a magnificent natural barrier is suddenly diminished from Belloc's "Great Hills" into a pathetic green heap outscaled by human interventions. The Rampion 2 wind farm will have an impact on at least five actual Marilyns¹, and many kilometres of other hilltops that are more than 150 metres above sea level. The sight of red pulsing lights at night and rotating, glinting blades by day extending upwards a further 140-odd metres above the top of the Downs is certainly a fundamental change to the setting of the Park.

The Applicants are either unaware of these effects (as seemed to be the case with the Heritage Coast) or simply chose not to point them out.

Referring to the "Chaotic" disruptive appearance of the turbines highlighted by the SDNP Authority, and the Orthogonal layout adopted for the planning of Rampion 1, RED's explanation of their efforts to improve the design and lower the impact through the introduction of gaps (actually necessitated by Shipping considerations) and extending the orthogonal grid did nothing to reduce the concerns.

In fact, the Qualities that increase visibility and noticeability are...

- Changes in size
- Gaps in the clusters
- Changes in density of the arrangement caused by differences in perspective in the orthogonal alignments along the two grid axes which are extremely obvious and variable from any particular viewpoint.
- Rotation of the sweep blades

These, and the design decision to place the turbines that extend westwards along the Bay from the existing Rampion wind farm at the same distance from the shore as the nearest existing turbines rather than in line with the furthest turbines that would be installed south of the existing arrays, do not reduce the impact, but increase it.

Placing 325 metre tall turbines at, and close to, the inner boundary of the array would MAXIMISE impact, increase the tendency of the rotating blades to catch the attention of observers, and amplify the natural perceptual tendency to mentally enlarge objects near the horizon.

Footnote 1:

Maybe best known to hill-walkers, the term 'Marilyn' used here is the English equivalent of a Scottish 'Munro', which is a 'top' that's higher than 3000 feet (approx 900 metres). A Marilyn is a significant destination hilltop that stands more than 150 metres above surrounding land on at least one side. Much of the South Downs is more than 150 metres above sea level, but not that high above surrounding land, e.g. Cissbury Ring, Harting Downs, Devil's Dyke, Wilmington Hill

There is a Wikipedia page "List of Marilyns in the British Isle" which has a map that shows the positions of the five Marilyns referred to above.