Comment by F.J.R.Brown IP No. 20044329 For submission by Deadline 6 of the EN010117 Rampion Wind Farm Examination

Having watched the proceedings of the Examination, and attended one of the Hearings, I have this comment to make at these closing stages.

I recently travelled in a loop around the Britain north of London, taking in a fair amount of the coast from the Solway Firth around northern Scotland and back down the East Coast, and took notice of onshore and offshore Wind Turbines along the way. The last time I did anything like this was about twelve years ago, when there were already a number of fairly large wind farms from the Wirral up to Galloway, and out into the Irish Sea, and also off the West Coast from Northumbria to Lincolnshire.

Even now, these windfarms are mostly populated by turbines no larger than the ones of Rampion 1. Some of the earlier, smaller ones are quite close to shore, but in the Irish Sea there are wind farms that are 40 kilometres and more offshore, which is possible because the entire seabed area lying east of the Isle of Man from Colwyn Bay to the Solway Firth is relatively shallow, from 20 metres to 50 metres deep. Likewise, on the East Coast, there are areas such as Smith Bank off the Moray Firth where there are shallows about 40km off the coast, and of the Tees about 25m deep where there is already a sympathetically-scaled wind farm, and very large areas of shallows off the Lincolnshire and North Norfolk coasts. And of course the Dogger Bank, which is doubly blessed with distance and excellent Wind Density.

What was particularly noticeable was that the least obtrusive and sympathetic offshore installations were the ones that formed compact bunches rather than straggled along the coast. These farms may have had orthogonal layouts, but did not seem to, because no straight-through lanes were evident.

The compactness meant that the angular inclusion was modest, and that there was smooth naturalforest-like texture to the arrangement which avoided the attention-grabbing man-made serried rows and gaps that are already a feature of the existing Rampion installation.

The Rampion 2 layout is the antithesis of this.

But the factors that make the Sussex Bay, and for that matter the whole of the South Coast of England, a far-less-than optimal location for windfarms are...

a) The Poor Wind Density and

b) The narrowness of the seabed that is of a suitable depth. Unlike the far more suitable areas referred to above, the problem with the Channel is that, before the catastrophic break through the sent the waters of the north sea tearing out into the Atlantic, scouring out the Channel into the form we know it now, this was the Rhine Valley, into which all the Rivers along the South Coast flowed as tributaries. So, about 20Km off shore, not far beyond the southernmost turbines of Rampion 1, the sea floor drops rapidly away into the 80 metres deep Northern Paleo Valley, further complicated with vestigial valleys of the Adur and Arun Rivers.

The consequence of this is the need to crowd any Wind Farm in this location into a strip that is unreasonably close to the shore.

This proposal should abide by the standards laid down in the OESEA buffer distance tables, but all but the furthest turbines from shore fail to do so - even for Turbines with a maximum rotor height of 225 metres. But the proposed turbines would be much taller, potentially 325 metres. Proportionally, if 225 metre tall turbines should be 33 to 40km off shore (OESEA4) then 325 metres turbines should be at least 48 to 58 kilometres away from the shore

Compare this with the London Array, the largest in the world, designed about 2011, which comprises 150 metres tall turbines, the closest of which are 20 kilometres from the shore. Again proportionally, this is equivalent to 325 metre tall turbines at a distance of 44 kilometres.

But Rampion 2 is not only closer to shore than it should be, it is proposed to use the largest turbines ever installed in the British Isles. And its extent will have an adverse effect on the settings not only on a National Park and a Heritage Coast, but also on numerous Listed Buildings and Conservation Areas in a number of seaside resort Towns and a City along the Sussex Bay. Proposals by RED to mitigate these effects on, for instance, Brunswick Terrace and similar regency and Victorian parts of Brighton and Hove, are at best minimal, and seem in some way to aggravate the negative effects.

The Change of Attitude of Brighton and Hove City Council towards this proposal compared with its support for the Rampion1 scheme is an indicator that even the smaller original scheme has signally failed to fulfil the promise that was heralded for it, and instead seems to have produced negative effects that the council feels justifies a large Compensation Claim.

However these Negative Effects will persist for the lifetime of the installation - and probably beyond, depending on how quickly and effective it is decommissioned and dismantles. How can adequate compensation be given to a complete generation deprived of those features - both material and therapeutic, that contribute to the wellbeing of the many visitors and families who visit the area for the uplifting benefits of the seaside, not merely to spend money in the area - the very features that transformed Brighton for a small insignificant Fishing Village into an internationally-renowned Resort?

Brighton, Hove and many other smaller Resorts exist because of the Seaside and its unique special qualities. the adjoining National Park adds to these qualities with its own mix of similar and different places and experiences. These experiences have been there for all, especially the experiences of the sea and coast and seascape and landscapes themselves, which are available to all, however rich or poor, and particularly for the many deprived and mentally troubled people who tend to be concentrated in seaside towns.

None should be subjected to the largest, closest turbines in the Country. The European Convention on Landscapes and the OESEA recommendations should be enforced to protect these Regional and National Assets.

Rodney Brown