



SOUTH DOWNS NETWORK

Working for the best possible National Park

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Chair: Dr A Whitbread

Chris Tomlinson
Rampion Project Manager
E.ON UK Ltd
20 New Road
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7 August, 2012

Dear Chris,

South Downs Network – 2nd consultation response to Rampion wind farm proposals

The South Downs Network is a group of community environmental, conservation and recreational organisations that have come together to work for the best possible South Downs National Park. It comprises nearly 50 organisations, although some of these bodies are networks themselves, so the effective membership is much wider.

The South Downs Network welcomes the small extension to the 2nd consultation from 6 to 8 weeks, but stands by its previous comments that 12 weeks would have been more appropriate for a project of such significance. The Network is also grateful for a hard copy of all the documents. However, the South Downs Network is extremely concerned that nowhere within the draft Environmental Statement is there any discussion of the need to minimise the impact on the South Downs National Park. E.ON has a legal duty to have regard to National Park purposes under Section 62 of the 1995 Environment Act, yet it does not appear to have fulfilled its obligations. This is a serious concern.

In addition to its comments made in response to the first round of consultation when little data was available, the South Downs Network would to make the following further points on the proposals:

1. The Network is extremely disappointed with the level of detail provided around the permanent visual impact of the proposals, particularly on the Heritage Coast. It previously highlighted deficiencies in the information given to the public, but this concern does not appear to have been properly addressed in this consultation. While there are many viewpoints provided, relatively few of these have had photomontages mocked up for them. However, even where photomontages have been produced, they are of poor quality, making it hard to determine the exact visual impact.

2. In addition, the small maps provided for the Zone of Theoretical Visibility, are at such a poor scale and quality that it is difficult to fully determine the impact on the ground and the difference in impact between the two types of turbines. Given that there is a difference in tip height of 30m between the smallest proposed turbine and the largest, this difference could play an important part in minimising impact on the National Park.
3. The Network is concerned that the visual impact assessment found that the overall impact was greater for Brighton beach than for the Heritage Coast. While it is accepted that more people will be on Brighton seafront at any one time compared to the Heritage Coast and that the spread of turbines on view will be greater (although they could be obscured by the Palace Pier in places), people's expectation in these two areas will be very different. On Brighton beach, people are not coming to appreciate a pristine area of countryside, with few incongruous features, as they do for the Heritage Coast. They are coming to enjoy the many attractions in the area, of which the seascape forms one small part. As a consequence, the Network is concerned that the impact on the Heritage Coast has been significantly understated.
4. The Network is concerned at the downplaying of the impact of the wind farm on the National Park and in particular the Heritage Coast. Dismissing or downplaying concerns about the impact because the top concerns for visitors in previous visitor research (nothing to do with Rampion) listed parking, traffic and litter is disingenuous and misleading. It undermines the soundness of the draft Environmental Statement.
5. The Network is extremely concerned about the choice of the underground cable route and that there has been inadequate consultation over this route with local stakeholders. Despite representations made during the last consultation and assurances that more information would be made available this time round, the Network can find little additional detail. The reasons for choosing the preferred route are still largely based on assertion with little supporting evidence. Alternative route options, as would be presented for a new road, have not been produced along with detailed information showing where the constraints are and what problems these presented. Certainly, the route has not been designed to minimise its impact on the National Park and this is worrying.
6. Finally, the South Downs Network is concerned that E.ON has failed to appreciate the importance of the South Downs Way, both as a recreational facility and an important economic asset for the area. As such it should remain inviolate, and remain undisturbed and open at all times, as is being proposed for National Cycle Routes and roads elsewhere. Indeed, given the fact that the South Downs Way, itself a Regional Cycle Route (89), is probably better used and more important economically than the National Cycle Routes in the area, it is odd that E.ON is not proposing to treat it in the same way. This provides further evidence that E.ON has failed in its duty to have regard to National Park purposes.

If you require clarification on any of the above, please do not hesitate to get in touch.

Yours sincerely,

Dr Tony Whitbread

Chair, South Downs Network