



**Written Representation by MOSCA (Middleton on Sea Coastal Alliance)
Our views on how the Rampion 2 DCO Application should be examined re Landscape,
Seascape and Visual Impacts
Pre-Examination Procedural Deadline of 16 Jan 2024**

15 January 2024

Dear ExA Members,

This written summary responds to the Rule 6 Letter and Annexes issued by the Examination Authority (ExA) on 14 December 2023 requesting views from Interested Parties about how the Rampion 2 Application 2 should be examined.

We value this opportunity to offer comments on how we believe this case-specific Rampion 2 Examination could be beneficial to mitigate and re-assess the Application.

We include a 2-page Summary of our Submission. The latter will give more detail on the context, policy relevance and Principal Issues we would like to see given weight and accommodated in the Examination.

We also note the ExA has indicated in the Rule 6 Letter and Annexes that:

- The Examination is principally a written process.
- Written representations carry equal weight to oral representations.
- Members of the ExA may publish questions on principal issues and issue-specific hearings that all Interested Parties (IPs) may respond to by given deadlines.
- IPs may offer comments on other Representations at any time, and
- Issue specific hearings have yet to be defined and announced.

Co-Chairs and Founding Members

Melanie Jones

Mike Visram

MOSCA (Middleton on Sea Coastal Alliance)

<https://Mosca.click>



MOSCA Middleton on Sea Coastal Alliance

IP Number 20045287

Seascape, Landscape and Visual Impacts

A summary of Written Representation issues

Co-chairs: Melanie Jones and Mike Visram

1. Significantly, No visual aids have been provided to the community from the developer that could have given a fair representation of real life animation or static representation of the large-scale construction – 2 ½ times the height and differing diameters than Rampion 1. As a result, no reasonable discussion has taken place, and understanding of the actual impact on the visual amenity cannot have been realistically understood by the community to enable engagement with the project. Consequently, no alternative placement of the turbines or a possible rethink in height, or clear horizon space, has been part of the consideration of the project. The critical socio-environmental impact to the area would be felt by both current and generations to come of residents, visitors and as well as the perception of the South Coast and mental health benefits not least in the economics of opportunity costs. All this without reasonable or adequate visual-consultation to explain the extent to which the actual impact will be seen.
2. Rampion 2 could, therefore, seriously undermine rather than offer a positive sustainable development in the Sussex Bay and associated area based on the proposed location, and large-scale construction which would impact significantly on social, economic and environment.
3. We request a within project discussion of alternative siting/placement and number of the turbines within the array in effect to break down and mitigate the extensive ‘fencing in’ that is proposed to take in the entirety of the line of the horizon (left, front and right). We believe the evidence clearly indicates construction and operation of Rampion 2 will debase the natural beauty of the Sussex Coast both inward and outward facing and put pressure on projects started for re-invigorating the marine environment, including kelp restoration after the ban on inshore trawling and biodiversity improvement efforts on land such as interrupting biodiversity corridors.
4. The location inshore in the Sussex Bay does not respect the Government’s strategic environmental advice on where the preferred location should be for such huge turbines such as Rampion 2 to avoid unjustifiable several social, environmental and economic detrimental impacts in coastal areas and undermine the protection of designated landscapes.
5. We ask for the consideration of alternatives for low emission generation is a policy requirement for the Rampion 2 DCO Examination. Alternatives need to be considered that offer more value for money for UK society, more than Rampion 2 across all policy metrics to help deliver energy security with reliable, affordable low-emission electricity supply, and to decarbonise the power sector by 2035 – without the same quantum of adverse impacts.

- 6.** We ask that proper consideration and mitigation is made to the the side-by-side arrays of Rampion 1 and 2 at vastly differing heights that will make the skyline a dense and chaotic mix of moving rotor sweeps. The Rampion PIER severely underrates the open sea and sky benefit which are features of this coastline and a particular benefit of mental wellbeing. This alone makes a significant loss of area benefits to a local population and possible visitors and tourists.
- 7.** We ask that careful thought is made with the proposed array regarding the required flashing navigation lights that – particularly at night will shorten the line of sight, creating what appears to be a physical enclosure and it will be impossible to see through to an open horizon.
- 8.** The proximity and scale of the proposal means there will a significant negative impact on almost the entire South Downs National Park and Seven Sisters Heritage Coast, both of which are due protection under National Parks and Levelling Up Legislation. Substantial weight should be given to fully applying existing OESEA visual buffers, specially the 25m (40km) distance of turbines over 225m tall from designated national landscapes and highly sensitive visual receptors (people).
- 9.** The Application must not breach legal or treaty obligations and any adverse impact of the proposed development would outweigh its benefits (The PA2008 is clear, in making a decision, the relevant Secretary of State ‘must decide the application in accordance with any relevant NPS’, s104(3), subject to certain provisions).
- 10.** Referencing the last paragraph - The Examination, therefore, should fully respect the legal treaty of Obligations under the European Convention on Landscapes that conjoins protection of Sea/Landscapes as reflected in the OEASEA Strategic Advice on provision of visual buffers. Reinforced by the Marine Policy Statement (2021) and again by the 2023 Levelling Up and Regeneration Act.