



MOSCA Middleton on Sea Coastal Alliance

IP Number 20045287

Seascape, Landscape and Visual Impacts

**Written Representation to the Rampion 2 Examination Authority
(ExA) on the Development Consent Order (DCO) Application**

**Important Issues underlining: Seascape, Landscape and Visual
Impacts**

Co-Chairs: Melanie Jones and Mike Visram

Submission date: 28 February 2024

We add, within this Written Representation, to three major aspects of the development referenced in our Summary 15 January 2024, and following on from the Hearing in Brighton starting 6 February 2024 – we have tried to flesh out sparingly the information that has been repeatedly offered to PINs during the process to indicate how important these issues are to Local people, Businesses, Visitors and the surrounding areas. The impact of this proposal will be a significant industrialisation of the open sea for at least 25 years!

- The critical importance of the **visual impact** on those who live, work and visit the area that are forced to 'host' this development and will feel the impact and loss of amenity of the proposed scheme 24/7
- The continuing **lack of visual interpretation** required from the Applicant, that would ensure a fair considered decision on the application. 'The visual animation hidden from public view'
- The importance of giving weight to applying **OESEA 4 visual buffers compliance** re Seascape, Landscape, and Visual Impacts regarding turbines over 225mtrs tall.

We believe all three concerns are highly important to the possible consent to the proposed development and need careful consideration.

Visual Impact:

The importance of identifying the visual impact caused by the physical presence of the suggested larger/taller turbines suggested for Rampion 2 on the mental health of those living, visiting and working in the area specifically regarding the life changing impact that the in-shore generating equipment will visually present from shore to horizon, as the effect extends across the entirety of the curve of the Sussex Bay and how this will transform the coastline both visually as well as its lifestyle implications to those who live and visit the area. Mental wellness recognizes the integrated and holistic nature of our health and wellbeing has tranquillity at its core. The state of our mind affects our body and vice versa. This imbalance has been recognised as a precursor to depression and is viewed to be a national concern.

The Sussex Bay forms a Natural Amphitheatre, and its landscape will seriously maximise the overlooking of the expanded arrays of both the Rampion Wind Farms. The entire length of this coastline has an historic and continuing link as a destination for recreational, remedial and retirement purposes, much of which is primarily attracted to, and influenced by the nature of the seascape.

The visual appearance of the proposed Wind Farm will have a negative consequence on the setting and outlook of the National Park and Heritage Coast, and on businesses that depend on the qualities of the visual attraction and openness of the seascape, and too as earlier stated, on the mental welfare of residents, both retired and active, and of the many visitors who come to the area to benefit from its natural appeal to get away from urban life.

- A. A serious consideration is whether the existing visual impact of the open ocean as it currently exists has characteristics that will significantly be altered by the introduction of new visually industrial structures giving a very different aspect of the open sea and coast and therefore cause a significant change to the character.
- B. Therefore, time must be taken to assess the balance between any beneficial and destructive impacts on the existing characteristics that are traditionally expected of this area and how this will affect residents and visitors if these characteristics of the Sussex Bay and therefore Coastal Sussex are irrevocably changed. To be able to do this there has to be a true-life visual animation of the proposed structure.
- C. The added visual disruption caused by placing two farms with substantially different heights and spacings side by side and overlapping rather than adopting a uniform size overall must be considered.
- D. The Therapeutic value of the seaside was revealed and highlighted in 2020 and 2021 when a very widespread feeling of holiday deprivation after the 2 years of lockdown became evident, and large numbers flocked to the coast. This period was associated with elevated levels of mental difficulties, which is still being re-evaluated. Through the lock-down periods every seaside promenade was thronged with health-walkers throughout every day, clearly drinking in the sight and scale of the seascape in whatever state it was at the time.
- E. During the piling and construction phase and continuing onwards there will be significant Turbine-kill washed up on the beaches whether mammal, birds, bats, or

insects. Likely many creatures not only dead but in some cases, dying. The height and scale of the turbine array of Rampion 2 being the cause particularly so close to the shore. The important ecological issues are not covered in this Representation, but the human reaction to both will be devastating and will concern many when thinking of walking, taking their children or dogs to the beach or engaging in any beach recreation.

Lack of Animated Visuals

As we have previously stated in our Registered Representation - **no visual representation has been 'made available' by the applicant, at any time during the consultation process nor so far during the Examination though requested by PINs.** Static visual representations of turbines produced by the Applicant were buried in volumes of the PEIR (Volume 16 and Volume 18), and otherwise not highlighted in any meaningful way in the Applicant's Zoom consultations or web videos and therefore not openly available. The PEIR included 'wireframe' representations of the views from various viewpoints, however these are highly diagrammatic, and are nowhere near as lifelike as the animations produced by *Protect Coastal England*, and consequently seem much less of a concern than the truer impressions given by the PCS animations.

The absence of visual animations and adequate static representations of turbines in virtual engagements, in on-line videos and in the PEIR offered as a basis for consultation; compounded by failure to meet standards for "Visual Representation of Wind farms" (SNH, 2017) which the Applicant says were followed. **Why were realistic animations not offered by the Applicant, or required by Authorities, and why the absence of visual animations were not picked up by Councils who had sight of the draft SoCC and other PEIR methodology material (not available to the public) is a concern that needs to be addressed.** Considering that the same critique of inadequate visual representations was made on the Navitus Bay Wind Park Application by Councils, on a project that was refused consent in 2015 the procedure fails to be consistent.

The Rampion 2 PEIR did promise more appropriate images of the seascape than the winter-time images included, but these have not been forthcoming. Likewise, no simulations have been provided that offer realistic representations of the views from points on land. Similarly, no illustrations or simulations have been produced to show the night-time impact of the flashing Aviation Lights viewed from the National Park and elsewhere particularly from the beach front. This makes it hard to assess the impact of the Wind Farm. The Rampion 2 PEIR recognises the importance of uninterrupted sea views from the Heritage Coast and the South Downs National Park and recognises that the proposed Wind Farm will have significant effects, but then seems to suggest that this is of little consequence since Rampion1 has been in commission since 2017 and has already degraded the "stunning panoramic views". In fact, during the consultation the Applicant did not provide printed copies of the any visualisations. When a request was made for printed copies at the right scale, the Applicant responded that the PEIR was available to be viewed on-line only. It is fact that visualisations on screen are not sufficient to view adequately such a proposal.

The applicant was still unable to present either indicative drawings or animated real-life visual representations for the Hearing that took place in Brighton on 6 February 2024. We understand they 'did not have time to do so when requested' by PINs. **To our knowledge this lack of visual aids continues to be absent from the crucial information that is needed to enable, both residents and PINs to evaluate fairly the impact of the suggested array (two and half times higher and the rotor sweep much wider than Rampion 1) giving this project a highly significant structural and visual footprint.**

It must be noted that the PEIR on which the consultation was framed fails to provide a realistic indication of what a large wind farm extending along the Sussex Coast may look like to thus enable residents to appreciate the sheer scale, expanse, and significance, or for residents and all interested parties to compare that visual representation with their knowledge of the existing and far smaller Rampion 1 installation. The question still stands of an adequacy failure by the Applicant who state in the PEIR that they have followed the accepted standards for "Visual Representation of Wind farms" (SNH, 2017) to generate their Rampion 2 consultation materials. So, it is a PEIR adequacy failure as well as a consultation adequacy failure that is still obstinately unchanged and still a lynch pin for consent in our opinion.

The PEIR underrates the value of the empty ocean and sky in all their transient variations as a feature of the coastline and seaside settlements that contributes enormously to the mental welfare of a large section of the local population as well as to visitors and much of the region.

Again, there is no illustration or simulation of imaging provided in respect of the Red Aviation Lights, nor any mitigation of light density suited to differing weather conditions. At night the 'fencing in of the open seascape will be highly significant making the view out to sea one of a penal colony!

The much smaller Rampion 1 Wind farm is highly visible at night under conditions of good or moderate visibility. For some years after installation the pulsing was synchronised across the whole field. It has been noted that synchronisation has now been lost, so the appearance is of a constant rippling of many red points of light. There would be concentrations of aviation lights at Eastern and Western ends of the Rampion 2 array.

Additionally, all views of windfarms can suffer from the effect caused by the parallel rows of turbines, so that parts of the array appear uniformly spaced, whereas other parts align into ranks so that only the nearest turbines of some rows are visible with large gaps between the ranks – which makes the whole array appear as disorganised random series of interruptions to the seascape, which is far more intrusive than an evenly spaced and sized set of masts.

The Rampion 1 offshore wind farm was given development consent in July 2014. The development control order (DCO) specified that no turbine would exceed 210m above LAT or exceed a rotor diameter of 172m. These size limitations were almost certainly fixed because of concerns of Visual Impact. The proposal for Rampion 2 does not provide any justification for the proposed much larger turbines other than economic and evolving industrial capacity considerations.



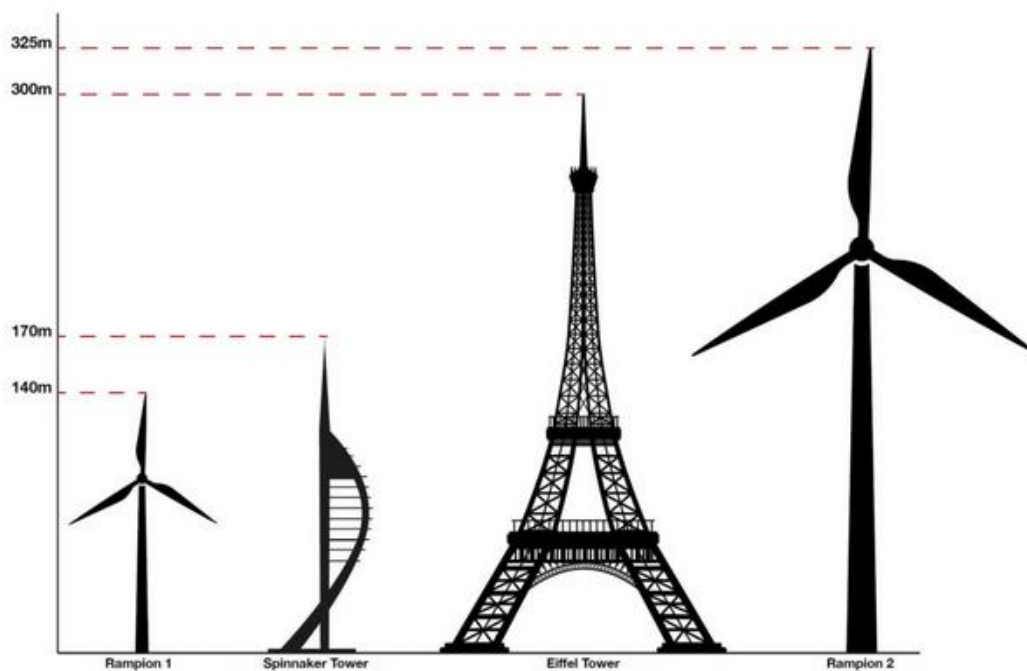
This photograph below shows the current open Seascape facing out from Middleton on Sea Beach



Below is a suggested representation of a 'visually enclosed' horizon – the array spread across the entirety of the Bay without 'free sea/sky space' this photo does not show the shocking impact when backlit by the early morning sun which already gives Rampion 1 a high level of 'skeletal industrial forest' impact as outlined starkly in black against the far horizon nor is there sight of the proposed array at night with intermittent flashing red navigation lights set at the top of the turbines



The illustration below shows a direct comparison between both Rampion1 (140mtrs.) and Rampion2 (325mtrs.) turbines against The Spinnaker tower and Eiffel Tower.¹



NB: The turbines will be higher than the 310mtr Shard building in London – up to 90 of them – Imagine this infrastructure development side by side or sporadically placed along the Thames!

We note the visual animations produced by ***Protect Coastal England*** (PCS) which is available online² and which sets a good benchmark for the Applicant to match and incorporate. However, they are not referred to by the applicant or by Councils or in local media.

OESEA Visual Buffer Compliance:

The proposal does not comply with legislation underlying National Parks, nor with the Government's Offshore Energy Strategic Environment Assessments.

It is important to note that the £3-4 billion Rampion 2 scheme, as proposed by the Applicant, a German-based multinational, would not be permitted under German law (the WindSeeG - Offshore Wind Act, 2017). Nor does it respect the DCO issued in 2014 for the smaller Rampion 1 installation as regard to the height of any additional turbines in the area being no more than 15 percent taller than Rampion 1, such as by an extension project.

Our understanding is that The Examination, has a duty to respect the legal treaty of Obligations under the European Convention on Landscapes that conjoins protection of Sea/Landscapes as reflected in the OESEA Advice on provision of visual buffers. Reinforced by the Marine Policy Statement (2021) and again by the 2023 Levelling Up and Regeneration Act.

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 deciding, the relevant Secretary of State 'must decide the application in accordance with any relevant NPS', s104(3), subject to certain provisions). The Government's Offshore Energy Strategic Environment Assessment 4 (OESEA4) and the White Report, that limit the installation of Turbines over 225m tall to locations not less than 33-40 kilometres (20.5-25 miles) distant from National Parks and similar sensitive features, should apply in full to this scheme. UK Government's own Offshore Energy SEA (OESEA) as the strategic environmental advice for visual buffers it offers, which we understand apply to Rampion 2.

The White Report "*White Consultants 2020 Seascape and Visual Buffer study for Offshore Wind farms*" was commissioned by BEIS and is incorporated into OESEA4.

As well as considering other, often location-specific, factors, the report quantifies the Visual Impact effect of wind farms by considering Height of Turbines, Distance from Shore, Spacing of Turbines and Proportion of Horizon occupied by the array.

²<https://www.protectcoastalsussex.org/windfarm-animations>

The report reviews “Offshore Wind Farms”, which includes a few older arrays that are technically closer than the Inshore Boundary – however, these older turbines are much smaller than any current installations and are often around 100m tall.

The Rampion 2 proposal is for turbines up to 325m tall, and nearly all would be technically “Inshore”, and the East-West size of the new arrays would mean that a considerable length of shore between Shoreham and Bognor Regis would be faced with a forest of turbines that filled the centre of the horizon. At the centre of this length of shore, around Ferring to East Preston, more than half the panorama would be blighted.

OESEA4 and the White Report limit the installation of Turbines over 225m tall to locations not less than 33-40 kilometres (20.5-25 miles) distant from National Parks and similar sensitive features. The closest inshore rank of the Rampion 2 proposal is only 13 kilometres (8 miles) from the shore.

When the first Rampion Wind Farm was proposed, both the National Trust and Natural England raised objections because of expected destructive interaction with the Heritage Coast. Neither body was satisfied by the small concessions that were made. Revisions to the original proposals (as considered in the PEIR) were included in the scheme published in October 2022, but considering the Order of Magnitude difference between the impact of the 140 metre Rampion 1 turbines and that of the 325m Turbines proposed for Rampion 2, the effect of the October Revisions would be at best marginal and not even register as an amelioration.

And although Local Planning Authorities only control development on shore, Section 7 of the Arun Local Plan sets out the requirements for the Protection of landscape character (Policy LAN DM1). In particular, “Development within the setting of the South Downs National Park must have special regard to the conservation of that setting, including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations.”

While it is accepted that for some of the time visibility is limited so that the turbines may only be partially visible or completely hidden, nevertheless the proposed larger turbines are likely to be visible for more of the time as an effect of their greater height, as they will more often be visible above mist and fog banks. The bigger turbines of Rampion 2 would be more than twice the height of the Rampion 1 generators, and the width of the masts and sweeps would be in proportion, meaning their visibility at a distance would be much greater. The existing turbines are regularly clearly and distinctly visible from 25 kilometres. It is likely most of the Rampion 2 array will be frequently visible from the Isle of Wight and Beachy Head.

This Written Representation does not have references or to the great extent footnotes, it tries to illustrate, at a human level, the need for these 3 major aspects of the development to be fully considered as the locality will have to live with the visual and physical impact of what may be agreed for the foreseeable future.



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to**

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- The critical importance of the **visual impact** on those who live, work and visit the area that are forced to 'host' this development and will feel the impact and loss of amenity of the proposed scheme 24/7 The impact on mental health and enjoyment of the beach and seascape contradicted by the urbanisation of the open sea, in effect fencing in the openness of the seascape.
- The continuing **lack of visual interpretation** required from the Applicant, that would ensure a fair considered decision on the application. 'The visual animation hidden from public view'

- The critical importance of giving weight to applying **OESEA 4 visual buffers compliance** re Seascape, Landscape, and Visual Impacts regarding turbines over 225mtrs tall.

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Visual Impact:

The importance of identifying the visual impact caused by the physical presence of the suggested larger/taller turbines suggested for Rampion 2.

Serious consideration should be given to whether the existing visual impact of the open ocean as it currently exists has characteristics that will significantly be altered by the introduction of new visually industrial structures giving a very different aspect of the open sea and coast and therefore cause a significant change to the character.

- A. Therefore, time must be taken to assess the balance between any beneficial and destructive impacts on the existing characteristics that are traditionally expected of this area and how this will affect residents and visitors if these characteristics of the Sussex Bay and therefore Coastal Sussex are irrevocably changed. To be able to do this there has to be a true-life visual animation of the proposed structure.
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