

**From:** [Larry Haas](#)  
**To:** [Rampion2](#)  
**Cc:** [Faye Christensen](#)  
**Subject:** Rampion 2 Examination - Issue Specific Hearing Input: On Day 1 Item 2 - 7 Feb 2024  
**Date:** 05 February 2024 08:30:08  
**Attachments:** [Submission for Rampion 2 - ISH Day 1 Item 2 discussion on 7 Feb 2024.pdf](#)

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Dear PINs,

As Interested Parties we offer the following input to the Rampion 2 Issue Specific Hearings.

On Item 2, Day 1 scheduled for 7 Feb 2024 in Brighton.

We kindly note that, as the detailed agenda for Day 1 was issued after the 16 January 2024 deadline to register for an oral presentation at the Hearings, may we ask this written input be read out at the Hearing to inform participants attending, or otherwise be raised and taken into account as part of Item 2 discussions.

Interested Party Registration Numbers:

Lawrence Haas 20045121 and Faye Christensen 20042547

In association with Protect Coastal Sussex

With respect to the Detailed Agenda issued by the ExA 29 January 2024:  
Item 2: The Proposed Development and Alternatives

Kind Regards,

Lawrence Haas and Faye Chistensen  
Littlehampton

**Submission by Lawrence Haas and Faye Christensen (Littlehampton) in association with Protect Coastal Sussex (PCS)**

Interested Party Registration Numbers:

Lawrence Haas 20045121 and Faye Christensen 20042547

**On Agenda Item 2 for the Rampion 2 Issue Specific Hearing (ISH – Day 1)  
Wednesday 7 February 2024**

**With respect to the Detailed Agenda issued by the ExA 29 January 2024:**

*Item 2: The Proposed Development and Alternatives*

- i. Brief explanation of the Proposed Development*
- ii. Clarification on quantum of turbines to be constructed*
- iii. Clarification on the choice of National Grid connection and onshore substation locations*

As the detailed agenda for Day 1 was issued after the 16 January 2024 deadline to register for an oral presentation, may we ask this written input be read out at the Hearing to inform participants, or otherwise be raised and taken into account as part of Item 2 discussions.

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**With regard to the consideration of Alternatives in the Issue Specific Hearing, Item 2, Day 1, on 7 Feb 2024:**

The NPS (2011) has a policy requirement to consider alternatives in the Rampion Examination under EN-1 (overarching) Section 4.4., Alternatives.

This is a case-specific policy requirement as Rampion 2 infrastructure would physically and visually interfere with designated landscapes and their functions (e.g., South Downs National Park), where EN-1, para 5.9.10 applies.

The Examination is to “... include assessment of: (including) the cost of, and scope for, developing all or part of the development elsewhere outside the designated area, or meeting the need for it in some other way, taking account of the policy on Alternatives set out in Section 4.4”.

Suggestions from IPs on talking account of relevant expert testimony and appropriate power system value analysis are offered in pre- Examination representations and submissions recorded in the Examination Library including:

- **PEPD-096:** Item 2 in the PCS written submission for the procedural deadline
- **RR-062; RR-287 and RR-197** as relevant IP Representations, and
- **AS-006:** The South Downs National Park PAD Statement

Relevant SDNP comment as item **SDA-01** on Section 4.4 Alternatives in its PAD Statement in November 2023 as **AS-006** was:

*"The consideration of alternatives for the scheme has not sufficiently demonstrated that meeting the need for offshore renewable energy could not be met through a scheme that did not intersect the South Downs National Park (SDNP). It is therefore the case that this 'test' of the National Policy Statement EN-1 paragraph 5.9.10 has not been met." (our underlining)*

With regard to the "need for the Project" as indicated in the previous version of the agenda for Day 1 in the Rule 6 Letter earlier in January 2024:

We believe that need should be framed in the context of the need for low emission generation (as in the NPS Energy revision, Nov, 2023) that will also be taken into account by the Secretary of State DESNZ when the ExA's recommendation is considered. The aim is to achieve the goal of decarbonisation of power supply to the national grid by 2035.

For a £3-4 billion investment decision having far reaching local and national consequences we believe that consideration is best informed by the required Section 4.4 Alternative assessment:

1. looking across all metrics for the national benefits identified in the NPS;
2. considering the Alternative generation systems now designated as critical national priorities (for low emission generation) to achieve secure, reliable and affordable supply and reduce risk to National Energy Security (as in **PEPD-096** Item 2)

The approach would reveal whether they are capable of providing the same or greater national benefit over the same timeframe as Rampion 2 (from about 2030 to 2050), without the adverse local impacts, and offer greater value for money in the local and wider national interest.

The above is consistent with delivering Government's wider objectives as provided in National Policy Statements:

EN-1, Para 2.2.27 ... *"The Government's wider objectives for energy infrastructure include contributing to sustainable development and ensuring that our energy infrastructure is safe. Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed affects the well-being of society and the economy..."* and

EN-1 (2011) para 2.2.4 .. *"It is important that, in doing this, the planning system ensures that development consent decisions take account of the views of affected communities and respect the principles of sustainable development."*