



MOSCA Middleton on Sea Coastal Alliance

IP Number 20045287

Seascape, Landscape and Visual Impacts

MOSCA Response to Rampion 2: Seascape, Landscape and Visual
Impacts Appendix B: 2.1.1 – 5.1.4

For Rampion 2 Examination Authority (ExA) Application Submission
Deadline 3

Co-Chairs: Melanie Jones and Mike Visram

Submission date: 25 April 2024

Further to previous representations, and subsequent responses by Rampion 2 for Deadline 3. We refer to, and question, their responses including the apparent continued evasion in concealing the visual scale impact of the proposed Development. Our points continue to be side stepped by the applicant highlighted in our Summary 15 January 2024, and following on from the Hearing in Brighton starting 6 February 2024 as well as our Written Response of 19 March 2024.

The visual impact of this proposal will make a hugely significant change of character and industrialisation of the open sea in the coastal area. Based on the Applicant's comments we reiterate our main concerns regarding the discourteous attitude to the area regarding video photomontage aids, and importantly adhering to OESEA's legal requirements.

We are pleased that Rampion 2 has reacted to our concerns in such detail and provided copious references. However, it still appears there is a large gap in the perception of the Applicant in their persistent refusal at any level to understand the significance to the community of a visual interpretation, in the case of Middleton on Sea no provision whatsoever, not even a flat photomontage buried in the Environmental Report. All the information, though useful, does not assist the impact visual from the shore (beach to horizon viewpoint) between Littlehampton and Bognor Regis. Possibly one of the most natural beach and residential area to be affected and for which it was 'too costly to provide another photomontage' yet

Rampion 2 was happy to provide some 54 other viewpoints across the SLVIA Study Area.

The view cannot, be accurately gauged from a flat photomontage – the actual living and roving eye sees actual distance very differently. A moving video would give an entirely different perspective of the scope of the full horizon and this vital need is being studiously ignored. It is impossible to believe that at no time, has ever a video montage not been provided to display such a development.

A photomontage (even if provided) cannot reflect different positioning along the coast where distance changes, the likely merge of Rampion 1 and 2 as well as the 'actual' perception of bulk and the horizon 'disorder'. We also refer to the distraction to the eye (human or bird) of the rotating blade movement at that height. The one transfixing the vision and the other causing flight interruption and blade impact. As well, the unmissable night sky impact both at dusk with the bulk of dark urban 'industrial' structures along the Southwestern skyline and equally as concerning – in full dark sky - the bright, pulsing navigation lights that will constantly flash towards the shore without break in space or time at different settings. Little mitigation or discussion on how that can be altered is available. From our point of view from the seafront the beach – just 8 miles out these 325mtr turbines would be impossible to ignore stretched across the horizon.

The Applicant refers in much detail to anything more illustrative such as a video montage as being difficult to provide owing to the coastal position or light et al! There is a whole range of reasons why they do not appear to have to comply and are within their rights so to do. We continue to strongly argue this lack of visual assistance, was and is, critical to ensure an accurate public understanding of the development, as well as an important aid to the deliberations of the ExA, of the true scale impact.

We acknowledge that in the request for visual/video animation, it may be an expensive public relations cost. However, the on-going cost to the local population should be respected and warrants proper consideration. We argue this must be brought into the Examination process to ensure that the application has been accurately examined and the 'likely' serious and character changing impact to the area is fully considered, based on the beneficial/adverse principle of the rules to which this Application must adhere. In their response to say visibility should not be a reason for refusing consent – These are much higher than average turbines. There is real visible adverse impact here, let alone any basic environmental damage, which outweighs this argument.

Again we argue that such a cost would be a pittance against the profit and development ongoing and should be judged fairly on 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 amenities coupled with 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. We argue that 3.2.3 though the Photomontage may well be recommended it does also mention some situations adding value to the decision-making process in the use of video montage. We are not asking for a replacement as suggested, but as an additional visual aid. Again, the cost implication appears to be the stumbling block. We must therefore assume that any video montage of something other than a distant hazy view - is far too terrible to take ownership and therefore a Middleton on Sea photomontage must be truly horrifying!

We also understand the Applicant has not decided on the exact number or height of the turbines which appears to mean you will get what you get on the day! This does not seem to be an entirely honest view of a planning application submission.

We argue the need for reasonable and crucial visual assistance was requested by the Planning Inspectorate prior to, and to be available at, the Hearing in February. This requirement must stand as fundamental to the transparency of the application. When requested the Applicant replied 'they did not have time to do so. The Applicant did not offer the range of responses now being offered. We argue that this request previously, from both Middleton on Sea Parish Council and separately from Cllr Pendleton and ourselves MOSCA, has been repeatedly made since 25 August 2021 either time or cost have been issues but not as the applicant now stands behind detailed reasons why they do not have to provide anything as being too difficult to provide. This is we argue must be provided to PINS to evaluate fairly the impact of the suggested array which gives this development a highly significant structural and visual footprint that warrants this request.

It appears from Rampion's reply to our questions that the critical importance of giving weight to applying OESEA 4 visual buffers compliance re Seascape, Landscape, and Visual Impacts regarding turbines over 225mtrs tall have not been undertaken because they cannot in the space do so. The distance does not allow - which the Applicant admits. Paragraphs 5.1.3 and 5.14 are highly significant in the regarding the distances and inability to conform to the buffer zone requirements.

For all the discourse on difference of position in taking a view, the light, the angle of perception et al. There is no visual representation that covers Littlehampton, Middleton, Felpham or Bognor from the shoreline. The closest Turbines will be at 8 miles. If using the Rampion 1 scale - turbines are visible at 142mtrs. Therefore, at 325metres (Eiffel Tower plus height) ranged across not just to one side or another but across the entirety of the horizon without break or space as previously reiterated - we argue how can this be justified without mitigation of some sort, height, number, or position unconfirmed - as well as they admit they cannot conform to the buffer zones. Again - 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. In repetition - The closest inshore bank of the Rampion 2 proposal is only 13 kilometres (8 miles) from the shore.

The people whom this development affects are not likely to be all scientific, big business or legally proficient. We are real human beings of all ages with real concerns who care for where we live and may not be able to interact at the level of detail and professional research that the Examination expects and which is available to Rampion 2 but not to us, nor the precisely accurate 'Speak' expected - it does not mean we should not be accorded respect in the requests made and where something is so important an effort or willingness could be seen to be made to allay the fears that concern us. Nor be faced with information that is represented within a response given that the presence of that information is not wholly evident to human inspection - *(Steganography partial quote)!*