



MOSCA: Middleton on Sea Coastal Alliance
IP20045287

Melanie Jones & Mike Visram Co-Chairs
Comments for Deadline 4 including Hearing on May 15th and
Questions/comments/responses made

Agenda Item 6: b and c (Hearing 15th May 2024)

The Applicant referred to Rampion 2's 'remoteness' to describe its placement in relation to the SDNP South Downs National Park. A point not fully answered, and we (MOSCA) Middleton on Sea Coastal Alliance also tried to query this – however, the meeting had moved on to the next point. We do not see how Rampion 2 can be considered as 'Remote' in relation to either the Horizon Seaview out from the Coast and from the sea back towards the coast and SDNP. 8 miles either way is not remote (first line of turbine positioning).

The impact on the line of sight or view, either way is considerable not insignificant. Remoteness is the state of being distant from something else. It would be helpful for the Applicant to clarify this description. If these Turbines started at the furthest end of the grid i.e. 12 miles, it would help allow for a more reasonable buffer to the Western arm of the array. To make the proposal economically work our Coastline is therefore compromised by the construction to fit it in.

The turbines will march in virtually a straight albeit staggered clustering along that line around/across the horizon of the entire Heritage Bay. The rotation of the blades is not at all the same as the movement of shipping, which are occasional occurrences, random but adding a little stimulating perception to the view. (which has been suggested). The former will be fixed in position yet rotating which catches and fixes the eye, the turbines will be in fixed view for perhaps 30 years detracting from any comfortable Seaward view.

RED does not seem to see the very defined differences between the two examples above. These points are extremely important and worth countless repetitions of the impact on people and the local culture and the environment to ensure that our concerns and the proposal are fully examined, particularly points/questions raised should be clearly answered and not ignored or glossed over.

There also seems to be little clarity on the background operating noise of the turbines. Both generated and the wind resistance against the sweep of the huge blades, depending on the wind direction. This concern features in a wind turbine landmark case in March (Ireland) on the future implications for future windfarms. The ruling found that turbine noise even within planning regulation limits could be categorised as a nuisance – noise pollution is also indicated by Government as an issue that needs consideration and should be avoided. It may also open the possibility of compensation claims where the turbine noise interferes with enjoyment of homes and daily lives. It can cause mental health issues particularly depression. It is impossible to gauge from Rampion 1 being so much smaller what this level could be. This implication needs to have the tested expertise to fully appreciate what this level of noise – along with the proposed number of turbines could produce. We ask that the data that is available for the size of the proposed wind turbine is clearly detailed noting that sound is louder across water.

Nationally significant energy infrastructure projects may have an effect on the landscape/seascape the Applicant says but **it does not mean there must be a requirement to inflict an insensitive, heavy, urban industrial structure footprint and consequent visual imprisoned fencing off the natural horizon.** No 'sentient' mitigation has been offered – such as open sea space and certainly not height/width considerations. There is no balance, we keep saying – but there truly is no balance to those who live here and nor does the Applicant react to this request.

MOSCA has raised that with such a specific lack of visual representation of any sort for the view horizontally across the horizon– allowing for the Viewpoints from Clymping or Bognor. The lack of information makes it difficult to assess the likely impact to our coastline. (height, width number or emplacement). We have been denied any sort of pre-development visual. Rampion 1 is visible (significantly at times) to the left of the local Seascape. The Rampion 2 array will continue this without any break

(apart from the Littlehampton Harbour access gap) - we in Elmer/Middleton on Sea and Felpham may not seem worth the expenditure of the cost of a single visual simulation (we note Rampion's Peir statement and associated explanation) - but it is also the larger picture incorporating the SDNP, areas of special qualities, historic and current – alongside our reasonable amenity desires of those who want to live, visit, be part of and the generations to come that are important to note and will give a largely negative perception of the area. How much, we ask the Applicant, of what we endlessly repeat, do they not understand?

From the Hearing, RED appears to be sitting behind the statutory guidelines, which is not a transparent approach. Referring to the need for renewable energy (comparably a very small economic bonus overall in this case) against the adverse visual destruction of our landscape. We are concerned that the rules of sustainability in this project are unclear. OESEA regulations are apparently ignored. How can the Applicant disregard the Rule of Law clearly set out and tweak their responses accordingly. At the Hearing it was noted that this had been dealt with in previous responses – we have seen nothing that clears or satisfies that specific question.

Applicant has yet to finalise the emplacement and final height of all or some of the turbines we note from documents and recent Hearings. We ask that this is scrutinised more fully, and reasonable balance could be considered going forward with such a huge 'extension'. Rampion 1 is clearly seen from the windows of the Hilton Doubletree Hotel it sits almost directly opposite – slightly to the right looking out to sea. The closest turbines therefore at the 8-mile mark are highly visible in both structure build and equally visible the moving/rotating blades. The view to the left is uncluttered.

The South Downs National Park has clearly focussed on a list of Special Qualities, this relates to how people engage with the space inside the park. And as its area of responsibility is within the boundaries of the park, it's quite proper that the Authority is more anxious to engage with how outside pressures, influences and encroachment as well as operational issues within the park and how these may change its attraction and characteristics. This however does not show the impact that that the development would have on those wishing to visit the Park -

the qualities of the Park as viewed from outside. These are the Special Qualities which have been particularly pointed out and apply significantly to the Heritage Coast. Overall, a natural, rural experience currently which could change exponentially with an industrialised structure on its doorstep.

It is difficult to comprehend how turbines cannot interfere significantly with either the view out from the coast or in from the sea when scaled, structurally 2½ times higher/wider along the horizon just 8 miles out – keeping to the 8mile initial turbine position of Rampion 1. The internationally important view from the Sea towards the Park and from the air has been passed over as no consequence please respond on how that can be allowed?

Another important consequence are the Night-time navigation lights. The current visual montages appear chaotic as referred to by SDNP, a disordered cluster of the remains of a blasted forest. We have seen little change making the concept any less so. The lights sited halfway up each turbine 160mtres and pulsing will be even more significantly visible due to the sweeps of the turbine blades. The Applicant has said some effort is being made to lessen this effect please not yet clarified. Please can the ExA raise a further question with the Applicants regarding the potential adverse impact of the navigation lights over the life of the wind farm. It is serious enough to require much greater detail and explanation of the mitigation methods. Specifically, how this can be done and how the lights will be programmed. Can weather change the strength of light used for example.

Again looking out from the Brighton Double Tree Hilton. Using a useful fixed flagpole outside as a guide for height reference in adding 1 ½ times again in height to the turbine height in front of the Hotel - it becomes clear that those lights will be high in the sky and apparently facing down on the coast – an ever-baleful blinking security guard to our coastline. The Applicant's explanation is not acceptable in present form. Rampion 2 is different in every way to Rampion 1 and a much larger stretch of turbines. This illustration is the nearest I can picture and share to what Rampion 2 will look like for Elmer/Middleton on Sea and Felpham and it is shocking! We should at least know from the Applicant the truth.

Agenda Item 7: a and e (Hearing 15th May 2024)

From discussion and responses given, we feel the Applicant's perception of the local community and how it may have to compromise and re-invent their lives around the proposed traffic management scheme for the Kent Street area for a considerable amount of time is unrealistic. Including major change to environment/hedgerows/trees. It seems that there is little detail in comprehending the traffic movements with ordinary traffic/ people/children/animals/particularly horses and the movement of these and the possible accidents that could be caused by the highly increased heavy vehicle movements all of which need further input. Further detail is expected, we request that this is urgently addressed.

Separately we have strong concerns with the basic response given by West Sussex Highways who appeared to rubber stamp the project with little comment on its implications and without flagging up any concerns which in the face of the number of Actions required by the ExA and requested by representatives of CowfoldRampion and Cowfold Parish Council.

We also have reservations with the response by the Applicant about detailed instructions/arrangements that deal with specifically washing down the heavy vehicles which will have, in this climate – a great deal of mud/fertiliser/road grime/fuel etc and exactly how that wash will be dispersed. There is a concern for the toxic impact of such on the local natural waterways and the land used for the purpose and where that run off is expected to go. Our understanding is that the Applicant will bring in water for the purpose of washing vehicles and the local water ways will not be utilized for the water needed nor the local water supply overloaded by demand. Please can the implementation details of this be clearly given.

3June 2024
MOSCA