

From: contact@mosca.click
To: rampion2@westsussex.gov.uk; [Rampion2](#)
Subject: Adequacy of Pre-Application Consultations (AoC) on Rampion 2
Date: 24 August 2023 08:41:29
Attachments: [image001.png](#)
[EMAIL SENT ON 19TH DECEMBER 2022 to Arun District Council.pdf](#)
[Middleton on Sea Coastal Alliance \(MOSCA\) Representation on the Adequacy of Rampion 2.pdf](#)
[Middleton on Sea Coastal Alliance covering email to ADC and WSCC re AoC Submission.pdf](#)

From: contact@mosca.click

To: "rampion2@westsussex.gov.uk" <Rampion2@planninginspectorate.gov.uk>



Middleton on Sea Coastal Alliance

Adequacy of Pre-Application Consultations (AoC) on Rampion 2

Dear Ms Davies,
Rampion 2 Case Manager, The Planning Inspectorate

Middleton on Sea Coastal Alliance (MOSCA) has sent the attached emails and AoC Representation to Arun District Council and West Sussex County Council for consideration when organising their Statutory Responses on the AoC of the Rampion 2 Proposal that has just been filed with the Planning Inspectorate and we strongly request that you are able to consider our Representation in your decision regarding the Application. For your information and consideration, we also attach the letter sent originally in December 2022 the adequacy of the Pre-Application Consultations.

Our email highlights the difficulties and concerns we, in Middleton on Sea, have experienced, since the start of the Developer's Application. This includes the Statement of Community Consultation failings and not meeting the AoC criteria. These failings are documented and have been raised with the Developer. As examples of AoC failings: during the Formal Consultation of July-September 2021 – the Developer disallowed face to face public meetings, which, even after Covid rules were lifted, effectively silenced public discussion therefore seriously limiting the level of public interaction, taking on effective control of the narrative. In the most recent onshore consultation – which had to be re-run a second time due to previous failings - the communities affected were not notified satisfactorily or in

some cases not at all, and place names were incorrectly used. At no time were visual presentations made available – the Developer citing it would be too costly for them to do so and presenting an inflexible condescension towards the communities affected. These are just some of the failings recorded.

During this time period of consideration by the Inspectorate now the Application has been filed – and should the Rampion 2 Application be accepted for Examination irrespective of documented SoCC & AoC failings, failing to meet the criteria of Sustainable Development, and the breaking of guidelines in terms of visual receptors of National Parks – we request strongly that it should be Conditional Acceptance only.

This way forward would at least give a fair and honest approach to correcting and addressing the failings in the Consultation and perhaps offer a better understanding to the Developer of a way to introduce the need for reducing the carbon footprint, keeping communities onside as well as deliberate the true evaluation of the development that is also sustainable and can work with not against the natural environment. The impact of this on the area could far outweigh any real value and costs to provide alternative energy, and raises an important question of reasonable balance and ‘footprint’ taking in impact, value and ecological regeneration already in progress. We ask, due to the failings documented - is the risk of major detrimental impact to the environment and community life we seek to preserve for future generations, worth allowing this Application – currently based on the failings documented

We fervently hope Authorities will consider seriously and lend their voice to this and other evidence in their responses.

With Best Regards,

Secretary

Middleton on Sea Coastal Alliance
MOSCA

Attachments:

Email copy to West Sussex County Council and Arun District Council – December 2022

Adequacy of Consultation submission to West Sussex County Council and Arun District Council

Email copy to West Sussex County Council and Arun District Council – August 2023



Middleton on Sea Coastal Alliance

Adequacy of Consultation on the Rampion 2 Development Proposal

Dear Councillors and Officers,

We note the Application for Rampion 2 Windfarm development is now filed - Thursday 10 August - triggering the 28 day Acceptance period. The adequacy of the Developer's Consultation (AoC) will now be assessed by the Planning Inspectorate.

As a reminder, attached is Middleton on Sea Coastal Alliance's (MOSCA) Representation Submission on the adequacy of the Application and sent to you in December 2022.

MOSCA is affiliated with, in particular, Protect Coastal Sussex, and since Dec 2022 the number of independent community organisations and members along the coast has increased considerably in those areas that would be directly impacted by the proposed 'industrial' Windfarm development. Concerns on the Consultation process and subsequent failings we have experienced are a concern for us all and we urge you to take a careful look at our findings.

We ask that you to note the importance of the issues that are reflected in our concerns. We repeat our request for Council to reference our input in its statutory AoC response to the Planning Inspectorate (PINS). It is clear, in our view, that the Applicant has clearly failed in a fair pre-application consultation standard as set out in the PINS Advisory Notes and prescribed in the Planning Act – it has, backed by documentation, fallen short on the required protocol.

We suggest therefore, that, if the Rampion 2 scheme is to pass to Examination despite the documented AoC failings, this should be made Conditional Acceptance only to reflect and correct these errors to ensure the evaluation process is accurate and fair.

We ask that the following prerequisite conditions should be taken into account which we fully endorse and are based on Protect Coastal Sussex's thoughtful submission.

- a. The developer must address and correct selected SoCC errors and specific failings in Consultation responses during the 3-4 month DCO Pre-Examination stage.*
- b. RWE makes public the detailed assumptions, models and detailed analysis that they based their power demand-and-supply claims on, so they are transparent and available for scrutiny and may be challenged during the Examination.*
- c. RWE funds, and makes publicly available, independent analysis of the performance and power benefits for Rampion 2, and Rampion 1 and 2 combined. Ideally these would be*

prepared by competent power authority staff such as Ofgem, or their consultants not connected to RWE.

d. Further, the Examining Authority (ExA) is asked by PINS to make provision to take due diligence evidence during the Examination on the efficacy of RWE's claims made during pre-application consultations as regard to benefits, performance and impacts (accepting it's at the discretion of the appointed ExA); Here a separate representation will be made to request PINS and the ExA consider provisions for an issue-specific Hearing at the Examination stage on Reasonable Alternatives basing this on the EN-1 National Policy Statement.

e. RWE arranges appropriate publicity in local media of the outcomes of remedial actions, including directly informing Councils and Project Liaison Group (PLG) members in Parish and Town councils established by the developer.

f. And now, given the significant body of evidence for the inadequacy of the Consultation with Cowfold residents - which has now become known to us - and the weakness of data provision when the sites were under consideration, as highlighted by CPRE, SWT and Natural England, RWE should fully reopen the Consultation with respect to the substation site, which, in the interests of meaningful consultation, should include both Wineham Lane North and South sites and the relevant northern parts of the cable route options.

We seriously ask that Council gives substantial thought and weight to our documented evidence, and, within the current political positioning on climate issues and seeking renewable opportunities that may not be fully evaluated at the time - raising the point of "Conditional Acceptance" in its AoC response to the Planning Inspectorate.

Thank you for your time

Sincerely

Secretary,
MOSCA (Middleton on Sea Coastal Alliance)
<https://www.mosca.click>

This email and attachment has also been sent to:

WSCC
Nick Gibb MP
Mr Andrew Griffiths MP
Mr Peter Bottomley MP
MOSPC (Middleton on Sea Parish Council)

Attached:
MOSCA Representation on the Rampion 2 Adequacy of Consultation Dec 2022

EMAIL SENT ON 19TH DECEMBER 2022

From: contact@mosca.click <contact@mosca.click>

Sent: Monday, December 19, 2022 6:22 PM

To: [REDACTED]@arun.gov.uk' [REDACTED]@arun.gov.uk>; [REDACTED]@arun.gov.uk'
[REDACTED]@arun.gov.uk>; [REDACTED]@arun.gov.uk [REDACTED]@arun.gov.uk>;
[REDACTED]@arun.gov.uk' [REDACTED]@arun.gov.uk>; [REDACTED]@arun.gov.uk'
[REDACTED]@arun.gov.uk>; [REDACTED]@parliament.uk' [REDACTED]@parliament.uk>; 'MOSPC'
<mospc@btconnect.com>

Subject: Middleton on Sea Coastal Alliance (MOSCA) Representation on the Rampion 2 Adequacy of Consultation

Dear Council Member,

Subject: Middleton on Sea Coastal Alliance (MOSCA) Representation on the Rampion 2 Adequacy of Consultation

Please find attached Representation by the Middleton on Sea Coastal Association (MOSCA) on the adequacy of the pre-application consultation by Rampion 2.

Our experience as documented here is that the Consultations were far from adequate and failed to meet published adequacy tests.

As interested and affected parties, we strongly ask the Council to take account of our concerns and the factual evidence when preparing the Council's statutory adequacy statement for the Planning Inspectorate.

We are aware of Representations made by other community organisations and civil society organisations along the Sussex Coast on this matter. We have also proposed additional Conditions of Acceptance relative to our experience and we hope to see these reflected in the Council's response as noted
(See Appendix 3: What Happens Next?)

MOSCA will share this Representation with other community organisations who have similar concerns about this proposed development and subsequent transformation of the Sussex Coast, which we feel is unnecessary given its contravention of the Government's own strategic environmental advice on the location of large turbines and reasonable alternatives that are missing from the developer's consultation information

Sincerely,
Secretary

On behalf of Middleton on Sea Coastal Alliance (MOSCA)

Email: contact@mosca.click

Website: <https://www.mosca.click>



Middleton on Sea Coastal Alliance

<https://www.mosca.click>

Representation to Arun District Council (ADC) and West Sussex Country Council (WSCC)

On the adequacy of the developer's pre-application consultations On the proposed Rampion 2 windfarm on the Sussex Coast

December 2022

Dear Council Member

This Representation seeks to inform you of ongoing concerns with the adequacy of pre-application consultations undertaken by the German based multinational developer RWE in support of a Development Consent Application as seen and understood from the experience of residents in Middleton on Sea

We ask Councils to consider these concerns and supporting evidence and to specifically reference and clearly reflect our concerns on what we, as interested and affected, residents see as important and legal to ensure the consultations are adequate.

Contents of this Representation include Attachments to this Representation include:

- Attachment 1: Hand-delivered form MOSCA used to survey Seaway Residents within 100m of the shore
- Attachment 2: Relevant MOSCA Communication with Middleton on Sea Parish Council on Residents Survey failings to provide statutory "Information Leaflets" Attachment

- Attachment 3: Residents Response List: Results of the survey of Seaway Road residents in Middleton-on-Sea living within 100m of the shore.
- Attachment 4: Relevant MOSCA correspondence with the Developer

Middleton on Sea Coastal Association (MOSCA) argues that the sustainability of Renewable Energy projects must respect the values of coastal communities, habitat and nature where they are located. Government guidelines state 'we need truly green wind farms that tread lightly on the environment'.

This is the MOSCA objective in embracing sustainable development. MOSCA also subscribes to the notion "think globally, act locally" and the ambition of the Localism Act (2011), "to facilitate the devolution of decision-making powers from central government control to individuals and communities", as introduced by the Minister at that time.¹

1. Failing to implement the Developer's Statement of Community Consultation (SoCC)

MOSCA's survey reporting and adequacy of consultation concerns started in 2022 as there were a number of irregularities that went either unnoticed or ignored by RWE/Rampion 2 during the original Statutory Consultation that was held 14 July 2021 to 16 September 2021.

These failings were initially exposed by shocked attendees at a public meeting organised by Middleton on Sea Parish Council (MOSPC) on August 25 2021 and latterly by ourselves as the Middleton on Sea Coastal Alliance (MOSCA), and other partner organisations affiliated to Protect Coastal England (PCE).

There were subsequent exchanges with the developer on the Statement of Community Consultation (SoCC) failings from various community organisations and interested parties, including area MPs as demonstrated in other Representations by community organisations. As the RWE / Rampion 2 "Information Leaflet" required by the developer's SoCC were arriving in an erratic pattern MOSCA started monitoring the distribution via survey techniques.

A record was kept of all Households within 100m of the shore randomly contacted by MOSCA along Seaway Road (Middleton) following the close of the "Original Consultation" on 16/09/2021, and the same "households" were re-contacted following the close of the "Reopened Consultation" on 11/04/2022.

As in the Survey hand-delivered to resident of Seaway all of which were 100m of the shore indicates (see Attachment 1) MOSCA asked:

¹ Eric Pickles (13 December 2010), Introduction to the Localism Act 2011 for example <https://www.gov.uk/government/news/localism-bill-starts-a-new-era-of-people-power>

Please contact@mosca.click - if you could answer the following questions with yes/no answers:-

- ***Have you received the recent Information 'Leaflet'?***
- ***Did you respond to the Original Consultation Survey?***
- ***Did you receive an automated acknowledgement?***
- ***Did you double click the link as requested on the above?***

Subsequently the results of the MOSCA survey were communicated to the Middleton on Sea Parish Council to be included in the Parish Councils ongoing conversations with the developer. (See Attachment 2)

Outcome of the Seaway Road Surveys of Residents within 100m of the shore:

As noted in Attachment 3:

- the MOSCA survey shows at the first statutory consultation 14 July 2021 to 16 September 2021 at least 20 house owners in Seaway with properties within 100m of the shore did not receive Consultation Leaflet, contrary to the Statement of Community Consultation (SoCC).
- When the developer re-opened that statutory consultation 7 February 2022 to 11 April 2022 to address that failure, the subsequent MOSCA survey indicated that 19 of the 20 households still did not receive the consultation Leaflet by mail, when the SoCC remained unchanged from the first round. It was clear the Post Office had designation households to deliver to which was not inclusive of the households affected.

This constitutes a clear failure to implement the SoCC which according to Planning Inspectorate's online FAQs is an important test of the adequacy of consultation. It is highly concerning to many Residents that the consultation was not accurately undertaken.

Separately, at least one known resident in Sea Way who is visually impaired did not have the ability to take part in the initial online survey and when finally, he had engaged in the online survey by way of a printed copy – sent by registered mail, helped by a friend at some high cost (there is proof of receipt) to meet the deadline, no confirmation was received even though the covering letter requested such. This fact of non-inclusion of all residents particularly those within the 100m boundary should be noted. He did not receive any further communication.

Additional failure to implement the SoCC:

- MOSCA believes as do other south coast community organisations and Residents as Interested Parties, that conducting the statutory consultations February 2022 to 11 April 2022 in primarily virtual modes of communication, when social distancing requirements were fully lifted, was a further breach of the statutory Statement of Community Consultation (SoCC)

This is in regard to SoCC provisions on adapting to changes in government social distance guidelines, where the SoCC states:

“Given the uncertainties of social distancing requirements during our consultation period, for the purpose of this SoCC, we are formally planning for primarily virtual methods of consultation and engagement. However, we will give consideration to ... and community engagement methods having regard to the latest advice and guidance from the Government regarding Covid ...” (Rampion 2 SoCC page 9).

- So, not only did the developer fail to contact Residents in Middleton-on-Sea in the 7 February 2022 to 11 April 2022 consultation as required by the SoCC, but additionally the engagement of the local community in the re-opened consultation was still limited to highly restrictive virtual only methods of interaction.

2. Other Adequacy of Consultation Failings

The SoCC failings are also set against a background of frustrating interactions many including MOSCA experienced on the ground when engaging with the developer via its marketing Team, who in our experience were less than forthcoming on a number of issues.

One example is the request for visual representations MOSCA members asked for and the Parish Council asked for, namely:

- Prior to meeting with the Developers, Parish Councillors “had requested – prior to that meeting – a visual from the coastline from the Elmer side of Littlehampton up to and including Middleton on Sea.”

Middleton on Sea consultation responses and requests were essentially dismissed out of hand. The developer’s response was neither reasonable, nor adequate and appeared to be, verbally noted as cost related and not required. (See Attachment 4 relevant correspondence with the developer) where the response is simply:

“The agreement of viewpoints for the environmental impact assessment (EIA) of nationally significant infrastructure projects (NSIPs), is a well-established process that is used on many other major projects in addition to wind farms.

If you feel that the number of viewpoints used is insufficient then so long as you have responded to the consultation, this would be your further opportunity to raise the matter via the Planning Inspectorate.”

The irony and reality is that the developer actually failed to respect “a well established process” as elaborate with clear evidence in the previous adequacy Representation by Littlehampton organisations in Feb 3 2022, communicated to Councils and shared with Community Organisation and the Developer’s Community Project Liaison Group.

“The absence of visual animations and adequate static representations of turbines in virtual engagements, and in on-line videos and the PEIR offered as a basis for consultations;

compounded by the failure to meet standards for “Visual Representation of Wind farms” (SNH, 2017) which the Applicant says were followed.” That goes on the detail these failings, where the developer PEIR states they have followed the accepted standards for “Visual Representation of Wind farms” (SNH, 2017) to generate their Rampion 2 consultation materials when the evidence demonstrates they clearly have not.

We also observe also there was little information in the developer’s Statutory Consultation Report that was made public when the additional round of consultations was announced in October 2022. In that Report which we see as superficial self-serving tick box effort only, the developer failed to reflect requests or remedy the very legitimate concerns raised in MOSCA and Middleton on Sea Parish Council responses to consultations.

In our view that constitutes failure to take account of consultation responses, a violation of the Planning Act 2008 Part 5 Section 49 and RWE’s, "Duty to take account of responses to consultation and publicity" see <https://www.legislation.gov.uk/ukpga/2008/29/section/49>

3. What happens Next?

We are aware of the Adequacy of Consultation Representation Protect Coastal Sussex (PCS) will make to both District and County Councils, as well as sharing more widely in the interests of openness and transparency. The PCS representation calls for condition-based acceptance if the Planning Inspectorate is inclined to accept the Rampion 2 Application for Examination despite clear evidence of inadequacy of consultations undertaken

We support conditions of acceptance that PCS proposes Council should consider recommending to the Planning Inspectorate in their adequacy statement.

We would also add to those conditions that:

- 1) the developer responds to the SoCC contravention in Middleton-on-Sea by providing the requested visual interpretations from this location, identified in MOSCA correspondence with the developer (see Attachment 4)
- 2) Further, we I would like the developer to ensure the original “Information Leaflets” along with the visualisations Requested by the Parish Council are hand delivered to all Middleton-on-Sea residents who meet the SoCC criteria for notification in the previous statutory consultation rounds.

Sincerely,
Mike Visram

On behalf of Middleton on Sea Coastal Alliance ‘MOSCA’

Email: contact@mosca.click

website: <https://www.mosca.click>

Attachments Follow on:

Attachment 1:

Hand-delivered form MOSCA used to survey Seaway Residents within 100m of the shore

You should have heard and seen on TV BBC Southeast News (also please look at our website) <https://www.mosca.click> RWE/Rampion2 were forced to confirm their tacit responsibility to re-open the wind farm Consultation on the 7th of February due to their failure to deliver 'Consultation Leaflets' to all addresses entitled to be consulted under (Zone 3) legal obligations, and up to 10,000 of these have apparently been posted to coastal homes and businesses to correct this serious error and to provide those originally excluded, the opportunity to express their views. ***This was opened for 9 weeks until April 11th 2022 – just 3 weeks left to enter your view.***

The result of RWE/Rampion2 closing the original Consultation on 16 September 2021 (even though publicly notified on 25 August 2021 of their failure to comply with strict consultation regulations) shows scant regard to due process and those who were disenfranchised. This in turn has raised serious doubts over their sincerity and competence to conduct a fair and transparent public consultation.

Consequently, the only way to be sure – irrespective of whether you have responded to the original Consultation and now have or have not received a recent leaflet – is to participate in the re-opened Consultation.

Please pass on a copy of the attached RWE/Rampion2 leaflet to all adult members of your family, neighbours and friends to encourage them to respond to this. It now appears that all adults in the UK, who live or work or holiday within the scoping area have the right to respond. The strength of your support is vital to mitigate the outcome of the proposed wind farm.

This request is so important as though we may all support the Government's call for truly Green energy which includes wind farms, there is no justification for this proposed 'extension' – it is in effect stand-alone, to be located in a low wind area just 8 miles from the Heritage Coastline of the Sussex Bay, particularly as it does not conform to Government recommendations.

There were a number of irregularities that went either unnoticed or ignored by RWE/Rampion2 during the original Consultation. These were initially exposed by shocked attendees at a public meeting organised by Middleton on Sea Parish Council (MOSPC) on August 25 2021 and latterly by ourselves Middleton on Sea Coastal Alliance (MOSCA) as well as other partner organisations affiliated to Protect Coastal England.

<https://www.protectcoastalengland.org/#action>

It should be noted that on 31 January 2022, over 6 months later, the Planning Inspectorate were formally notified by ourselves and other local organisations that the RWE/Rampion2 Consultation was flawed, supported by irrefutable evidence to substantiate our claim with a request that they do not consider the impending application for a Development Control Order 'DCO' acceptance - it allows local authority scrutiny to be by-passed - as well as to order a new Consultation. Just 7 days later they re-opened their Consultation.

This original 'flawed' Consultation process was also presented to the local authorities to order a second accurate Consultation and has raised serious doubts over RWE/Rampion2's sincerity and competence to conduct a fair and transparent Consultation.

A recent example is that though the Leaflet seems to seek to assist it does leave much unsaid. Two virtual 'public meetings' were held, the first on 12 February just 5 days after the opening of the Consultation and the second on the 28 February. No mention of either made in the Leaflet or advertised in the press. Only those monitoring the RWE/Rampion2 website regularly will have had the opportunity to join the 'virtual public meetings. It was difficult to find the option to join - hidden within their website. These meetings were held just with questions from the public posted only to and seen by the panel of 4 Rampion consultants. There was no rebuttal ability or further clarification. We have proof that at least 4 questions were not addressed well within the time frame – the meeting finished 30 minutes earlier. No further meetings virtual or otherwise are planned.

It is a fact that the RWE/Rampion claim that the proposed wind farm has a capacity to power 1,000,000 homes, yet the same sized wind farm located in the Dogger Bank – further out to sea where winds are consistently stronger – has the capacity to generate energy for 1,600,000 homes (Source: The National Grid).

Rampion1 is one of the UK's least efficient wind farms - with only a 35% capacity factor, so it is nonsense to propose such a huge extension in the same relatively low wind area, especially given Rampion2 cannot even link to the grid via any existing connections and would need a stand-alone infrastructure. Significantly, Hornsea 1B in Dogger Bank has a much higher capacity factor at 56% (as shown in National Grid data Link).

<https://www.nationalgrideso.com/document/186166/download>

The unavoidable high impact construction within and around our coastal waters from the proposal in its present format, Bird, marine, wildlife the environment, makes no 'Green' sense. It must be fought to ensure that we can make a valid argument to ensure the best 'Green Deal' for the benefit of our environment and future generations and not surrender for the sake of profit and subsidies that we will pay for but for which we will get nothing – certainly no reduction to our energy costs!

Make absolutely no mistake, the proposal will take time to implement up to the end of the decade. The impact of on-going substantial destruction of our environment will be there to endure and see for a considerable time in the future before any possibility of healing the

damage can take place. It is conjecture as to what the ongoing impact of the work will wash up alive or dead on our shore. The ongoing damage to migration will not diminish.

The pocket of 'dark skies' that are so important to cherish for wildlife and humanity will vanish forever. The entire horizon will be fenced in by these massive turbines which will flash red at night with shipping/aircraft security lights – currently it has been confirmed there is no ability to dull these lights to suit weather/light conditions.

As RWE/Rampion2 Information Leaflet Packs are arriving in an erratic pattern we are monitoring the distribution to avoid a repetition of past mistakes and will be able to give a further update this at the close of the Consultation.

Lastly, a number of residents have reported to us that the online Consultation Survey is unwieldy and confusing. 'Too broadly based and technically

complicated'. It has confused and put off a response which without comment enable RWE/R2 to have carte blanche to do as they will. Also, some have requested to know if there is a template to aid understanding how to respond we are pleased to direct you to Protect Coastal England.

For ease of reference please find below an example of a Consultation survey response that can be found on that website that would help enormously to mitigate the proposal in its present form.

For information: email address for RWE/Rampion 2 is: rampion2@rwe.com their website is <https://rampion2@rwe.com>

To familiarise you with the 'history of the back of office' efforts to secure a fresh consultation. Please take a moment to look at the Breaking News section on our website at <https://www.mosca.click>

Thank you for your time and interest. If you believe in ensuring a fair process please take the time to question and think carefully about the current proposal, your view could make the vital difference to the future of this beautiful area we live in.

Mike Visram

On behalf of 'MOSCA'

Email: contact@mosca.click Middleton on Sea Coastal Alliance 'MOSCA' argues Renewable Energy projects must respect the coast and habitat where they are located. Government guidelines state 'we need truly green wind farms that tread lightly on the environment' This is our objective. The MOSCA survey reporting and adequacy of consultation concerns can also be accessed at our website <https://www.mosca.click>

You could make the difference - protect this rare and beautiful heritage coastline of The Sussex Bay, South Downs National Park and the many and varied protected species and conservation areas which will bear the impact of the RWE/Rampion2 proposal



(A CONSULTATION RESPONSE TEMPLATE WAS THEN OFFERED)

Please refer to our website that reports on all aspects of Rampion 2 proposals and matters such as “Impact on wildlife” and “Effects on many Protected Species Underplayed”: Lack of oversight resulting in unchecked apparent profiteering. Plus, a whole array of issues that impinges on the lives of the inhabitants of our coastal villages, towns and city that straddle the seashores of our West Sussex Bay and anyone who cares for the future wellbeing of our Heritage and Environment.

Attachment 2:

MOSCA Communication with Middleton on Sea Parish Council on Residents Survey failings to provide statutory "Information Leaflets"

Dear Mr Lake, Parish Council, Middleton on Sea Parish Council

Please find attached list headed "Residents Response List".

This a record of all Households randomly contacted by us along Seaway (Middleton on Sea) following the close of the "Original Consultation" on 16/09/2021 and the same "households" following the close of the "Reopened Consultation" on 11/04/2022.

All Households with X alongside (except those with figure 1 alongside) identify the properties that did not receive the statutory "Information Leaflets" or notification of the "Reopened Consultation." as required be delivered to all addresses entitled to be consulted within 100 m of the Sea under (Zone 3) arrangements.

This clearly demonstrates that all of a total 25 Households consulted only one in the case of the "Original Consultation" and two in the case of the "Reopened Consultation" were provided with appropriate notifications.

You will recall that following a public meeting organised by yourselves the "Middleton on Sea Parish Council," and the public outcry and shock voiced at this meeting against not being informed about Rampion2 wind farm proposals, the Parish Council, we (MOSCA) and others formally questioned the validity of the "Original Consultation".

As result of the above RWE/Rampion, after failing over 6 months to provide answers, finally had to publicly admit on National TV that a mistake had been made and to correct this the "Consultation Period" has been extended to 11 April 2022 with some 10,000 addresses written to with details of the "Reopened Consultation" to provide all those who missed the opportunity to comment at the time of the original consultation to now have a say on an informed basis and those that previously commented of making further comments if they so choose.

The outcome of the reopened consultation you will see once again demonstrates RWE/Rampion2's lack of competence to conduct a fair and an open Consultation. Consequently, we trust the Middleton on Sea Parish Council will be inclined to support our call based on the evidence above for the "Reopened Consultation" to be declared void and a new consultation take place under the auspices of an independent body qualified carry out such consultations.

Therefore, the question we would like raised (with the developer) is:-

“How is it possible for the same householders in Sea Way who did not receive the "Consultation Leaflets" in respect “Original Consultation” did not again receive the notification for the "Reopened Consultation" given that the latter was specifically organised to correct the very serious admitted failure to contact some addresses entitled have a say; and “Can a full list of addresses written to by yourselves both in respect of "The Original" and "Reopened Consultations" be made available for scrutiny and to guarantee the integrity of the "Reopened" and indeed the whole Consultation process and thus avoid a repeat of the inaccuracy and questionable legality of the previous consultations.

I am sure, you will with your expertise, be able to phrase the question far more effectively than we.

Kind regards,

Mike Visram.

On behalf of MOSCA.

Attachment 3:

Residents Response List: Results of the survey of Seaway Road Residents in Middleton-on-Sea living within 100m of the shore.

As noted in the Covering Letter of this Representation:

- the MOSCA survey shows at the first statutory consultation 14 July 2021 to 16 September 2021 at least 20 house owners in Seaway with properties within 100m of the shore did not receive Consultation Leaflet, contrary to the Statement of Community Consultation (SoCC).
- When the developer re-opened that statutory consultation 7 February 2022 to 11 April 2022 to address that failure, the subsequent MOSCA survey indicated that 19 of the 20 households still did not receive the consultation Leaflet by mail, when the SoCC remained unchanged from the first round. **The delivery made by the post office by hand was we understand designated only for certain houses to receive. This was checked verbally with the local post deliverers.**

In the Survey hand-delivered to residents of Seaway all of which were 100m of the shore MOSCA asked:

Please contact@mosca.click - if you could answer the following questions with yes/no answers:-

- ***Have you received the recent Information 'Leaflet'?***
- ***Did you respond to the Original Consultation Survey?***
- ***Did you receive an automated acknowledgement?***
- ***Did you double click the link as requested on the above?***

The responses to the first question are indicated in the Residents Response List on the following page. Kindly note the individual names of Residents and house numbers are redacted in correspondence for data protection, with the developer and Parish Council and as this Representation is to be shared and circulated to other community organisations.

This information can be made available to Councils as appropriate observing data protection requirements.

Residents Response List

MOSCA Survey of Properties within 100m of the shore on Seaway Road Middleton on Sea Q1: *Have you received the recent Information 'Leaflet'?*

Seaway Road	Property	First Consultation - Survey 14 July to 16 Sept 2021	Re-opened Consultation 7 Feb to 11 April 2022
1	Resident Owner	No	No
2	Resident Owner	No	No
3	Resident Owner	No	No
4	Resident Owner	No	No
5	Resident Owner	No	No
6	Resident Owner	No	No
7	Resident Owner	No	No
8	Resident Owner	No	No
9	Resident Owner	No	No
10	Resident Owner	No	No
11	Resident Owner	No	No
12	Resident Owner	No	No
13	Resident Owner	No	No
14	Resident Owner	No	No
15	Resident Owner	1	1
16	Resident Owner	No	No
17	Resident Owner	No	1
18	Resident Owner	No	No
19	Resident Owner	No	No
20	Resident Owner	No	No
21	Resident Owner	No	No
22	Resident Owner	No Response	No Response
23	Resident Owner	No Response	No Response
24	Resident Owner	No Response	Unoccupied
25	Resident Owner	No Response	No

Note 1: Individual names of Residents are redacted in correspondence with the developer and Parish Council as this Representation is to be shared and circulated to other community organisations. Again, that information can be made available to Councils as appropriate observing data protection requirements.

Note 2: X means No mailed Leaflet Received

Attachment 4: MOSCA

Relevant MOSCA correspondence with the Developer

From: Chris Tomlinson [REDACTED]@rampionoffshore.com>
Sent: Friday, February 4, 2022 6:51 PM
To: [REDACTED]@mosca.click; [REDACTED]@rwe.com; rampion2@rwe.com
Cc: [REDACTED]@parliament.uk; 'MOSPC' <mospc@btconnect.com>; [REDACTED]@rwe.com; [REDACTED]@rwe.com; [REDACTED]@rwe.com
Subject: Re: Please confirm receipt of email and please reply: Rampion 2: Visual for Elmer and Middleton on Sea promise?

Dear Ms Jones,

Many thanks for your email of 17th January and apologies for my delay in replying.

Since the formal consultation closed on 16th September, we have been reviewing and analysing all the consultation feedback from a wide range of statutory bodies (such as environmental organisations and local authorities), parish councils, landowners and the Sussex community. This includes feedback received during events and meetings, and responses received via post, email and from the feedback form. We will be writing to all those who provided written consultation responses later in the spring.

The agreement of viewpoints for the environmental impact assessment (EIA) of nationally significant infrastructure projects (NSIPs), is a well-established process that is used on many other major projects in addition to wind farms. Developers of major projects inevitably receive requests to supply viewpoints from numerous locations. B Therefore, the list of viewpoint locations are prepared in agreement with key bodies to determine which locations offer a good representation of the scheme, to understand its effects.

Nevertheless, when the application is submitted, members of the public who have responded to the formal consultation, can register as Interested Parties and comment on the application. If you feel that the number of viewpoints used is insufficient then so long as you have responded to the consultation, this would be your further opportunity to raise the matter via the Planning Inspectorate.

Turning to the consultation period, the statutory period for a formal consultation of a NSIP is 28 days. In consultation with local planning authorities, a six-week consultation was agreed for Rampion 2. However, we chose to extend this to nine weeks, to allow more time for the community to review and consider the consultation materials and provide their response.

The consultation materials were available in various forms to allow individuals to choose the format that best suited them, e.g. videos, maps, a series of fact sheets, the more detailed Preliminary Environmental Information Report (PEIR) and a non-technical summary of the PEIR. We received 12,500 visits to the consultation materials during the nine-week period, in what was the largest consultation RWE has ever undertaken.

I'm sorry that we are unable to accommodate all requests that we receive, and I would like to thank you for taking the time to get involved in the Rampion 2 consultation.

Many thanks and kind regards,

Chris
Chris Tomlinson
Development & Stakeholder Manager
Rampion 2
[REDACTED]

From: [REDACTED]@mosca.click [REDACTED]@mosca.click>

Sent: 31 January 2022 15:33

To: Chris Tomlinson; [REDACTED]@rwe.com; rampion2@rwe.com

Cc: [REDACTED]@parliament.uk; 'MOSPC'

Subject: Please confirm receipt of email and please reply: Rampion 2: Visual for Elmer and Middleton on Sea promise?

Dear Mr Tomlinson

Further to my email of January 17th I have not, as yet, received a reply nor confirmation of receipt of that email. As I have received no bounce backs from RWE/Rampion 2 I must assume you have this. Do you need any further information from me to enable you to answer my queries, very happy to oblige?

The queries I have raised have a great importance not just to those that live within the area in particular but those who live in the vicinity and visit and we do not accept your reasoning that a viewpoint from either side is the same as a viewpoint that offers what will be seen as a complete unbroken arc across the horizon - which was requested.

Yours sincerely

Melanie Jones

Middleton on Sea Coastal Alliance (MOSCA)

I would be grateful to have your confirmation and reply on this issue.

Melanie Jones

From: [REDACTED]@btinternet.com>
Sent: Monday, January 17, 2022 11:33 AM
To: [REDACTED]@rampionoffshore.com' [REDACTED]@rampionoffshore.com>; [REDACTED]@rwe.com' [REDACTED]@rwe.com>; 'rampion2@rwe.com' <rampion2@rwe.com>
Cc: [REDACTED]@parliament.uk [REDACTED]@parliament.uk>; 'MOSPC' <mospc@btconnect.com>
Subject: Rampion 2: Visual for Elmer and Middleton on Sea promise?

Dear Mr Tomlinson

I have been in regular contact with Middleton on Sea Parish Council (MOSPC) since attending a zoom presentation meeting on the Rampion 2 Consultation Proposal - held at the Middleton on Sea Village Hall on August 25 2020. This was 'enlightening' in all the wrong ways in apparently offering up a proposal that was something of a done deal. Launched during lockdown on the 14th of July 2020 it left little time to for people to research, try to understand or question the logistics and validity of the likely imposed local impact of the scheme – as well as complete a complicated document internet response by 16 September 2020.

I noted at the meeting that Cllr Jackie Pendleton had requested – prior to that meeting – a visual from the coastline from the Elmer side of Littlehampton up to and including Middleton on Sea. Vaughan Weighill, after some awkwardness did remember this and promised to look into it (my notes confirm). Since that time I have asked the PCC at least 5 times what the status was of this promised visual.

Finally, I am now aware of a reply dated 14th December from yourself (see below for clarity) - which appears cursory in its content, and more concerning, highly disrespectful – certainly to me and others as residents of the area.

In precis it reads a cursory apology for not replying to the PCC requests for the information back in August 2021. Rampion 2 'feel' that the two view points already taken from Littlehampton and Bognor Regis are sufficient as they are 'in close proximity to Middleton on Sea' and provide (in your view) representation of what is planned.

I would like an answer to the following questions

1. Why did it take over 4 months to either to confirm receipt of the PCC request or make any formal reply to the PCC at all?
2. How can a visual representation that is focussed to either side (therefore side view from Elmer and Middleton on Sea) of the coastline out to sea in question be relevant to the actual part of the coastline in between looking straight out to sea?
3. This is in complete disregard of those residents and communities who will be impacted from both the proposed plan, the ongoing work and environmental devastation, and finally the prospect of 325ft turbines 'fencing in' our horizon with flashing red lights to be told in effect that we do not matter, you are going ahead

anyway and will not waste the publicity budget on our behalf – likely the prospect would be so intrusive as to cause public outcry?

4. Why did you launch the Consultation Document process under cover of lockdown and not extend the time as many companies did at the time to give people a fair chance with an extended time frame to be aware and complete the form?

I strongly fear that if I do not copy in other interested bodies to this request for answers I am likely to join a list of unanswered emails that perhaps are 'too awkward or not apparently worthy of answer' and therefore kicked into touch until it is too late.

I await your speedy reply.

Yours sincerely

Melanie Jones

From: Chris Tomlinson [REDACTED]@rampionoffshore.com]
Sent: 14 December 2021 18:52
To: mospc@btconnect.com
Cc: rampion2@rwe.com; rampion@tractivity.co.uk
Subject: Re: Rampion 2 - Visualisation from Middleton

Dear Joe,

I'm sorry that you haven't had a response to this, which I believe was raised in a parish council meeting that we attended early in the year.

We did look at this at the time when considering viewpoints for visualisations, which are tools for assessing impacts rather than artists impressions of the new wind farm. The viewpoints have been selected to be representative views from various key locations, in agreement with statutory bodies. We have many visualisations taken from viewpoints along the coast, including one from Bognor Regis two miles or so to the west and one from Littlehampton to the east. Therefore, we felt that these would provide representations from viewpoints along the coast in close proximity to Middleton-On-Sea.

Once again, apologies that this wasn't communicated to you.

Best wishes,

Chris
Chris Tomlinson
Development & Stakeholder Manager
Rampion 2
[REDACTED]