

Written representation by Elizabeth Marogna

My views on how the Rampion 2 DCO Application should be examined re Ecology (Onshore and Offshore). Pre-Examination Procedural Deadline of 16 January 2024.

Submitted 15 January 2024. IP number 20045425.

This written summary responds to the Rule 6 Letter and Annexes issued by the Examination Authority (EXA) on 14 December 2023 requesting views from Interested Parties about how the Rampion 2 Application should be examined. I would like this letter to also be confirmation of my participation in the Procedural Hearings.

My views are as follows:

Regarding environmental impacts and the developer's lack of detail in their Environmental Statement and Impact Reports. Some of these details lacking include:

1. Marine biodiversity net gain was not considered.
2. Habitat suitability assessments, including pre- and post-construction surveys and impacts on special marine protection areas have not been suitably carried out.
3. Sedimentation from construction and decommissioning will set back the Kelp Regeneration scheme being carried out in the Sussex Bay by many years, due to smothering and lack of sunlight.
4. Release of toxic sequestered chemicals are at risk of being released during construction (pyridine from anti-fouling paint on boats: English Channel is busiest shipping lane in the world) as well as sequestered carbon from the benthic layer.
5. Lack of regard on the impact on marine mammals, including many rare and protected species that are in the proposed zone out to the 12 nautical mile limit. This includes how noise will affect the health, mortality and behaviour of cetaceans 50km from source of noise.
6. Lack of regard on the impact of fish in the Sussex Bay. The noise from installation, operation and decommissioning will raise the Sound Exposure Levels (SEL) to potentially deadly levels for many species.
7. Insect migration is not able to be mitigated. Lack of consideration of emerging research of the adverse impact on flying insects impacting on biodiversity as well as pollination services on both sides of the Channel. Research concluded that 3.5 trillion arthropods fly or windsurf over the southern UK each year within the range of the proposed turbine rotors.

Overall, it must be accepted there is a high degree of uncertainty in the magnitude of significant impacts and the effectiveness of mitigation measures where there is currently limited research, data and surveys.

Rampion 2 would lead to net biodiversity loss both offshore and onshore. The proposed disruptions, many of which cannot be mitigated, would leave fragile ecosystems and natural capital even more vulnerable to multiple pressures – not only including long-term climate change.

Under National Planning Policy Framework NPPF Section 15: *“Conserving and enhancing the natural environment, Para 174. “Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a. *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils ...;*
- b. *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c. *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d. *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”*

The Applicant has not demonstrated Biodiversity Net Gain and the disturbances made to build this OWF would be vast. The currently installed Rampion OWF has a comparatively low output (compared to Scottish Isles, Dogger Back OWFs) and thus contributing very little to offsetting fossil fuel use.

Sincerely,

Elizabeth Marogna

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