

Carlo Marogna for Constructive Heritage LLP
IP number : 20045427
For Rampion 2 Examination Authority (ExA) Application Submission Deadline 3
Submission date: 25 April 2024

Thank you to the applicant for the response to the concerns raised in the previous representation.

There are a few issues felt still outstanding, however, these mentioned below:

Regarding the previous comments by a number of interested parties on lack of visual representation of the turbines during operation, we thank the applicant for pointing out their location within the previous documentation. However, we reiterate this was not represented or readily available at the time of public engagement/consultation, nor were there moving images presented at any time. There is a question regarding the correct scale of turbines in the applicants photomontages. Images were requested at the time by numerous parties and denied on reasons of cost and practicality. Whilst understood there would be a need for representation at multiple viewpoints and the extra costs involved in video editing, such as from the South Downs National Park, for such significant visual changes planned, the public should have been made more aware. We commissioned our own audio visual expert to give us a scale panoramic idea of the moving turbines from Littlehampton pier and it was not expensive or too time consuming.

Rather than repeat what others have added we would like to endorse 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

We support:

“The people who 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 research that the Examination is asking for and which is available to Rampion 2 nor the precisely accurate speak that may be 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 can be seen to be made to allay the fears that we feel. Nor be faced with information that is represented within a response given that the presence of the information is not wholly evident to human inspection – (Teganography!)”

Representation by Constructive Heritage LLP

2.1.11 Request for further information based around current data.

The applicant states “the modelling used was undertaken using the INSPIRE underwater noise modelling software, which is dedicated to underwater noise from impact piling, is approved by the MMO, who have raised no concerns with the methodology and is continually updated with real world data”.

INSPIRE is an Energy flux model which is fast, physically insightful but only valid for simple cases, giving coarse descriptions of the field. It’s applicable to broadband average intensity. It does not take into account sound speed profile. There is a need to conduct a large series of Sound Speed Profiles across the area at various times of the day and year to begin to achieve an accurate baseline understanding of sound propagation and decay.

The National Physical Laboratory have a calculator on the absorption of sound through water: Their simple data calculates an absorption of 0.06 db per km in typical seawater. Agree that this is subject to numerous factors but that means that high sound levels will carry over much further distances than previously stated by the applicant Therefore more accurate modelling is still needed..

We note comments and would like to endorse and defer to the MMO and NE and their relevant representations and concerns on sound noise levels during construction and operation.

We would also like to refer the applicant to best practice regarding underwater and surface monitoring of all aspects of generated noise. This is a complex subject, that we trust will be overseen by the relevant authorities using BS and ISO guidelines on underwater and surface monitoring.

We maintain that infrasound and ultrasound will be generated and should be included in any monitoring program and future modelling.

There is a published standard of relevance that should be referred to: ISO 18406:2017 – Measurement of radiated underwater sound from percussive pile driving.

Comments on MMO representation

1.1.20 1.1.20 “The MMO acknowledges NE concern over the lack of clarity over piling ‘worst case scenario’, and agrees that it is, currently, not possible to confidently assess whether this has been robustly assessed by the applicant. Additionally, the MMO notes concerns relating to the Vessel Management Plan (VMP) and marine mammals. The MMO also has concerns relating to underwater noise and will keep a watching brief on this topic.”

We would like to reiterate our opinion on excessive sound levels and their potential to do significant harm if not mitigated correctly as previously stated and defer to and endorse the MMO and NE on this subject.

Thank you for your time and consideration in this matter.