

Chairman: Prof Peter Jones
Chief Fisheries & Conservation Officer: Mr Robert Pearson

C/O Ms Maria Militsky
Offshore Consents Manager Rampion 2
Email: [REDACTED]@rwe.com

Sussex IFCA Contact Officer:
Dr Jen Lewis, Conservation and Research Manager

9th July 2024

Dear Ms Militsky,

RE: Rampion 2 Environmental Statement Consultation – Comments for Deadline 5
Reference Number: DCO/2019/00005

See below for Sussex Inshore Fisheries and Conservation Authority's (IFCA) comments on submissions received for deadline 4.

Comments on “7.17 In Principle Sensitive Features Mitigation Plan” and “8.40 ITAP - Information to support efficacy of noise mitigation / abatement techniques with respect to site conditions at Rampion 2 Offshore Windfarm”

Sussex IFCA note the inclusion of using double big bubble curtains and the Hydrosound Damper as mitigation technology to reduce the impact of underwater noise on sensitive features. Due to the differences in environmental conditions at the proposed site for Rampion 2 compared to where noise mitigation has successfully been deployed, Sussex IFCA would ideally like to see this technology tested in situ for efficacy but appreciate the difficulties of doing this prior to construction.

Sussex IFCA welcome the opportunity to be involved with the subsequent consultation throughout the detailed design stage of the project, including in the planning and review of pre-construction surveys in the offshore export cable corridor, as well as during development of the final project design, construction plans and mitigation measures.

Comments on “8.25.1 Applicant's Post Hearing Submission – Issue Specific Hearing 1 Appendix 9”

Sussex IFCA notes the inclusion of noise mitigation and abatement measures and defer to the MMOs advice that a threshold of 135dB SELs, based on a study by Hawkins et al. (2014) as a suitable threshold for behavioural responses of sensitive fish receptors.

Comments on “8.74 Without Prejudice Measures of Equivalent Environmental Benefit (MEEB) Review”

Sussex IFCA has serious concerns about the implementation and equivalence of the proposed measures within the MEEB. Specifically, around the uptake and significance of extending voluntary measures that are already in place within Kingmere MCZ, and the relevance of litter picking as having a positive impact to black seabream populations. Sussex IFCA asserts that in their current form, both measures would likely have negligible additional benefit. Sussex IFCA support the telemetry work conducted by the University of Plymouth which is already being used to inform

management decisions and would see furthering this as a positive impact on black seabream populations within Kingmere MCZ.

Throughout the document, the Kingmere MCZ Engagement Group (KMEG) is referred to, with regard to how any of these measures would be developed and delivered. Sussex IFCA is specifically mentioned as being a key member of this group (eg. Section 5.2.14) but would like to state we have not been consulted with or informed about this, prior to this document being submitted. Being part of this group would require significant resource and would need to be considered as part of our strategic planning processes. Specific comments on the proposed measures are below:

5.2 Reduction in Disturbance from Watercraft within Kingmere MCZ (voluntary seasonal speed limit/no anchor zone)

Sussex IFCA have significant concerns around the comparison of boat noise, which is transient, compared to impulsive piling noise. A reduction in boat noise will not have a comparable effect on black seabream populations to a reduction in piling noise.

Sussex IFCA already have a voluntary code of conduct (CoC) that sits aside our current management measures (April-June). This CoC states to drift if possible (no anchoring) or use a lower impact anchor. It is Sussex IFCA's understanding that Rampion have not engaged with the angling community about the possible uptake of any additional voluntary measures. From our extensive engagement with anglers during the Kingmere MCZ management development process, it was made clear that anchoring restrictions for angling would have the same impact as prohibiting them. Sussex IFCA's opinion is that it is unlikely there will be any significant additional positive impact from this proposed Measure of Equivalent Environmental Benefit.

No evidence is presented within the document (e.g. case-studies from previous uses of voluntary measures etc) as to how these measures will have a measurable impact.

5.3 Removal of Marine Litter, Including Awareness and Engagement

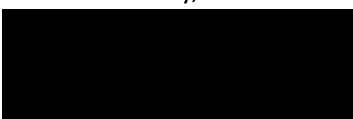
Sussex IFCA has concerns around the relevance of this measure in relation to positive impacts, specifically on black seabream. Sussex IFCA is also mentioned as a key delivery partner to remove litter from within Kingmere MCZ (section 5.3.29) but would like to again state that we have not been consulted about our resource capability to do this.

5.4 Research on Black Seabream

Sussex IFCA do not necessarily consider this a Measure of Equivalent Environmental Benefit but would like to highlight the value of this proposal to furthering our understanding of black seabream populations within and around Kingmere MCZ. Sussex IFCA strongly suggest that Rampion use this proposed measure as part of their monitoring programme, in determining the impact of Rampion 2 on black seabream populations.

On behalf of the Authority,

Yours sincerely,

A solid black rectangular box used to redact the signature of Dr Jen Lewis.

Dr Jen Lewis
Sussex IFCA