Examination Deadline 6

For EN010117 – Rampion 2 Wind Farm

Interested Parties (IPs) Closing Statement

Representation submitted by:
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Deadline 6, 1st August 2024

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This Closing Statement is offered in 5 sections mainly in bullet form:

Section 1: The Summary

Many informed residents and community organisations in the south believe that consenting Rampion 2 is not in the local or national interest. Evidence offered by community organisations in this Examination matches many concerns that statutory consultees raised in their Principal Areas of Disagreement (PAD) Statements and Representations.

- Fundamentally, the scale of the industrial transformation of the Sussex Bay with multiple adverse effects on marine habitat and wildlife together with the disruption of terrestrial habitats and designated landscapes makes Rampion 2 inappropriate infrastructure development - in the eyes of many.
- Apart from breaching UK international commitments under the European Landscapes Convention (ELC)[1] that upholds cultural, heritage and social values and promotes well-being, and being literally "off the scale" in respect to visual impacts, with no regard for visual buffers or objective interpretation of ELC-aligned UK policy and safeguards, Rampion 2 would disproportionately affect current and future generations of families and degrade the experience of many visitors to the south coast.
- The nature and scale of disruption of ecologically sensitive and bio-productive inshore waters in the Sussex Bay and the transmission right-of-way across the South Downs National Park with its statutory purposes significantly affected, coupled with the severing of planned ecological connectivity corridors all compounding the risk of degrading natural capital in the south[i].
- Evidence indicates the construction and operation of Rampion 2 poses a clear disruption risk to ecosystems already under multiple human pressures today. It leaves them even less resilient to the effects of long-term climate change.
- Rampion 2 has more significant opportunity costs that are manifest from local-to-national levels, as compared to allocating the £3-4 bn Rampion 2 would cost to more efficient low-emission alternatives designated as Critical National Priorities (CNP) in NPS (Nov,2023), which offer better value for money.
- These opportunity costs manifest as significant national **disbenefits** span the economic, social and environmental dimensions of sustainable development.
- Close analysis rather than subjective opinion and unqualified acceptance of the commercial Applicant's narrative suggest that adverse local impacts and the national disbenefits together dwarf the overstated national benefits of Rampion 2.

[1] To conserve and protect natural landscapes and seascapes and their connectivity, as interpreted by the UK Offshore Energy SEA programme (OESEA-4, 2022) with its objective on this theme to accord with the ECL, page 66,https://assets.publishing.service.gov.uk/media/623356e4e90e0709e1e4530d/OESEA4_Environmental_Report.pdf

Section 2: Three overarching NPS policy-relevant concerns

At the outset of this Examination Interested Parties (IPs) were advised by the ExA that two overriding considerations in the Examination were the Application must be decided:[2]

"in accordance with any relevant NPS ... subject to certain provisos. Essentially, the provisos are that the application must not breach legal or treaty obligations, and any adverse impact of the Proposed Development would not outweigh its benefits."

A third overriding proviso was also important and relevant to local stakeholders, which is explicit in the NPS and wider body of national-to-local policy, including the NPPF and Local Plans. That is whether Rampion 2 risks undermining the achievement of sustainable development in the south.

Three overarching case-specific concerns that many IPs have highlighted, which argue against awarding consent for this Application are these:

1. **<u>BREACH OF INTERNATIONAL COMMITMENTS AND ALIGNED UK POLICY AND LAW</u>: With up to 90 turbines up to 325m tall spread along the Sussex Bay inshore, evidence indicates the Rampion 2 Application breaches UK commitments under the European Landscape Convention (ELC).**

   - Specifically, in terms of interpretation of the ECL breach in the Rampion 2 case, the Government's own Offshore Energy SEA programme in its latest OESEA4 (2022) states its very objective and the indicators on this theme are: [3]

     "To accord with, and contribute to the delivery of the aims and articles of the European Landscape Convention and minimise significant adverse impact on seascape/landscape including designated and non-designated areas."

   - Rampion 2 seriously challenges closely aligned UK policy, safeguards and laws, including the OESEA strategic advice on visual buffers required in the Rampion 2 case **<u>to accord</u>** with the ELC obligations; as well as the Marine policy Statement (MPS, 2021) on the indivisibility of seascapes and landscapes, and the Levelling up and Regeneration Act (2023) amending the PA2008 to strengthen related safeguards.

   - Even if the ExA were to recommend setting aside the OESEA interpretation of "according with ELC obligations", which an ExA recommendation to consent would imply, Rampion 2 challenges any reasonable interpretation of the ELC aims and the body of closely aligned UK policy and law. [4]

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[2] In its ExA Rule 6 Letter of Dec 2023, Annex C

[3] OESEA-4, 2022, BEIS, page 66, https://assets.publishing.service.gov.uk/media/623356e4e90e0709e1e4530d/OESEA4_Environmental_Report.pdf

[4] As Natural England states, the Levelling up and Regeneration Act (2023) specifically imposes a new active duty for such developments to enhance the designated functions of National Parks and the protection of designated landscapes (i.e., the South Downs National in this case).

- We observed in representations the Applicant in its statutory public consultations during the Pre-Application categorically refutes the relevance of UK policy or law in these regards to Rampion 2. That claim went largely unchallenged and unscrutinised, while being widely reported as factual in local and national media.
- That had a chilling effect as described in **PEDP-96** and elaborated in **REP1-145**[5]**.** That denial was repeated in the Applicant's Environment Statement (ES) in its response to local authorities and statutory consultees raising the same question and concern. [6]
- The ExA's silence and lack of clarity on this material matter remains perplexing and concerning for many IPs participating in good faith in this Examination.

2. **ADVERSE IMPACTS OUTWEIGHING NATIONAL BENEFITS: We believe the evidence in the Examination Library demonstrates that cumulative adverse local impacts together with national disbenefits outweigh assumed national benefits, this given the scale of development in this inshore location classified as a low to moderate wind power density (WPD) zone for the UK.**

- Here national disbenefits include the inter-dependent economic, social and environment opportunity costs of Rampion 2 manifest at national-to-local levels. [7]
- We recognise this is ultimately a judgement call the ExA must make in framing its recommendations. Given what is at stake, we have argued this judgement must be based on the best available information, analysis and open discussion of the metrics, in order to be credible and enjoy public confidence.
- While many Representations offer views on how best to ensure rigour in that judgement and make it less subjective, these proposals were largely rejected by the ExA in the Preliminary Meeting.[8]
- They included suggestions consistent with PINs Guidance Notes and published Examination Procedures, such as:
  - expert testimony for certain specialised technical matters or scientific topics where relevant expertise and experience is important;

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[5] Chapter 1 of the LIA par 1-7 in the Due Diligence Representation as the second of 3 separate representations compiled under REP1-145

[6] The Applicant's (ES) repeatedly dismisses the UK Govts. OESEA advice as essentially irrelevant and as being only, "a high level 'buffer' study … it is a strategic tool and is not guidance or a roadmap for placing of wind farms …" ES, Volume 2, Chapter 15: Seascape, landscape, and visual impact Assessment, Pages 52, 53 and further on in that ES document. See also the PC Due Diligence Representation on page 253 of **REP1-145**

[7] Opportunity cost meaning the foregone opportunity to allocate financial resources £3-4 bn elsewhere for power system expansion with low-emission generation and demand-side management where the same or greater benefit may be realised for less cost to society.

[8] Audio recording in the Examination Library of the ExA response in the first open Hearing to a PCS affiliate question as to whether the ExA will accept Expert Testimony in support of IP Representations, as is provided in PINs Advisory Notes on the matter and in published Examination Procedures, https://youtu.be/nnxC5Hv6sEo?t=2178 . In contrast to para 33 in the Procedure Rules allow an ExA to call expert witnesses to give evidence on specific points at hearings and consider requests from the Applicant and other interested parties to call expert witnesses in support of their representations. The unequivocal response of the ExA was no outside expert advice will be accepted in the Rampion 2 Examination, stating that the Secretary of State (SoS) had full confidence in the ExA Members to arrive at their own conclusions.

- use of relevant best available analysis methodologies, such as power system value analysis as was offered and accepted in other DCO (Energy) Examinations, and
- offering clear interpretations of NPS provisions, such as metrics for sustainability and what constitutes sustainable infrastructure in the NSIP regime (**PEDP-96**);

- Overall it remains unclear to many IPs what substantive basis, supporting methods and metrics the ExA will rely on to inform the judgement on this important proviso regarding adverse local impacts + national disbenefits outweighing benefits.

3. **UNDERMINING OF SUSTAINABLE DEVELOPMENT IN THE SOUTH: Evidence in the PINs Examination Library indicates Rampion 2 risks undermining rather than advancing the achievement of sustainable development on the Sussex south coast and affected inland areas.**

- Apart from what the commercial Applicant asserts, evidence in the Examination Library indicates that Rampion 2 is more than likely to deliver net losses (not net gains) in the form of local impacts in the South, for each sustainability dimension (i.e., across economic, social and environmental metrics).
- Rampion 2 thus challenges the ambition of appropriate, sustainable infrastructure development. This is counter to the body of NPS [9], NPPF (2023)[10] and local policy that legally defines sustainable development as delivering net positive gains for each of the three mutually reinforcing dimensions of sustainable development.
- Local Authorities as statutory consultees indicated there are few local socio-economic or regional economic benefits to be derived from the £3-4 billion capital outlay for Rampion 2, or through the operation phase (i.e., few if any permanent high value jobs and skills development opportunities, as well as actual profit retained locally, or economic and industrial development opportunity).
- These are mainly "off shored" to European consortium and supplies who will own and develop Rampion 2 with their proprietary technology and skilled labour. [11]
- Due to the likely hit to the tourism economy in the South, as indicated by local authorities who refute the Applicant's claims to the contrary, it is more likely that Rampion 2 risks a net loss for jobs. [12]

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[9] NPS EN-1 (2011): Ensuring balance across mutually reinforcing environment, social and economic objectives to achieve net gains under each objective. EN-1 Para 2.2.4, "It is important that …. the planning system ensures that development consent decisions take account of the views of affected communities and respect the principles of sustainable development; and EN-1 Para 2.2.7, "The Government's wider objectives for energy infrastructure include contributing to sustainable development and ensuring that our energy infrastructure is safe … Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed and affects the well-being of society and the economy …"

[10] The purpose of the planning system is to contribute to the achievement of sustainable development ..." (Para 7, The National Policy Planning Framework (NPPF) supported by the Planning Act (2008). In effect, it is a legal presumption not only to development, but to ensure sustainable development as pursuing three overarching objectives (environment, social and economic objectives) that are "interdependent and need to be pursued and balanced in mutually supportive ways". (NPPF)

[11] As in the documented experience with offshore wind development in Scotland cited in Representations .

[12] That is before taking into account the impact of upward pressure on electricity prices on local businesses across all sectors in the short to medium term as increasingly admitted in policy statements and

Many Representations thus assert that Rampion 2 does not pass the relevant National Policy Statement (NPS) tests related to these three overarching concerns. [13]

That view is generally, if not specifically corroborated by statutory consultees, including the SDNP Authority and Local Authorities.

Given that this Closing Statement:

- Offers a summing up and reminder of the engagement of local residents and local community organisations in this DCO process;
- That was over 3 years from early 2020 spanning the pre-Application, Acceptance and Examination stages and the argument and evidence marshalled; and
- Given the massive volume of Examination materials that the ExA must wade through in the next 3 months to frame its recommendations.

We thus take this opportunity to highlight the following concerns as important and relevant to take into account and hopefully revisit in a less rushed and contemplative manner as the ExA prepares its recommendations over the next 3 months.

These are summed up under three headings:

- **Good faith participation in this DCO process**
- **Evidence based representation list**
- **Other substantive and material concerns raised**

[13] The Rule 6 Letter Annex B provisos refer also to NPS 2011, Section 1.1.2 on which this examination is based. These provisos are retained in NPS (November, 2023) the Secretary of State must take into account.

Section 3: Good Faith Participation in the DCO process

Community-based IPs pro-actively and constructively engaged in this DCO process since early 2020, as elaborated in bullet points in Representation **REP1-145** in Chapter 1.[14] Among the many substantive inputs and contributions to the DCO included:

- Input to Local Authorities (during COVID lockdowns) proposing improvements in the developer's draft Statement of Community Consultations (SoCC) and offering support for parallel activities to improve community outreach and understanding of the proposed development; and otherwise conform to what the legislation envisaged as adequate pre-Application consultations – despite the "chilling effect" of the Applicant's virtual only consultation approach and unchallenged (very one sided) narratives.
- Supporting and participating in developer-led consultations, actually funding special events and face-to-face meetings among stakeholders to help increase awareness among local residents and councillors of what was proposed, when it became possible to hold open meetings
- This while the developer remained in virtual consultation mode only for the main project-wide statutory consultations July-September 2021 and suddenly re-opened in February-March 2022 (mostly due to pressure from local communities documenting SoC failures then discussing these with the developer, and when ignored) reporting to Council Authorities and PINs and are MPs following Advisory Notes and procedures. [15]
- Submitting substantive AOC representations comprehensively documenting multiple ongoing violations of the SoCC and good practices public consultations approaches based on what communities experienced and witnessed on the ground.
- Proposing a conditional acceptant of the Application if those SoCC deficiencies were addressed in the Pre-Examination. We saw those concerns initially addressed in the PINs Advice Letter to the Applicant the same day the Acceptance for Examination Letter was issued. But that was reversed by the subsequent ExA in its Rule 6 Letter that opened the Pre-Examination process with no resolution of the adequacy issues raised.
- Once the Examination started, preparation of Relevant Representations and numerous comprehensive Written Representations (WRs) to offer research and analysis, local knowledge and empirical evidence to support our arguments, all the while crosschecking corroborating views of Councils and other statutory consultees; and written and oral participation in the Open and Issue Specific Hearings and commenting on the ExA's Written Questions for Statutory Consultees where IPs could offer views and evidence.

[14] Chapter 2, Background and Terms of Reference in the PCS, Local Impact Assessment (LIA)

[15] That in response to the shortcomings of the developer's virtual only consultations that went without scrutiny and was far from the quality of informed consultation envisaged in the PA2008 and relevant legislation that had not anticipated (a) lock downs, and (b) virtual only engagement and only online public consultations. That included community organisations and Parish Councils, themselves organising and paying for face-to-face meetings such as in Littlehampton and Middleton on Sea as a last resort.

Section 4: Evidence-based documentation List

Substantive representations from Protect Coastal Sussex (PCS) and affiliated community organisations in the South were prepared at each stage of the Examination.

These were collaborative efforts by many people in the community working in a voluntary capacity that brought together a range of local perspectives, local knowledge, relevant professional experience and multi-disciplinary evidence.

Among these representations by PCS, and others in association with PCS included:

Note: for convenience, readers may click on the underlined blue hyperlinks to directly access the PDF of the representation referred to in the PINs on-line Examination Library

- **AoC-19 114 pages; and AoC-021 22 pages.**
  Adequacy of Consultation compendium of PCS Affiliates.
- **PEDP-96 25 pages; PEDP-081 11 pages; PEDP-069 2 pages: PEDP-83 4 pages; and PEDP-84 1 page.** These contain PCS and affiliate Pre-Examination Responses to the ExA's Rule 6 Letter and proposed amendments to the National Policy Statements (NPS) in the NPS Public Consultation (30 March 2023 to 23 June 2023) as relevant to the Rampion 2 DCO decision, and; PCS and community organisation affiliates views on how the Rampion 2 Application should be examined, including Principal Issues and implications of National Policy Statements (in PEDP-081).
- **REP1-145 367 pages.** Three PCS written representations as described in text following this hyperlinked list of representations, namely: (1) the PCS Local Impact Assessment, (2) Due Diligence on the Applicant's claims and (3) Consideration of the scope for low-emission Alternatives to Rampion 2 in this Examination, focused on the case-specific NPS requirements in that regard.
- **REP1-123 3 pages.** PCS discussion points requested to be included in the Alternatives agenda session in Issue Specific Hearing 1 (ISH1), 7 Feb 2024:
- **REP1-134 11 pages.** PCS affiliate comments on Seascape, Landscape and Visual Impacts and matters relating to the Applicant failing to provide visual buffers for turbines as an issue to be discussed in the Examination.
- **REP1-165, REP1-151 and REP1-152** by PSC affiliates and members on adverse ecological impacts, including underwater noise of the Rampion 2 infrastructure construction and operation, on marine and terrestrial ecosystem resilience and ecosystem services, including likely net biodiversity loss, not gain.
- **REP2-064 33 pages.** PCS comment on the Applicant's Response to the ExA Action Points Arising from Issue Specific Hearing 1 (ISH1) asking for detail on the level of wind resources in the Channel (Sussex Bay Inshore) with evidence in that regard including wind power density (WPD) records and relevant Rampion 1 and other offshore windfarms capacity factors or load factors.

- **REP2- 065 1 page, and REP2-066 32 pages.** PCS comment for other IPs and readers to help navigate the three separate PCS Deadline 1 Representations (mistakenly) compiled as a single representation as a very large **REP1-145** in the PINs Examination Library. **REP2-066 o**ffers one-page bullet points on each Representation and a Annexes with the submitted concise Summaries of there main PCS WRS as noted later in this section.
- **REP2- 046, REP2-O47 and REP2-048.** Representations by PCS civil society affiliate CowfoldvRampion (Cowfold Residents'Action Group) on the multiple impacts of the onshore transmission proposal and substations that will be covered in their Closing Statement for Deadline 6.
- **REP3-115 18 pages.** PCS highlighting the NPS policy requirements to consider alternatives in the Rampion Examination under EN-1 (overarching) Section 5.9.10, "Development proposed within nationally designated landscapes", and Section 4.4. Alternatives that is not addressed by the Applicant.
- **REP3-120 4 pages.** PCS affiliate MOSCA commenting on the applicant's ongoing failing to provide information to adequately assess seascape, Landscape and Visual Impacts from Middleton on Sea and the failure to include visual buffers to conform to the Offshore Energy SEA interpretation of what is needed to conform international treaty commitments for Landscape / Seascape conservation and protection.
- **REP4-114 5 pages.** PCS comment on the Issue specific Hearing ISH2: (1)on the SDNP response to the hypothetical ExA question on whether the Levelling up and Regeneration Act (2023) means Rampion 2 should not be consented; and (2) the community question how the ExA will account for the European Convention on Landscapes and Offshore Energy SEA strategic advice for visual buffers applicable to the very large Rampion 2 turbines.
- **REP4-115 6 pages.** PCS comment on the Examining Authority's request for further information from Natural England arising out of the Issue Specific Hearing 2 concerning visual impacts on the special qualities and statutory functions of the SDNP and duty of all Parties to protect and conserve these qualities.
- **REP5-116 3 pages**: PCS comment on the ExA's Further Written Questions about Seascape, Landscape and visual effects directed to the South Downs National Park Authority and directly related matters of conformance with the Levelling Up and Regeneration Act (LURA) 2023) raising the bar to legally protect SDNP special statutory qualities in line with ELC Treaty obligations.
- **REP5-152** and **REP5-152**: Representations by PCS affiliate CowfoldvRampion (Cowfold Residents' Action Group) on various onshore impact concerns to be covered in their Closing Statement for Deadline 6.

To highlight three Substantive Written Representations of PCS

Notable among the PCS inputs for Deadline 1 were three separate but complementary PCS Representations each with their own summary (compiled in the PINS Examination Library as one large **REP1-145**). These 3 separate submissions were made more

accessible in one-page bullet form with the original summaries of each Representation Annexed in Deadline 2 **REP2-066**:

WR-1. **PCS Local Impact Assessment (LIA) - 250 pages**
This first substantive representation offers the Examination a comprehensive document with information, analysis and evidence on how many residents and local community organisations view local and national-to-local impacts. It cross-references corroborating information in the Principle Areas of Disagreement (PAD) Statements that reach similar conclusions, and it tracks relevant NPS provisions.[16]

WR-2. **Local Community Due Diligence: On the Applicant's Claims about the Performance, Benefits and Adverse Impacts of Rampion 2 - 42 pages**
This second substantive representation offers due diligence on claims made in the developer-led statutory consultations and the Application about the performance, benefits and impacts of Rampion 2 that we believe lack credibility and evidence. It highlights how those claims contributed to a "chilling effect" in the planning context for the Rampion 2 Examination. People were less inclined to participate in the consultations or the Examination process. It aims to inform the key policy judgments the ExA will make on whether the "adverse impacts of Rampion 2 outweigh its national benefits"

WR-3. **PCS Consideration of Alternatives in the Rampion 2 Examination as a NPS Requirement - 72 pages**
This third substantive representation responds to the case-specific NPD policy requirement in the Rampion 2 Examination (to assess, "*the cost of, and scope for, developing all or part of the development elsewhere outside the designated area, or meeting the need for it in some other way)*", as stipulated under "Developments Proposed within Designated Landscapes", EN-1 (2011) 5.9.10. *The assessments are to be made under NPS, EN-1, Section 4.4, "Alternatives*".

WR-3 benchmarks Rampion 2 against three critical national priority (CNP) alternatives for low emission generation and compares the National Benefits of each with Rampion 2 on the basis of NPS provisions. That was offered to help calibrate the opportunity costs[17] of Rampion 2 relative to these realistic Alternatives to commit £3-4bn .

That in turn helps to inform and better understand whether adverse local impact + the national disbenefits of Rampion outweigh the assumed national benefits. And it highlights low emission generation technology (CNP)) that would do more across most NPS benefit measures than Rampion 2 would, over the same timeframe that Rampion 2 would operate (2030 to 2050-55), for incrementally less cost for essential power system (decarbonisation) transitions and less adverse impact on UK society.

[16] It ties the Impact Assessment to NPS EN-1 and EN-3 and ensuring sustainable development as a balance of Economy, Environment and Social Community. Individual chapters consider: Relevant Policy, Planning and Legislation; Seascape, Landscape and Visual Impacts; Social Effects on local residents and communities; Tourism Economy, other socio-economic and national-to local economic impacts; Environment, Biodiversity and Ecosystem Impacts, and; Landscape and Underwater Noise Effects.

[17] Again, opportunity cost meaning the foregone opportunity to allocate financial resources £3-4 bn elsewhere for power system expansion with low-emission generation and demand-side management where the same or greater benefit may be realised for less cost to society.

Section 5: Other material concerns Community IPs raised in the Examination

While everyone accepts the Examination task for Rampion 2 is complex and multifaceted, at the same time not all multi-billion £ windfarms are the same. [18]

- Performance, impacts, benefit-cost tradeoffs and value for money for offshore wind developments are location specific, and circumscribed by weather dependency.
- All DCO Applications must be examined on a case-by-case basis, weighing all relevant NPS provisions interpreted objectively.

In addition to the three overarching concerns highlighted in Section 2 of this Closing Statement are these to take into account:

1. Inadequacy of the Applicant's the consideration of Alternatives
2. Limited net contribution to UK Energy Security and related context
3. Clarity needed on the net Co2 emission reduction and Rampion 2 role in decarbonisation of power supply by 2035
4. Upward pressures on the consumer price of electricity in the short to medium term driving the cost of living
5. Lack of clarity on sustainable development metrics and conformance to sustainable Infrastructure policy
6. Need for quantification of adverse impacts and benefits to the extent possible to inform meaningful interpretation of key NPS previsions
7. Rampion 2 compromises necessary future proofing of valued coastal assets – if UK citizens must limit off-island travel, vacations and recreation.

This list is followed by a selective bullet points on each citing the Representations the Examination Library (hyperlinked for convenience) that elaborate and offer evidence.

[18] Unconditional support for any wind turbine anywhere from some people is understandable. In the Rampion 2 case our experience on the ground apart from encountering limited awareness of the proposal was the degree of conflation of strong public support for renewable energy with support for this Rampion 2 proposal itself, as we observed in the developer's consultation narrative and this Application. Our conclusion looking across the evidence in the Examination Library from different perspectives (local-to-national) and NPS provisions is we disagree with well-meaning, but misinformed views that Rampion 2 should be consented at any cost. It fails the key NPS tests in Section 1.1.2 as highlighted by the ExA (noted in Sections 2).

1. ***Inadequacy of the Applicant's Consideration of Alternatives: Failure to adequately consider Alternatives in respect to: (a. within-project alternatives according to EIA Legislation, and (b. the scope and cost of Alternatives to Rampion 2 for low emission generation, as a case-specific NPS policy requirement.***

   - Recognition the ExA gave to a) above in its Initial Assessment of Principal Issues in its Rule 6 Letter was welcomed, relating to the onshore transmission route alignment options and substation location option to connect to the National Grid. That opened the door helpful exchange of views in the Hearings that followed and ExA questions.
   - However on b), no clear acknowledgement was given to the fact Rampion 2 invokes the NPS Overarching, EN-1, para 5.9.10 policy requirement to:
     - *"…. include assessment of: … the cost of, and scope for, developing all or part of the development elsewhere outside the designated area, or meeting the need for it in some other way, taking account of the policy on Alternatives set out in Section 4.4*" of NPS EN-1. (our underlining for emphasis)
   - **PEDP-96** Item 2, page 3, flagged this as a clear policy-relevant Principal Issue for this Examination.
     - **REP1-145** in Chapter 2, The Policy and Legislative Landscape in the comprehensive PCS Local impact Assessment **REP1-145** for Deadline 1 elaborated the relevance and rationale.
     - **REP1-123** also requested discussion on the invocation of NPS Section 4.4 Alternatives in Open Hearing 1 Sessions and highlighted the representations provided metrics and methodologies that were appropriate.
   - It thus remains perplexing at this stage of the Examination that these substantive issues on NPS policy requirements raised by both community organisation IPs and statutory consultees remained without mention in ExA questions and discussions in Open and Issue Specific Hearings.[19]
   - The South Downs National Park Authority (SDNPA) in its Principal Areas of Disagreement (PAD) Statement, of Dec 2023 said with clarity.
     - **"T*he consideration of alternatives for the scheme has not sufficiently demonstrated that meeting the need for offshore renewable energy could not be met through a scheme that did not intersect the South Downs National Park (SDNP). It is therefore the case that this 'test' of the National Policy Statement EN-1 paragraph 5.9.10 has not been met.*"** (our underlining again for emphasis)
   - A quantitative analysis and qualitative assessment of NPS alternatives was offered to the Examination in PCS **REP1-145**. And while that contribution was to address the Applicant's failing to respect the stipulations of NPS EN-1, para 5.9.10, we suggested it helps to better inform the ExA's consideration of the opportunity costs of Rampion 2.

[19] **REP1-123** suggested procedures for considering Alternatives under EN-1 Section 4.4 could reasonably be announced at the Day 1 Hearing 7 Feb 2023, along with steps to provide related system value modelling analysis and relevant written or oral testimony . **PEDP-96** previously offered these views on how the Examination may be conducted in response to the ExA request in that regard.

- That is relevant to objectively judge whether the sum of local and national disbenefits (the latter being the opportunity costs of Rampion 2 revealed by the required NPS Section 4.4 Assessments[20]) outweigh the national benefit.
    - Three alternatives were assessed under the NPS Section 4.4 requirement were designated Critical National Priorities (CNP) in NPS (Nov, 2023), namely:
        - A RE Option: Consisting of the same wind turbines moved and properly located offshore in favourable wind regimes without the disproportional case-specific impacts on south coast people and the environment:
            - Including the option of a good-faith negotiated outcome in the interest of the same developer and UK society to move the Rampion 2 turbines to a newly awarded license area on Dogger Bank where there are multiple synergies; [21]
        - Providing existing or new high efficiency gas turbines fitted with carbon capture making them Net Zero and hydrogen ready utilising existing transmission infrastructure and assets; and
        - Providing a flexible small modular nuclear (SMR) powering steam turbines located at decommissioned large nuclear sites (7 nuclear plant decommissioning anticipated before 2030), or former natural gas or coal power stations where transmission and power system infrastructure is already in place.
    - PCS offered a simple benchmarking of Rampion 2 against these three CNP generation alternatives in the form of a scoring and ranking exercise to help break down and illustrate the national benefits and disbenefits.
    - This approach and outcome is summarised in bullet points on page 7 of **REP2-066** and further elaborated in the Annex 3 Summary there. [22]
- IPs also observed in **PEDP-96** page 16 that a High Court Judicial Review in 2022 overturned a BEIS Secretary of State decision on a proposed cross-channel power under sea interconnector cable between France and the south of England mainly on grounds of failure to adequately consider alternatives in the DCO process.
- We understand that High Court decision underscores the material relevance of NPS *5.9.10* and Section 4.4 Alternatives as NPS-1 policy requirements to apply in the

[20] Such as the consequences of Rampion 2 (relative to investing in other more efficient Critical National Priority alternatives) thus requiring: the UK to import incrementally more LNG and nuclear power from France via cables over the economic life of Rampion 2 (2030 to 2050-55); invest more in dependable back up generation capacity invest more in power system infrastructure for supply-demand balancing. That all ensures higher average power system costs translating to higher consumer electricity bills nationally.

[21] Here we suggested as a negotiated addition to two existing RWE offshore wind licences for windfarms at very preliminary design stages on Dogger Bank which would have multiple comparative advantages for the UK and the commercial developer and operator RWE, as outlined in **REP1-145** in the Consideration of Alternatives Representation compiled as the last of three representations there. The alternative of moving Rampion 2 turbines to the North Sea was recommended to the Rampion 2 developer RWE during formal pre-application consultations in a Community-Led Public meeting in Littlehampton Town Council Millennium Chamber 24 August 2021, and documented as a Resolution endorsed by the 80+ participants including representatives of all levels of local government along the south coast, and shared with PINS.

[22] That Annex offers the summary of the full 72 page PCS Representation on the NPS required consideration of alternatives (NPS Section 4.4 Alternatives) in REP1-145.

Rampion 2 Examination and not ignore or dismiss them lightly.

2. <u>Limited Net Contribution to UK Energy Security and the related context</u>*:* From an energy security perspective several factors diminish Rampion 2's actual contribution to different aspects of energy security and incrementally increase risk to energy self reliance.

- Energy security is a multi dimensional concern. We argued that several elements and metrics need to be taken into account, when weighing adverse effects and national disbenefit of Rampion 2 against national benefits – including Energy Security in respect to both benefits and disbenefits.[23] [24]
- Context is important to assess the net contribution of individual renewable energy Applications against different aspects of Energy security in a meaningful way (as referenced in bullet form in **PEDP-081** and its Attachment 1). [25]
- Concerns relevant to the Rampion 2 case were highlighted in the separate PCS representations compiled in the Examination Library as **REP1-145** [26]
    - We noted, several of these energy security aspects are location related directly and indirectly.
    - For example, Indicators for annual wind power density (WPD) show the Sussex Bay inshore area is at the lower end of the WPD scale compared to the level wind resources across in UK offshore areas **REP2-064** as confirmed comparing lifetime load duration curves of Rampion 1 (since 2017) versus other windfarms located truly offshore in strong wind regimes.
    - This impacts the level of import dependence during periods of low wind or now wind and has cascading effects on the reliability and quality of grid supply.
- While Rampion 2 output is a benefit during high wind periods, as compared to other Critical National Priority generation sources of the same installed capacity but which offer more dependable supply for power system operation, the evidence indicates consequences and risks of consenting Rampion 2 include:
    - Overall lower and less reliable electricity output and supply reliability for the same installed capacity of other CNP generation.

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[23] Energy Security It is not simply a matter of swapping out the remaining fossil fuel generation capacity (MW) of natural gas on the National Grid today for similar installed capacity (MW) of renewables (RE) as fast as possible. As set out in NPS, a challenging multi decade transition is needed to achieve demand-supply balancing as the UK moves to dramatically increase the share of RE on the National Grid. Context is clearly essential to assess the net contribution of individual renewable energy Applications against different aspects of Energy security in a meaningful way (as referenced in bullet form in **PEDP-081** its Attachment 1).

[24] Generally, UK inshore areas where Rampion 2 turbines are to be located exhibit less wind energy generation potential and less steady winds than locations truly offshore beyond 12 nautical miles as indicated in WPD data and load duration curves of existing installations.

[25] That involves interpretation of different NPS provisions as they related to delivery of secure, reliable and affordable electricity supply and energy self reliance. It calls for interpretation of relevant NPS provisions on a case-specific basis, as differentiated from questioning NPS, which is not permitted in any DCO Examination.

[26] In <u>Section 5.4 Economic Effects: National-to-Local</u>, starting with para 5-21 page 124 as part of the first of 3 PCS representations in that same REP-145. And in the 3rd Representation in that same REP-145 on the Consideration of Alternatives, page 23 Part 3: COMPARISON OF ALTERNATIVES WITH RAMPION 2 IN RESPECT TO NATIONAL BENEFITS AND DISBENEFITS.

- Incrementally more UK reliance on imported LNG from 2030 when Rampion 2 would be commissioned to around 2050-55 when it is decommissioned (LNG imported for abated gas generation to back-up for low or no-wind conditions (as the National Grid Electricity System Operator (ESO) recently indicates will be required for decades).
- Incrementally increased UK strategic vulnerability to global competition for available LNG on competitive world markets and greater exposure to international energy price shocks (of LNG).
- Incrementally greater UK reliance import of power from France via cross-channel power inter-connectors (of limited capacity in respect to UK demand when the wind drops, as the share of variable RE especially offshore wind on the grid is significantly increased).
- Greater UK reliance on France's appetite to export nuclear power to the UK, increasing vulnerability to french energy policy and pricing and other factors outside the energy policy envelope (as demonstrated with the forced tradeoffs in French fishing access to UK waters and power supply to Jersey in 2022).
- Incrementally more investment needed in national grid infrastructure in respect to the greater need for dependable low-emission back up generation and other power sector infrastructure investments for demand-supply balancing and what are called ancillary services[27] and transmission.

- We noted in terms of the supply reliability aspect of energy security, consenting Rampion 2 means incrementally more risk of power outages and power supply interruption on the National Grid. And for southern load centres.
  - That translates to significant energy security supply risk for a modern society and competitive economy.
  - Not only to service existing electricity demand reliably, but also to meet a projected doubling of electricity demand from the policy mandated electrification of the heating and transport sectors in effect.
  - The National Grid Electricity System Operator (ESO) in July 2024 stated the concerns of power system reliability (due to the RE transition and inherent RE variability – weather dependency in the case of wind power) requiring abated gas-fired generation on the National Grid for decades (until longer term energy storage via hydrolysis of water to produce hydrogen or utility battery storage is available, scalable and affordable) [28]
- We noted other effects of consenting Rampion 2 on UK energy self reliance 2030-2050 that translate to greater incremental risk to UK society include:

[27] Ancillary power system services are needed to ensure grid stability (such as spinning reserve and reactive power generation, and power factor correction). CCGT with or without Co2 abatement offers these services whereas RE technology such as wind generators and solar do not. Thus additional equipment such as utility-scale expensive capacitor banks are required.

[28] The UK power sector will rely on natural gas generation (abated as a point source emission) for decades to come as National Grid has said (July 2024) Demand for gas is now expected to be at least a fifth higher than previously expected in 2030, according to the National Grid Electricity System Operator (ESO). https://www.nationalgrideso.com/

- It maintains the low contribution to UK RE industrial capacity because the £3-4 billion Rampion 2 development cost is for technology proprietary to the European RWE Consortium and its European suppliers.
- That investment does little to enhance UK capacity to develop its own offshore wind industry capacity and technology base.
- While this incrementally increase in UK dependency on imported energy and imported RE technology may be unwelcome as (national disbenefits with calculable risk), it also fails to take account of greater physically vulnerability of UK power supply due to growing geopolitical risk.
- This is not only strategic energy security vulnerability in respect to exposure to future globally competitive pricing of LNG imports, but also exposure to the "too many eggs in one basket" concern with offshore wind infrastructure.
- Here we noted it bears repeating there are hostile (bad actor) military threats to all UK energy infrastructure fixed offshore, including wind installations (offshore substations, cabling and wind turbines themselves have not receded after 2022-2023 events, recognising the geopolitical realignments now underway.

3. **<u>Clarity is needed on the net Co2 emission reduction and Rampion 2 role in decarbonisation of power supply by 2035</u>: This is in terms of climate policy and issues that really matter to how ambitions for decarbonisation of the power sector are achieved.**

- As PCS documented the Applicant claimed, "Rampion 2 is even more critical than before and offers 2 million tonnes carbon reduction annually", implying 40 to 45 million tonnes over 20-25 years (i.e. from commissioning around 2030 to decommissioning 2050-55).
- While few people understand what those figures actually mean at the global climate scale or in relation to the extent the UK ""offshore" its CO2 emissions, PCS argued with evidence in representations that the Applicant's narrative misrepresents the actual situation for several important reasons that go unmentioned. [29]
- A major factor is the UK power sector is to be fully decarbonised by 2035, NPS (Nov, 2023). Some voices now suggest that political ambition may be shifted from 2035 to 2030 by the new Labour Government.

  What that means in policy and in practice is:

  - Rampion 2 will not offset any CO2 from fossil fuel generation from 2035. There will be no unabated fossil fuel generation for Rampion 2 to offset on the National Grid. By 2035 the National Grid will be fed by an appropriate (hopefully) complementary mix of low emission generation sources and technology systems all designated as Critical National Priorities in the NPS.
  - Thus Rampion 2 <u>will only compete</u> with other low emission generation sources from 2035 on, based on its relative merits not relating to climate action.

[29] **<u>REP1-145</u>** on Local Community Due Diligence On the Applicant Claims about the Performance, Benefits and Adverse Impacts of Rampion 2, the second separate representation compiled there. Page 254 of the compilation; Part 2: Item 5, The inflation of the benefits of Rampion 2. Page 18

- In those terms, Rampion 2 will only compete with other low emission generation sources on a price and power system impact basis – i.e. what may be needed to keep the lights on, the grid system from collapsing and at what cost to society and the environment.
- It is not a nuanced point. Rampion 2 will simply form part of a complementary low emission generation mix – albeit Rampion 2 being a relatively inefficient one situated in a low to moderate wind power density (WPD) area in the south inshore also presenting significant opportunity costs.
- Using standard methodologies it also means that at best, the Applicant can claim Rampion 2 offers carbon benefits only for 5 years, from 2030 or thereabout when it is commissioned, to 2035 at which time the UK power sector is fully decarbonised.
- Given the time scales for decarbonisation, it is argued that Rampion 2 consenting decision is essentially a resource allocation decision about the best allocation of £3-4 bn for low emission generation that would be in place in 2035.
- This is regardless of whether it is Rampion 2, or more preferably wind turbines of this scale more appropriately located in strong wind regimes to be more efficient, or other CNP generation options available in the same timeframe as Rampion 2, that is online from 2030 to 2050-22 -, especially dependable generation located close to load centres in the south which are essential to complement the UK's build out of appropriate RE, while keeping the lights on.

- **As another consequence, the extent to which Rampion 2 contributes to policy factors <u>other than CO2 emission reduction potential in the power sector</u> are issues that really matter and come to the forefront. They are relatively more important in the decision on whether or note to consent Rampion 2, all things considered.**
  - These NPS policy-relevant factors illustrated in the footnote have been highlighted in various representations. [30]
  - The national context also is there is no unlimited pot of money available to UK society for power sector expansion now and in coming decades for the energy transition, despite what some may think or claim.
  - There are national affordability consequences, balance of trade and currency value effects that arise from both massive public borrowing and off-balance sheet borrowing not to mention the "chilling effect" on economic growth of higher electricity prices and the risk of power shortages and blackouts.

[30] On the benefit side of the equation informing the NPS requirement to assess "whether adverse impacts outweigh benefits" relating to whether alternatives do more for less (cost) than Rampion across different policy ambitions and metrics, for instance:
- Value for money? Whether loans from international investors (repaid at high commercial rates of return by UK consumers in tariffs) or the UK public sector (taxes)
- Genuine contribution to high value RE permanent job creation?
- UK Balance of payment impacts, given the large amounts
- The contribution to UK industrial development strategy and technology self reliance
- Effect on reducing upward pressure on consumer and small business electricity prices? and
- contribution energy security, including technology-self reliance, and reducing over dependence on foreign ownership of critical UK infrastructure, etc

- CO2 benefits for Rampion 2 were benchmarked against those of competing low-emission generation CNP alternatives and offered as PCS input to the Examination in the form of a contribution to the required NPS Section 4.4 Alternatives analysis.
    - That provided a helpful comparative analysis of the relative merits these three reasonable alternatives designated as critical national priorities [31] across 12 NPS policy metrics, including CO2 emissions.
    - These analysis were offered in **REP1-145**[32] and **REP2-064**
    - It notes ideally a proper metric for CO2 impact and measure of investments as a climate action is life cycle emissions.
    - That includes supply chain analysis for the energy resource (if it is not renewable) and the conversion technology (e.g., whether it is wind turbine generators and associate infrastructure, abated gas turbine or SMR driving a steam turbine) and decommissioning of the infrastructure.
    - While that is a complex calculation, it can be quantitatively estimated if there is willingness to do so.
    - Otherwise, qualitative analysis offered on this theme indicates Rampion 2 would fair worse than expected, relative to other CNP alternatives considered when taking into account life cycle or "cradle to grave" emissions. [33]
- The bottom line on the CO2 emissions theme and climate action is consenting Rampion 2 means accepting an inefficient location for RE wind generation. This is clearly demonstrated by indicators such as lower wind power density (WPD) on the south coast inshore and the lower capacity factor of Rampion 1 as compared to other offshore wind farms.
- This leads to less and more infrequent power output in the near to medium term, and relatively higher LNG imports with substantial imbedded co2 emissions over the life of Rampion 2 (2030 to 2050-55) for emissions that are not reflected in the UK Carbon accounts. [34]

4. Upward pressures on the consumer price of electricity in the short to medium term driving the cost of living: The narrative Rampion 2 will lower the cost of electricity on the south coast is flawed and misleading.

[31] NPS guidance was three key elements of the Government's strategy for moving towards a decarbonised, diverse electricity supply are (i) renewables; (ii) fossil fuels with carbon capture and storage (CCS); and (iii) new nuclear". NPS (Nov, 2023) designates each as Critical National Priorities (CNP).

[32] para 6, page 19 of **REP1-145**, un the Due Diligence representation the second on compiled as ERP1-145, and page 23 the third representation on the Considerations of Alternatives in the same REP1-145 under Part 3: COMPARISON OF ALTERNATIVES WITH RAMPION 2 IN RESPECT TO NATIONAL BENEFITS AND DISBENEFITS in analysis and Table 2: Relative Carbon Emissions of Rampion 2 - Life-Cycle and Operation.

[33] This is due to greater amounts of CO2 emissions in the supply chain.

[34] Life cycle emission analysis needs to be applied to all generation alternatives. The calculation of all the imbedded co2 in Rampion 2 in mining, processing, smelting, manufacture, construction, operation and maintenance would be helpful to understand if it is greater CO2 emissions than 5 years savings assumed at 1.8 million tonnes Co2 a year (i.e., the rare earths and critical minerals and steel and concrete)

- As documented in representations, the Applicant claimed Rampion 2 would drive down and reduce the cost of electricity to UK consumers in the south. Not just offshore wind but Rampion 2 specifically.
    - This was in the pre-application consultations, reported unchallenged in local media and in the Applicant's ES.
    - Context for considering the merits of this claim include:
        a.) BEIS funded analysis in 2022 showed in offshore wind will not translate into lower electricity in the short to medium term, certainly not before energy storage is available, scalable, affordable and deployed. [35]
        b.) We note also there is a welcome detectable shift in recent Government policy statements on the build out of offshore wind from - it will reduce electricity prices to it will **eventually** reduce electricity.
- Over the life of Rampion 2 from about 2030 or shortly after when it is commissioned to around 2050-2055 when Rampion 2 must be decommissioned or replace, there will be major expenditures on the national Grid to accommodate the increasing quantum of intermittent and variable RE that will raise the average system costs generally.
- Among the direct risks and consequences there are case-specific factors to take in to account when considering Rampion 2 as a system capacity addition that impact on the cost of power to UK consumers (families and small business) going forward:
    - Location specific conditions impact on the performance and efficiency of Rampion 2 that in turn and place incremental upward pressure on average power system costs.
    - Rising average system cost automatically translate to upward pressure on the present high electricity tariff levels (among the highest of any major economy in the world) not only in the south, but nation-wide on the National Grid. [36]
    - Despite the commercial Applicant's claims to the contrary RE investments in lower wind regimes like the UK south coast inshore (as verified by WPD and documented life-time load factors of Rampion 1 compared to truly offshore wind turbines).
    - Rampion 2 will place incrementally more upward pressure on average system cost than more efficient low emission CNP alternatives available as capacity additions in the same timeframe as Rampion 2.
    - Higher average system costs also result due to incrementally more requirement for the National Grid to invest in back up generation (i.e. for each wind turbine installed equivalent capacity (MW) of dependable low-emission generation needs to be installed, or power imported when the wind drops or stops, otherwise electricity demand is unserviced or must be reduced).

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[35] Electricity Networks Strategic Framework: Enabling a secure, net zero energy system, Department of Business, Energy and Industrial Strategy, August 2022

[36] Rampion 2 has no direct energy resource cost but the efficiency and cost trade-off is wind turbines in the location are comparatively inefficient, intermittent, variable and weather dependent. On a system level Rampion 2 requires more investment in complementary dependable back-up either via power imports from the Continent or abated gas-fired generation (costly LNG) and requires more investment in other system infrastructure to provide ancillary power serves such as indicated in the Consideration of Alternatives the third representation in **REP1-145** Annex 6 on the Cons – adding to the economic opportunity cost of Rampion 2.

- Evidence clearly indicates lower efficiency variable RE like Rampion 2 requires the National Grid to invest more in power system infrastructure to deal with the intermittency and variability and to balance demand-supply.
- Lastly, there is incrementally higher risk of high-cost unserviced electricity demand across all sectors of the economy and social disruption, at the same time as the UK is mandating electrification of the transport and heating sectors.

- We recognise that much depends how NPS provisions are interpreted in the Rampion 2 case and our ask is that give little weigh to such clams and the Applicant's narrative on this price reduction theme when in fact the opposite is valid.

5. Lack of clarity on sustainable development metrics and conformance to sustainable Infrastructure policy. This is connected to the third overarching concern in Section 2 (*Rampion 2 poses an unacceptably high risk of undermining, rather than advancing the achievement of sustainable development in the south.*

- Sustainable development is cited as the "objective of the UK planning system" as noted in the National Planning Policy Framework (NPPF, 2023). It connects UK policy from international level commitments and treaties to National and down through local planning and local development policies and applies to NSIP infrastructure.
- Sustainable infrastructure development as interpreted for NSIP infrastructure in NPS EN-1 (2011, in effect for this Examination and in the connected NPPF is defined as:
  - Ensuring balance across mutually reinforcing environment, social and economic objectives to achieve net gains under each objective.
  - Para 2.2.4, *"It is important that …. The planning system ensures that development consent decisions take account of the views of affected communities and respect the principles of sustainable development."*
  - *and Para 2.2.7, "The Government's wider objectives for energy infrastructure include contributing to sustainable development and ensuring that our energy infrastructure is safe … Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed and affects the well-being of society and the economy…".*
- **From an economic perspective**: Statements from local authorities including Arun District Council (ADC), West Sussex County Council, and Horsham Council assert Rampion 2 has little local socio-economic benefit, as tracked in Chapters 4 and 5 in LIR (**REP1-145**).
  - PCS and affiliates argue with evidence the net economic would be negative, due net adverse impacts on the tourism economy.
  - Analysis is provided by Bournemouth Borough Council for the Navitus Bay Wind Park Application refused consent in 2015, adjusted for the Sussex location context and relative tourism volume and value, indicates the Rampion 2 impact on West Sussex would be in the order of £5 billion, cumulatively in today's money.
  - That is over 20-25 years. Even if it were half that figure, it is massively significant and far outweigh local economic effects.
  - Evidence in the Examination Library and PAD Statements of local authorities all cited concern over the adverse imparts on the tourism economy in the South.

- Councils also pointed to uncertain and limited supply chain opportunities available to boost local content and for local companies and business to participate in the Rampion 2 construction and post-construction

- **From an environment perspective:** Evidence clearly indicates that construction and operation of Rampion 2 will degrade marine and terrestrial ecosystems and natural capital [37] of the Sussex Coast already under multiple pressures. [38]
  - Moreover, there is probable risk the 4–5-year construction and subsequent 20-25 year operation will lead to net biodiversity loss in both the coastal marine environment due to the offshore component and terrestrial ecosystems due to the onshore component.
  - Offshore risk includes that to migrating birds and flying insect populations moving cross-channel in massive numbers, the latter linking to loss of ecosystem services such as pollination on both-sides of the channel ultimately impacting food security.
  - These effects are extensively documented in the PCS Local Impact Assessment **REP1-145** chapters**.** Data and research on this is cited.
  - As cited in PAD Statements of Statutory Consultees, there is high risk, uncertainty, and high probability that conservation benefits claimed in the Rampion 2 Environmental Statement (ES) for adverse impacts on terrestrial ecosystems will not be achieved due to limited, weak or ineffective mitigation measures.
  - Natural England's most recent advice to this Examination in July 2024 [39] indicates significant concerns with likely significant impacts of the proposed construction techniques planned for the transmission line on the special qualities of designated landscapes.
- **From a social perspective:** community representations to the ExA consider the likely scale and significance of social impacts, as we see them, and argue they would be net negative affecting social and emotive values, the sense of place and quality of life for beneficial enjoyment of coastal living for many residents.
- In the PCS LIR we used the Marine Scotland conceptual framework for social impact assessment to offer a simple but relevant benchmarking of social impact. That is considered evolving best practice in the literature.

[37] Natural Capital: in general defined as the collection of natural resources of a region, land area or a coast together with its ecosystem services viewed broadly, including its overall economic value (for example, from the value derived from pollination services provided by migrating birds and insects lost to windfarm turbines, to the visual impacts of transforming the natural seascape that affects the visitor and coastal tourism economy and jobs, to intrinsic values of natural seascapes the are part of our culture, heritage and promote well-being.

[38] We, like others, believe Rampion 2 will adversely set back current efforts for natural capital improvement now underway, including kelp restoration after the ban on inshore trawling and biodiversity improvement efforts on land such as interrupting biodiversity corridors, as cited in Relevant Representations. Eg, Baird Rampion 2 Offshore Wind Farm, Representation by The Baird Farming Partnership (The Baird Farming Partnership) Date submitted 6 November 2023m in relation to Ecosystem Connectivity corridors such as through the "Weald to Water" Initiative. .

[39] In The Infrastructure Planning, Examination Procedure, Rules 2010, on the Appendix H5.5 to the Natural England Deadline 5.5 Submission Advice on Landscape Visual Impact Assessment.

- The assessment is from the perspective of community organisations and residents who would be required or forced to "host" Rampion 2 scheme, whether they supported it or not. [40]
- It was noted that:
    - While some people will always enjoy the visible display of large turbines on the natural seascape and are happy to impose that view on others; for many it is a disturbing and dystopian machine transformation, excessive change to the character of the area, plus a violation of local environment stewardship.
    - PCS's view is many if not most residents who were silent during the DCO, once Rampion 2 construction starts will awaken to the extent of social impacts and transformative change in the character of their area.
    - This includes effects on wellbeing, peace-of-mind, tranquillity and intrinsic values for many – all the reasons why many residents choose to move to or remain and raise families or retire on the south coast and what motivates many living outside the area to visit and enjoy the coastal offer as it is today.
    - Once construction starts, community cohesion across a variety of social values that we see as important will be affected along with the "sense of place". This includes emotive bonds and attachment to the distinctive and unique character of the area, its natural beauty and ecology, as many value it.
    - Other social factors include perceptions of transparency, good faith, and fairness in terms of how we are engaged in the DCO process considering Rampion 2, and whether we feel our voices actually counted.

On sustainability more generally, what is important also but otherwise unclear to local IPs are the metrics and weight to be given to assess the extent to which Rampion 2 is sustainable infrastructure

6. ***<u>Need for quantification of adverse impacts and benefits to the extent possible to inform meaningful interpretation of key NPS previsions.</u> We believe a judgement on whether "adverse impacts outweigh National benefits" needs balanced the consideration of facts and evidence using clear criteria and quantitative metrics to the extent possible on both sides of the equation.***
    - That calculation and judgement on whether "adverse local impacts + national disbenefits outweigh benefits" is crucial in the Rampion2 Examination as the ExA stated.
    - At the same time, we argue that logically and in respect to procedural fairness that such judgements can only be valid (and enjoy public confidence) through a balanced and comprehensive consideration of all the facts and evidence using clear quantitative metrics, to the extent that is possible.
    - For that purpose, we have argued consistently in this DCO process that national benefits need to be broken down and considered in respect to the underlying NPS provisions. Note done superficially only or largely based on general moving political targets for

[40] Whether people were: (a) aware of the Rampion 2 proposal; (b) were complacent or objected to it, or (c) whether in future they would view the scale of the landscape / seascape transformation and change of the character of the area and environmental consequence in a positive or negative light.

installed capacity of a particular technology target and timing - without attention to underlying the aims of the policy provisions.

- Otherwise, those critical judgements risk being overly subjective, or superficial tick box exercises.
- In our view that would be highly inappropriate for considering a £3-4 bn energy infrastructure investment, plus given what is at stake for local communities, as well as the wider public and national interests at this time.
- In relevant representations it was argued such judgement require proper power system value analysis to help calibrate and measure the contribution to the National benefits using metrics for National benefits explicitly specified in NPS, e.g. **PEDP-96** , **REP1-145** and **REP1-123**
- We assert that the assessment of whether "adverse impacts outweigh benefits" cannot be made by public attitude surveys conducted by telephone, as the Applicant has done and offered the ExA. Especially in the context of the Rampion 2 pre-application consultation, given its limitations being conducted in virtual mode and failings as documented in **AoC-19** and **AoC-021** .[41]

7. ***Rampion 2 compromises necessary future proofing of valued coastal assets: if UK citizens must limit off-island travel, vacations and recreation .***

- The decision on Rampion 2 comes at a time when we expect there will be climate related Government encouragement and likely price related disincentives, or even hard restrictions to travel "off-island".
- Meaning the UK as a society needs to maintain the integrity of our natural seascapes and landscape endowment rather than degrade coastal assets and valued designated landscapes that have both intrinsic and economic value.
- This "future proofing" is wholly consistent with the ethos and objectives of the European Landscape Convention (ELC) to which the UK is a Party, and the body of aligned UK strategic advice, policy and law.
- **We believe the ExA should also consider how the Convention (ECL) is interpreted to establish visual buffers for large offshore wind turbines as in other European jurisdictions and take expert advice in that respect.**
- **That includes for example, comparisons with Germany, where under the Wind Energy at Sea Act (WindSeeG), in effect since 2017, to help accelerate offshore wind (in the Baltic and North Seas), while maintaining safeguards with strict adherence to visual buffers that would not permit a "Rampion 2" situation Germany, as well relevant policy in the Netherlands and Belgium.**
- **The ultimate irony to many affected community organisations is the German-based Applicant RWE claims UK commitments and Law have no place in the considerations Rampion 2 as revealed in the Government's OESEA programme documentation cited in representations.**

[41] Attachment 3 of the LIR provides a rebuttal of the RWE commissioned survey of local attitude indicating that among other logic and design flaws we see, it conflates support for renewable energy with support for the Rampion 2.

[i] Natural Capital: in general being the collection of natural resources of a region, land area or a coast together with its ecosystem services viewed broadly, including its overall economic value (for example, from the value derived from pollination services provided by migrating birds and insects lost to windfarm turbines, to the visual impacts of transforming the natural seascape that affects the visitor and coastal tourism economy and jobs, to intrinsic values of natural seascapes the are part of our culture, heritage and promote well-being.