MOSCA: Middleton on Sea Coastal Alliance
EN010117 -IP20045287
Closing Statement to Rampion 2 Wind Farm
Principle and highlighted issues in the project
Deadline 6
Co-Chairs: Melanie Jones and Mike Visram

MOSCA's view is the key to the underlying adversity of benefit that manifests in almost all areas of disagreement in this proposal is the overall size and particularly the height of the proposed turbines and placement in The Heritage Bay.

We are seriously averse to the height, size and array of the proposed offshore wind farm project that is in effect to be built 'inshore' as it is so close to the shore, ignoring Government guidelines and legal requirements that exist. We strongly argue – there is no fully supporting data available yet on marine life in construction impacts for this height/bulk and positioning of this development in the Sussex Bay. There is however relevant data in progress referred to below. There appears no sure current available scientific evidence to support the height related proposal.

This Summary repeats and anchors our previous submissions, the tone and concerns of which has not changed but even small percentage of recent data updates we have seen, noted below, have strengthened our belief that the Applicant should be required to pause the development to take advantage of the new scientific supporting information. This data is pivotal when finalising decisions that will have a significant and overarching effect on and to this area – environment, ecology and community for the current time and future years.

We draw your attention below to research on Marine noise and an immediately forthcoming ISO on under water noise. As well as research in progress on wind decay changes across the country. Clearly these issues

are now more widely seen to be needing serious consideration which should be supported.

Our Major Closing Points relate to:

- **The legality of the development is clearly in breach of the Law and ignores the significant need for buffering**

- **Impacts of operational noise from offshore windfarms on the marine environment – lack of data - including airborne noise impacts**

- **Adverse Impacts on bird, bat and insects in a key migration 2-way highway**

- **Visual Impacts and irreversible harms to the SDNP and coast**

- **Visual impacts on the night sky**

- **The development is not in the Local Interest and does not follow sustainability guidelines of benefit and adverse impact balance**

- **Low economic benefit and concerns for energy storage facility safety.**

- **Non inclusive and poor AOC consultation**

The legality of the development is in breach of the Law and ignores the significant importance buffering

Rampion 2 refuses to recognise the protective distancing and buffering specified in the OESEA4 to protect the sensitive receptors that form the Sussex Bay area. We believe the protections in place should be enforced in particularly Countryside and National Park legislation, Offshore Energy Strategic Environmental Assessment 4 and the ECL. (the development appears to breach the interpretation). Government's Offshore Energy SEA programme in OESEA-4(2022) objective "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 which are vital elements of our country and region. Natural England contests the Seascape effects alone

should result in withholding the DCO due to flaws in the Applicant's need case and alternative case which we fully support.

The detrimental impact of the footprint of these significantly larger turbines on the Area of Special Qualities of designated landscapes applies to visual adverse impacts both outwards towards the sea and inwards from the sea towards the Downs, Southdowns National Park and chalk cliffs of the Heritage Coast and therefore will substantially harm the designation applied by the State to provide protection against such an impact. Achieving sustainable development is recognised in UK law and policies from local to national levels and in international commitments as pursuing three overarching objectives – environment, social and economic and are interdependent and need to be pursued and balanced in mutually supportive ways. – National Policy Planning Framework (NPPF).

The proposed depth and height impact of the proposed turbine field on this coast is enormous. The harm this may cause based on the minimal data available for these larger turbines and the statistics below show up the urgent need for more considered information to assess just how this could impact on both this specific local seascape and landscape.

As examples, At 8mls (13kms) from the shore. Rampion 2 is more inshore than offshore for the purposes of visual/noise and impacts on special areas such as the SDNP.

Rampion 1 is 142mtrs high and 13km to 20km offshore
Rampion 2 is 325mtrs high and 13km (8mls) offshore (advertised height) – it is clearly more inshore than offshore for the purposes of visual/noise adverse impacts particularly on special areas of quality such as the SDNP
Norfolk: The Two largest offshore wind farms in the country are at Hornsey 1 and 2 (off the Yorkshire coast)
Hornsey 1 height 80 metres (262 ft) and 120 Km or 74.6mls offshore
Hornsy 2 height 200mtrs and 89Km or 55.3mls offshore
Both wind farms are considerably further out to sea and deemed therefore to make little visual impact from the landward side.

The Swedish energy giant Vattenfall said costs had climbed 40% due to rise in global gas prices and in 2023 were not pushing ahead with what would have been the largest offshore wind farm project in the UK at 350mtrs. High. In March 2024 they completed the sale of the Norfolk Offshore Wind Zone

(also known as Norfolk Vanguard & Norfolk Boreas Offshore Wind Farms) to RWE.

This would make Rampion 2 the tallest operating offshore (inshore) wind farm in the shallowest waters by far in the UK alongside the lack of visual buffers and in proximity to one of the most sensitive areas of natural beauty (SDNP). Consideration of the development should be extremely sensitive to these factors.

Rampion 2 cannot therefore be deemed 'insignificant' in its visual or operating impact for which there is no full data to support that likely impact. The OESEA and White Report limit of installation of turbines over 225mtrs tall clarifies turbines should be located not less than 33-40km (20.5 to 25miles) distant from either national parks or similar sensitive features.

It is clear, critical importance of giving weight to OESEA's visual buffers compliance has not been undertaken because they cannot in the space do so and therefore are unable to conform which the Applicant agrees!

Impacts of operational noise from offshore windfarms on the marine environment – lack of data - including airborne noise impacts
It is fact that the data available to underpin this is insufficient. A recent study being undertaken (*Pure wind project funded by the JPI Oceans Initiative 'Underwater noise in the marine environment' published in Hydro International Magazine*) clearly notes the current understanding of their impacts are very limited but offshore wind farms are among the main contributors of anthropogenic noise to the marine environment and ecosystems. The use of higher more powerful turbines and deeper piling needs to be carefully explored as research and long-term effects are not yet clear to ensure there is limited detrimental effect. Also to note the following ISO will be approved to move to Final Draft (FDIS) status on 8th August 24:

- ISO 7447 Underwater acoustics — Measurement of radiated underwater sound from percussive pile driving — In-situ determination of the insertion loss of barrier control measures underwater.

We repeat that in the case of Rampion 2 the height is significantly taller than any other turbine field around the UK. (A minimum of a further

125mtrs taller). It should be a matter of serious consideration to ensure that data is made available to ensure that the height and depth of piling of these turbines is fully understood prior to development. Construction in open seas can affect local hydrographic regimes and it is not yet fully established how these changes influence upwelling/downwelling episodes and therefore, phytoplankton blooms and zooplankton abundance. It is vital that the impacts of such construction are comprehensively understood and balance with the environment in which they are constructed.

There is also a degradation factor of above sea level white noise, not just from piling in construction but overall operational noise also noted in the study. There is no consistent data that can give a truthful explanation of what that decibel level could be nor its real mitigation capability nor what that noise will truly do to marine life and humans.

Noise carries over water more clearly and sharply. The short distance from shore is likely to heavily increase a constant white noise. It is important to factor in intrusive noise from the enlarged blade rotations/sweeps as well as electrical operation.

Adverse Impacts on bird, bat and insects in a key migration 2-way highway

The Heritage Bay receives and disperses a varied plethora of migrating birds as well as bat and insects. The latter being an integral part of the food chain. The height of the turbines and the sweep of the blades will severely impact that free movement and interfere with their sonar and homing instincts. The blades can easily pull the migrators towards a certain death they can push them off course and into another turbine further down the line and in particular the navigation lights will act as a magnet. This is a highly significant concern, and it is almost entirely down to the height. In France, we note a wind farm has been closed because of this. Others will argue the case more technically – it is a very real concern to us. As well as the sad debris of dead and dying that will wash up on the beach which will only add to the adverse visual impact and misery of this proposal and deter visitors and residents alike.

Visual impacts and irreversible harms to the SDNP and coast

At the end of this Examination comment period - Arun DC, WSCC, NE, SDNPA are all in dispute with Rampion over the visual impact to the

heritage coast and SDNP. We are in complete agreement in arguing that there is ‘severe’ harm proposed that will change the character of the area irrevocably. Rampion's response is that it is 'in the national interest'. The national interest is not served by destroying our heritage, jobs and wildlife.

Visual Impacts at night
Due to distance and lack of buffering the turbines will be greatly visible at night. Navigation lights about halfway up will flash methodically 24/7. Across the entirety of the horizon. No part of the view to sea will be ‘dark sky’ and a ‘fencing in’ or barrier of stop lights will appear clear and prominent.

The development is not in the Local Interest and does not follow sustainability guidelines of benefit and adverse impact balance.
The evidence indicates that consenting Rampion 2 is not in the local interest. It points to unequal distribution of low benefits, to high detrimental impacts and risks the affected coastal and inland communities bearing the brunt of the of an adverse balance of effects.

This development does not fit within the Development brief of Sustainability. Quote from the EIA from Rampion 2 ‘the ultimate aim is to design a project with minimal environmental impact or disruption to the community during construction and operation’ this is clearly not the case.

Attracting visitors to the area and bolstering the local economy must not be ignored. As well as the therapeutic and harmonious value of the interplay of water, light, sound and openness of the horizon and associated ‘free’ pleasure will be entirely lost based on the proposed development. Immersing in natural pastimes is a support to good mental health and why the coast has always been such an asset and was politically highlighted as such in 2020/21 during lockdown.

Economic implications
We argue the economic value is not in the National interest either. Documentation to support the development is not given due process to confirm its worth, (the development also does not have a final footprint). There is recent research on wind speed decay with wind speeds increasing in the North – particularly in winter – and decreasing in the South – particularly in summer.

This work which takes up the wind decay issue - The impact of climate change on the levelised cost of wind energy
*Daniel Hdidouan, Iain Staffell**
Centre for Environmental Policy, Imperial College London, SW7 1NA, UK

The South coast is not known for offshore wind farm implementation Rampion 1 being the only operational wind farm. For all the costs of this project, albeit the 'ground' is tacked on to Rampion 1 and already earmarked - it would make more considered economic sense, at this time – until the data is more available on wind speed, marine noise to take advantage of new technologies re the build of offshore wind farms, to build Rampion 2 in a high-level wind/deepwater position without the added costs of further cabling and off shore and on shore development costs not least the provision of energy storage units as well as making good – as far as possible - of the countryside around it which will take years to recover to any real benefit. It is also of great concern that battery storage facilities are not yet fully tested and are of a known security/safety concern. The Grid is yet unable to work with the surge of energy due to the erratic wind patterns.

We also argue that in freeing up onshore wind by the new government – which must be cheaper – this make this type of 'squeezed project' offshore wind less competitive/profitable over a 25-year life period – the materials and recycling being now a much higher cost to provide. We also note the Government wishes to put in a further 1.5bn into offshore wind projects. We still need to ensure that the value of such a project is economically useful and viable but it is also supported by valid data. The outcome of which could well be disastrous if ignored.

Non inclusive and poorly executed AOC
We strongly suggest that due diligence claims made in the developer led statutory consultations and the Application about the performance benefits and impacts of Rampion 2 lack evidence and credibility. In previous submissions we have referred in depth with supporting evidence, to the poor/lack of due diligence particularly in consultation procedures in Middleton on Sea which have been ignored. The percentage of the population that have engaged with or been made aware of Rampion 2 is oddly still very minor.

We have focussed strongly on standing by the Laws by which we abide is crucial to clearly deal with all infrastructure issues and must be fully recognised and respected. The law cannot be ignored or hidden because it interferes with a purpose.

Renewable energy is significant to the future and energy security, but it must work within the protection of the Law and be developed in balance with the local environment, ecology and community that it could adversely affect, without this balance it would outweigh the low benefit to the national energy supply.

Destroying the Planet to Save it! There is little value in saving the planet, if how you save it is by having such a skewed impact on the local environment, local communities and local economic wellbeing and also makes the area devoid of its character and natural beauty. This is not a basis for a 'sustainable' project. If energy is so valuable and needed, we should learn to conserve more rather than use more.

1 August 2024
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