



MOSCA Middleton on Sea Coastal Alliance

IP Number 20045287

Response to the Secretary of State's request for further information of 25th November 2024 re Application by RWE for an Order granting Development Consent for proposed Rampion2 Offshore Wind Farm Project.

Post Examination Representation Response dated 6 December 2024 Reference: EN010117

Dear Mr Miliband

Further to Mr Wheadon's letter requesting information on the above proposal, MOSCA requests to make comments on points 3, 5 and 7.

Economic growth in the UK is clearly a need. It is important, however, that national infrastructure projects should be fully fit for purpose and need careful evaluated consideration of the complexity of how the development would integrate and contribute to the local development, as seen in representations from local councils. Moreover, it disrupts local cohesion by dividing communities.

Gaining Consent on this proposal - without this evaluated consideration could lose the very ethos of the locality by pushing reforms through planning without weighing the adverse local impacts ethically against any benefit. This cannot be a closed conclusion however much it may rankle that delays of necessity should also be seen as judicious future planning. A balance on need and economic value are important but the natural landscapes and inshore seascapes of this country are also intrinsically valuable assets that should be considered responsibly for future generations as they make up the individual character of this country.

By Consenting to Rampion 2 there is a very real and acute risk of undermining sustainability on the south coast and adjacent or impacted inland localities due to the immense scale and location and the specific significance of adverse impact on social, economic and ecological effects. The point also raised is that the operation of Rampion 2 risks making sensitive marine and terrestrial ecosystems that are already under many pressures even less able to cope with the effects of long-term change.

On behalf of our residents and wider community, we have many times made clear the necessity for detailed verified research and data that can prove the category of windfarm proposed in the Sussex Bay is suitable, sustainable and its impact would not impinge

destructively on the community, environment and economic structure of the area - which will be, we repeat, acutely affected by the current development.

Referencing points 3, 4, 5 and 7 Concerns and responses requested we value and look forward to these being given further explanation:

We are pleased NE has been offered the opportunity to comment and look forward to seeing this response regarding the Great black-backed gull.

This windfarm proposal would be the first ever windfarm to be built anywhere in the world with turbines of this height and bulk (90 up to 325mtrs, taller than the Shard building in London) spread along the horizon in very close proximity to a populous natural coast with designated and protected landscapes, including The South Downs National Park – areas of exceptional natural beauty and environmental importance. The height of the proposed turbines makes it contrary to visual buffers compliance (OESEA 4) re Seascape, Landscape, and Visual Impacts Turbines over 225mtrs tall to locations not less than 33-40k (20.5-25mls) distant from National Parks and similar sensitive features. The closest inshore rank of the Rampion 2 proposal is only 13 kilometres (8 miles) from the shore.

There are bigger windfarms far out to sea (North Sea and elsewhere) not close to the coast, so they respected the ELC and visual buffer distances the UK government recommends in the Offshore Energy SEA.

Therefore, there can be no verified facts based on actual development impacts available (they do not exist), nor can there be confirmed data available that would deal with the known incontestable facts relating to the area specific migration highway concerns to birds, bats and insects which needs careful consideration.

Migration concerns are not just with turbine height and overall size above the waterline, but on the number of turbines ranged across the entire inshore horizon effectively a massive moving rotor fence deterrent (attracting by noise, movement and light) plus the unknown implications completely undocumented using an 'inshore' location not offshore – again there is no genuine verified data available to sustain the case for development currently and so close to the shore where migrating creatures tend to dip to home in or rise to fly out – the height being key.

Underwater noise impact from piling for such a development does not have the data from 'actual' developments of this size to be able to ascertain likely or real sound damage that could be done to marine life – mammals, fish et al. Nor the impact on the seabed/environment during piling as there are no inshore or offshore windfarms of this height and scale,

We are pleased the Applicant has been asked to provide a revised in-principle Sensitive Features Mitigation Plan and Offshore In-principal Monitoring Plan to address the serious safety concerns to fish/mammal life and we ask this is carefully taken on board by the Applicant to provide detailed information on what can realistically be achieved and that this is made available to all listed on the letter as requested by Mr Wheadon.

The post-consent adaptive management request for information we welcome this information to be available and again look forward to seeing this response.

Though not a specific in the request for information but relevant to the principle of ensuring such a proposal's sustainability and to provide verified information that promotes such a significant industrialisation of the open sea for at least 25 years we strongly remain concerned on the critical importance of the visual impact on those who live, work and visit the area that are forced to 'host' this development and will feel the impact and loss of amenity of the proposed scheme 24/7.

The ramifications of the proposed development on mental health and enjoyment of the beach and seascape contradicted by the urbanisation of the open sea, in effect fencing in the openness of the seascape will seriously affect Local people, Businesses, Visitors and the surrounding areas.

The community gets nothing in lieu of the consequences brought about by the development. Time must be taken to assess the balance between any beneficial and destructive impacts on the existing characteristics that are traditionally expected of this area and how this will affect residents and visitors if these characteristics of the Sussex Bay and therefore Coastal Sussex are irrevocably changed.

We ask What shall it profit if by gaining Consent without evaluated consideration - you lose the very soul of the locality. Save the planet and destroy the environment is not a clear-cut conclusion Referring to Mark 8:36: "For what shall it profit a man, if he shall gain the whole world, and lose his own soul?" seems an apt analogy.

Economic considerations particularly in the light of current figures and therefore the value return does not appear good value for this project when spending to keep in the green energy race means that the energy for the future is lost/overpriced by the lack of stable infrastructure capability now. At this stage this Mega – untried - Wind farm is a profligate waste of current needful investment in exchange for the Sussex Bay likely wind capability.

The National Grid storage capacity is unfit to carry the increasing wind generated power currently and the Ofgem Strategic Spatial Energy Plan (SSEP) is not finalised yet so rapid placement of Nationally Significant Infrastructures such as this could benefit from that report. There is some way to go to get battery storage facilities et al on line.

Our thanks for the ability to comment Post Examination on the Department for Energy and Security & Net Zero letter of 25th November but are shocked by RWE's recent press piece in ReNews BIZ, who make it clear they are dismissive of the request for further consideration for 'updated ornithological and environmental mitigation to the developer' and the planners have placed 'undue reliance on the views of stakeholders by asking them to comment on the adequacy of the revised information before a redrafted examination table is published later this month' This viewpoint does little to ensure there are reasonable and properly researched grounds for their proposal overall. In conclusion they say why they were being 'treated so differently' from other offshore wind DCO applicants. The point is clear this is not offshore and there are therefore more considerations.

On a further related piece - A local meeting held on the 28 November to promote the Rampion 2 development by Britain Remade clearly was wholly inadequate to give the audience facts. The panel - Adur Councillor [REDACTED], CEO of Britain Remade, [REDACTED] and the MP for Shoreham by Sea, [REDACTED]. No representative from Rampion 2 and all, when asked, confirmed they had not read either the extensive background found on the PINS website but had only a cursory knowledge of the complexity of the development and its impacts.

The thinking clearly indicated that the project impact is viewed as insignificant even though there is a lack of evidence to support it going forward (there are no windfarms of this height period) and would subject the locality to the untested proof of how the development might impact but with little positive gift. Ie possibly 70 jobs. [REDACTED] welcomed such a development out of hand without any verified backup. This balances RWE's above mentioned press comment to basically get on with it and hang the consequences sadly noted.

This was a PR – political - 'moment' to push up National infrastructure projects overall as a wonderful opportunity for clean energy, this being one of many that Britain Remade supports. Our concerns are that this meeting may be used to inaccurately lobby and ramp up support when it did not exist and why we brought it to your attention.

A final point we recognise that Metropolis (1927 film) was not and never could be an uplifting place to live in freedom and enjoy the natural beauty of where we live. It is up to our planners now to both balance and protect our environment as well as our energy security for our economic and mental good.

Yours sincerely

Melanie Jones & Mike Visram (Co-Chairmen)

Middleton on Sea Coastal Alliance (MOSCA)