

Date: 11 December 2024  
Our ref: Case: 15576 Consultation: 495851  
Your ref: EN010117



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BY EMAIL ONLY

Dear Sir/Madam,

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010**

**Application by Rampion Extension Development Limited (“the Applicant”) for an Order granting Development Consent for the proposed Rampion 2 Offshore Wind Farm Extension Project (“the Proposed Development”)**

The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Information (RFI) dated 25 November 2024.

Natural England has considered the requests for information, included within the Secretary of State’s Consultation, and our responses to Part 2 of the request are provided in Appendix 1.

In answering the requests for information Natural England have reviewed the following documents:

- Applicant's Response to Examining Authority's Request for Further Information (August 2024) [REP6-275] – Question MM 3.1.
- Draft Piling Marine Mammal Mitigation Protocol [REP6-218] – in relation to the soft start and ramp up period for piling
- Draft Development Consent Order [REP6-007] – in relation to Condition 11(1)(j) of the DML

If you have any further queries, please do not hesitate to contact us.

Yours sincerely

Emma Preston

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Appendix 1 – Natural England’s responses to the relevant points within the Secretary of State’s Request for Information (RFI) – Part 2

Point	Subject	Question/Request	Natural England’s Response
<b>Part 2</b>			
18	Worst-case scenario for piling	The Secretary of State notes that NE has not had an opportunity to respond to the Applicant’s response detailing the worse-case modelling which informed the Applicant’s ES. NE is invited to comment on the Applicant’s response (Question MM3.1) regarding the worst-case piling scenario.	<p>Natural England understand that the WCS for simultaneous/sequential piling is up to 4 monopiles per 24h (2 locations, 2 monopiles each) and 8 pin piles per 24h (2 locations, one multi-leg foundation each), as stated in point MM 3.1 [REP6-275]. We advised within point C24 our risks and issues log at Deadline 6 [REP6-296] that we considered this aspect of the WCS resolved. However, this was provided these scenarios were clearly modelled, labelled and assessed across all figures and documents, as MM 3.1 suggests. We noted in our Deadline 6 response on marine mammals [REP6-289] that simultaneous/sequential piling had not been considered in the bottlenose dolphin assessment, and that this specific element remained outstanding.</p> <p>Whilst this information resolved part of the point in line C24 of our risks and issues log [REP6-296], we noted that the second part of this comment on the WCS remained unresolved. This part related to the modelling locations rather than the piling scenario itself. Specifically, whether the east and west locations are the worst-case in terms of spatial extent of underwater noise impact, when considering marine mammal receptors. We advised that this may make a difference to the spatial scales over which noise impacts occur. We advise the response to Question MM3.1, does not appear to provide any further clarity on this point to enable us to close out this matter.</p> <p>We note that Question MM3.1 specifically relates to marine mammals, therefore our response to this question relates to marine mammals <b>only</b>. Please see our Deadline 6, Appendix E6 [REP6-291] submission on fish and shellfish in relation to our remaining concerns with regards to the underwater noise modelling of the worst-case scenario relevant to this thematic area. In relation to black seabream, we note that should the full piling restriction (1<sup>st</sup> March to 31<sup>st</sup> July inclusive) be implemented, our concerns about the modelling would be addressed because no impacts on black seabream during the sensitive season would be realised.</p>
19	Piling soft start and ramp up	The Secretary of State notes that the Applicant updated its draft Marine Mammal Mitigation Protocol (“MMMP”) at Deadline 6 of the Examination to include explicit mention of a soft start and	<p>Natural England advise that the updates to the duration of the soft start and ramp up procedure are sufficient; however, we advise that the starting hammer energy should be no greater than 10% of the maximum hammer energy.</p> <p>Natural England note that the MMMP has been updated to include information relating to the ‘Noise reductions from noise abatement systems in ITAP (2024)’ [REP4-067] and ‘In Principle</p>

		ramp up period for piling of 30 minutes. NE is invited to provide its response to the Applicant's updated MMMP.	Sensitive Features Mitigation Plan' [REP5-082] submitted at Deadline 4 and 5. Natural England provided responses into the examination on this information at Deadline 5 and Deadline 6.
21/22	Monitoring of noise abatement effectiveness on Bottlenose Dolphin	<p>The Secretary of State notes the concerns raised by NE in relation to the proposed noise abatement measures and marine mammals. The Applicant, NE, and the MMO are requested to provide their views on the following possible wording for Condition 11(1)(j) of the DML : "A monitoring plan which accords with the offshore in-principle monitoring plan and is to detail proposals for pre-construction monitoring surveys, construction monitoring, postconstruction monitoring and related reporting;"</p> <p>NE and the MMO are requested to consider whether the drafting is sufficient to secure the monitoring of the effectiveness of noise abatement on bottlenose dolphin in a final Offshore Monitoring Plan.</p> <p>NE and the MMO are also invited to consider whether the drafting is sufficient to secure an updated pre-construction assessment should new information on the Coastal West Channel bottlenose dolphin population be published before piling commences.</p>	<p>Natural England advise that Condition 11(1)(j) of the DML7 as worded is not sufficiently specific to secure the monitoring of noise, or the monitoring of noise abatement measures in relation to bottlenose dolphin, marine mammals or any of the other species for which this monitoring is relevant. We advise that the key parameters of the monitoring of piling, including where they relate to noise abatement measures, should be secured within a specific condition within the construction monitoring section of the DML (see also point A18 of our risk and issues log tab on the DCO/DML [REP6-296]). We advise that it is standard procedure across offshore windfarm DML's to have a specific standalone condition in relation to securing the monitoring of noise generated from piling, which in this case extends to the monitoring of noise abatement measures. Natural England would therefore advise that a more specific condition is provided to secure this. We note such conditions usually include details such as (but not limited to) the number of piles of each foundation type that will be monitored, agreed timescales for the provision of the monitoring, and a provision for all piling activity to cease until further monitoring requirements have been agreed, if the impacts are, in the opinion of the MMO in consultation with the relevant statutory nature conservation body, significantly beyond those predicted/assessed.</p> <p>We advise that Natural England's advice submitted into the examination on this matter, particularly our Deadline 5 Fish and Shellfish advice [REP5-139] should be considered when drafting such a condition. Whilst we have not been asked to review the Offshore In-Principle Monitoring Plan submitted at Deadline 6 [REP6-221], and we have therefore not undertaken a detailed review, we highlight that this version broadly does not appear to fully reflect Natural England's advice into the examination regarding the monitoring of noise generated from piling, and noise abatement measures across thematic areas. Therefore, this matter remains unresolved.</p> <p>We would expect further details of how the monitoring relates specifically to bottlenose dolphin, to be included within the final Offshore Monitoring Plan, as noted in our Deadline 6 response [REP6-289]. However, as stated above we advise that an overarching condition needs to be added to the DML to adequately secure noise monitoring and monitoring of noise abatement measures across all thematic areas for which this is relevant.</p>

			In relation to the Coastal West Channel bottlenose population, we advise that it would be sufficient for any relevant new information to be considered as part of the final MMMP.
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