



MOSCA Middleton on Sea Coastal Alliance
IP Number 20045287
Application by Rampion Extension Development Limited for an Order granting
Development Consent
Request for Information by The Secretary of State
Department for Energy Security & Net Zero
Submission Date 20 February 2025

Dear Mr Miliband,

I write on behalf of MOSCA (Middleton on Sea Coastal Alliance), linking to the questions you have raised regarding the sea bed and the implications for the Rampion 2 wind farm proposals.

The sea bed licence was granted to RWE by the Crown Estate. As a public body, the Crown Estate has an ongoing and active duty to inform DCO processes of ways to further the Statutory objective of the South Downs National Park owing to the impact of its decision in granting the seabed license creating the situation where the project would impact significantly the statutory purposes of the Park .

The Crown Estate awarded a seabed leasing agreement for the Rampion 2 extension project but the extension project has yet to complete the Development Consent Order (DCO) consenting process. The Crown Estate still retains a significant role and responsibility under the Levelling Up and Regeneration Act (LURA, 2023), even though it may have already granted the seabed license prior to the enactment of LURA (2023).

As part of the DCO process, the Crown Estate also plays a crucial advisory role. While it does not have the final decision-making power on whether the development should proceed, it is obliged to inform the Secretary of State about the extent to which it has considered the protection and conservation of affected landscapes and connected seascapes when granting the seabed license.

In this situation, it means that The Crown Estate must provide clear and transparent information to the Secretary of State about how the seabed lease aligns with or conflicts with LURA's statutory duty to protect National Parks, particularly as the project is likely to result in significant and irremediable impacts. It should explain how the project's scale, location, or impact on protected landscapes has changed since the extension was competitively awarded (ie from 400MW to 1,200MW). Our understanding is The Crown Estate should ensure that this information is brought forward in the DCO process in a clear and transparent manner as part of LURA Duties.

A statement from the Crown Estate at the end of 2023 regarding the seven Extension Projects it had granted licences to, including Rampion 2, suggests that the Crown Estate recognises this obligation, and provides clear evidence that the environmental impacts were to remain under review; the statement says that *“The Crown Estate will balance the economic and clean energy potential of these projects with its commitments to nature and biodiversity and duty to make the most effective and efficient use of a valuable, but increasingly busy, seabed. **Any decision taken will be subject to a ‘Plan-Level Habitats Regulations Assessment’ (HRA) to understand the collective environmental impact of the additional capacity across all seven projects”***

<https://www.thecrownestate.co.uk/news/the-crown-estate-sets-out-plan-to-unlock-enough-new-offshore-wind-capacity>

The main criteria in the competitive bidding process for these seven licences stipulated the proposed extensions could be no greater than the original project it was extending. The original project Rampion 1 was 400 MW.

One consequence of that decision by The Crown Estate is the landscape and seascape impacts of the Rampion 2 extension proposal was significantly increased, thereby introducing fundamental concerns as to whether that scale of development (1,200 Mw) - in that location the Sussex Bay Inshore in close proximity to the South Downs National Park and coastal communities - constituted a breach of the UK's obligations under the European Landscape Convention (ELC) and the Offshore Energy SEA advice on visual buffers for wind turbines; and now invokes a conflict and necessary clarification of The Crown Estate's pro-active and ongoing LURA duties.

We ask, therefore:

- How has The Crown Estate (TCE) shown that it has fulfilled its active and ongoing duty under LURA (2023) to inform the Secretary of State DESNZ about how it considered landscape and seascape impacts when it decided to award the seabed license for Rampion 2 Extension project?
- Specifically, how has The Crown Estate explained its decision to increase the size and scale of the Rampion extension project from 400 MW to 1,200 MW
- As the Examination process has been ongoing since the 2023 LURA and the **“collective environmental impact of the additional capacity”** has been able to be assessed as The Crown Estate statement suggests , what evidence has The Crown Estate provided to show that it has considered the evidence brought to that Examination in terms of its statutory duty under the LURA, the ELC and the Offshore Energy SEA?

Yours sincerely

Melanie Jones & Mike Visram (Co-Chairs)
MOSCA (Middleton on Sea Coastal Alliance)

20 February 2025