

I write in response to the questions from the Secretary of State on 6th February regarding the piling on the sea bed. Numerous concerns have been raised during the DCO process about the damage from the wind turbine and cable installation to marine life and the sea bed, also the destruction of the SSSI site at Climping, where landfall will occur and from where access to the sea will be gained. Both on land and on the sea bed this is ecologically a highly sensitive location.

EN-1 (Nov 2023), paragraph 4.1.21 reminds us that *“In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development,”*. It is inappropriate therefore to hold our precious ecology to ransom by now claiming it would be economically unviable to protect it.

It would be even more inappropriate not to consider the potentially *more* harmful effects of decommissioning the wind farm at the end of its relatively short life.

At the first Coastal Community Project Liaison Group (PLG) meeting in 2020 (see attached PLG Minutes on page 7 below) Rampion 2 representatives were asked the question:

“The turbines have a lifespan of 25-years, what happens after that time? “

Their answer was:

*“As part of the application, there has to be a decommissioning plan. Meaning that before anything is built, **there has to also be a plan to remove it at the end of its lifespan.***

Technology is developing quickly and turbine technology continues to evolve, so there could be new options to repower the site when the turbines get to the end of their lifespan. However, this would be treated as a new project and would require a brand-new planning application and rigorous consultation. Either way, they will not just be left.”

If they are to be removed, where is the plan to do so? Where is the assessment of the damage this might do? If more turbines are to replace them, this will do yet further damage. In either case, any restoration which might have occurred in the interim years will be undone. All of this must be taken into account when assessing the benefits of the proposal against the harms it will do. It has not been, so far as I can see.

However, the renewable industry’s own trade body, Renewable UK, published this month a document entitled “Developing Effective End-of-Life Policy Frameworks for UK Offshore Wind”. In this we learn that it is currently not possible to know how such massive turbines would be removed, or the damage that this action might do, but that it would probably be worse than at installation, and that **no turbines of anything like this size have ever been removed from UK waters before, or elsewhere, and the industry itself recognises there is no strategy for removal or who will pay.**

The Applicant is not therefore in a position to give even a reasonably accurate picture of the environmental harms. Add to this the fact that in other areas of the project, such as around the onshore substation, it is clear that they have sought to *under represent* the true harms they *could* have more accurately assessed.

This report from the trade body also means that RWE, when making the above response, were not in a position to make a meaningful statement about the economic impacts of decommissioning of this wind farm, nor are they able to do so now. They are not in a position to make a *‘judgement on the financial and technical viability of the proposed development’* without knowing what the end-game is.

Today the Tony Blair Institute for Global Change warned that the job opportunities from green manufacturing are overstated. During the Examination many people challenged Rampion’s claims about the economic benefits the project would bring to the area. It would seem that they were right, and that the

unsubstantiated economic benefits suggested by the applicant, do not weigh as a positive balance against the undoubted damage to tourism along the coast and the outstanding National Landscapes, as evidence from local councils and businesses convincingly shows.

As with many other alleged benefits of the scheme, the economic gains have been exaggerated, just as the harms have been downplayed.



Community Project Liaison Group (PLG) Coastal

22 October 2020, 12noon – 2pm

Attendees:

Name	Organisation
Chair – Paula Seager	Natural PR
Chris Tomlinson - Development & Stakeholder Manager	Rampion 2
Eleri Wilce – Consents Manager	Rampion 2
Fruzsina Kemenes – Stakeholder Manager	Rampion 2
Cllr Jonathan Spencer	Bersted Parish Council
Cllr Alison Sharples	Bognor Town Council
Cllr Colin Humphris	Clymping Parish Council
Cllr John Gunston	East Preston Parish Council
Cllr Glen Hewlett	Felpham Parish Council
Cllr Keith Buckenham	Kingston Parish Council
Juliet Harris	Littlehampton Town Council
Joe Lake	Middleton-on-Sea Parish Council
Cllr Graham Amy	Newhaven Town Council
Caroline Spencer	Pagham Parish Council / Kingston Gorse
Cllr Ron White	Peacehaven Town Council
Elizabeth Marogna	The Littlehampton Society
Cllr Ann Donoghue	Henfield Parish Council (member of the Onshore PLG)
Note taker – Madeline Stoneman	Natural PR

Apologies:

Name	Organisation
Helen Plant	Lancing Parish Council

Meeting summary:

This Community (Coastal) Project Liaison Group (PLG) brings together the community coastal interest groups to allow for the sharing of information, discussion and feedback with the Rampion 2 project team as proposals for an extension of the wind farm are scoped and developed.

The Rampion 2 team presented a project update on the wind farm expansion project off the Sussex coast which could create clean, renewable electricity to power over one million homes in the UK, reduce carbon emissions by around 1.8 million tonnes per year and create green sector jobs and investment. The team are assessing an Area of Search off the Sussex coast to identify a suitable site for up to a maximum of 116 new wind turbines (the same number as the existing Rampion wind farm) and an onshore Area of Search to identify a route for underground cables to connect the power to the National Grid at Bolney.

An informal consultation with stakeholder organisations and the local community will continue to the end of the year, seeking feedback on the team's approach and identification of any other local issues and constraints that should be taken into account as the team prepares draft proposals. Formal public consultation on the draft proposals will take place in spring 2021 prior to the submission of final proposals which will form the basis of the development consent application, planned to be submitted in autumn 2021. If consent is awarded, construction would begin 2025/26 at the earliest with a view to having a completed, operational project before the end of the decade, contributing to Government targets to secure clean energy supplies and tackle climate change. The current area of search for the offshore wind farm and cable route can be reviewed on page 54 of the planning inspectorate website: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-000006-EN010117%20-%20Scoping%20Report.pdf>

Minutes

Item 2 / 3 – Project overview, development process and timetable

CT / EW introduced the group to the Rampion 2 project – copy of presentation attached.

The green hatched area on slide 6 shows the broad offshore area of search being looked at and the red line boundary on slide 9 shows the onshore area of search for the cable route. Any local issues and concerns within these areas can be shared with the project team for consideration as they develop their draft proposals.

Any members of the group who would like to visit to the Rampion Visitor Centre to contact CT to organise [REDACTED] [@rampionoffshore.com](mailto:[REDACTED]@rampionoffshore.com).

Item 4 – Feedback on project overview

Raised by	Point raised	Project response
Visual and area		
AS – Bognor Town Council	In Rhyl, the offshore wind farm is ugly and has had a detrimental impact on tourism in the area. The government also states that turbines should be a minimum of 25 miles offshore, you are quoting 8 miles.	The project understands that while a consistent majority of over 80% support offshore wind farms, not everyone likes the visual impact of wind turbines as beauty is in the eye of the beholder. However, there is a consensus that alternative sources of energy are required to assist with combating climate change. An independent Populus survey conducted 18 months after the Rampion turbines had been operating, found that 85% of those polled in the Sussex community felt positive towards Rampion and only 4% negative. There is a cluster of three separate wind farms off the coast at Rhyl. However, Rampion 2 will abut the existing Rampion site to become one site. The turbines will not be any closer to shore than the existing Rampion turbines, the nearest of which are around 8 miles offshore, which is in line with the minimum distance to shore set out by The Crown Estate and Government. Many wind farms are closer to shore than Rampion in
GH – Felpham Parish Council	Wind turbines have become an attraction, and onshore turbines have more of an impact than offshore.	

		<p>the UK. It's not clear where the 25 miles figure comes from.</p> <p>The turbines cannot be any further offshore than our area of search, due to other constraints such as the English Channel shipping lane (the busiest shipping lane in Europe) and the safety buffer to the north of the shipping lane known as the 'traffic separation scheme' or TSS.</p> <p>Rampion has become a tourist attraction with charter vessels taking people out to see the wind farm, which is good for local business. The Rampion Visitor Centre is estimated to attract 100,000 visitors per year, but Covid has prevented that at this stage.</p> <p>There is no evidence of wind farms being detrimental to tourism, only anecdotal evidence to the contrary.</p>
<p>RW – Peacehaven Town Council</p> <p>EM – Littlehampton Society</p>	<p>What will the visual impact be?</p> <p>Can the project create a mock up to show the size of the new turbines and how it will look from the coast.</p>	<p>Visual impact will be assessed as part of the Environmental Impact Assessment (EIA). The project will be creating visualisations at key points along the coast to show how the new turbines will look.</p>
GH – Felpham Parish Council	<p>The Protect Coastal England protest group is stating that the new turbines will be 325m tall, which is taller than the Shard.</p>	<p>The figure of 325m is a worst-case scenario to ensure latest technology by turbine manufacturers is considered, although this doesn't mean the tallest turbines would be selected. The project's assessments will be done on worst-case, so there are no surprises, but it probably will be less. The original Rampion scheme was actually consented for turbines of up to 210m but the final scheme used turbines 140m tall.</p> <p>The scheme will comprise up to 116 turbines, but depending on the turbine size used, there may be fewer turbines required to meet the same capacity.</p>
JS – Bersted Parish Council	<p>Will the new area be the same size as the current wind farm</p>	<p>It will be a larger area, but with a maximum of 116 turbines, the same amount as the operating Rampion wind farm. As the new turbines have a larger rotor diameter, they need to be spaced out more than the turbines within the existing Rampion wind farm to ensure one row of turbines does not 'steal the wind' from the row lying behind. The final wind farm area will be significantly smaller than the Area of Search on the chart.</p> <p>The new area will abut the current wind farm, to look like one development. The scoping activities will look to make sure the project delivers the optimum solution.</p>

AS – Bognor Town Council	Concerned about the flashing lights at night.	The lights are a safety requirement for aviation. Investigations are underway to see how these can be reduced, but they are an essential safety requirement.
Socio-economic		
RW – Peacehaven Town Council	What will the local benefit be? How much of the build cost will be retained locally with regards jobs etc?	Rampion currently employs 65 full-time permanent staff at Newhaven. Out of 40 technicians, eight have come through as apprentices and there is also a graduate programme. At the height of construction for the existing Rampion wind farm, 650 people were employed, mainly offshore. The project has a duty to develop a Supply Chain Plan and a Supply Chain Working Group is being considered. It is difficult to commit to targets this early in the project and there will be specialist contractors required for areas of delivery that might not be available within the local supply chain e.g. turbines and foundations, but the project will look locally where possible.
KB – Kingston Parish Council	Where will the turbines be made?	
RW – Peacehaven Town Council	Will any additional jobs be created at Newhaven?	Where these jobs are will depend on a number of factors such as the location of the final site selection and efficiency of operations. However, the facility in Newhaven has spare capacity to take on a larger team, if required.
Environmental and ecological		
CH – Clymping Parish Council	Clymping Parish Council appreciated the opportunity to speak to the team recently as they know only too well the impact of climate change with sea defences having been breached. Clymping residents are extremely concerned about climate change and need to address it.	The project is aware of the current coastal erosion and it is being assessed to ensure we can address concerns as much as possible. The cables will be drilled from the intertidal zone under the beach to the agricultural land north of the beach.
KB – Kingston Parish Council	Is the project aware of the fish breeding grounds north of the scoping area?	Yes, the project is aware of the Kingmere MCZ where black seabream come to breed. For the existing Rampion Offshore Wind Farm, the project implemented piling restrictions during the breeding season, this was a precautionary measure as the impact from noise on breeding is unknown. The project is working with Natural England to look at all impacts to fish and marine life, and it will form a key part of the EIA.

Planning and development		
CH - Clymping Parish Council	The cable route might look clear, but is the project aware of the plans for bunds along the Arun and the possibility of new homes being built between Middleton-On-Sea and Littlehampton?	The project is in contact with the local planning authorities so any development proposals can be taken into account. The project requests the group sends through details of any proposals they are aware of to ensure everything is captured.
Technology / life span		
RW – Peacehaven Town Council	Will the project be looking at battery technology, given that one issue with wind technology is that it only works when the wind blows?	Battery technology is not something that is needed for this site as Rampion is the only wind farm on the south coast of England, with this corner of the country having one of the highest population densities in Europe and a massive electricity demand. Battery storage would have more of a role in places that have a greater supply of wind power and lower electricity demands.
EM – Littlehampton Society	The turbines have a lifespan of 25-years, what happens after that time?	As part of the application, there has to be a decommissioning plan. Meaning that before anything is built, there has to also be a plan to remove it at the end of its lifespan. Technology is developing quickly and turbine technology continues to evolve, so there could be new options to repower the site when the turbines get to the end of their lifespan. However, this would be treated as a new project and would require a brand new planning application and rigorous consultation. Either way, they will not just be left.
Consultation and community PLGs		
GA – Newhaven Town Council	Wanted to reassure those to the west that the team worked closely with local groups on Rampion and that was not as bad as anticipated. Suggested the project team shared videos and content produced during Rampion to those new to the project.	CT encouraged PLG reps to visit the Rampion Visitor Centre and offered a 1.5 hour slot for those interested, when Covid restrictions allow. The Visitor Centre has a wealth of information on how we developed, built and operate Rampion and how we work with the Sussex community.
GA – Newhaven Town Council	Suggested the project team look at using empty shop units to get information to those that might not be accessing information online.	Engagement techniques are being considered in light of the current restrictions. We have previously distributed hard copies of information to local libraries and town halls.

RW – Peacehaven Town Council	With the wind farm creating three times the power, will the community fund reflect this and be three times the size?	The existing Rampion wind farm saw the introduction of the Rampion Fund – a £4m voluntary community benefit fund managed by Sussex Community Foundation. This fund provides the opportunity for community groups to apply for financial support to deliver climate or environmental focused community projects. Six funding rounds have been held so far, and it will continue for another seven years. It is the intention to do something similar for Rampion 2, but too early to commit to a value. For information about the Rampion Fund: https://sussexgiving.org.uk/give-to-your-community/our-funds/named-funds/rampion-fund/
GA – Newhaven Town Council RW – Peacehaven Town Council	Are there any resources that can be shared with schools or plans to produce any? There are lots of local creatives that something like this could be outsourced to.	The Visitor Centre was designed as an educational resource, with five hours a day during term time being dedicated to school visits. The current global pandemic means this has not been possible. As the project develops, opportunities will be identified and shared. CT to contact Jennifer Donn to see if anything is currently available. Post meeting note: CT can report that the VC team is planning to develop an activity booklet for use by younger children in the VC and a worksheet for schools. Anyone who would like a visit to the visitor centre to email CT to organise: ██████████@rampionoffshore.com
CH – Clymping Parish Council	Can we have some information to be included in our local newsletters?	The project will be looking at its own newsletter with the first issue due end November. Post meeting note: CT has provided a short piece for the Clymping PC Newsletter. The project requested that Parish Councils provide details of channels they have that might be able to support the team to get messages out.
RW – Peacehaven Town Council	Have Telscombe Town Council, Rottingdean Parish Council and Seaford Parish Council been invited to join the PLGs?	Yes, they have been invited. The project will be keeping them up to date as the proposals develop.
JH – Littlehampton Town Council	Can substitutions be sent to the PLGs?	Yes, definitely. The terms of reference ask for only one attendee from each organisation, but let PS know in advance of any changes of attendee.
GH – Felpham Parish Council	A pressure group has requested to present at a Parish Council meeting, would the project be	Yes, the project is happy to attend and present to any meetings or groups.

	happy to present at another meeting to give a balanced view?	
RW – Peacehaven Town Council EM - Littlehampton Society	To be effective as a group we need to be involved as the proposals develop, so it would be useful to have regular meetings.	Agreed that meetings would be held in: - Jan/Feb 2021 – Preliminary Environmental Information Report - April 2021 – start of formal consultation - Late summer 2021 – ahead of submission
Other		
RW – Peacehaven Town Council	Will there be any reduction in local utility bills to smooth the way?	This is not something that we can influence directly as the regulatory framework within the UK doesn't allow it.

Item 5 / 6 – Role and purpose of PLGs and representatives

CT explained the role and purpose of the PLGs. With such a large geographical area to cover, a population approaching a million people and a wide and diverse range of interests, the PLGs act as a conduit for a two-way information dissemination process. Each PLG covers a different area of interest and looks to make the most of the representatives' local knowledge, expertise and networks. This helps a small project team reach a far greater audience to raise awareness of the project, while also increasing the level of feedback to help shape the proposals. The process was very successful for the original Rampion project, benefiting both the project team and the Sussex community.

There are six PLGs covering the following interests:

- Onshore communities (along the proposed cable corridor)
- Coastal communities
- Environmental
- Sea Users
- Public Rights of Way
- Business & Tourism

There will also be commercial fisheries working groups and a local liaison group in the vicinity of the proposed substation.

Action Points

All present - The project requests the group sends through details of any proposals they are aware of to ensure everything is captured.

All present - The project requested that Parish Councils provide details of channels they have that might be able to support the team to get messages out (eg. Newsletters / Facebook forums / etc).

CT - to contact Jennifer Donn to see if anything is currently available. Post meeting note: CT can report that the VC team is planning to develop an activity booklet for use by younger children in the VC and a worksheet for schools.

CT – to provide Clymping PC with content for newsletter. Post meeting note: done.

Item 7 – Project Liaison Group Terms of reference

PS reviewed terms of reference with the meeting, copy attached. If we don't hear any feedback within 14 days, we will consider these approved.

Item 8 / 9 – Future meeting aspirations / timings

Meeting agreed 12 noon – 2pm was fine, as long as advance notice was provided. It is anticipated the next meeting will be in early 2021, when the Preliminary Environmental Information Report will be presented to include more refined proposals. A third meeting will be held in early April to present the draft proposals for consultation, ahead of the formal public consultation period in April and May. A fourth meeting will be held at the end of the summer to present consultation feedback, analysis and proposed changes to accommodate the feedback, where possible. This will amount to the final proposals that will form part of the development consent order to be submitted end September / early October. We will review a meeting schedule beyond this during the fourth meeting.

The project team encouraged the group to submit feedback and queries at any time either via PS or to the team.

Item 10 – AOB

CT / PS thanked everyone for attending. Contact details for the team to provide feedback or comments:

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