MOSCA Middleton on Sea Coastal Alliance
IP Number 20045287
Response to the Secretary of State's request for further information of 16 December 2024 re Application by RWE for an Order granting Development Consent for proposed Rampion2 Offshore Wind Farm Project Reference: EN0-10117

Dear Mr Wheadon,

We fully appreciate the time and consideration this proposed Windfarm has received from those who have asked questions and those who have responded, plus the detail and a mass information provided in support of the Rampion 2 Windfarm by the Applicant.

Our response below for January 13th is in support specifically to Respondents Natural England and Carlo Marogna - on behalf of both Protect Coastal Sussex and Constructive Heritage Llp. With both respondents we note that important questions are still lacking full answers to the 'grit' of the sensitive and salient questions raised albeit receiving carefully constructed and apparently fulsome replies from the Applicant.

We earnestly request there is a genuine need to pin down a clearer understanding of impacts and harms on marine life in particular - and the environment as a whole, and to ensure that should the proposal for the location go forward, this needs to be exhaustively verified in its checks. This project will have major forward implications many of which cannot yet be known and there will be no going back. This is a vital point of information request.

There must be rigorous regular monitoring of noise levels during construction. Noted Natural Englands' request that no more than 10% soft start energy pile driving is reasonable at the start of the project. Regular monitoring the disturbance of the seabed and the toxicity levels must also be a priority. However, also seriously noted is Carlo Marogna's point that with tides (ebb and flow) and the shallowness of the location marine noise levels cannot possibly be accurately measured for impacts and harm.

We strongly hold a view that the facts of actual in-life data do not yet exist to support a windfarm of the proportions suggested in the proposal for the Heritage Bay that has very complex issues to be factored into a model. Though impressive in its figuring this is almost all a modelling exercise. There can be no life measurement as nothing of this windfarm size (height and depth) and proportion has yet been built in the world and the impacts from being implemented so close to the shoreline and therefore shallower water raises a very different set of considerations. This windfarm is not clearly offshore

as it is advertised it is inshore by its close proximity to the shore. To reiterate, there is no other windfarm as yet built – period!

We fully support the careful professional insight of Carlo Marogna specifically on marine noise impact. Also, those issues raised by Natural England and the MMO. There is data that has yet to be professionally published we understand, regarding marine noise. At this time to what realistic degree it is not clear that 'bubble curtains' around piles in construction to alleviate noise would mitigate to any great extent. We also note also that the Secretary of State has highlighted the concerns raised by NE and the MMO during the Examination in relation to uncertainties concerning the efficacy of double big bubble curtains (DBBC) as a noise abatement system. It would seem sensible if data is being compiled to pause on allowing this application to proceed so that an accurate report based on updated research could ensure the unprecedented noise levels can be truly alleviated.

Safeguards on mitigation of noise levels suggested can only do that - mitigate - and we do not know what that mitigation fully means. Logic says that without any life data available the shock of violent piling to the depth required for these turbines, into the Sussex chalk bed must impact at a reverberatingly threatening level in noise pollution (noise under water travels deeper and stronger than above), along with the release of toxic substances – mostly from human sources - from consistent smashing into the sea bed for those piles and we do not know the impact on that on either marine life nor what is taken from the sea for food - in the shallow depths that are available to pile.

As an alternative quoting Carlo Marogna 'the greater proportion of aquatic life lives inshore, moving to a site farther away from the shore' So it would be far more sensible to site this project in 'an area of greater wind density and depth and as he says 'such as Dogger Bank – deep water.' The need for renewable energy security on schedule is understood, but what has become clear after 3 years of review into this application (without referring to further issues) is how potentially destructive an industrial power plant of this size could be verified to be sited so close inshore.

We are pleased that some issues have been noted and changes/mitigations suggested. But the above major concern has to be that a modelling exercise does not give a true picture of the construction impacts and running issues to both seascape and landscape – the unchartered issues of noise impact to sea life cannot be ignored nor the impact to the migration highway above the sea to birds, bats and insects all of which play a basic but important part in supporting the environment and the life chain that life and humans included rely on for both food and beauty of the surroundings in which we live. This cannot be ignored.

This migration highway is based on figures and facts and is a hugely important factor relevant specifically to this area of the Southern Coast and should be given a more serious understanding and decision balancing to what could be irrevocably damaged and lost against the possible benefits of what appears to be a flagship to NetZero policies.

We are clear that pausing on this project to ensure the most effectively accurate, and sustainable solution for the Sussex Heritage Bay must be proved or disproved as a serious basis of economic need noting the recent publications relating to reliance on Wind power which is not yet clear to be the best solution plus it is now known that the costs of provision are getting more complicated and costly and less economically viable to the country as a whole.

Wind energy is expensive to run - £1bn was paid out in 2024 to windfarms to switch off due to high winds and the National Grid struggling to cope with their added power. As well as the need to provide backup gas turbines which does not advocate Net Zero. We are now in the third quarter of a low wind period and as I write we have according to Centrica just one week of gas storage available. The cost of turning to Carbon capture are also not yet fully priced and involve more impacts on NetZero guidelines in ferrying this around the world. Solar power is also not reliable as can be seen by recent weather periods.

Appreciating that not all the risks below may/could have relevance specifically to this project It does however clearly make a case for careful overall consideration as the implications and costs of this project are inherent within the National Infrastructure Projects and costs overall at National level - it must make an economic case for 'being' as well as its sustainability.

The need for wind power is just part of our national energy needs. Its place in our need for energy and our energy security is not fully supported by factual evidence. What is the geopolitical and market risk this country is incurring by placing its main assets and infrastructure for power generation in the sea around the entirety of the British Isles?

This could - alongside its reliance on undersea gas pipeline supplies from Norway bring a number of geopolitical and market risks that could significantly affect our energy security and broader economy. Offshore windfarms are by right less secure than onshore projects.

There are any number of possible non friendly risks which include: Geopolitical risks from Supply Chain vulnerabilities, Undersea cable and pipeline vulnerabilities, Dependency on European Energy Markets including Fluctuating energy prices and political instability, Geopolitical risks from Norway and Gas supply, Risks from offshore wind infrastructure including weather and climate related risks and more importantly supply chain and manufacturing risks, Market risks from changing regulations and EU relations, Cyber security risks and Market risks.

In short, the wind and energy infrastructure initially offers a positive transition to a low carbon economy, however it faces a volatile geopolitical market in the medium term at least.

This could lead to a cumulative effect on higher energy costs, energy security challenges and economic instability. It is imperative that diverse energy sources

strengthen the country dependency and resilience, and we are not there yet by a long way.

Windfarms may well be valid but the size, proportion, location and impacts to the area should be realistically factored against pure economic gain and with careful attention to taking political decisions that going forward may not be sustainable and create a poor return in the wider sense

It is still in our view and a reminder to note the legal position that this windfarm poses OESEA et al 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 of course 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.

We do not believe breaking/bending laws to suit is good or correct at any time however when the proposed development falls short of what could be achieved in a more viable and economic location it makes the decision even less sustainable in our view.

Protect Coastal Sussex have argued that Rampion overestimates the energy efficiency at this location we need to make sure we get the most value for whatever destruction takes place in assessing harms. Please not we are extremely concerned that following Natural England's' recognition of meadows as priority habitat and effectively trashing Rampion's ecology surveys there – we ask why should we now believe any of their evaluations about other sites or likely harms done?

After Rachel Reeves recent directive that we now more than ever need to ensure maximum efficiency on every project and in every department so that every remaining penny is available for other social projects such as the NHS, social care etc

Therefore, does this project – based on its location and its proposed economic base, the impacts and harms on the environment make such an overwhelming case that it falls into that economic efficiency requirement and good value for taxpayers' money rather than perhaps a commercial profit vehicle and convenient NetZero flagship tick box project. The idea of saving the planet but tipping up the environment in the NetZero race does not appear to be sustainable in the argument relating to this proposed application.
Yours sincerely

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January 13 2025