10 Sept 2023

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PROTECT COASTAL SUSSEX

Press Release

A silent ecosystem killer, an attempt to save nature by trashing it: Sussex Coast Residents respond to acceptance of the Rampion 2 wind farm proposal for Examination

What happens next …?

The Application for a Development Consent Order (DCO) for the controversial £3bn+ Rampion 2 proposal that would transform the natural Sussex coast inshore into a highly visible industrial power park was accepted for Examination by the Planning Inspectorate (PINS) on 7 September 2023.

The Application sets out commercial plans of the German multinational (RWE) for a 1,200 MW capacity scheme consisting of up to 90 large wind turbines up to 325m (1066 feet) above the sea at low tide (higher than the 310m London Shard building) on steel towers driven into the seabed stretching over 50 miles (80km) along the Sussex Bay inshore from east of Brighton to west of Bognor Regis.

Associated infrastructure would include hundreds of miles of array cabling cut into the seabed, a power export cable landing at Clymping, and over 22 miles (35 km) of buried cable routed through the South Downs National Park to connect to a new substation at Oakendene, Cowfold, 1.8 miles (2.9 km) from the Bolney National grid Substation.

PCS spokespersons said:

"The sheer scale of the Rampion 2 scheme in environmentally sensitive inshore waters with a cleared transmission right-of-way through a National Park will disrupt and permanently degrade ecosystems in the sea, on the land and in the air, both during construction and operation. It will make them less resilient and even more vulnerable to long-term climate change. In human terms, it will substantially degrade intrinsic values of the natural seascape and landscape impacting on the wellbeing of many."

Previously during statutory public consultations on the developer's proposal, Nick Gibb, MP for Bognor Regis and Littlehampton said:

"I support the Government's aim for the UK to be a world leader in renewable energy and the Government's ambitious programme to tackle climate change, but this stretch of the West Sussex coastline is an inappropriate location for such a large wind farm. The English Channel is too narrow to enable the turbines to be positioned far enough out to sea to be acceptable. This proposal does not, therefore, comply with the Government's recommendations for offshore wind farms of this size".

Andrew Griffith, MP for Arundel and South Downs describes the new cable route as a, *"cable motorway"- through communities within the Arun and Horsham districts, and across the South Downs National Park protected landscape. Its construction phase alone is expected to disrupt households and businesses in West Sussex for many years."* [1]

Acceptance of Rampion 2 for Examination triggers the pre-Examination stage of the DCO process run by central Government. A Panel of 3-4 Planning inspectors will be appointed to conduct a 6-month Examination. PCS and affiliates are preparing Relevant Representations to better inform this Examination and will register as Interested Parties (IPs) to participate.

There are no further public consultations before a decision is taken on Rampion 2, apart from topic-specific Public Hearings for individuals and organisations who formally register as Interested Parties. They can make representations to the Panel and comment on representations of others and the Applicant's proposal documents.

Core values and key concerns:

At the heart of growing local community concerns about the Rampion 2 Application are:

- Rampion 2 would undermine rather than advance the achievement of sustainable development on the south coast and affected inland areas due to the nature, sheer scale and location-specific significance of impacts;
- The adverse impacts of Rampion 2 would demonstrably outweigh the benefits for both current and future generations of residents and visitors – as well as wider society;
- The location does not respect the Government's own strategic environmental advice on where to put exceptionally large turbines to avoid unwarranted multiple social, environmental and economic harms in coastal areas; and
- Reasonable alternatives offer better value for money and do far more than Rampion 2 across all policy metrics to deliver energy security with reliable, affordable low-emission electricity supply, and to decarbonise the power sector by 2035.

[1] https://www.andrewgriffithmp.com/news/andrew-griffith-lib-dem-councils-abandoning-local-communities-impacted-windfarm-extension

Reasonable alternatives otherwise compete for the £3bn+ investment that Rampion 2 requires, and not all windfarms are the same in respect to benefit-risk tradeoffs.

We fully appreciate that people - with good intentions at heart - in our communities would support a commercial application to install wind turbines – anywhere, at any cost to the environment, without the facts and therefore the wellbeing of others. If it ticks the Green Box it cannot be refused!

Other informed residents see the impacts of Rampion 2 will be so substantial and transformative, even to the point they will reconsider living in the area.

PCS argues that we must sensibly prioritise and develop the most efficient wind projects, those which are truly offshore in the best wind regimes and preferably connected to an offshore ring grid. Wind power can then play its optimal role in our generation mix and climate strategy - not divide and disrupt communities.

Next Steps:

To communicate these concerns clearly with relevant argument and hard evidence, community organisations affiliating with Protect Coastal Sussex (PCS) are collaborating in preparing three mutually supporting Representations for the Examination, namely:

1. ***A Local Impact Assessment (LIR):*** *A community-led LIR to set out how we see Rampion 2 will impact current and future residents, area visitors, the environment and our natural capital. We aim to better inform consideration of this Application with local voice, knowledge and experience, as well as the statutory LIRs prepared by external consultants who may be engaged by Arun District Council and West Sussex County Council.*
2. ***A due diligence representation on benefit-risk tradeoffs****: To fact-check the credibility of uncontested and highly significant claims the developer has made as the single-source of information to date on the performance, benefits and impact of Rampion 2, and*
3. **A Representation on Reasonable Alternatives**: *To support the consideration of reasonable alternatives in the examination of Rampion 2, as triggered by provisions in national policy statements on ways to better spend £3+ billion on clean, low-emission generation and reduce the upward pressure on electricity bills.*

We encourage all south coast and Sussex residents interested in speaking out for genuine environmental stewardship and sustainable development to register as Interested Parties when the registration period for the Rampion 2 Examination opens, likely this autumn. That will be advertised in local media.

Go to the Planning Inspectorate website for information now and sign up for updates.
https://infrastructure.planninginspectorate.gov.uk/projects/south-east/rampion-2-offshore-wind-farm/

Please also visit the PCS website for further information on the progress of these representations and how you may contribute your voice.

The Middleton on Sea Coastal Alliance (MOSCA), and The Littlehampton Society (TLS) and all those affiliated with PCS as individuals and organisations seek to ensure the best balance and outcome for people and the environment – and a re-alignment with reality.

Secretary
Protect Coastal Sussex

On behalf of PCS Co-Chairs

Chris Lee, Aldwick
Melanie Jones, Middleton on Sea
Lawrence Haas, Littlehampton
Meera Smethurst, Cowfold

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PCS website, "Who we are":
https://www.protectcoastalsussex.org/about

MOSCA website
https://mosca.click/

The Littlehampton Society website
https://thelittlehamptonsociety.org.uk/rampion-2

The Cowfold Residents Action Group website
https://www.cowfoldvrampion.co.uk/

PRESS RELEASE ACCOMPANYING NOTES:

1. On the day the Rampion 2 wind farm was accepted for Examination, power output from the existing Rampion 1 installation was 2.25% its nominal capacity (400 MW).

2. Rampion 1 had been barely produced for more than a week, since 22 Aug 2023, due to low winds. These vary seasonally and year-to-year, where typically winds are lowest in summer and in cold dead winters. Rampion 2 turbines would have the same pattern of low output over this period (a small percent of its nominal 1,200 MW capacity).

3. For many, it calls into question many claims the Applicant made in developer-led statutory consultations to seek public support for the Rampion 2 scheme, such as: "Rampion 1 and Rampion 2 combined will be able to meet all the power needs in Sussex - twice over." [2] What is not to like? – if only it were true.

4. Figure 1 below from The Crown Estate website shows actual offshore wind output across the UK for 30 days to 7 Sept 2023. The low and variable combined output from all offshore wind turbines, in this period, can be compared to total nominal installed capacity of UK offshore wind, presently around 13,700 MW. [3]

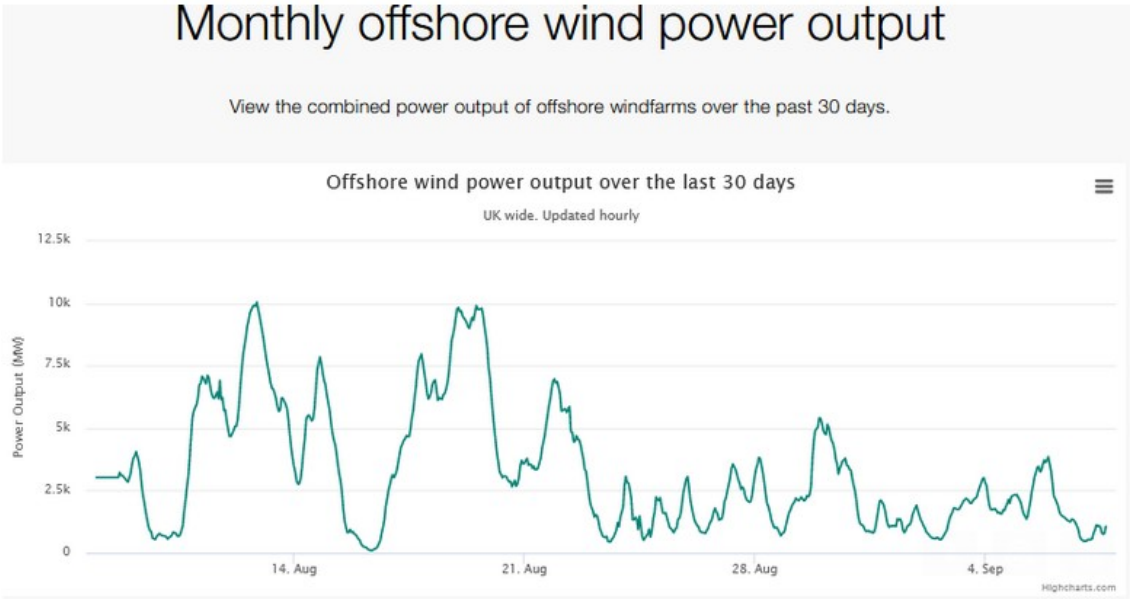

Figure 1: Past 30 days of total UK offshore wind output (combined) to 7 Sept 2023 (source: The Crown Estates website on rolling 30-day output)

[2] Claims made during statutory consultations, in media and in Community Project Liaison Group meetings in 2022-2023. Acceptance news releases changed that to "could power all homes in Sussex, twice over" – still without acknowledging intermittency or variability (i.e., no or low output for days when the wind does not blow. It does not matter how many wind turbines there are – there is little output. Plus no acknowledgement of the impact of mandated electrification on increased power demand for EV charging and heat pumps.

[3] Left scale in Figure 1 thus mostly under 1,000 MW - 2,500 MW output available since 22 Aug 2023.

5. It also means that for each and every Rampion 2 wind turbine, all things considered, we need to find or fund the equivalent capacity (1,200 MW) of dependable low-emission power generation - to turn on every time the wind drops on the south coast inshore. [4]

6. This underscores the importance of supporting the most efficient offshore windfarms (not just any lower efficiency windfarm) - as a re-alignment with reality. And take into account obvious reasons for failure of the recent UK offshore wind bid round.

7. Specifically relevant to consideration of Rampion 2, the Planning Act (2008) and National Policy Statements (NPS, Energy) on which the decision to consent or refuse consent for this Rampion 2 windfarm development will be largely based, stipulate that:

    i. There is a **legal presumption for sustainable development, not just any development**.

    ii. Decisions on Nationally Strategic Infrastructure are made "in accordance with the relevant NPS, **except to the extent** …. that to do so, **would result in adverse impacts from the development outweighing the benefits**" as in NPS EN-1 para 1.1.4).

2. Overarching National Policy Statements on energy infrastructure development under review now by central Government after Public consultations ended in June 2023, propose a new provision, to say the single **Critical National Priority** (CNP) for the UK is the deployment of offshore wind turbines.

3. This is to meet political targets to integrate variable and intermittent offshore wind generation in the UK power supply mix. Whether this is intelligent or not, is not material as we are not permitted to challenge it in the Rampion 2 DCO process by law.

4. There are also installed capacity targets for other renewable and low-emission technologies in a suite of technology-specific NPS, but they have not been proposed as critical national priorities, hence they do not give central Government through the DCO process the ability to override existing environmental and social safeguards and local voice – which is reserved only for commercial offshore wind proposals.

5. It is worth bearing in mind, for the foreseeable future offshore wind technology will be mainly supplied by state-backed or state-supported European consortiums, meaning the CNP is giving them preference over UK home-grown technologies, regardless of any implications for off-shoring UK renewable energy subsidy, profit and high value green jobs to the Continent in the near to medium term.[5]

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[4] Installing wind turbines in areas of lower and less steady wind (lower wind density areas such as the south inshore) calls for incrementally more back up generation to be put in place, as well as more transmission and other grid infrastructure - than is required if wind turbines are installed in better wind regimes. HIGHER electricity bills are the inevitable consequence, at least in the short to medium term beyond 2035.

[5] SCOTLAND has produced only around a tenth of the offshore wind jobs forecast by ministers as it aimed to make the country the green energy capital of Europe (citation next page).

6. The Panel appointed by the Planning Inspectorate (PINS) for the Examination will make a recommendation to central Government based on conformance to the newly revised National Policy Statements. The Secretary for State for the Department of Energy Security and Net Zero (DESNZ), presently the Rt. Hon Claire Coutinho, will make the final decision on Rampion 2 in late 2024, or after.

7. **PCS and others argue that the new CNP introduced by this Government should interpret "offshore" as it is legally defined by the UK Marine Management Organisation (MMO).** That definition is the sea area greater than 12 nautical miles (about 14 statute miles or 22 km) from shore. It means wind turbines can only be classed as "offshore" if they are more than that distance from shore. That region of the sea (beyond 12 nautical miles) is also wisely classified in the Energy Act (2004, revised) as the **Renewable Energy Zone (REZ).**

8. Relevant also is the Government's rolling Offshore Energy Strategic Environmental Assessment programme (OESEA) which provides strategic environmental advice and guidance that says wind turbines of the scale of Rampion 2 should be erected no closer than 25 miles (40 km) from sensitive visual receptors on shore. This is to avoid unnecessary local harm, as documented by the OESEA programme. [6]

9. In the Rampion 2 case, the developer is proposing to install up to 90 turbines up to 325m (1066 feet) tall in ecologically sensitive inshore waters, starting 8 miles (13 km) from shore, the same distance as the much smaller Rampion 1 turbines.

10. Labelled as a 1,200 MW "extension" to the existing 400 MW Rampion scheme, the Rampion 2 turbines will be far taller (up to 2.3 times the existing Rampion turbine height) and wider in profile; and thus impact more of the south coast for a greater portion of the horizon than the existing Rampion installation that has smaller 140m turbines in a limited sea area.

11. The biggest difference in the visual impact in this respect between Rampion 1 (the existing turbines) and the Rampion 2 scheme is the latter will hit the land and communities that lie to the west of Lancing. All along this coast the nearest turbines will be as close as 8 miles (13 km), but they will be far larger, and the arrays will extend 13 miles (21km) further west, which means that at every point along the coast from Peacehaven to Selsey Bill the turbines will be much higher than the cliffs at Peacehaven.

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https://www.heraldscotland.com/news/homenews/23489568.offshore-wind-delivers-one-tenth-jobs-promised-ministers/

[6] See OESEA - Review and update of Seascape and Visual Buffer study for Offshore Wind farms (2000) https://www.gov.uk/government/publications/uk-offshore-energy-strategic-environmental-assessment-research-projects

12. Even though safeguards such as the OESEA advice exist, the Examination Panel can recommend to the Secretary of State that the Government's strategic environmental advice put there to avoid local harms - can be ignored.

13. After closely following the developer's work in the pre-application period to identify its commercially preferred scheme and considering that in January 2023 RWE declared that the offshore component was "fixed for its DCO Application", PCS evidence gathering and analysis to date concludes that the adverse impacts of the Rampion 2 scheme would undermine, rather than advance the achievement of sustainable development on the south coast of England and affected inland areas.

14. This is important because achieving sustainable development is recognised in UK Law and policies from local to national levels and in UK international commitments as pursuing three overarching objectives (environment, social and economic objectives) that are "interdependent and need to be pursued and balanced in mutually supportive ways". The essence of balance is that one objective of sustainability must not eclipse the other two objectives. Three pillars must be balanced to achieve benefit, stability and fairness for the needs of both current and future generations.

15. Conclusions that PCS has reached are based on the scale and significance of adverse impacts, as well as uncertainty due to the lack of research on impacts.

16. The Applicant (RWE) has yet to put its Rampion 2 proposal documents including the Environmental Statement (ES) and Consultation Report on its website. PCS will update the community-led analysis of impacts when the Applicant makes the documents available.

17. There is no doubt the construction and operation of Rampion 2, at the sheer scale proposed, would be a silent, chronic killer of the natural environment on the Sussex coast including animals large and minute therein (Cetaceans and Arthropoda). It will degrade nature and natural capital already under pressure. It will make sensitive marine and land-based ecosystems even more vulnerable and less resilient to long-term climate change. What is relevant is the scope and scale of the disruption is far greater for windfarm schemes installed in inshore waters where the marine habitat is far more productive and sensitive than marine ecosystems further offshore.

18. On the benefit side of the calculation (adverse impacts outweigh the benefits), commercial developers of offshore wind tend to exaggerate the benefits and understate the impacts. This was seen in the Navitus Bay WindPark Application on the other side of the Isle of Wight that was refused development consent in 2015.

19. PCS believes examining substantive claims that RWE makes about the performance and benefits of Rampion 2 that lack credibility is massively important to have the full picture. This includes due diligence on claims the developer has made on performance during

the statutory consultations, such as Rampion 1 and 2 combined provide all the power needs of Sussex - twice over.

20. Moreover, that claim was made public and to Councils at all levels with no external scrutiny or acknowledgement of the intermittency and variability of Rampion 1 and 2 power output. Nor does it take into account what that implies across all benefit calculations in terms of the relative contribution, such as from offsetting emissions to contribution to decarbonisation of the power sector by 2035 to the avoidance of energy imports. Or reducing UK dependence on the import of technology - along with consideration of the global supply chain emissions and environmental impacts in developing countries from sourcing the additional critical minerals and rare earths that lower efficiency wind projects such as Rampion 2 would entail.

21. It is for these and other reasons that in June 2023, the PCS in the open public consultation on National Policy Statements conducted by Government, proposed amendments to the new Critical National Priority (CNP) sections that include:

    - Focusing offshore wind development in the designated Renewable Energy Zone (REZ) wisely identified as such in the UK Energy Act (i.e. from 12 to 200 nautical miles seaward);

    - Giving legal status to the Government's own existing Offshore Energy Strategic Environmental Assessment (OESEA) advice on ensuring visual buffers for large wind turbines (distance from significant receptors, or from shore) to ensure consistency and fairness to coastal communities and thereby reduce controversy;

    - Ensuring system value analysis / modelling of all NSIP offshore windfarm proposals are routinely undertaken by relevant authorities (such as Ofgem or ESO) to inform each DCO application and to optimally time and sequence low-emission generation additions with the essential transmission and ancillary services; and

    - Rank and prioritise locations to systematically promote investment in offshore wind by appropriate criteria such as efficiency, energy performance, system fit and value for money. Further it will massively help to introduce a fast-track category of offshore wind developments that satisfy simple location and policy criteria,

The Broader Context

22. Affordable and reliable energy is central to human prosperity and as a basic need. Electrification is a major trend in all societies globally. Most advancing and western economies acknowledge the need to have a complementary mix of variable output renewable and dependable output low-emission electricity supply technology (to turn on when the wind does not blow sufficiently and the sun does not shine).

23. Our analysis and hard evidence to be supplied in Representations indicates that the Rampion 2 scheme is not part of that complementary mix of generation sources for

many reasons. It is a sub-optimal wind project from a power system expansion perspective, as Rampion 2 is at the low end of the efficiency scale for UK windfarms operating today. It does not offer value for money compared to other offshore windfarms and especially compared to other reasonable alternatives for low emission generation in the South of England.

24. It will put upward pressure on household and small business electricity bills, in relative terms, due to higher system costs in the short to medium term. That is due to the need for more new generation to make up the efficiency difference as well as other power system infrastructure, this at a time of mandatory electrification of heating and transport - and given the level of subsidy and incentive payment put into tariffs.

25. We must ask the question, why does the UK today have among the highest share of renewable generation of any major economy in the world today - yet at the same time, the highest electricity tariffs of any major economy? Wind and solar today make up over 43% of UK electricity supply - on an average annual basis and ignoring the intermittency. That share is expected to rise to at least 66% across the ESO (National Grid Operator) Future Energy Scenarios (FES) scenarios by 2030.

26. Underpinning the concerns of many Residents and community organisations who pro-actively embrace the Localism Act (2011) and local stewardship of our highly valued natural resources, is they felt a collective responsibility to help boost local awareness of the proposed permanent transformation of the environment and character of the place where we live, play and work and the actual choices involved to make a difference.

End