

Reject Rampion 2

Summary

Rampion 2 is a second wind farm development off the Sussex Coastline. Rampion 1 was approved in 2014 and started producing electricity in November 2017, four years ago. Since Rampion 1 was constructed, Government policy and guidance have advanced considerably, with much more emphasis on environmental impacts. Rampion 2 will mean large industrial turbines occupying around 4 times the area of Rampion 1 and, at first glance, make a significant contribution towards the Government's aim of quadrupling the offshore wind capacity to reach 40GW by 2030¹. However, the Government now favours the development of new wind farms much further off-shore to take advantage of higher wind densities and greater efficiency - and in areas where the wind farm can connect to the Offshore Transmission Network (OTN) in order to greatly minimise environmental impacts. Rampion 2 would, in contrast, be both damaging and inefficient: it is inshore and cannot connect to the OTN.

Closer inspection of the Rampion 2 proposal reveals that up to 116 new, very tall turbines are being proposed (up to 2.35 times higher than Rampion 1), only 8 miles from the Sussex Coast - far closer than that recommended by the Government's recent policy guidelines and statements made by the Prime Minister. The visual impact of Rampion 2 is of great concern, including that on the South Downs National Park, and could cause the coastal economy in West Sussex to decline significantly, with reduced income from tourism and newcomers, and associated job losses. Public scrutiny of Rampion 2 has also been hampered by inadequate consultation which needs to be addressed by the planning authorities.

We should bear in mind that there is already 60GW in the pipeline² (i.e. 50% over the target) to reach the Government's aim - with many much greener, less environmentally harmful and more efficient wind farms planned. Abandoning this Rampion 2 proposal would not impact reaching the Government's target. Moreover, it's important not to overreach the target with fixed wind farms since new and more effective technologies are being developed all the time.

Disclaimer

This Open Letter has been based on published information, which has been clearly referenced, and the views expressed by residents at Public Meetings on 24th and 25th August 2021. The conclusions of this Open Letter are solely based upon this published information and residents' views. The reader can satisfy themselves of the factual accuracy of this Open Letter by reference to the source material cited, and form their own opinion.

Introduction

This Open Letter is being sent to all Parish and District Councils in West Sussex, to all the Parish and District councils formally consulted, to the Isle of Wight Council, to East and West Sussex County Council, to all Members of Parliament in West Sussex, to the Secretary of State for Business, Energy & Industrial Development, to the Prime Minister, to the South Downs National Park Authority, to the Isle of Wight AONB, to Natural England, and to newspapers, radio stations and TV channels in the

¹ <https://www.gov.uk/government/news/new-plans-to-make-uk-world-leader-in-green-energy>

² <https://www.thecrownestate.co.uk/media/3910/owdevwaterfall-june2021.pdf>

area. A copy will also be sent to RWE, a German power company [based in Essen] and the principal developer of Rampion 2. This Open Letter is evidence-based, refers to relevant Government policy statements and concludes that **Rampion 2 must be rejected**.

Inadequate Consultation

In the Statement of Community Consultation, dated June 2021, RWE outlined how the consultation process would be publicised, based on three Zones: (1) the area of proposed substation sites; (2) the area of the proposed cable route; and (3) the coastal area. The consultation period extends to 12 noon on Thursday, 16th September 2021. Zone 3 is the focus of this Open Letter. RWE committed to distributing consultation leaflets to persons or groups whose property was situated within 100 metres of the Sussex Coastline, between Beachy Head and Selsey Bill, and on the eastern side of the Isle of Wight. As of Wednesday, 25th August 2021, it was evident from a Public Meeting held in Middleton-on-Sea, and many other related enquiries along the coast, that RWE had failed to adequately distribute the promised consultation leaflets. It is no longer possible to rectify this as leaflets delivered in the last few days of the consultation would not be in time for residents to access the information and become informed sufficiently to respond. Consequently, it appears that many of the residents in West Sussex at least have been left oblivious to RWE's proposals for Rampion 2, and that **the consultation process has been inadequate**. It is considered that **the consultation process should be suspended** pending resolution between RWE and the relevant local authorities.

At a Public Meeting in Littlehampton on 24th August 2021, which around 80 people attended (mostly members of the public but also a number of local councillors), there was a briefing by RWE followed by a presentation from Protect Coastal England to provide some evidenced-based background information, and then a question-and-answer session. At the end of the meeting, the attendees were asked to vote on a number of resolutions, one of which was to support a request for RWE to alter their project and move to a region at least 25 miles offshore or, if that was not possible here, then to move to the Dogger Bank region. This was supported almost unanimously with only 2 of the 80 people voting against.

In briefings from RWE more generally, the full facts have not been available, the only information generally made available about the project coming from the developer: the unexamined claim has been repeatedly made by RWE that Rampion 2 is essential for tackling climate change and we have no alternative (a view publicly described as 'greenwashing'). The Public Meetings cited above demonstrated that when people are presented with all the facts about the project, their conclusion is very different from RWE's and is very clear.

Failure to Comply with Government Guidance

The Government's Department for Business, Energy & Industrial Strategy has been developing national plans for offshore wind power generation. These are tied into the Prime Minister's Ten Point Plan which includes the quadrupling of offshore wind generation capacity to 40GW by 2030 and the process of "levelling up". Towards these aims, the Government has already supported two new offshore wind ports in the Humber region and Teesside.

In the Government's Offshore Guidelines, OESEA2³ recommends that the wind turbines should be in offshore waters, that is, **further than 14 miles from shore**. Moreover, OESEA3 recommends that,

3

for tall turbines >200m, wind farms should be more than **25 miles from a National Park**⁴. The Government's Marine Management Organisation South Marine Plan⁵ recognises the importance of the seascape for tourism and recreational activities and states that proposals for any development will only be supported if they can a) avoid, b) minimise or c) mitigate any adverse impact on tourism and seascapes. **For the proposed turbines of Rampion 2, this means moving the wind farm significantly further from shore**, which is not practicable due to shipping lanes. For the protection of birds, OESEA2⁶ recommends all windfarms should be **more than 14 miles from the shore**. It is clear here that **Rampion 2, which will be only 8 miles from the shore, fails to comply with any of these Government guidelines**.

On 6th October 2020, the Prime Minister announced offshore wind farms to be sited "**far out in the deepest waters**"⁷. On 14th November 2020, he further stated that: "Britain's iconic landscapes are part of the fabric of our national identity – sustaining our communities, driving local economies and inspiring people across the ages. That's why, with the natural world under threat, it's more important than ever that we act now to enhance our natural environment and protect our precious wildlife and biodiversity"⁸. **The Prime minister is recognising the need to minimize harm to our landscapes and seascapes, and to make the best use of these to inspire and encourage us**. On 18th November 2020, the Prime Minister further stated: "Our green industrial revolution will be powered by the wind turbines of Scotland and the North East, propelled by the electric vehicles made in the Midlands and advanced by the latest technologies developed in Wales, so we can look ahead to a more prosperous, greener future."⁹ **The Prime Minister is supportive of focusing new offshore wind farms in the North Sea for a greener future**.

In light of these recent statements and guidelines, Rampion 2 should not go ahead as proposed.

Efficiency and Environmental Impact

The manufacture and installation of wind farms create significant levels of carbon dioxide emissions. Each conventional wind turbine also requires a significant quantity of rare earth minerals. These are in short supply globally and need to be used up carefully. Wind farms located where the wind power density is high generate much higher output, as is the case Far out in the North Sea, for example. They make a much better use of resources and generate lower-cost electricity. Large parts of the North Sea (Dogger Bank) are shallow and can use Fixed Wind Turbines. By comparison, wind farms located off the South Coast are much less efficient. As an example, Hornsea 1B wind farm on Dogger Bank, which is 75 miles offshore, has a wind power density of 1000W/m², compared with the current Rampion 1 wind farm, only 8 miles offshore, which has a wind power density of only 300W/m².

Rampion 2 would fence in the whole of the Sussex bay. Nowhere on the UK Coast are there such large turbines as close to the shore as those proposed by Rampion 2. **Nowhere** on the UK Coast is there a wind farm spanning such a large proportion of the horizon as that proposed by Rampion 2. Its extent is illustrated on the map below.

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896084/White_Co_n_sultants_2020_Seascape_and_visual_buffer_study_for_offshore_wind_farms.pdf (Table 7.4 page 66)

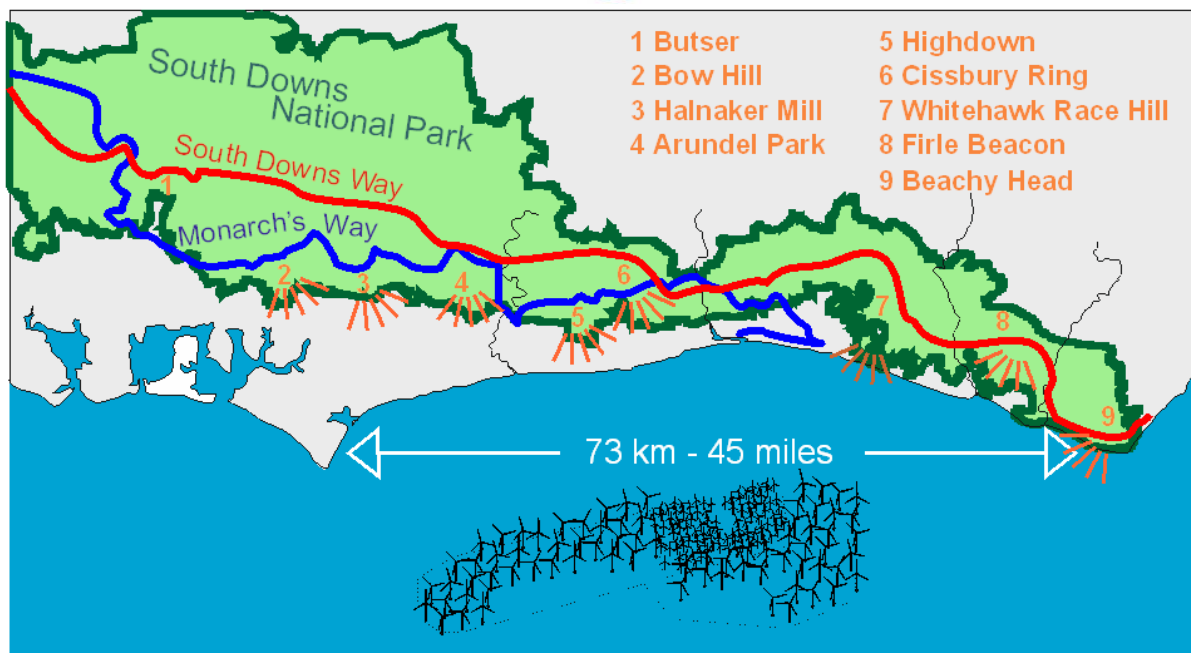
⁵ <https://www.gov.uk/government/publications/the-south-marine-plans-documents>

⁶ OESEA2 NTS Page xiv

⁷ <https://www.conservatives.com/news/boris-johnson-read-the-prime-ministers-keynote-speech-in-full>

⁸ <https://governmentbusiness.co.uk/news/16112020/greater-protections-announced-england%E2%80%99s-iconic-landscapes>

⁹ <https://www.gov.uk/government/news/pm-outlines-his-ten-point-plan-for-a-green-industrial-revolution-for-250000-jobs>



It can be seen that the addition of Rampion 2 will mean that giant turbines, potentially as high as the Eiffel Tower and taller than the highest peak of the South Downs, would be the dominant feature of the sea views from:

- The South Downs Way for 5 days of walks from Butser to Beachy Head.
- 50 miles of the newly designated coastal path
- The seafront of all of the Sussex Bay

At night, the red flashing lights at the top of each turbine would continue, and add to, the adverse visual impact.

Tourism and Inward Investment

If the proposed Rampion 2 inshore project goes ahead, it is likely to cause the coastal economy of West Sussex to go into decline. Tourists and visitors, and those who come to live here for the sea views and invest in the area, will increasingly shun the Sussex Bay, choosing to go to more attractive locations instead. Based on the Bournemouth Borough Council study in 2015 for the Navitus Bay wind farm¹⁰, it is a reasonable worst-case scenario that Coastal West Sussex could **lose £198M in annual tourism income**, which is equivalent to **2,800 jobs**. In the Arun district, which depends significantly on tourism in Bognor Regis and Littlehampton. The equivalent loss in annual tourism income would be **£44M** with a loss of around **1,200 jobs**. The fall in inward investment of businesses seeking new coastal locations to attract employees is not included in the above and is likely to be significant.

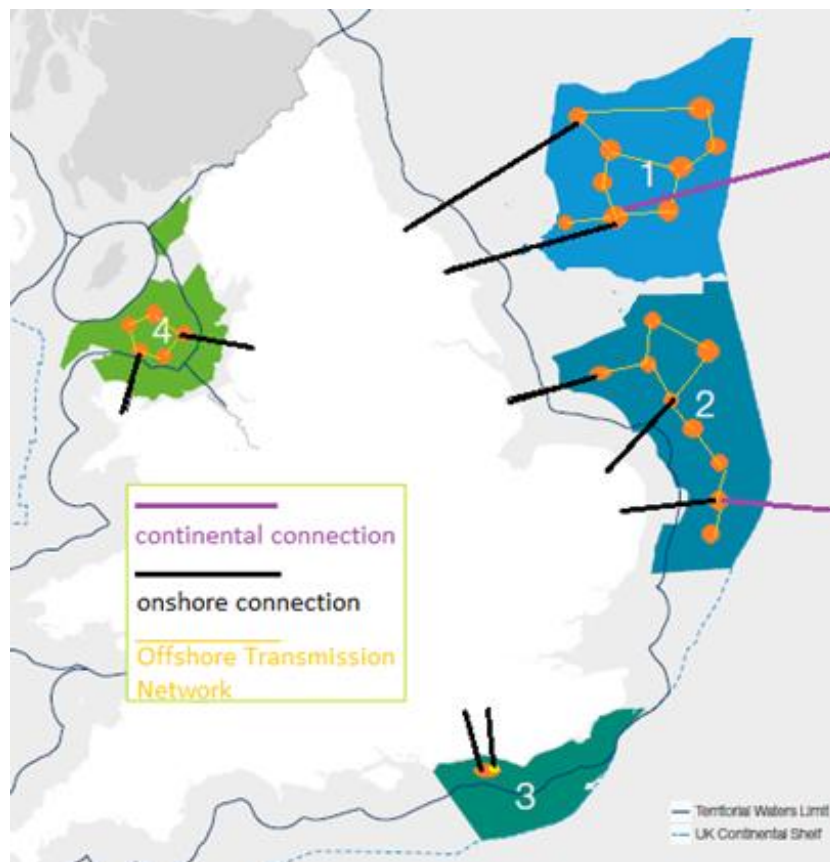
National Grid

All wind farms connect directly to the National Grid. A new offshore grid network¹¹ will link up offshore wind farms in Areas 1, 2 and 4 but not 3 (the South Coast), as illustrated schematically below. There are benefits that come from concentrating offshore capacity within the North and Irish Sea, with fewer cable links onshore, reduced impact on coastal communities, reduced transmission costs and reduced electricity costs to consumers. The extra benefits of the North Sea are the multi-

¹⁰ PINS reference EN010024 – Navitus Bay Offshore Wind Park Local Impact Report, Bournemouth Borough Council 6/10/2014

¹¹ <https://www.nationalgrideso.com/future-energy/projects/offshore-coordination-project/documents>

purpose interconnectors that are planned with continental connections to Norway, Belgium and the Netherlands. The North Sea is the most advantageous area. However, the proposed Rampion 2 scheme in the South Coast region cannot benefit from either the offshore transmission network or the multi-purpose interconnectors.



Conclusions

1. Any new wind farms should be far offshore, in areas of high wind power and where they can connect to the Offshore Transmission Network, to maximise efficiency and minimise environmental impacts.
2. Rampion 2 fails to comply with recent Government guidelines and fails to comply with recent policy statements made by the Prime Minister.
3. The environmental impacts of Rampion 2 are unacceptable.
4. Rampion 2 must be rejected.

Further Information

If you wish to discuss further or arrange a more detailed presentation, please contact ProtectCoastalEngland by e-mail: admin@protectcoastalengland.org. You can also visit the website at <https://www.protectcoastalengland.org>

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