

Report to Deborah Urquhart, Cabinet Member for Environment and Climate Change

September 2021

Proposed extension to Rampion Offshore Wind Farm: approval of consultation response

Report by Matt Davey, Director of Highways, Transport and Planning

Electoral division(s): All

Summary

Rampion Extension Development Limited (RED) propose to extend the Rampion Offshore Wind Farm (Rampion 1). The proposal, Rampion 2, is a Nationally Significant Infrastructure Project (NSIP) requiring a Development Consent Order (DCO) from the Secretary of State (rather than planning permission from the local planning authority). The County Council is a statutory consultee in the DCO process and it has specific responsibilities as a 'host' authority.

Rampion 2 would have a generating capacity of up to 1,200MW, compared with 400MW for Rampion 1. The offshore element of Rampion 2 would be located within an area of search to the west and south east of Rampion 1 together with a small link or 'bridge' area between the two areas for cabling. The onshore elements of the scheme include a buried transmission cable running for approximately 36km between a landfall at Climping Beach, near Littlehampton, and a 'satellite' project substation near the Bolney National Grid Substation.

In advance of an application for consent being submitted, RED are undertaking formal consultation from 14 July to 16 September 2021 on a Preliminary Environmental Information Report (PEIR), which identifies the likely significant impacts of the Rampion 2 scheme and any required mitigation.

A detailed analysis of the PEIR has been undertaken, with consideration being given to likely significant impacts (both direct and indirect) and whether those impacts are considered to be positive, negative, or neutral (taking into account any proposed mitigation measures). Consideration has also been given to whether further work could be undertaken by RED, including mitigation measures, to address issues identified as being significantly negative.

In summary, although it is considered that Rampion 2 should be supported in principle, there are a number of matters of significant concern that need to be satisfactorily addressed by RED, including: the methodology for the Seascape, Landscape and Visual Impact Assessment (SLVIA), specifically viewpoint locations; the size and layout of the offshore wind turbines (in order to reduce impacts on views out to sea); final selection of the location of the project substation; final selection for

the cable route and the micro-siting of the cable route within the cable corridor; further understanding of the impacts of crossings along the cable corridor and reinstatement proposals; the impacts on onshore and offshore ecological receptors and the need for ecological enhancement (including Biodiversity Net Gain); and the socioeconomic benefits to West Sussex and impacts on tourism.

Recommendation

That the Cabinet Member for Environment and Climate Change:

- (a) approves the comments in paragraphs 2.33-2.64 of the report and the detailed comments in Appendix D as the County Council's formal response to the consultation on the proposed extension to the Rampion Offshore Wind Farm
- (b) authorises the Director of Highways, Transport, and Planning to respond to any further stages of pre-submission consultation - in support of the formal response approved under (a)
- (c) if an application for a Development Consent Order is submitted, authorises the Director of Highways, Transport, and Planning to:
 - (i) approve the County Council's 'adequacy of consultation' response
 - (ii) prepare and submit the County Council's written representation and Local Impact Report, and to negotiate with the applicant on the DCO requirements, any S106 Agreement, and the preparation of a Statement of Common Ground - all in support of the formal response approved under (a); and
 - (iii) attend the examination hearings and answer the Examining Authority's questions in support of the County Council's position; and
- (d) if a Development Consent Order is made, approves the County Council becoming a relevant authority for the discharge of onshore requirements, provided that the Authority's costs are met in full.

Proposal

1 Background and context

- 1.1 In 2012, the Planning Inspectorate (PINS) became the agency responsible for operating the planning process for nationally significant infrastructure projects (NSIP). NSIPs are usually large-scale developments such as new harbours, power generating stations (including wind farms), and electricity transmission lines, that require 'development consent' from the relevant Secretary of State under the Development Consent Order (DCO) process, rather than planning permission from the relevant planning authority.
- 1.2 Any developer wishing to construct an NSIP must submit an application for consent. Following submission, PINS examines the application and makes a recommendation to the Secretary of State, who will make the decision on whether to grant or to refuse development consent. Once made, a DCO provides all the approvals (for example, planning permission, compulsory purchase) required for a development to proceed.
- 1.3 In 2019, The Crown Estate confirmed that an application by Rampion Extension Development Limited (RED) for an extension to the Rampion Offshore Wind Farm could go ahead on their land. The scheme, known as 'Rampion 2', is a NSIP because it involves an offshore generating station with a capacity of more

than 100 megawatts and so requires development consent. Given that onshore elements of the scheme are within West Sussex, the County Council is a statutory consultee in the DCO process.

- 1.4 In advance of an application for consent being submitted, RED is undertaking formal consultation from 14 July to 16 September 2021 on a Preliminary Environmental Information Report (PEIR), which identifies the likely significant impacts of the Rampion 2 scheme and any required mitigation. In addition to consultation on technical matters, it also involves consultation with the public in accordance with the Statement of Community Consultation (SoCC), a formal document that sets out how RED propose to consult the community.
- 1.5 This report outlines the scheme and the key areas for consideration by the County Council in making a formal response to the consultation.

2 Proposal details

Rampion Wind Farm

- 2.1 The current Rampion Offshore Wind Farm, Rampion 1, was granted development consent by the Secretary of State for Energy and Climate Change in 2014. It is located between 13km and 25km off the Sussex Coast and covers an offshore area of 72km² that extends from Brighton to Worthing (see Appendix A: Location Plan). The offshore element of Rampion 1, which has a generating capacity of 400MW, includes 116 wind turbines with a maximum tip height of 140m above the lowest tide. The onshore elements include a buried transmission cable running for approximately 26km between the landfall at Brooklands, between East Worthing and Lancing, and a project substation that connects into the Bolney National Grid Substation in Mid Sussex.

Proposed Extension - Rampion 2

- 2.2 It is proposed that Rampion 2 would have a generating capacity of up to 1,200MW. The offshore element of Rampion 2 would include up to 116 wind turbines, with a maximum tip height of 325m above the lowest tide, and up to three offshore substations. They would be located within a 270km² area of search to the west and south east of Rampion 1, together with a small link or 'bridge' area between the two areas for cabling (see Appendix A: Location Plan). The location of the extension is no closer to the coastline than Rampion 1 and takes account of water depths and the need to avoid environmental designations and shipping lanes.
- 2.3 At this stage, the number of turbines, their size, and their location within the offshore area of search have yet to be determined by RED pending the completion of further survey and technical assessment work; this will be done following the consultation and prior to submission.
- 2.4 Cables would be laid on or beneath the seabed between the wind turbines and offshore substations and between the substations themselves. Export cables would be laid to transmit electricity from the offshore substations to the landfall at Climping Beach, near Littlehampton.
- 2.5 The onshore elements of the scheme include a buried transmission cable, with jointing pits, running for approximately 36km through West Sussex (see Appendix B: Onshore Cable Route). The cables would travel under the beach and sea defences and then run north through Arun District (crossing the A259,

the River Arun, the railway line (twice), the A284, and the A27) before continuing underground through the South Downs National Park and crossing the A24 and the A283. The route continues north through Horsham District to a 'satellite' project substation in close proximity to the Bolney Substation in Mid Sussex District (which serves Rampion 1). At this stage, there are two options for crossing the A27 at Warningcamp pending the completion of further technical work and the outcome of the consultation. The final route will be determined by RED prior to submission of the application for consent.

- 2.6 RED has undertaken a number of technical and environmental studies as part of the Environmental Impact Assessment (EIA) process and has developed the onshore cable route taking into account sensitive historic, ecological and landscape features, as well as physical constraints, including proximity to residential properties and key infrastructure. This has been presented to stakeholders for feedback through an informal stage of the consultation and through technical working groups. On completion of construction works along the cable corridor, land will have to be reinstated to its former condition. Where underground cables are installed, although RED will not purchase the affected land, a permanent easement will be agreed with landowners, that is, payment for use of the land. It is RED's intention that the landowner would take back the land upon completion with RED 'renting' the subsoil in perpetuity.
- 2.7 At this stage, there are two options (with corresponding cable corridor options) being consulted upon for the location of the project substation; they were shortlisted from a long list of seven sites (all within a 5km radius of the Bolney Substation). The two substation options are Bolney/Street Kent Road (to the south of the A272, east of Cowfold) and Wineham Lane North (immediately north of the Rampion 1 project substation and the National Grid Substation) (see Appendix C: Substation Options). Wineham Lane South (south of Bob Lane, the Rampion 1 project substation, and the National Grid Substation) has been removed from the shortlist after informal consultation feedback from local residents and stakeholders indicated concerns about proximity to sensitive receptors and the potential for planning applications for other commercial developments covering part of the site. The preferred option for the substation will be determined by RED following the consultation and prior to the application for a DCO. Underground cables between the new substation and the Bolney Substation would connect the offshore wind farm to the National Grid.
- 2.8 The broad timetable for the scheme is submission of the DCO application in early 2022, followed by examination through to mid-2023 and a decision by end 2023; more information on the DCO process is set out in paragraphs 2.10-2.18. If consent is awarded, work would not start until 2025/25 with Rampion 2 fully operational and connected to the grid in 2028/29.
- 2.9 If approved, the anticipated maximum total construction duration, including all on and offshore components, is approximately four years. The turbines, substations, and foundations would operate for about 30 years, after which a decision would be made whether to refurbish the offshore plant or remove it. The onshore cables, and any buried offshore cables, would be left buried in situ. The onshore substation could also be refurbished or removed, subject to relevant consents.

DCO Process

- 2.10 There are six stages in the DCO process.

Pre-application

- 2.11 Before submitting an application for consent, potential applicants have a statutory duty to carry out consultation on their proposals; this is the current stage for Rampion 2. The consultation provides the best opportunity for consultees, such as the County Council, and third parties to try to influence the project, whether they agree with it, disagree with it, or believe that it could be improved.

Acceptance

- 2.12 The Acceptance stage begins when an applicant submits an application for development consent to PINS. Key documents submitted by the applicant will include the draft order, which will include a number of legislative clauses (relating to matters such as statutory nuisance, tree protection orders, and stopping-up of public rights of way) and 'requirements', which are akin to the conditions attached to planning permissions. Documents relating to mitigation of the scheme may also be submitted, for example, a Code of Construction Practice, Environmental Management Plans, S106 Planning Agreement, and topic-specific strategies.
- 2.13 There follows a period of up to 28 days (excluding the date of receipt of the application) for PINS, on behalf of the Secretary of State, to decide whether the application meets the standards required to be accepted for examination. This includes consideration of the adequacy of the applicant's consultation prior to submission.

Pre-examination

- 2.14 At this stage, the public will be able to register with the Planning Inspectorate to become an 'Interested Party' by making a Relevant Representation, which is a written summary of a person's views on an application. As a statutory consultee, the County Council is automatically 'registered' as being an Interested Party. An Examining Authority is appointed at the pre-examination stage, and all Interested Parties will be invited to attend a Preliminary Meeting, run and chaired by the Examining Authority (i.e. a panel of inspectors).
- 2.15 Although there is no statutory timescale for this stage of the process, it usually takes approximately three months from the applicant's formal notification and publicity of an accepted application.

Examination

- 2.16 PINS has up to six months to carry out the examination. During this stage, Interested Parties are invited to provide more details of their views in writing. Careful consideration is given by the Examining Authority to all the important and relevant matters, including written representations, key documents, and any supporting evidence submitted by Interested Parties, and answers provided by them to the Examining Authority's questions (set out in writing or posed at hearing sessions).

Recommendation and Decision

- 2.17 PINS must prepare a report on the application to the relevant Secretary of State, including a recommendation, within three months of the close of the six-month Examination stage. The relevant Secretary of State then has a further

three months to make the decision on whether to grant or refuse development consent.

Post decision

- 2.18 Once a decision has been issued by the relevant Secretary of State, there is a six-week period in which the decision may be challenged in the High Court. This process of legal challenge is known as Judicial Review.

Role of the County Council

Pre-Application

- 2.19 In July 2020, PINS asked the County Council, as a statutory consultee, to comment on a scoping request by RED, the purpose of which was to identify the information to be provided in the Environmental Statement (ES), which will be part of the DCO submission); officers made detailed technical comments in response. In August 2020, PINS issued a Scoping Opinion, which is binding on RED.
- 2.20 During the last year, officers have been engaging with RED, supporting evidence gathering, attending steering and expert topic groups, and commenting on technical studies and informal consultation on route development. They have also commented on RED's draft SoCC.
- 2.21 In advance of an application for consent being submitted, RED is undertaking formal consultation on the PEIR, which identifies the likely significant impacts of the scheme and any required mitigation. The Non-Technical Summary (NTS) of the PEIR is on the Rampion 2 [website](#). As identified above, this is a key stage in the process and the County Council's suggested response, for which approval is sought, is addressed in paragraphs 2.30-2.64 below.

Submission

- 2.22 If an application is submitted, the County Council, as a statutory consultee, will be expected to engage in the post-submission stages of the process.
- 2.23 As part of the acceptance process, the County Council will be asked to comment whether the pre-submission consultation undertaken by RED accords with their SoCC. In addition to any concerns that the County Council may have, it must also consider the views of any third parties that consider the consultation to be inadequate. Accordingly, delegated authority is sought for officers to approve the County Council's 'adequacy of consultation' response.

Examination

- 2.24 If the submission is accepted by PINS, the County Council will be invited to submit a written representation and a Local Impact Report (LIR - see paragraph 2.25). It will also be expected to negotiate with RED on the DCO requirements, any S106 Agreement, and the preparation of a Statement of Common Ground (SoCG - see paragraph 2.26).
- 2.25 In deciding whether to grant or to refuse development consent, the Secretary of State is required to have regard to LIR submitted by local authorities. An LIR is a technical document defined as "a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that

area)". Provided that it fits within this definition, the structure and content of an LIR is a matter for each local authority.

- 2.26 It is also anticipated that a SoCG will be submitted by the applicant. The SoCG will identify issues where it is considered that the signatories agree with the applicant about the impacts of the proposed development. The contents of the final SoCG can only be agreed by the County Council following the conclusion of discussions with the applicant about the key issues and the finalising of the Authority's LIR.
- 2.27 Accordingly, delegated authority is sought for officers to prepare and submit the necessary responses and documents and to negotiate with the applicant in support of the County Council's formal consultation response. Delegated authority is also sought for officers to attend the examination hearings and to answer the Examining Authority's questions in support of the County Council's position.

Post-Decision

- 2.28 Although the County Council will not be responsible for determining the application for consent, it can play a formal role in the post-decision approvals process by becoming a 'relevant authority' for the discharge onshore requirements in the DCO (if it is granted). The legislation allows there to be more than one relevant authority and the final decision rests with the Secretary of State but, if requested to do so by RED, it would help to give the County Council some control over implementation of the scheme.
- 2.29 Until recently, the County Council was a relevant authority to discharge some onshore requirements relating to Rampion1 with full cost recovery being secured through a Planning Performance Agreement (PPA) with the applicant. Therefore, provided that the Authority's costs are met in full by RED, approval is sought for the County Council becoming a relevant authority for the discharge of onshore requirements for Rampion 2 (if an order is made).

Preliminary Environmental Information Report (PEIR)

- 2.30 Officers have undertaken a detailed analysis of the PEIR, considering likely significant impacts (both direct and indirect) and whether those impacts are considered to be positive, negative, or neutral (taking into account any proposed mitigation measures). Consideration has also been given to whether further work could be undertaken by RED, including mitigation measures, to address issues identified as being significantly negative. As the County Council's remit only extends to the Mean High Water Mark (MHWM), this response is limited to those elements that have onshore-related impacts (including those from the construction and operation of the offshore wind turbines and associated infrastructure).
- 2.31 The following paragraphs address the key issues in relation to the proposals presented at this formal consultation stage. Following some general, overarching comments, the key issues for the four main development areas (offshore; the landfall; the onshore cable route; and the remaining substation options) are summarised. Lastly, some key project-wide issues, which are not specific to a geographical area, are identified.

2.32 Approval is sought for the comments in paragraphs 2.33-2.64 and the detailed technical comments in Appendix D to be submitted as the County Council's response to the formal consultation.

General Comments

2.33 The County Council acknowledges the target set by the UK Government of delivering over a third of electricity from offshore wind by 2030 and, therefore, it is supportive of the principle of offshore wind development. However, this needs to be achieved without significant adverse effects on the environment, local communities, and economy of West Sussex.

2.34 RED has identified that the offshore infrastructure associated with Rampion 2 could have potentially significant adverse impacts on the seascape, coastal landscapes, and people who live, work and visit West Sussex. The onshore infrastructure at the substation site also has the potential to negatively impact on a number of environmentally sensitive areas and features and on residential amenity during the lifetime of the project. However, it is acknowledged that a worst case has been presented by RED and that any adverse impacts need to be balanced against the benefits of the scheme.

2.35 Therefore, although the Rampion 2 Offshore Wind Farm is supported in principle by the County Council, there are number of matters of significant concern that need to be satisfactorily addressed by RED; these include:

- the methodology for the Seascape, Landscape and Visual Impact Assessment (SLVIA), specifically viewpoint locations
- the size and layout of the offshore wind turbines, in order to reduce impacts on views out to sea
- final selection of the location of the project substation near Bolney
- final selection for the cable route and the micro-siting of the cable route within the 100m PEIR boundary
- further understanding of the impacts of crossings along the cable corridor and reinstatement proposals
- the impacts on onshore and offshore ecological receptors, including key species and habitats, and the need for ecological enhancement (including Biodiversity Net Gain)
- the socioeconomic benefits to West Sussex (including employment opportunities and supply chain expenditure, and the creation of an additional Community Benefit Fund) and the impact on tourism; and
- responses to the technical queries raised in Appendix D.

2.36 Therefore, the County Council will continue to engage with RED in the coming months to seek to influence the remaining design elements to achieve the best possible outcomes for the local communities and other sensitive receptors that would be most affected by the construction and long-term operational impacts of Rampion 2.

Offshore

2.37 In general terms, the assessment is detailed and provides useful information to enable the consideration of impacts on SLVIA aspects. A worst-case scenario has rightly been presented (reflecting the current position of the design and

understanding of baseline conditions) and the methodology is largely clear, considering the full range of key matters that would be expected. Although it is recognised that matters of professional judgement are involved, in some cases it is considered that these may have been downplayed, specifically with regards to 'receptors' (that is, a physical feature or area that would be directly or indirectly affected) along the West Sussex coastline. The County Council notes and agrees with the concluding findings of the assessment, that is, that the proposed development would have some significant seascape, landscape, and visual effects. Therefore, it has concerns about the scale of likely impacts of Rampion 2 in addition to, and in combination with, the currently operating Rampion 1 Offshore Wind Farm.

- 2.38 The assessment largely includes comments made by County Council officers during technical discussions. However, there are several matters, particularly those relating to impacts on 'visual receptors' (that is, groups of people who are likely to be affected), that would benefit from further consideration.
- 2.39 The documentation suggests in several places that viewpoint locations have all been agreed. Although there has been general consensus on the viewpoints that have been provided, officers have consistently asked for additional viewpoints to be considered, in particular at key populated areas along the coastline and within the coastal plain where the assessment clearly show views are likely to be visible. Although RED sent a follow-up method statement after formal consultation, which indicates the outstanding concerns around viewpoints have been understood, dialogue on these matters needs to continue in the coming months.
- 2.40 The provided photomontages are useful tools that aid in the assessment of visual effects. They clearly show the significance of impacts likely to be experienced by receptors in West Sussex, in particular, the impacts that would result from the lengthy westerly extension, which would significantly extend the field of view over which impacts on seascape would be experienced.
- 2.41 Although a worst case has been presented, consideration should be given to an offshore layout that has an overall potential for lesser impacts. A commitment should be made by RED to a break in the lateral spread of turbines to reduce the proliferation of visual impacts upon the horizon should be made. Although the PEIR states that there cannot be "perceptible separation distances between Rampion 1 and Rampion 2", the County Council would query why this is the case.
- 2.42 Therefore, the County Council wishes RED to consider developing the SLVIA methodology to include more detailed assessment of effects upon the receptors of West Sussex. Also, RED should continue to work with stakeholders to further develop commitments to the layout of turbines to reduce the significant visual impacts as presented in the assessment. Key areas for consideration are:
- to agree and identify the remaining viewpoints not considered as part of the PEIR
 - to review the quality and number of photomontages, to provide clarity on potential views from identified points
 - to give greater consideration to night-time views from highly populated coastal areas, where sensitive visual receptors are located and many of which benefit from a dark horizon in seaward views

- the scope of the Built Heritage Assessment
- commitment to a clear separation of Rampion 1 and Rampion 2 to minimise the horizontal extent of the offshore wind turbines east to west along the horizon/seascape in order to reduce the potential curtaining effect
- consideration of using the full north-south extent of the search area to also reduce the lateral spread; and
- a more detailed understanding and discussion of the balance between the potential locations of turbines in the western extension area (which would clearly be more detrimental to receptors along the West Sussex coastline) and that of Zone 6 (the unused area of the original Rampion 1 zone).

Landfall

- 2.43 The offshore export cables would come ashore at Climping, between Middleton-on-Sea and Littlehampton. Although the Scoping Report presented a list of reasons why this landfall location was chosen, the County Council expected to see a fuller narrative in the PEIR of why Climping was chosen. Although it is understood that there are limited options for bringing the cables ashore (given that the Sussex coastline is densely populated and that there are engineering constraints, e.g., cliff heights providing barriers to landing points), this matter should be addressed in more detail in the ES.
- 2.44 There are a number of environmental sensitivities within the landfall area that have required due consideration; these include West Beach Local Nature Reserve (LNR), Climping Beach Site of Special Scientific Interest (SSSI), Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS), the location in Flood Zone 3, and the presence of Environment Agency flood defences. RED have stated that, to reduce construction impacts, a trenchless solution is proposed to install ducts that would house the cables under Climping Beach. Although this approach is welcomed, there could still be indirect impacts on these sites that have not been assessed as part of the PEIR and that should be more transparently assessed in the ES.
- 2.45 The commitment to a trenchless method of crossing should allow the beach to be accessible at all times during construction; this would be important to the local communities that use this area for recreation. However, the construction of Rampion 1 resulted in activities that required works at low tide on a number of occasions. This resulted in disruption (from associated accesses, plant, and temporary associated compounds on the beach) that was not foreseen as part of that application.
- 2.46 The residents and visitors using Climping Beach and the surrounding areas, would experience the construction of the offshore, nearshore, and onshore elements of Rampion 2 and would be open to views of the proposed operational wind farm. Therefore, the County Council expects lessons to be learnt from Rampion 1 in relation to the construction methodologies and the length and timing of the works that are considered. It also expects that, as required, they are properly mitigated.

Onshore Cable Route

- 2.47 The onshore cable route would be approximately 36km in length and travel from the landfall at Climping through the SDNP to the grid connection point near Bolney. RED is currently proposing a 50m construction corridor within

which to house the cable trenches, haul road, and soil storage areas. With the addition of four large temporary construction compounds, a total of 207 hectares (ha) of land would be disturbed along the onshore cable route. This route would also cross several roads, watercourses, Public Rights of Way (PRoW), and hedgerows between landfall and the onshore substation. Although the undergrounding of the cables for the full length is welcomed, the County Council requests that further justification is given for the requirement of a 50m working width. A cross section of this 50m is given with the PEIR but a clear indication of dimensions for each element within the construction corridor is not.

- 2.48 The experience of Rampion 1 has demonstrated that it is possible to reduce the working width considerably to avoid unnecessary clearance. Although it is acknowledged that further work needs to be undertaken by RED to identify constrained areas (such as hedgerows/woodland) within the corridor, the County Council expects RED to reduce the working width as far as is practicable as the project progresses through the next stages of its development.
- 2.49 The County Council welcomes the crossing of Sullington Hill LWS using a trenchless method and the commitment to a narrowing of the construction corridor through Warningcamp Hill and New Down LWS. However, it is questioned whether this is one specific area where the cable route could be narrowed even further to reduce impacts on the site.
- 2.50 The key limitation with regards to the baseline data presented in the PEIR is the extent of land that had been subject to field surveys, specifically ecological survey. It is noted that the PEIR is based on a Phase 1 Habitat Survey that covered less than 30% of the onshore route. Until surveys have been completed over a far wider area, many of the ecological impacts cannot be assessed. Although impacts on ancient semi-natural woodland have been scoped out (because the cable route avoids direct loss of this habitat), the route lies very close to some ancient woodlands (e.g., within 20m of Poling Copse LWS); this is of concern given the ecological importance of edge habitats.
- 2.51 The assessment of onshore cable corridor construction on visual amenity concludes that eight of the 13 settlements within the study area would experience significant temporary visual effects; these include Climping, Littlehampton, Crossbush, Warningcamp, Wepham, Wiston, Partridge Green and Shermanbury. The views from five long distance recreational routes would also be significantly affected by the onshore cable corridor during the construction phase; this includes the Downs Link, approximately 500m south of Partridge Green. Recreational users of short sections of approximately 76 local PRoWs would also be significantly affected (both direct and indirect). All PRoWs must be suitably accommodated during construction and adverse impacts, after the works are complete, must be minimised; such matters should be addressed through the development of the Outline Public Rights of Way Strategy.
- 2.52 It is recognised that most of the traffic movements would occur during the construction phase and it is expected that adverse impacts are minimised through the development of the Construction Traffic Management Plan (CTMP). However, concerns are raised about the significant number of temporary accesses that are proposed; if possible, the number should be reduced, especially where multiple accesses are proposed onto the same A road.

- 2.53 The construction of the cable below ground would have a direct and significant impact on buried archaeological deposits where they survive. Results from Rampion 1 have shown the presence of previously unknown multi-period archaeological deposits surviving within the area. Therefore, it is important that an appropriate programme of investigation is undertaken for the ES; this is currently unclear from the submitted documents.
- 2.54 During the development of the proposal, County Council officers have raised concern about the cable route at the following locations:
- A27 Crossing/Warningcamp - This is a very sensitive area with a number of ecological constraints, including woodlands, hedgerows, unimproved chalk grassland, and river valley floodplain. There is concern about the loss of important habitat and habitat severance. The County Council reiterates the importance of choosing a crossing option that minimises the ecological impact in this area and welcomes that this matter will be further investigated by RED.
 - Washington – The trenchless crossing of the Washington Recreation Ground is welcomed and the County Council would expect to see a Method Statement outlining the construction methods and mitigation measures to ensure the public are kept safe and aware of the construction works. With regard to the Washington construction compound, forward visibility for vehicles turning from the A283 onto The Hollow is poor. It is understood that vehicles associated with the Rock Common Quarry are prohibited to turn right onto The Hollow; similar restrictions would be expected as part of the Rampion 2 proposals. Consideration of the HGV movements in and out of the Quarry should be included, ensuring that the movements can continue, avoiding preventing or prejudicing site operations. The County Council would request the number of temporary accesses proposed be reduced, particularly along the A283 corridor as this is a very busy high speed rural road, which does not have a good accident record. Further discussions will be required to understand the potential impacts on highway capacity and road safety, and on a number of sensitive receptors within the locality, including the village, primary school, and camp site.
 - Spithandle Lane - There are a number of patches of woodland that have been avoided by routing between them. However, around the crossing of Spithandle Lane, patches of woodland would be removed, which would result in severance between this network of woodlands. This area requires careful consideration, including seeking the least damaging route and crossing method, in order to maintain connectivity between the woodland areas.
 - Cables into Wineham Lane North - The cable route would impact upon a large swathe of trees south of Westridge Place. In addition to woodland, there are other habitats in this area that should be avoided, including (complex) water courses, ponds and hedgerows and the probable presence of great crested newts.
- 2.55 The experience of Rampion 1 reinstatement has not been wholly successful, with numerous planting failures; this was partly due to weather conditions but crucially, the lack of timely interventions to suppress weeds and provide other routine maintenance requirements (which are seasonally dependent). Year-on-year replacement of failed stock may result in vegetation at year nine (of a 10-year maintenance plan) being replaced (instead of it being well-established and showing up to 10 years' worth of growth, which is the target condition).

Therefore, a comprehensive, fully resourced and implemented maintenance plan is essential with regular, timely inspections (at an agreed frequency) to ensure planting succeeds at an early stage in the plan. Planting in advance of the proposed development, as part of habitat creation and enhancement (both in and outside of the PEIR boundary), would help to secure early gains and should be actively explored.

Substation Options

- 2.56 Two remaining substation options are currently under consideration; only one will be taken forward to the ES and associated DCO application. The County Council acknowledges the grid connection offer of Bolney Substation from National Grid and the investigations presented to confirm the acceptance of this offer. The PEIR details the long list of options for a satellite site within 5km of Bolney and how this long list was reduced to the two remaining options. This process is considered to be thorough and based upon a set of avoidance principles and gathered evidence.
- 2.57 The remaining concerns held by the County Council centre around the potential size of the site required. As well as 5.9ha for the operational footprint, a total area of 9ha is being proposed to ensure there is space for access, compounds and for mitigation landscaping and planting. Although it is appreciated this is a worst-case design scenario, every effort should be made to reduce the overall footprint (including height) as much as possible.
- 2.58 The County Council notes the conclusions of the LVIA and agrees that the presence of the onshore project substation, based upon the worst-case design parameters, would have significant visual effects on views experienced by people in the local area. Although the assessment is based upon views from transport routes and larger settlements, it does not assess visual impacts from residential properties in close proximity to the substation sites. This has been raised with RED as a concern and is noted as 'next steps in the process' within the PEIR. The County Council expects this assessment to be undertaken on both substation sites, to help aid the decision-making process for the final substation site.
- 2.59 It would have been helpful if the formal consultation materials could have delivered a clearer picture of the likely scale of the project substation in more visual form, individually and in combination with the substation built for Rampion 1 and the National Grid substation. The production of indicative photomontages could have aided with understanding the likely impacts of both sites and helped provide more meaningful feedback, which is summarised as follows:
- Wineham Lane North - Concerns are raised about the potential impacts (including noise and effects to visual amenity) upon residents in close proximity to the proposed site; they have already been subject to the construction and operational impacts of Rampion 1 in the recent past and the operation of the National Grid infrastructure. This site is also in close proximity to the consented Coombe Solar Farm. The County Council raises concerns about impacts on the mitigation (planting and bunding) put in place for Rampion 1, which is subject to a 10-year monitoring programme. This must be assessed and considered as part of the site optioneering work undertaken and the County Council is concerned how the impact of the Rampion 1 substation could be effectively mitigated if the existing planting

and bund would be removed by a Rampion 2 substation. The cumulative impact with the consented Coombe Solar Farm to the west of Bolney Chapel Road also needs careful consideration.

- Bolney Road/Kent Street - The main concern raised for this option is the management of access off the A272 to the north. Where possible, Kent Street would need to be widened, along with vehicle movements closely controlled, due to the narrowness of the road. There are also concerns about potential impacts on the residential visual amenity of those in close proximity to the site and also on a historic parkscape (around the Grade II listed Oakendene Manor).

2.60 Residents and recreational users of the area around both substation sites would experience not only the construction disruption of the cable routes, compounds, substation, and National Grid upgrades, but also the operational impacts. This is in an area where the impacts of the construction and operation of Rampion 1 continue to be felt. Therefore, in advance of a decision on a final substation site, the County Council expects RED to consider (a) reducing the maximum dimensions of the project substation, where possible, and (b) increasing the scope of the LVIA to include a more detailed assessment of impacts upon residential receptors.

Project-Wide

- 2.61 The County Council expects RED to undertake further assessment work to reduce significant adverse impacts on both onshore and offshore ecological receptors as identified within the PEIR. This should first be undertaken through sensitive design to avoid these key species and habitats. Second, where these features cannot be avoided, detailed mitigation measures to reduce these impacts should be proposed. As well as mitigation, ecological enhancements should be demonstrated with a clear approach to how Biodiversity Net Gain will be achieved. When more baseline survey reporting is available, further discussions through the development of the project with relevant stakeholders will be required and should be clearly reported within the ES.
- 2.62 Although the creation of renewable energy capacity is welcomed in principle by the County Council, the potential adverse impacts need to be balanced against the benefits that the construction and operation of the proposed wind farm would bring. This should be demonstrated within the project boundary, through enhancements to the area (including through a nature positive approach to Biodiversity Net Gain as referred to above) and through discussions and negotiations. These benefits should also be experienced in the wider area, through the proposed additional Community Benefit Fund. Even with mitigation measures, certain receptors identified in the socioeconomic assessment are at risk of being significantly and permanently impacted. Therefore, the County Council encourages further exploration of ways to compensate affected communities, especially in areas already experiencing relative deprivation.
- 2.63 The County Council also expects RED to take account of the Authority's Economy Reset Plan 2020-2024. Further consideration of visitor economy data that is available (beyond that for Brighton and Hove) is expected to be presented in the ES. Elements of data are out-of-date and do not reflect the significant impact that the COVID-19 pandemic has had on jobs and employment. Therefore, further acknowledgement of this needs to be made in the ES. Similarly, there are currently labour supply pressures in construction,

which may or may not settle by the proposed construction dates (if consent is granted).

- 2.64 A key issue for the County Council is the relatively low economic beneficial impact expected for West Sussex through the construction phase. The PEIR states that “around 40% of the Proposed Developments £2.87 billion construction cost, or the equivalent of £1.14 billion will be retained by businesses in the Proposed Development’s supply chain nationally. At the Sussex-level, the overall level of supply chain expenditure retained by local businesses is anticipated to be minimal (around 1% of total construction costs) adding up to £30.1 million (2019 pricing)”. At the Scoping Stage, it was stated that scenarios would consider the use of local ports and project expenditure captured by local business would be developed. Therefore, it is requested that RED works with the County Council to ensure sufficient strategies are put in place to maximise benefits locally, as per the commitment made, with a view towards the percentage figure for Sussex increasing from a currently low base. Another key issue is the importance of tourism to the West Sussex economy, which has been significantly impacted by the COVID-19 pandemic. This requires further exploration and discussion with RED to ensure that any adverse impacts of Rampion 2 on the visitor economy are fully understood and satisfactorily addressed.

3 Other options considered (and reasons for not proposing)

- 3.1 As a ‘host’ authority, one of the responsibilities of the County Council is to respond to the current formal consultation. The responsibilities also include: discussing the DCO requirements and S106 Agreement; providing an ‘Adequacy of Consultation’ response; preparing SoCG and LIR; and submitting written representations and participating in the examination process.
- 3.2 There is the option to not take on the role of being a relevant authority with responsibility for the discharge of onshore requirements (if an order is granted). However, the County Council is currently undertaking this role for Rampion 1 (with full cost-recovery) and it seems sensible for it to undertake this task for the Rampion 2 scheme (if costs are recovered) because it would give the Authority some control over implementation of the scheme.

4 Consultation, engagement, and advice

- 4.1 Internal officers have been involved in the analysis of the PEIR and preparation of the detailed comments in Appendix D.
- 4.2 Liaison on key issues has taken place with the other affected authorities: Arun District Council; Horsham District Council; Mid Sussex District Council; and the South Downs National Park Authority.
- 4.3 An all-member briefing was held on 26 July 2021 at which an outline of the scheme and its impacts (and proposed mitigation) was given by RED, with the opportunity for questions and answers.
- 4.4 Informal engagement on the proposed response to the consultation has been undertaken with members of the Communities, Highways, and Environment Scrutiny Committee. No comments were received in response.

5 Finance

- 5.1 The County Council has a Planning Performance Agreement (PPA) with RED to enable the Authority to fully engage in the DCO process. The PPA covers the work to date through to a decision by the Secretary of State and allows the County Council to recover its costs in full.
- 5.2 If an order is confirmed, a new PPA with RED will be sought in relation to the County Council discharging onshore DCO requirements with, as was the case for Rampion 1, the Authority's post-decision costs being met in full.

6 Risk implications and mitigations

- 6.1 There are no risks associated with responding to the consultation and engaging in the next stages of the DCO process.

Risk	Mitigating Action (in place or planned)
None	n/a

7 Policy alignment and compliance

- 7.1 Legal Implications – the County Council is a statutory consultee in the DCO process. It has specific responsibilities as a 'host' authority, including being a consultee on the draft SoCC [undertaken]; responding to the scoping request [undertaken]; responding to the formal consultation [this stage]; discussing the DCO requirements and S106 Agreement; providing an 'Adequacy of Consultation' response; preparing SoCG and LIR; and submitting written representations and participating in the examination process. The recommendations in this report seek to ensure that the County Council delivers its responsibilities for the current and remaining stages of the process.
- 7.2 Equalities – not applicable as it is a response to a consultation by an external organisation.
- 7.3 Climate Change – although focussed on the County Council's activity, the Authority's [Climate Change Strategy](#) is supportive the use of renewable energy sources, instead of fossil fuels, with less reliance on imported oil and gas and less vulnerability to increasing oil prices.
- 7.4 Crime and Disorder - not applicable.
- 7.5 Public Health – not applicable.
- 7.6 Social Value – not applicable.

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Appendices

Appendix A: Location Plan

Appendix B: Onshore Cable Route

Appendix C: Substation Options

Appendix D: Detailed Comments on the Preliminary Environmental Information Report

Background papers

None