



Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

Tel: 01903 737500
email: neil.crowther@arun.gov.uk
www.arun.gov.uk

By email only
rampion2@planninginspectorate.gov.uk

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Your Ref: . EN010117

Please ask for:
Neil Crowther
Planning
Direct Line: 01903 737839

Our Ref:

Dear Planning Inspectorate

Relevant Representations on behalf of Arun District Council

This letter is Arun District Council's (ADC) Relevant Representation for Rampion 2 Offshore Wind Farm (hereafter referred to as the Project).

ADC supports renewable energy generation and carbon reduction objectives to meet climate change commitments, whilst also promoting economic development and locally skilled jobs. However, as a host authority of the Project, ADC has some concerns regarding disruption and impacts to residents, businesses, the local economy and the environment. The benefits of the Project as a whole or beyond Arun will be of limited value to residents and local businesses who face disruption during construction. We will continue to engage with the Applicant to make sure that should the Project be granted, the Project delivers social, economic and environmental benefits to Arun that outweighs the disruption.

ADC is the planning authority for Arun, with the exception of the area of Arun within the South Downs National Park. West Sussex County Council is the highways authority, education authority and Lead Local Flood Authority that covers Arun. The initial principal areas of concern set out below therefore relate largely to subject and geographical areas which ADC has primary responsibility.

1. General

- There is considered to be insufficient evidence and justification for selection of some aspects of the Project and the alternatives studied by the Applicant, taking into account environmental effects.
- ADC has concerns about the location, substantial size and the likely effects of Climping Compound during the construction period.
- ADC has concerns of the lack of commitment and securing mechanism of mitigation, monitoring and compensation. It is not always clear mitigation/compensation is followed though to a securing mechanism and the Commitments Register appears more aspirational rather than embedded environmental measures.

2. Socio-economics/Economics/Tourism

- Outline Skills and Employment Strategy – limited detail is outlined within the Outline Skills and Employment Strategy and ADC is not listed as a consultee to this document. This is a concern given the adverse effects the District will experience during construction. ADC is expecting to be a recipient and consultee regarding benefits – being particularly interested in learning related opportunities at all levels including apprenticeships and universities. The Strategy is very high-level and it is not clear how different elements inter relate, for example, para. 2.3.3 refers to “*Encouraging and supporting growth and employment in local supply chain companies... Increasing visibility of local SMEs*” whereas supporting local business is not included as an objective in para 5.1.2. Further to this, the Environmental Statement (ES) (Chapter 17, Table 17.19) cites “*RED will identify opportunities for companies based or operating in the region to access supply chain for the Proposed Development*” as being secured through measure C-34 in the Outline Code of Construction Practice (OCCP). This measure, however, is not within the OCCP.
- Community Benefits Package - ADC has concerns about securing benefits from this package. Reference is made to the Community Benefits Package in the Outline Skills and Employment Strategy. Due to adverse effects identified (below) the Community Benefits Package is necessary to assist in mitigation.
- Jobs – ADC has concerns that there will be a low number of locally skilled jobs created in Arun from the Project. The construction benefits are described in the ES as being 80 jobs across Sussex and operational benefits as being 100-110 jobs across Sussex (Chapter 17, Tables 17.25 and 17.32). The potential for employment by location may be influenced by the Skills and Employment Strategy in terms of preparing and informing local business. Details on this are therefore important.
- Tourism – ADC has concerns regarding displaced tourism from Arun. The ES (Chapter 17) notes that regarding construction effects of wind farms ‘*the research typically focusses on measuring opinions of what the impacts on the visitor economy could be prior to implementation of the scheme. However, ex-post research suggests that even where there have been negative effects, these often occur in the form of displaced tourism with visitors diverting to neighbouring areas instead*’. Whilst this may be considered a neutral effect at the wider area level, it suggests areas directly affected by construction such as Arun will experience at least temporary adverse effects.
- Tourism Assets – ADC has concerns regarding the adverse effects on tourist assets within Arun. Chapter 17 of the ES states that at the local level ‘*installation activity along the onshore cable corridor may have a negative impact on walking and cycling routes, coastal paths, holiday parks and other tourism-related assets that are located in close proximity to onshore construction works... the assessment concludes that during the construction phase there would be major / moderate, and therefore significant effects on a limited number of tourist destinations. These locations are Climping Beach, Climping Camp Site, Climping Caravan Park and Washington Caravan Park*’. Many of these locations are in Arun and there are more in the vicinity of Climping Compound. Whilst at County level, it may be a negligible effect, however for Arun, the effect on residents and local businesses will be significant in some instances and this should be identified and mitigated.
- Amenity – concerns regarding the significant effects on public rights of way within Arun, some of which are heavily used.
- Strategic Housing Allocation - the cable route crosses the housing allocation ‘Strategic Housing Allocation SD4 Littlehampton – West Bank’ as identified in the Arun Local Plan (adopted 2018). No assessment has been identified which considers the effect on the strategic housing allocation and cable route in terms of the implications and any sterilisation of land.

3. Seascape, Landscape and Visual

- ADC acknowledge that the spatial extent of the offshore array area and quantity of wind turbine generators has been reduced. However, ADC continues to have significant concerns regarding the scale relative to the proximity to the coastline and the resulting significant visual effects.
- ADC has significant concerns regarding the visual effects associated with the temporary (approximately 3 years and 5 months) construction horizontal directional (HDD) compound and Climping Compound, which is of a significant size and duration.
- ADC also has concerns regarding onshore landscape scarring and the effects on landscape landform and visual character. Reference is made to restatement of construction compounds and onshore cable corridors. We expect reinstatement to be an appropriate like for like replacement, taking into account new/emerging threats from diseases and biodiversity enhancements.
- ADC note that the onshore cable route has been refined to approximately 40m in width with permanent infrastructure corridor width up to 25m (or wider at trenchless crossing locations). We seek clarification and detail on the surface treatments within these permanent infrastructure corridors, any requirements for easements in these areas and whether this impacts reinstatement.
- We note that the landscape reinstatement will be subject to an on-going minimum 10-year monitoring programme. The maintenance programme will need to align and comply with the requirements of the biodiversity net gain for Nationally Significant Infrastructure Projects, which is expected to come into force in 2025; the same year the Project is planned to commence construction.

4. Terrestrial and Marine Ecology

- ADC has significant concerns regarding the cable route passing beneath and near to the Climping Site of Special Scientific Interest (SSSI) and ecological sensitive areas. Nationally scarce invertebrates have been identified on the sand dunes of Climping beach. We note access would be restricted in the SSSI and no groundbreaking activity. However, the potential for indirect effects is unclear and unplanned events could lead to localised degradation of habitat within the SSSI, which is of a concern.
- We note that the Applicant seeks to achieve biodiversity net gain of at least ten percent onshore for the Project. Biodiversity net gain has not been assessed at the district level. We would expect biodiversity net gain to be achieved within the administrative area of Arun.
- We acknowledge that marine biodiversity is not yet mandatory and the Applicant is exploring opportunities for marine benefits. ADC would expect marine benefits and contribution to marine restoration projects such as Help the Kelp. Consideration should be given to a marine biodiversity net gain assessment.

5. Noise

- There are concerns regarding the adequacy of the noise assessment which in ADC's view may underestimate the construction and operation noise effects (of the proposed Climping Compound). ADC has concerns regarding the modelling of the noise sources, adequacy of the assessment of background noise levels (in relation to the Climping Compound), omissions from the assessment and validity of the assessment method. Further information is required before ADC can determine whether the assessment is a representative assessment of construction noise and vibration.

6. Historic Environment

- ADC has identified and prepared a list buildings and areas of character which are non-designated heritage assets. There are two associated Local Plan policies (HER DM2 and HER DM4). In terms areas of character, some adjoin conservation areas in Littlehampton. The most relevant is the South Terrace Area of Character adjoining the Littlehampton Seafront Conservation Area. Within the historic environment assessment (Chapter 25 of the ES), it states that '*Assessment of effects on Locally Listed Buildings or Structures of Character and Areas of Character, as identified by Arun District Council, is presented in Sections 25.9 to 25.11*'. An assessment has not been undertaken for non-designated heritage assets, even though some are within the 1km study area. In Appendix 25.7 of the ES, Table 5.1 consists of the Step 1 Assessment which fails to identify No's 45-47 South Terrace, which are listed buildings. It also fails to identify any of the locally listed buildings or Area of Character.

7. Human Health and Population

- Within the population and human health assessment (Chapter 28 of the ES), we seek clarification as to why a determination for sensitivity and magnitude can produce two different outcomes. A low sensitivity and a high magnitude of impact can deliver a minor or moderate effect. This ambiguity could lead to a misunderstanding as to whether the Project leads to a non-significant or significant effect on a particular receptor.
- The Equalities Impact Assessment (Appendix 28.3 of the ES) is based on the Equalities Act and makes specific reference to 'protected characteristics' as defined in Section 4 of the Equalities Act. However, the assessment (Tables 1.4, 1.5 and 1.6) is not limited to the protected characteristics (i.e. age, sex, race, religion etc.). Clarification is therefore required to assess the protected characteristics as per the Equalities Act.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours sincerely



Neil Crowther
Group Head of Planning
Arun District Council