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Date 14 September 2021

Your Ref:

Our Ref: NC

By email only to: Rampion2@rwe.com

Dear Eleri

Please ask for:
Neil Crowther
Group Head of Planning
Direct Dial: 01903 737839

Consultation response into Rampion 2 Consultation

I write in response to your letter dated 13 July 2021 inviting Arun District Council (ADC) to comment in response to the Section 42 Notice and the proposals for Rampion 2 Wind Farm.

ADC considered their response to the Consultation at the Planning Committee on 8 September 2021. A copy of the report to the Committee can be found at;

www.democracy.arun.gov.uk/ieListDocuments.aspx?CId=137&MId=1508&Ver=4

ADC welcomes the opportunity to comment on the Preliminary Environmental Impact Report (PEIR) provided by RWE. Based on the information available to date, Arun is not yet in a position to support the proposals and therefore wishes to subject a holding objection to the proposals for the following reasons.

- Site selection/Alternatives. It is considered that the site selection and consideration of alternative is essential if there is to be a very large-scale and visually dominant offshore wind farm.
- The Council has significant concerns regarding the scale of the proposals relative to their proximity to the coastline. It is noted that the proposed turbines are substantially larger than the existing Rampion 1 turbines and the visual impacts of the proposals will be enormous. The combination of the size of the turbines and the quantity of them lead ADC to conclude that the proposals are an overdevelopment in this location.
- ADC concludes that the larger turbines should be located further offshore or elsewhere.

- ADC would expect that specific visual impact assessment work was carried out for sensitive locations such as Conservation Areas, coastline open spaces and tourism locations.
- ADC recognises that the views to the sea are one of the prime attractions for residents and visitors to the District. The potential impact on economy and tourism is unknown. More information and assessment is required. ADC would like to understand what the impact of such large proposals has been on the economy of other coastal towns as a result of similar proposals.
- It is noted that the economic benefits during the construction period are forecast to be exceptionally low within West Sussex as a whole. The economic benefits of the proposals appear to be very limited. The Council wishes to secure training programmes for locals as part of the construction and maintenance of a wind farm. It would also wish to secure much greater economic benefits and mitigation through things such as development funds and tourism funds.
- The full Environmental Impact Assessment should consider the impact on designated and non-designated heritage assets. If works are consented any impact upon a heritage asset should be mitigated appropriately.
- Biodiversity Net Gain should be secured through the works required in the reinstatement programme following the installation of the underground cables and a long-term management plan should be included.
- Impact on habitat loss and disturbance. ADC would expect that these impacts can be fully mitigated.
- Any intrusions into the landscape or installations (i.e. fencing, maintenance requirements etc) should include appropriate landscape remediation and mitigation works to ensure that there is no detrimental impact to landscape character. Mitigation through landscaping schemes should be undertaken in accordance with arboricultural guidelines and should both inform, and respond to, the results of the Landscape Visual Impact Assessment.
- Highways impacts from construction phase will be critical in terms of where construction compounds will be located and where construction traffic will be routed.
- ADC would expect the applicant to go above and beyond its statutory duty to engage on a meaningful basis with the public and key stakeholders within the District. Any reasonable consultation response should be demonstrably entertained and considered in the formulation of the final proposals. ADC would also expect the applicant to liaise with local residents and ADC throughout the period of construction to minimise disruption and to ensure that tourism opportunities are not hindered.

ADC will be instructing a Local Impact Report to consider in more detail many of these issues and intend to submit this, when it is available, in response to the formal proposals and to the Examination.

Appended to this letter are full consultation responses received from ADC internal consultees.

Yours sincerely

A handwritten signature in black ink, consisting of the letters 'N' and 'C' in a cursive style, followed by a period.

Neil Crowther
Group Head of Planning

Environmental Health

Chapter 22: Noise and Vibration.

Base line survey and Table 22-25. I note that a baseline noise survey is intended now that Step 4 COVID easing has been applied. Arun EHD would be pleased to consult on these findings (page 21). In the first instance however, I would recommend close liaison with Arun Planning Department to inform the careful selection of any survey position based around existing and proposed sites for noise sensitive development within and around the 5 years Rampion 2 development framework.

Paragraph 22.8.25. typing error SOAEL +10dB?

Paragraph 22.9.42. The degree and extent to which residential sensitive receptors (within 20m, or even 10m) may be exposed to unsatisfactory levels of noise will need careful evaluation, particularly in consideration of any evening or night-time working, or where evening/night-time working is continuous with day-time working and where noise screening has been evaluated as impractical for the works (paragraph 22.9.43)

Paragraph 22.9.44 and 22.16.3. Selected roads/lanes may be unsuitable for HGV traffic, not only from the point of view of noise exposure to gardens and habitable rooms but given that houses/gardens may exit directly onto currently quiet roads, with no provision for pavements and pedestrian safety.

Crossbush and Warningcamp: Night-time noise exposure should also be considered. depending on the decided route of cable laying and required access to project sites, by vehicles, including HGV's.

General:

i. it would be useful if a map, demonstrating the route of the proposed works in relation to the location of stated sensitive receptors was provided in this section.

ii. **Table 22-22.** Please provide the current levels of noise experienced on *relevant* roads and for example, bearing in mind that the Lyminster By-Pass is now under construction.

iii. **Table 22-28** - I trust (as above) that further consultation will take place to inform a decision as to the final location of the proposed 4 construction compounds, vehicle access and use of minor roads.

*although the document refers to many work items as 'temporary' this may be for a period of months or even years and is unlikely to be viewed as acceptable by noise sensitive receptors.

*please could a link be added to describe stated C22, C-26, C-33 etc, for example - Appendix A:-

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010117/EN010117-000006-EN010117%20-%20Scoping%20Report.pdf>

Air Quality

In 20.3.10 MSDC suggested that RED should consider providing charging points for electric vehicles at the onshore substation – Arun supports this suggestion and would expand to suggest that any permanent sites which will be visited during the operation phase should have EV charge points and as part of a construction management plan as many vehicles as possible used at the sites should be low emission vehicles.

Modelling

The report states in 20.4.8 that the peak of construction road traffic is taken to occur in 2026 for the purpose of determining vehicle emission factors however in 20.8.2 it states that the Road traffic for the construction phase has been modelled as part of the transport assessment for three scenarios: a 2019 baseline; a 2024 without the Proposed Development; and a 2024 with the Proposed Development. Please explain why the peak of construction road traffic is taken to occur in 2026 and emission factors for this year have been used in the model which would assume lower emissions from newer vehicles but the completed scenarios are based on 2024. Why have corresponding years not been used and why is construction assumed to be in 2026 in one section but completion prior to this in 2024 in another section?

Baseline Data Gathering 20.5

Please note that *Table 20-9 Data sources used to inform the air quality PEIR assessment* indicates that monitoring data from ADC has been used. It should be noted for the future that a number of sites in Arun were discontinued and new monitoring sites were set up in 2020 but due to Covid restrictions results across the district show a 20-30% reduction in No2 levels. Any comparison should therefore use data from 2019, pre Covid and any new monitoring data should be used with caution as we don't yet know the full impact of Covid 19 restrictions and changes to travel patterns going forwards.

20.6 – there is no discussion of monitoring or base line levels in Arun, only the AQMA's in Horsham and Worthing. I appreciate these are the areas of most concern but feel there should be some discussion of baseline levels in Arun.

Preliminary assessment: Construction Phase

20.9.1 - construction traffic on roads Appendix 20.1 referred to here sets out in Table 1-1 the details of the receptors where impacts have been modelled. None of these are within Arun district, all are within Horsham and Worthing, mostly within the AQMA's but not all. Coupled with the fact that there is no discussion of baseline levels in Arun it seems that Arun has been excluded from the assessment and I cannot see any discussion or justification for this in the report.

20.9.19 - construction equipment on site – One site at Crossbush Lodge has “moderate adverse” and three other sites have “slight adverse” impacts of No2 from construction equipment but the overall conclusion in 20.9.34 is not significant due to the conservative way in which emissions and concentrations were estimated. However, given that this is estimated it would be useful for those sites with predicted adverse impacts to be subject to increased attention or monitoring during works to ensure the impacts here are as expected and not significant.

20.9.42 - Emissions of Dust from Construction – All measures described in *Table 20-22 Specific environmental measures to be applied for construction dust management (from IAQM guidance)* must be required as part of a dust management plan at all construction and decommissioning sites. The dust management plan must be approved by the Local Authorities. Please clarify whether the information comes from 2014 or 2016 IAQM guidance as both are referred to in respect of these measures in the construction and decommissioning sections of the report.

Contaminated Land

From a potentially contaminated land perspective, it is recommended that the applicant or their agent provides EH with a copy of the confirmed cable route so that the relevant areas of PCL can be identified. It is possible to work with the scoping area, however as this is a large swathe of the district, this will be a significant project. It would be anticipated that any areas highlighted as PCL will require, as a minimum, a risk assessment with regard to the proposed land use. It is also likely that a planning condition regarding contamination discovered during this project is appropriately quantified and managed.

Noise

Preliminary Environmental Information Report.

Chapter 4. The Proposed Development.

Infrastructure: Note that a Construction Compound is to be formed to the west of Arun River, as well as a Transition Joint Bay in the field behind Climping Beach. Please inform this Department, as soon as possible, re the proposed position of infrastructure such other construction compounds within the Arun area.

4.5.2 - Construction Programme - Timing.

Would request that where development takes place close to one or more sensitive receptor/s then any noisy operation does not take place before 08:00 hours and after 18:00 hours Monday to Friday (and as per stated hours of operation for any Saturday, public or bank holiday.)

4.5.3 - Construction Programme - Extended Hours of Working

Furthermore, that this paragraph be amended so that the Local Planning Department/Environmental Health Department (and any sensitive receptor) as well as West Sussex

County Council and the South Downs National Park will be notified at least 72 hours before any 'required' continuous periods of construction work, any abnormal loads delivery, or works to the foreshore, or any other noisy activity outside the agreed hours of working (paragraph 4.5.2). This will allow the Council's Out of Hours Service to be suitably forewarned of possible noise complaints. I trust that the relevant Environmental Health Department will be advised of a 'Rampion' contact number which will deal with complaints concerning this development, closer to the time.

The applicant is requested to contact the Local Planning and Environmental Health Departments well in advance for determination of any s61 application (Control of pollution Act 1974).

Note (2) that the operation of 'louder' HDD equipment is also exempted here, with 24-hour operation possible. Understand that this machinery cannot easily be switched on and off. Would request that the operative seeks to ensure that such works begin early in the day-time period (07:00 to 23:00 hours) in order to avoid night working whenever possible.

An 'early start' should also be put in place for off and on-shore piling (paragraph 22.8.7) particularly when 'pushing through' particularly dense rock strata (see 40 complaints to Adur-Worthing Council re night time off shore piling - Rampion 1).

Generator noise was also identified as problematic at Brooklands Reservoir site, during Construction of Rampion 1. Please would the applicant ensure the use of quiet equipment/necessary mitigation, where sensitive receptors may be adversely affected.

Lighting

Thank you for due consideration of this matter.

Conservation & Heritage

Chapter 16 Seascape, Landscape and Visual Impact Assessment

Table 16-11 Viewpoints included in the SLVIA fails to consider or identify that there is a conservation area fronting on to the sea, with a second one close by. This is disappointing as the same table identifies the conservation areas in Bognor Regis and other LPA areas. This issue had to be raised at one of the online meetings, and it would appear that this issues still has not been properly addressed.

There is also an Area of character in South Terrace which has not been identified (non-designated heritage asset).

Chapter 26 Historic Environment

Both the proposed cable corridor and the WRG themselves has the potential to affect heritage assets, both designated and non-designated. Whilst an extensive amount of work has been prepared as part of the assessment of the impact of the proposal, I do have the following comments.

The Climping Coastal defence features from the Second World War, whilst identified as being of archaeological interest, are also non-designated heritage structures. Would expect some care to be taken so as to ensure that their significance is not harmed as part of the Horizontal Directional Drill (HDD) technique that will be used at the landfall location.

Table 26.2 – whilst the table identifies potential receptors such as designated heritage assets including listed buildings, it fails to include all of the non-designated heritage assets in the Arun LPAA. The Arun LPAA have identified both buildings and areas of character which are non-designated heritage assets. The LPAA has prepared a Local List of Non-designated Heritage assets and there are two Local Plan policies associated with them (HER DM2 and HER DM4. As a result, it would appear that the South Terrace Area of Character is not to be considered, even though it adjoins the South Terrace Conservation Area.

Table 26-9 – only refers to Buildings or Structures of Character and not Areas of Character.

Table 26-31 'Offshore substation and wind turbine generators – Potential effects arising through change to setting of heritage assets during the operation and maintenance phase - Paragraph 26.4.17 of the PIER states that the identification of heritage assets to be included within the settings assessment is based on stage 1 of GPA 3. This followed a two-stage process which included identifying those assets where the coastal setting, including views out to sea, contributes in a notable and substantial way to the heritage significance of an asset. It is therefore not clear why some assets have been included in this table (and table 26-12) and others haven't. For instance, all of the Conservation Areas in Bognor Regis are included, but none in Littlehampton. Likewise, other piers have been included whereas the one in Bognor, even though it is located within one for the aforementioned conservation areas is not. It is also not clear why only a limited number of listed buildings are included, when there is a significant number in the Littlehampton Seafront Conservation Area that have a relationship with the sea. This table needs to be updated to reflect all of the assets along the Arun coast.

Table 26-37 Further consultation and engagement – it is positive to note that there will be further engagement. It is not clear what form this will take. It is suggested that smaller meetings taken place with individual or neighbouring authorities.

LANDSCAPE

The WTG will be clearly visible from the seafronts of both of the coastal towns. For instance, in Littlehampton, the report states that Seafront views, including those from the sea-front promenade will be defined by open, direct views of the offshore elements (Viewpoint 11), where they will be a prominent element in good visibility of the offshore field of view. This will result in a high magnitude of change and significant (major) effect on views experienced by residents and users of Littlehampton seafront. However, the failure to include the Littlehampton conservation areas in the heritage assessment (table 26-31) means that this impact has not been fully assessed on the heritage assets.

The landscape study identifies that the Bognor Regis Seafront Promenade (which includes the conservation area) has a medium-high sensitivity to change, a medium high magnitude of change, resulting in the significance of residual effect being significant (major/moderate). However, the heritage report then identifies that the impact on the conservation area would be minor (in terms of the significance of the effect. Is this correct?

Coastal Engineers

Expect Natural England and the MMO will be commenting in relation to the Marine Plan area. The IFCA will be best placed to respond re fishing.

Bird strike – Have no evidence and would leave it to the likes of Natural England and RSPB to evidence a case one way or the other.

Assume it is not for us to comment on civil or military aviation/radar impacts.

The onshore feed cable will coming ashore at Climping but it will be buried, with little to show that it is there – there will obviously be disruption during installation and a wayleave corridor afterwards - this may get close to potential LEGA developments on its route to Bolney.

Aware from the A27 Focus Group that Highways England are aware of the project and have been in discussion regarding the routing at Arundel.

People have concerns about construction effects (i.e. piling noise/vibration) – know that there was some disturbance from Phase 1. Whether the noise was airborne or somehow related to geology might be worth a bit of investigation. Know from piling for timber groynes there can be effects felt inland (50 – 100m) when there is no perceivable vibration right beside the works – bulbs of influence and stratification of the geology.

Have already made the RWE Team aware of the wave buoy and tide monitoring station off Rustington.

Environmental Assessment Officer

We are glad to see that all the designations for the landfall site have been recognised. It is noted that more work is being done on further mitigation to reduce any impacts on Kingsmere MCZ. As such we would wish to be kept informed about these as they develop, particularly to ensure consistency with other projects in the vicinity (i.e. Help Our Kelp Restoration Project).

Due to the recent release of the peak river flow allowances incorporating climate change from the 2018 projections, it is advised that 40% should be used in the modelling, especially due to the landfall location being within flood zone 3a and the significant inland incursion affected.

Landscape Officer

The proposed onshore cable corridor will impact on a large swathe of countryside and communities in the Arun District and the bordering South Downs National Park.

Landfall indicated at Climping Beach has the potential to impact on the Climping Beach SSSI and West Beach LNR. Methodology suggests that Horizontal Directional Drilling installation, will be used in these areas. The further onshore cable route is detailed to be laid within a corridor, the majority of which to have a temporary working width of up to 50m.

The proposed route will directly affect many Parishes from the south west to the north east with environmental impact on residents and unspoiled countryside, with the proposed route cutting through ancient habitats and heritage sites on the South Downs. The proposals will inevitably come at some environmental cost, which Arun will be looking for assurances to be addressed.

- Habitat protection particularly any interface with Ancient Woodland. Appreciation of the legacy of any physical attributes ie Trees/ancient hedgerows.
- Mitigation for landscape/habitat loss. Net gain or betterment in the proposed finished scheme. Unavoidable tree loss, ground formation, grassland habitat, to be addressed with new planting which over time will be required to improve the diversity and resilience of the local tree, fauna and flora population. Considering climate change and new and emerging threats from pests and diseases impacting these. The opportunity to introduce genetic diversity within the mitigation plans, which may help to increase climate resilience in the long term.
- An on-going minimum 10-year monitoring programme to ensure the reinstatement of above within the full cable route.
- Visual impact to the wider surrounds, landform and visual character. Impact on the SDNP to the north and impact on local areas of special landscape character. Impact on existing settlements and the necessary mitigation, to also include visual impact of mitigation associated with reinstatement of the cable runs in these areas.
- The effect of the proposals on Arun's evolving landscape and the interface with planned and known upcoming development in this area.
- Impacts on the landscape - sensitivity of the South Downs National Park as well as its setting.
- Timescale of works indicated as likely to take many months/years during which time residents may face disruption and which will involve the digging of trenches to site the

cables, resulting in damage to natural habitats. The impact of light and noise pollution, as well as increase in construction traffic.

- Rights of way, severance of communities and wildlife and Green Infrastructure networks/corridors which will require reinstatement.