

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING COMMITTEE ON 8 SEPTEMBER 2021

SUBJECT: RAMPION 2 WIND FARM EXTENSION CONSULTATION REPOSE

REPORT AUTHOR: Neil Crowther, Group Head of Planning

DATE: September 2021

EXTN: 01903 737839

AREA: Planning

EXECUTIVE SUMMARY:

Rampion Extension Development Limited (REDL) (the Applicant) will be submitting to the Planning Inspectorate (PINS) an application for a Development Consent Order (DCO) for the construction, operation and maintenance of an offshore windfarm. A formal consultation is being carried out on the draft proposals that include a Preliminary Environmental Information Report (PEIR) and a Non-Technical Summary (NTS). Responses to the consultation will be reported as part of the application submission. The consultation period is 14 July 2021 – 16 September 2021.

RECOMMENDATIONS:

- i. That the Committee agree the contents of the response to the consultation.
- ii. That the Committee agree to a Supplementary Estimate to commission a Local Impact Report be prepared to be submitted to the Secretary of State.

1. BACKGROUND:

- 1.1 In 2019, the Crown Estate confirmed that an application by Rampion Extension Development Limited (REDL) for an extension to the Rampion Offshore Wind Farm could go ahead on their land. The current 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 District Council is a statutory consultee in the DCO process but is not the decision maker.
- 1.2 Rampion 2 is a proposed expansion of the existing offshore wind farm. Rampion 2 will have a generating capacity of up to 1,200MW, compared with 400MW for Rampion 1.
- 1.3 Rampion Extension Development Limited (REDL) (the Applicant) will be submitting to the Planning Inspectorate (PINS) an application for a Development Consent Order (DCO) for the construction, operation and maintenance of an offshore windfarm.

- 1.4 The offshore element of Rampion 2 will be located within an area of search to the west and south east of the existing wind farm, together with a small link or 'bridge' area between the two areas for cabling.
- 1.5 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 located within a 5km radius of the Bolney National Grid Substation.
- 1.6 REDL are consulting on the draft proposal from 14 July to 16 September 2021. Their website, [Consultation - Rampion 2](#), includes all the consultation material and provides the opportunity to explore the proposal, including through maps and videos, to sign up to attend an online public forum with the project team, and to complete a consultation response form to give feedback to the team.
- 1.7 The process of getting consent for the expansion is very long. There has already been one informal consultation in 2020. This is the next step with RWE asking for views on the evolving design of the Rampion 2 project. In particular, the project team have completed a Preliminary Environmental Impact Report (PIER) which sets out the initial findings of all the work RWE are doing to assess impacts on the environment and local communities.
- 1.8 Rampion 1 received consent in July 2014 and the final turbine (of the 116) was installed in September 2017. Rampion 1 is located between 13km and 25km from the Sussex coast.

2.0 The Proposals

- 2.1 The proposal is for up to 116 turbines within an area of 270km², together with a small link area for cabling. Export cables from the array area will make landfall at Climping. The onshore elements of the proposal comprise a transmission cable running approximately 36km from landfall at Climping, to a 'satellite' substation located in the vicinity of the existing Bolney Substation, at Twineham, Mid Sussex to which it will then be connected.
- 2.2 Turbines will have a maximum tip height of 325m and there are three offshore substations proposed. Cables will be laid beneath the seabed. The onshore cables will be laid within a corridor, the majority of which shall have a temporary working width of up to 50m. The height of the turbines is between 1.5 – 2.3 times the height of the Rampion1 turbines (140m).
- 2.3 The cable route will be undergrounded for the entirety of the route using a trench and ducting methodology. However, horizontal directional drills will be used to tunnel underneath Climping Beach, the River Arun, the railway and major roads to reduce environmental impacts and keep traffic and trains running during construction.
- 2.4 During installation of the onshore cables, the topsoil and subsoil will be stripped and stored on site within the temporary working corridor and stored in separate stockpiles. The trenches will then be excavated using a mechanical excavator, and the cables

will be installed into the open trench. The cables are then buried by backfilling the trench with the excavated material before the land is reinstated to its previous use.

2.5 RWE state that Rampion 2 could provide green electricity to 350,000 homes and save 600,000 tonnes of CO₂ every year. They also state that Rampion 1 have employed 65 full time staff.

2.6 A Preliminary Environmental Information Report (PEIR) has been prepared to support this consultation. The purpose of the PEIR is to enable members of the public, consultation bodies, and other stakeholders, to develop an informed view of the likely significant effects of Rampion 2, and comment on aspects of interest. The full findings of the EIA process will be presented in an ES that will be submitted as part of the application for development consent.

3.0 Assessment

3.1 A summary of some of the conclusions contained within the PEIR that may relate to Arun District is contained in the following paragraphs.

3.2 Views to the sea and the offshore elements of Rampion 2 from the West Sussex coastal plain (the area of West Sussex between the urban coastline and boundary of the South Downs National Park) are limited by existing vegetation, woodland and buildings within urban areas. This coastal plain is separated from the sea by large urban areas. The main areas where Rampion 2 may be theoretically visible are coastal areas between Selsey Bill and Beachy Head. The PEIR acknowledges that Significant seascape, landscape and visual effects of the offshore elements of Rampion 2 are contained within the areas of the SDNP, Sussex Heritage Coast, West Sussex, East Sussex and the City of Brighton.

3.3 Rampion 2 is predicted to have a number of likely Significant Effects on a number of onshore and offshore recreational activities (event attendees, users of some Public Rights of Way, wind/kite surfers, recreational angling and village green users) during the construction phase and on the users of two Public Rights of Way. However, no direct Significant Impacts were identified at this stage for volume and value of the Sussex tourism economy.

3.4 The preliminary assessment concludes that Significant Effects are likely to occur to landscape and visual amenity receptors at some assessed locations as a result of construction, operation and maintenance, and / or decommissioning of Rampion 2. Construction and decommissioning effects will typically be short term and temporary. The preliminary cumulative effects assessment concludes that Significant Effects will occur to landscape and visual amenity receptors due to the combined impacts of Rampion 2 with other developments in the area.

3.5 Based on the proposed location of the onshore substation and routing of the onshore temporary cable corridor, plus the incorporation of appropriate embedded environmental measures, No Significant Effects have been identified at this stage in relation to potential impact of Rampion 2 on air quality from construction, operation and maintenance, and decommissioning.

- 3.6 The preliminary assessment indicates that there is the potential for Significant Effects associated with the loss of topsoil and the temporary loss or damage to agricultural land during the construction phase only. These effects will be managed and minimised as far as possible through the Soil Management Plan. No significant effects are anticipated during the operational phase.
- 3.7 No Significant Effects have been identified at this stage in relation to potential impacts of Rampion 2 on noise and vibration from onshore construction, and decommissioning.
- 3.8 Significant Effects are predicted on the following habitats: semi-natural woodland, calcareous semi-improved grassland, native hedgerows, and streams, ponds and permanently wet ditches. This is due to temporary or permanent land take or land cover change, and due to changes in hydrology. This loss will largely be associated with the construction phase of Rampion 2.
- 3.9 There is potential for Significant Effects on a number of species including bats, hazel dormouse, great crested newt and common toad. During the construction phase this is due to the temporary, and possibly permanent, loss and fragmentation of habitat, in addition to disturbance from noise, vibration and lighting. During the operation and maintenance there is potential for effects on bats close to the substation due to lighting.
- 3.10 Based on the proposed location of the onshore substation and routing of the onshore cable corridor, plus the incorporation of appropriate embedded environmental measures, no Significant Effects have been identified at this stage in relation to transport receptors from Rampion 2 construction, operation and maintenance, and decommissioning.
- 3.11 There is the potential for a number of Significant Effects from Rampion 2 on the historic environment. During the construction phase these include the potential impact, in certain locations, on archaeological heritage assets, changes to the setting of heritage assets and change to historic landscape character.
- 3.12 Based on the proposed location of the onshore substation and routing of the onshore cable corridor, plus the incorporation of appropriate embedded environmental measures, No Significant Effects have been identified at this stage on the water environment from construction, operation and maintenance, and decommissioning.

4.0 Consultation Responses

- 4.1 Some internal consultation has taken place with other departments of the Council and their comments are summarised below.

Conservation Officer

- Both the proposed cable corridor and the turbines themselves has the potential to affect heritage assets, both designated and non-designated. An extensive amount of work has been prepared as part of the assessment of the impact of the proposal.
- 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.

- The PEIR fails to include all of the non-designated heritage assets in the Arun.
- With reference to some of the assessment Tables (26-31 & 26-21), it is 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.
- The proposal 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.

Landscape Officer

- Mitigation for landscape/habitat loss. Net gain or betterment in the proposed finished scheme should be sought. 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.
- An on-going minimum 10-year monitoring programme to ensure the reinstatement of above within the full cable route will be required.

Environmental Assessment Officer

- 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 Minerals Consultation Zone. 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.

Engineering Services Manager

- The turbines are/would be in deep water – well, relatively - deep enough for the sand/shingle on the seabed not to be mobilised/demobilised or for a detrimental effect to be felt.
- Turbine spacing would be such that the effect on wave energy would be negligible.
- I believe the Littlehampton Harbour Board will be supportive of the project and be seeking some form of maintenance base in the Arun.

- There should be little impact on kelp regeneration or other aspects of the emerging Sussex Bay Project.
- The onshore feed cable will be 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.

Environmental Health

- Should make provision for electric vehicle charging points at onshore substation and as part of Construction Management.
- Peak construction traffic is forecast in 2026 but transport modelling is for years 2019 and 2024. Discrepancy needs addressing.
- Air quality data should be taken from 2019 (pre-Covid).
- Arun appears to have been excluded from the construction traffic impacts.
- Requirement for a dust management plan at all construction and decommissioning sites.
- 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 the Council as soon as possible, re the proposed position of infrastructure such other construction compounds within the Arun area.

5.0 The Council's Response

5.1 It is recommended that those comments in section 4 are included within the Council's response. Comments above are summarised so the full comments will be submitted. It is further recommended that this consultation response relate to the aspect of the proposals that will directly impact upon Arun District because other bodies have different matters that relate to them and will be better placed to provide expert comment. Those impacts that directly impact upon Arun can principally be summarised as;

- Visual Impacts of the offshore turbines
- On shore impacts of cable installation
- Other environmental impacts within Arun
- Economic Impacts within Arun

5.2 Members may wish to comment on some or all of the following matters so that a response can be prepared and submitted. The final wording of the response will be agreed with the Chairman of the Planning Committee prior to submission but the Committee as a whole will need to agree the matters (with detailed wording to be agreed).

- Site selection/Alternatives. It is considered that the site selection and consideration of alternative is appropriate if there is to be a large-scale offshore wind farm.
- However, the Council should determine whether the scale of the proposals are visually acceptable in this location or whether the larger turbines should be located further offshore.
- The potential impact on economy and tourism is unknown. More information and assessment is required. But, are the proposals likely to impact upon investment in coastal locations?

- Less than 2% of the economic benefits during the construction period are forecast to be within West Sussex as a whole. Therefore, does the Council wish to secure training programmes for locals as part of the construction and maintenance of a wind farm? development funds, tourism funds etc to mitigate impacts.
- 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 re-instatement programme following the installation of the underground cables and a long-term management plan should be included.
- 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 abroricultural 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 general 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.

5.2 Whilst this is the first formal consultation stage of the process it will not be the only involvement in the process for Arun District Council. There will be opportunities to make comment when the submission is formally made as well as through the Examination Process. Members may therefore wish to instruct a Local Impact Report on behalf of Arun District Council so that it is able to seek to quantify some of the likely impacts. This will look in more detail at issues such as environment, tourism, economy/investment, recreation, and ecology and can be submitted to the Secretary of State prior to Examination of the proposals. This will be a study carried out by an independent consultant to provide their advice on behalf of Arun District Council and will therefore not be produced to be consulted upon prior to completion.

5.3 A similar document was prepared on behalf of WSCC, Adur, Worthing & Mid Sussex for Rampion 1 in 2013 (the reasons why Arun did not participate are unknown) and there may be an opportunity to jointly commission a similar document for Rampion 2. Brighton & Hove and the National Park also produced a stand-alone LIR in 2013. At the time of writing, the likely costs of such a report are unknown. Further, costs will vary depending on whether members wish to instruct a report for just Arun or as part of a wider joint report with other authorities in West Sussex.

6.0 Next Steps

6.1 RWE have indicated that the submission of a formal consent application is likely in early 2022 with the Examination Process taking place over a 12-month period from

Q2 in 2022.

2. PROPOSAL(S):

To agree the Council's response to the consultation.

3. OPTIONS:

Not to respond to the consultation.

4. CONSULTATION:

Has consultation been undertaken with:

YES

NO

Relevant Town/Parish Council

x

Relevant District Ward Councillors

x

Other groups/persons (please specify)

x

**5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES:
(Explain in more detail at 6 below)**

YES

NO

Financial

x

Legal

x

Human Rights/Equality Impact Assessment

x

Community Safety including Section 17 of Crime & Disorder Act

x

Sustainability

x

Asset Management/Property/Land

x

Technology

x

Other (please explain)

6. IMPLICATIONS:

There will be financial implications for the Council if a Local Impact Report is commissioned. There will be wider sustainability implications for green energy production nationally.

7. REASON FOR THE DECISION:

8. BACKGROUND PAPERS:

www.rampion2.com

www.rampion2.com/consultation/