

18 August 2023

Case Manager: Emily Davies
Via E-Mail: Rampion2@planninginspectorate.gov.uk

Dear Ms Davies,

Project Reference: EN010117
Adequacy of consultation request – Proposed application by Rampion Extension Development Limited for an Order Granting Development Consent for the scheme Rampion 2 Offshore Wind Farm.

Thank you for your letter, dated 11 August 2023, regarding the application by Rampion Extension Development Limited for an Order Granting Development Consent. This letter is the response of the South Downs National Park Authority (SDNPA) to the request for our opinion as to whether the applicant has complied with the Planning Act 2008 (as amended) with regard to the following duties:

- Duty to Consult (section 42)
- Duty to Consult the Local Community (section 47)
- Duty to Publicise (section 48)

Duty to Consult (S42)

The SDNPA can confirm that it was consulted and responded as follows:

- Project-wide consultation (14 July 2021 – 16 September 2021) – response issued 13 September 2021. The SDNPA were notified again when this consultation was extended on 07 February 2022 until 11 April 2022, although did not provide further comment.
- Onshore consultation (18 October 2022 – 29 November 2022) – response issued 28 November 2022.
- Targeted onshore consultation route – LACR01d (24 February 2023 – 27 March 2023) – response issued 27 March 2023.
- Bolney substation extension consultation (28 April 2023 – 30 May 2023) – no response provided.

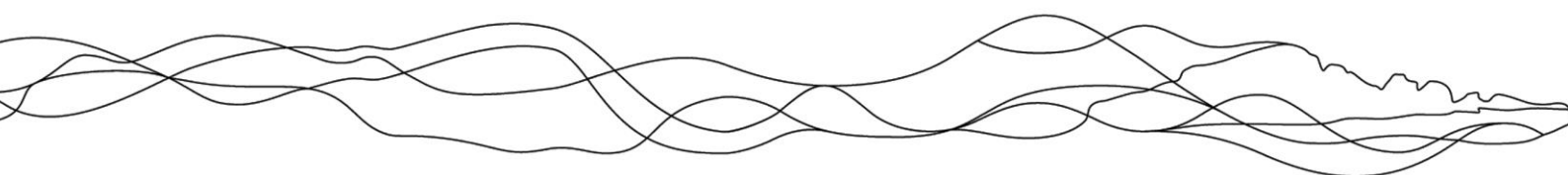
The SDNPA has attended regular Steering Group, Expert Topic Group and Targeted Meetings with the applicant and other Local Authorities and Statutory Consultees since August 2020.

Duty to Consult the Local Community (S47)

The SDNPA attended meetings and was consulted on the draft Statement of Community Consultation (SoCC) in April 2021. The comments made by SDNPA were taken into account in the final version of the SoCC. Further consultation was undertaken on the updated SoCC for the onshore consultation in March 2022 and October 2022. SDNPA provided feedback and most comments were taken into account in the final version.

During the project-wide consultation period (and shortly after it had closed) the SDNPA received correspondence from Protect Coastal England, via an open letter dated 03 September as well as letters of concern from two other individuals regarding the adequacy of the consultation process.

As a point of correction in Table 5.7 of the Rampion 2 Consultation Report, it states 30 SDNPA Members attended a meeting on 22 July 2021. This meeting was attended by SDNPA Officers and Members (we do not have 30 Members).



Duty to Publicise (S48)

The SDNPA has no reason to consider that the proposed development has not been publicised in accordance with S48 of the Planning Act 2008. As noted above, following it coming to the attention of the applicant that newsletters had not been distributed in accordance with the SoCC for the project-wide consultation, the consultation was re-opened with fresh publication.

Duty to Take Account of Responses to Consultation (S49) and Guidance about Pre-application Procedure (S50)

We would also like to take this opportunity to provide comments on how the pre-application and consultation process has complied with this section of the Planning Act 2008; the relevant guidance being issued by the then MHCLG in March 2015.

The 2022 onshore consultation and 2023 targeted consultation were both presented in a manner where the information was hard to read, particularly with the numerous abbreviations and other terminology chosen. We also raised concerns that whilst it is appreciated that there was a need to consider alternative routes through an iterative process, the SDNPA was concerned that the overarching landscape impacts of the entire route were being lost through this process. This has not been reflected in the applicant's approach to taking account of responses to consultation. This is compounded by the consultation for cable route option LACR-01D and its eventual inclusion as the chosen route, as no meaningful demonstration of why it is preferred above the other route options had been provided prior to submission.

Conclusion

Overall, the SDNPA considers the applicant has complied with its duties under Sections 42, 47 and 48 of the Planning Act 2008 (as amended) and demonstrated commitment to the procedural aspects of consultation. We consider that in terms of Sections 49 and 50 of the Planning Act 2008 (as amended), there remain from the SDNPA's perspective, concerns.

Yours sincerely,



Vicki Colwell
Principal Planning Officer
South Downs National Park Authority

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