



National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

Customer Services: 0303 444 5000  
e-mail: Rampion2  
@planninginspectorate.gov.uk

---

To the Applicant  
(By email only)

Your Ref:

Our Ref: EN010117

Date: 7 September 2023

---

Dear Mr Lamont

## **Planning Act 2008 (as amended) – Section 51**

### **Proposed Application by Rampion Extension Development Limited for an Order Granting Development Consent for the scheme Rampion 2 Offshore Wind Farm – EN010117**

#### **Advice following issue of decision to accept the application for examination**

On 7 September 2023 the Secretary of State decided that the application for the above project satisfied the acceptance tests under section 55 of the Planning Act 2008 (PA2008). The Planning Inspectorate's acceptance checklist and the application documents have been published and made available on the project page of our website.

In undertaking checks at the acceptance stage, the Inspectorate has made some initial observations in relation to the application. This letter comprises advice to the Applicant provided under section 51 of the PA2008 in respect of these initial observations. The Applicant should pay attention to its content and consider how appropriate action might be taken in response. It is possible that the appointed Examining Authority may contact you separately on matters reported below to ensure they are submitted in a timely manner.

## General Scheme Outline Plans

The Inspectorate notes there are no Onshore General Scheme Outline Plans. It is advised that such plans are submitted and that they clearly show arrangements of onshore cable routes.

## Land Plans (Doc 2.1.2)

The Applicant is advised to review the Land Plans to ensure cut lines are clear and consistent. This also includes ensuring plots which appear on multiple sheets are labelled consistently. Some cut lines labelling directions and insert directional lines often sit directly on red line boundaries, making it difficult to identify continuation of lines and division of plots (examples include sheet 1/2, 2/3, sheet 22).

Clarity is required with regards to cut lines. It is not clear from the sheet where cut lines truly match or are completed. It is not clear on sheet 13/14 that those cut lines are consistent. The boundary between 13/7 and 14/5 is also unclear as both plots seemingly have different labels on different sheets.

It is advised that the Applicant reviews its labelling and its use of insert lines within the plans. It is unclear whether there are two different plots of land labelled 3/25. The review of labelling should also include a consistency check over inserts as identification of duplication of insert 4/B has been noted on sheet 4 of the Land Plans. The Inspectorate also noted that inserts are not used for some smaller plots, examples being 1/20, 14/5, 17/4, 27/21. These should be included and labelled accordingly.

All plots should be clearly labelled, for example, plot 7/6 should be labelled which is presently missing. It is also noted that the use of insert lines appears to create additional unlabelled plots of land. Additionally, inserts overlay some labelling, making it difficult to identify plots via their descriptions, an example being sheet 27 – Godsmark Farm description for 27/26, which is partially covered. The Applicant is advised to check for consistency between the offshore and onshore elements of the Proposed Development.

## Book of Reference (BoR) (Doc 4.3)

The Applicant is advised to conduct a cross reference between the BoR and Land Plans to ensure all plots are clearly identifiable and included in the plans. The Land Plans show a plot 9/015 and 9/010 which are not included within the BoR.

Some descriptions in the BoR are also not identifiable. For example, Atherington Cottages for plots 1/6 and 34/21 is described in BoR as "*lying north east of Old Doctors and south of Eastridge Lodge*" whereas on plan (sheet 34) it is described as "*lying south east of Old Doctors and south east of Eastridge Lodge*". Furthermore, plot 33/24 is described in BoR as "*south of Cowfold Road*" however Cowfold Road is not labelled on sheet 33. Such descriptions should be amended and made clear and identifiable.

## Works Plans (Doc 2.2.1 to 2.2.2)

It is noted that the areas which include the Works seem to be excessively large and vague. Areas should be concise and only be of suitable sizing for the works taking place within them.

The Applicant should ensure works comprising various elements should be correctly and precisely labelled. Although work numbers appear in the key, there are no work numbers on the plan. All work numbers should be included so they can be read and understood fully. The approach with labelling is not consistent with onshore work plans. Therefore, both onshore and offshore approaches should be consistent.

Some areas do not have appropriate labelling. For example, Works 9 (a), 9 (b) are both labelled as Work No 9, these should be split and labelled accordingly. In addition, Work No 14 is missing from the plan and should be included.

There should be consistent labelling across the Works numbers and draft DCO. It is noted that the key states Work No.18 is "*Permanent substation access*" whereas schedule 1 states Work No 18 is "*construction and operational access including drainage connecting Work No. 16 to the A272 including a new access junction*". A cross check should be conducted to ensure labelling across the Works numbers and dDCO are consistent and accurate. There should also be consistency between the offshore and onshore elements of the proposed development.

### **Draft Development Consent Order (dDCO) (Doc 3.1)**

The Applicant is advised to ensure all references with other schedules and documents are accurate and consistent. For example, the 'Outline Operational Travel Plan' is referenced as 7.2 in the dDCO whereas the Index and document title is 7.5. No reference number is included in the dDCO for 'Outline Construction Method Statement' whereas the index states the reference to be 7.23. Land Plan documents are referenced in the dDCO as 2.1.1, whereas the index and document title is 2.1.2. Finally, the Index states "*Offshore in Principle Monitoring Plan*" whereas the dDCO states "*In Principle Monitoring Plan*".

The Applicant is advised to conduct a cross reference between Volume 2 Chapter 4 of the Environmental Statement (ES) and the dDCO numbered works to ensure all references and wording are consistent and accurate. A comprehensive description of Rampion 2 (the 'Proposed Development') is provided in Chapter 4: The Proposed Development, Volume 2 of the ES (**Doc 6.2.4**). On page 15 of this document in section 4.2.1 it states that: The draft Development Consent Order (DCO) Limits (illustrated in Figure 1.1, Volume 3 (**Doc 6.3.1**)) used to inform this ES combines the offshore and onshore elements of the Proposed Development. Figure 1.1. shows the red outline. The only reference to numbered works in the ES Vol 2 Chapter 4: The Proposed Development, is to works No. 8 and works No. 10, which makes it very difficult to compare the numbered works in the dDCO with exactly what is covered in the ES.

The Inspectorate notes it is reference in Schedule 1 Part 1 for Work No.1, and in Part 3 Requirement 2 that the authorised development must not exceed 90 wind turbine generators (WTGs) and in Requirement 2(a), that they must not exceed a height of 325m. The Inspectorate notes, however, that no assessment of the effect of 90 WTGs appears to have taken place and evidenced in Chapter 15 of the Environmental Statement (seascape, landscape and visual impact assessment), where it appears that only 65 WTGs have been assessed. The Inspectorate considers that the dDCO needs reviewing to ensure that the total quantum of turbines sought has been fully appraised and assessed in the ES taken as a whole. This is further discussed in the paragraphs below.

Furthermore, inconsistent language is used between Part 1 and Part 3. Part 1 refers to “*no more than 90...*” whereas Part 3 states “*must not exceed 90...*”. While the Inspectorate accepts there may be little difference in the interpretation of both, consistent language and terminology should be used throughout the dDCO.

There are several areas which require attention in the dDCO referenced in the s55 checklist.

### **Statement of Reasons (SoR) (Doc 4.1)**

The Applicant is advised to conduct a cross reference check between the SoR and works numbers to ensure consistency. For example, plot 34/25 states in SoR, Appendix 1, that it will be used for Works Nos 10, 13 and 19, whereas the works plans suggests there is a small area of work No 15 (operational access) in ‘pink stripes’ as well which is not referenced in the SoR.

### **Environmental Statement (Doc 6.1 to 6.3.9)**

It is advised that the Applicant reviews the array areas which are inconsistent with the executive summary of the introductory Chapter of the ES and Explanatory Memorandum at paragraph 4.1.1, whereby they are quoted at 160 square km whereas the parameter at Table 4.1, paragraph 4.2.6, Volume 2, Chapter 4 of the ES is 196 square km.

The Inspectorate notes that there is inconsistency surrounding the distances mentioned between the site location and Rampion 1 Offshore Windfarm. ES Chapter 4 states that the site is located adjacent to the existing Rampion 1, approximately 13km and 26km from the Sussex Coast in the English Channel. It is not made clear in the main text of ES Chapter 4 why these two distances are provided. Paragraph 4.2.3 refers to the same distances of approximately 13km to 26km and ES Figure 4.1 (**Doc 6.3.4**) shows the red line boundary offshore. Table 4.1 however lists the Proposed DCO Order limits characteristics and states that 13km would be the closest distance to shore of wind farm array area, but the 26km distance is not explained. Additional explanation should be provided here.

As referenced above, the Inspectorate considers there remains inconsistency with regards the quantum of WTGs sought by the Order. The dDCO states “*no more than/must not exceed*” 90 in total, yet no assessment of that number forms part of Chapter 15 of the Environmental Statement. Throughout ‘Chapter 15, there are discrepancies which should be checked and amended. For example, Table 15-25 refers to the maximum of 65 larger turbines only, rather than the 90 smaller turbines option listed in other aspects of the ES, and subsequently the minimum spacing of 1,130m rather than the smaller 830m. The chapter also refers to the total length of the offshore export corridor as 140km, whereas the majority of the ES states 170km. The Inspectorate further notes that the ES Volume 3 Figures associated with Chapter 15 of the ES illustrates 65 WTGs only.

There are continuous changes with reference to the worst-case scenario throughout ES chapters which should be addressed and amended to ensure consistency. ‘ES Chapter 9: Benthic Ecology’ states 90 wind turbine generators would be the worst case scenario. However, page 102 states “*Piling fewer wind turbine generators (65) 13.5m monopiles represents a greater spatial impact than (90) 10m monopiles*”. Again, ‘ES Chapter 9: Benthic Ecology’ appears to interchange between 90 and 65. It is therefore unclear what is considered as the worst-case scenario. This is also repeated as an inconsistency in ‘ES

Chapter 8: Fish and Shellfish Ecology'. All discrepancies should be changed and present the same 'worst case scenario'.

The Applicant should review their approach with regards to the allocation of significance in the SLVIA, LVIA and onshore archaeology / cultural heritage chapters to ensure a consistent approach is taken in line with their methodology. There are areas where moderate is referred to as significant and other times not.

The Applicant is advised to conduct a check in relation to the figures as the ES does not always represent all the sensitive receptors referred to. Air Quality figure 19.1 shows 6 Air Quality Management Areas, with a detailed figure only provided for 2. There are some other minor labelling omissions such as Figure 26.1 representing Water Framework Directive waterbodies that are not labelled.

Temporary construction compounds (associated with, for example joint bays and lasting 6-8 weeks as referenced in the LVIA chapter) should be added and represented on the ES figures, as these mostly appear to show the larger construction compounds shown on the works plans.

### **Minor errors and omissions**

There are other minor errors and omissions, as reflected in Box 30 of the acceptance checklist.

### **Summary**

Please pay close attention to the advice set out in this letter and act on it accordingly. It is requested that you action these points **before the commencement of the Relevant Representation period**. This will contribute towards a more efficient examination and give any future Examining Authority comfort that the documentation is complete and accurate.

We trust you find this advice helpful, however if you have any queries on these matters please do not hesitate to contact our office using the contact details at the head of this letter.

Yours sincerely

*Emily Davies*

Emily Davies  
**Case Manager**

This communication does not constitute legal advice.

Please view our [Privacy Notice](#) before sending information to the Planning Inspectorate.