

Rampion 2 Offshore Wind Farm (Project Reference: EN010117)

Response to the Rule 6 Letter (14 December 2023)

West Sussex County Council (IP Reference 200445228)



Introduction

1. This document sets out the response of West Sussex County Council (WSCC) to the Rule 6 Letter published by the Examining Authority (ExA) on the 14 December 2023 (PD-006). It is acknowledged that the deadline for commentary upon this letter is the Pre-Examination Procedural Deadline of 16 January 2024. This document is supported by a summary of the WSCC Relevant Representation (RR) submitted in November 2023 (RR-418), which exceeded the 1,500 word count.
2. This response provides commentary on the following matters raised in the letter:
 - Draft Examination Timetable;
 - Initial Assessment of Principal Issues (IAPI);
 - Attendance at Preliminary Meeting/Hearings; and
 - Accompanied Site Inspections (ASI) and suggestions for locations to visit.

Draft Examination Timetable

3. The draft timetable is set out in Annex E of the Rule 6 letter. Although WSCC is committed to being engaged in the process and providing resources to cover the commitments of the Examination deadlines, officer resources will be constrained. In addition to undertaking the day-to-day business of an upper-tier local authority, WSCC is also an Interested Party for the Examination of the Gatwick Northern Runway Project (NRP) DCO (TR02005), which is running in parallel to the Examination of Rampion 2. In light of the above, WSCC wishes to raise a few key points about the draft timetable:
 - **Timetabling and agenda for Issue Specific Hearing 1 (ISH1)**– Annex F outlines the proposed agenda to ISH1, which will be held over three days (Wednesday 7 February to Friday (morning only) 9 February). Agenda item 4 refers to broad environmental matters only with no commitment on which dates these topics will be examined. Although Page F2 under agenda item 4 states '*Environmental Matters to be determined at a later date*', no firm date is given when this detail will follow. In light of the fact WSCC will not have provided a Local Impact Report (LIR) or Written Representation (WR) until Deadline 1, WSCC requests a more detailed agenda be provided for ISH1 to allow better preparation by officers. It would also be a better use of WSCC resources (due to the number of officers involved) if ISH1 topics could be assigned specific dates, so that attendance can be targeted rather than officers having to be present for all three.
 - **Date for responses to ExA Written Questions** – WSCC requests that Deadline 4 is extended from 18 April to 30 April 2024. This deadline primarily relates to responses to the ExA Written Questions (ExQ1), which

are issued on 28 March 2024. Answering the first set of written questions will be a labour-intensive task (for all parties) and clashes with the Easter holidays. Lack of time for proper attention by technical experts is likely to result in rushed or superficial answers to questions, which are unlikely to assist the ExA. It should be noted that WSCC will also have received the ExQ1 for the Gatwick NRP DCO on the same day (28 March 2024), which has a deadline of 19 April 2024. WSCC requests that the ExA takes all of the above into consideration when finalising the Examination timetable.

Initial Assessment of Principal Issues (IAPI)

- 4. WSCC notes the list of IAPI presented in Annex C of the Rule 6 letter and understands that it is not a comprehensive or exclusive list of the issues. Although WSCC is broadly in agreement with this list, it would query the omission of Socio-economics and Tourism, which has been listed as a topic for discussion during ISH1 (Annex F).

Attendance and speaking at PM/Hearings

- 5. The sections below provides the list of relevant officers, position and contact details (where needed) for the Preliminary Meeting, Open Floor Hearing 1 (OFH1) and ISH1, along with how they will be attending and whether WSCC wish to speak under any agenda items.

Preliminary Meeting

- 6. WSCC officers wish to attend the Preliminary Meeting in person, but do not wish to speak under any agenda items.

Table 1: WSCC Officer attendance at the Preliminary Meeting	
Name, Organisation and Position	Email and telephone number
Mike Elkington (WSCC Head of Planning Services)	██████████@westsussex.gov.uk ██████████
Amy Harrower (WSCC Rampion 2 Project Officer)	██████████@alhcs.co.uk ██████████

Open Floor Hearing 1

- 7. WSCC officers wish to attend the Open Floor Hearing 1 in person, but do not wish to speak under any agenda items.

Table 2: WSCC Officer attendance at OFH1	
Name, Organisation and Position	Email and telephone number
Mike Elkington (WSCC Head of Planning Services)	██████████@westsussex.gov.uk ██████████
Amy Harrower (WSCC Rampion 2 Project Officer)	██████████@alhcs.co.uk ██████████

Issue Specific Hearing 1

8. WSCC wish to attend ISH1 virtually and will be available to answer the questions raised by the ExA. Based upon comments raised in Section 2 of this letter, WSCC attendance is based upon the topics currently proposed in Annex F.

Table 3: WSCC Officer attendance at ISH1	
Name, Organisation and Position	Email and telephone number
Amy Harrower (WSCC Rampion 2 Project Officer)	██████████@alhcs.co.uk ██████████
James Neave (WSCC Principal Planner)	██████████@westsussex.gov.uk ██████████
Graham Roberts (WSCC County Ecologist)	██████████@westsussex.gov.uk ██████████
Jordan Walker (WSCC County Arboriculturist)	██████████@westsussex.gov.uk ██████████
Kevin Macknay (WSCC Drainage and Flooding Lead Professional)	██████████@westsussex.gov.uk ██████████
Chloe Hunnisett (WSCC County Archaeologist)	██████████@westsussex.gov.uk ██████████
Ian Gledhill (WSCC County Highways)	██████████@westsussex.gov.uk ██████████
Carolyn Carr (WSCC Economic Development Strategic Lead)	██████████@westsussex.gov.uk ██████████
Dave Widger (AECOM Head of B&P UK&I Economic Development)	██████████@aecom.com ██████████
Nicholas Scott (WSCC Principal Rights of Way Officer)	██████████@westsussex.gov.uk ██████████

Accompanied Site Inspections

9. WSCC acknowledges the Unaccompanied Site Inspection (USI1) undertaken on 15 and 16 November 2023 by the ExA, which is outlined in EV1-001. However, WSCC wants to make the following observations on locations for the potential ASI (to be held in May if required), grouped by topic. These would all be available from public land, except that around Oakendene Manor. The locations have been suggested to provide the ExA with a clearer understanding of the issues of concern raised by WSCC through the RR and to better gauge baseline conditions. WSCC is happy to provide further details on locations if required.
10. WSCC requests to attend the ASI in May.

Highways

11. It is suggested the ExA look at the accesses onto A280 Long Furlong (it is noted they have already been along Michelgrove Lane (A26) but not Tolmare Farm (A28). It is also suggested the ExA visit the accesses and traffic conditions along the A283 (A32, A33, A34, A35, and also A41, A42, and A43) if they have not done so already through the visit to the Washington construction compound location.
12. Visiting Cowfold during either the AM or PM peak, given the existing traffic conditions being reported by IPs, would be helpful to the ExA.

Seascape, Landscape and Visual

13. WSCC has identified some key viewpoints not currently identified by the Applicant. It is suggested these are visited by the ExA. These are:
 - The A272, looking directly south at the newly created access point;
 - Footpath 1786 west of industrial estate, where obvious and open views of construction compound will be possible (and where the footpath is likely to require temporary diversion around the field perimeter); and
 - Footpath 1787 (wrongly excluded from identified visual receptors for the Oakendene substation by the LVIA). Parts of this footpath provide elevated northerly views across the substation site via an existing field access, which would likely to be exacerbated by the proposed cable route crossing also in this location (and associated temporary hedgerow removal, which provides screening).
14. Although the ExA visited Climping and Bognor Regis, it would be useful to also visit Littlehampton and other locations along the West Sussex Coastal Plain, as identified in the viewpoints chosen and agreed with stakeholders for the SLVIA. This would allow the ExA to better appreciate the visual extent of the turbines along the West Sussex Coastal Plain.

Cultural Heritage

15. From a cultural heritage viewpoint, further locations listed below would help understand the issues raised. These are;
 - Location of viewpoint SA3, PRoW 1786 Taintfield Wood, looking north towards Oakendene Manor;
 - From PRoW 1786, looking north towards Oakendene Manor;
 - From Oakendene Manor, looking south and south-east across the historic parkland to the substation location; and
 - Chantry Post/Sullington Hill, looking south over the prehistoric downland landscape, with Harrow Hill and Blackpatch Neolithic flint mining monuments in the distance.

Ecology

16. It is suggested a visit to the Cowfold Stream crossing, a sensitive area with watercourses, small fields and hedgerows is undertaken. Also the Arun Valley

section of cable route, near Lyminster, including crossings of Black Ditch, the railway line and floodplain. A visit to Michelgrove Park to better understand the constraints present, including ancient woodland, in the area proposed for the use of HDD is also suggested.

Rampion 2 Offshore Wind Farm (Project Reference: EN010117)
Response to Rule 6 Letter
West Sussex County Council (IP 200445228)
Submitted on 16 January 2024