

Rampion 2 Offshore Wind Farm (Project Reference: EN010117)

Summary of Relevant Representation

West Sussex County Council (IP Reference 200445228)



1. Introduction

- 1.1 The Relevant Representation sets out a summary of WSCC's issues of concern and should be read alongside the submitted Principal Areas of Disagreement Statement (PADS), as requested by the Examining Authority (ExA) as part of a Procedural Matters (PD-005) letter (20/09/23).
- 1.2 As the remit of WSCC only extends to the Mean High-Water Mark (MHWM), the representation is limited to the elements of the Project that have onshore-related impacts (including those from the construction and operation of the offshore wind turbines and associated infrastructure).

2 Overview

- 2.1 WSCC acknowledges the target set by the UK Government of delivering over a third of electricity from offshore wind by 2030 and, therefore, it is supportive of the principle of offshore wind development in helping to tackle the challenges faced by climate change. WSCC recognises the national importance of having a balanced supply of electrical generation, including increasing renewable energy supplies from offshore turbines in helping decarbonise the UK's energy sector. Critical national infrastructure must not only deliver the Government's energy objectives but also deliver sustainable societal and economic impacts in the regions that are hosting them. Therefore, the Project needs to be achieved without significant adverse effects on the environment, local communities, and economy of West Sussex.
- 2.2 The Applicant has identified that the offshore infrastructure associated with Rampion 2 will have potentially significant adverse impacts on the seascape, coastal landscapes, and people who live, work and visit West Sussex. The onshore infrastructure at the substation site also has the potential to negatively impact on a number of environmentally-sensitive areas and features, and on residential amenity during the lifetime of the Project.
- 2.3 Therefore, although the Rampion 2 Offshore Wind Farm is supported in principle by WSCC, there are number of matters of significant concern that have not been satisfactorily addressed to date by the Applicant. These are:
 - i. Concerns about the size and layout of the offshore wind turbines and the significant adverse effect on views out to sea;
 - ii. The significant scale of the onshore substation creating an adverse effect on the existing landscape and surrounding local communities;
 - iii. The anticipated scale of historic environment impacts, which could cause an unacceptably high degree of harm to heritage assets, including those of national significance;

- iv. Concerns about the downplaying of temporary impacts of cable route construction, without securing construction phasing and timescales within the dDCO;
- v. The impacts on ecological receptors, including key species and habitats, and the needs for ecological enhancement (including Biodiversity Net Gain);
- vi. Concerns about impacts on the West Sussex transport network during construction and the level of mitigation proposed through the Outline Construction Traffic Management Plan (OCTMP);
- vii. The limited mitigation measures proposed to safeguard minerals, which require strengthening;
- viii. The limited socio-economic benefits to West Sussex (including employment opportunities, supply chain expenditure, and the creation of a Community Benefit Fund), the limited scope of the Outline Skills and Employment Strategy (OSES), and potential adverse impacts on tourism;
- ix. Requirement for further environmental assessment and justification of assumptions across a number of technical elements, as highlighted within this representation;
- x. Ensuring the commitments and mitigation measures to reduce the adverse effects presented are secured sufficiently with the control documents and dDCO, including defining the role of WSCC in the discharge of requirements process; and
- xi. The limited scope and scale of the draft section 106 principles presented by the Applicant, which indicate a disappointing level of commitment to West Sussex. The concerns are reflected in the gap in expectations that currently exist between the Applicant and WSCC.

2.4 As part of the DCO process, WSCC wishes to continue to engage proactively with the Applicant to reduce the areas of concern and seek to achieve the best possible outcomes for the local communities and other sensitive receptors that would be most affected by construction and long-term operational impacts. This work will contribute to further refinement of the PADS, as well as informing the drafting of Statements of Common Ground (SoCG), Written Representations, and any response to the ExA's questions during the forthcoming examination. WSCC also recognises the importance of liaising meaningfully on the detail of the s106 Agreement.

3 WSCC Key Areas of Concern

- 3.1 The Relevant Representation covers the following topics:
- A. Assessment of Alternatives
 - B. Project Description and Construction Phase Detail
 - C. Seascape, Landscape and Visual Impact (SLVIA)
 - D. Socio-Economics
 - E. Landscape and Visual Impact (LVIA)

- F. Noise and Vibration
- G. Ecology and Nature Conservation
- H. Arboriculture
- I. Traffic and Transport
- J. Minerals Safeguarding
- K. Historic Environment
- L. Water Environment
- M. Major Accidents and Disasters
- N. Public Health
- O. Public Rights of Way
- P. Draft Development Consent Order (dDCO)

3.2 It should be noted that the level of analysis of the DCO submission documents contained within the Relevant Representation reflects the limited time available for WSCC officers to respond to the deadline set by the Applicant, after having little sight of draft documentation through the pre-application period. Further technical analysis and assessment work will be undertaken by WSCC to support detailed consideration of the issues. This will be presented in the Local Impact Report (LIR) and further Written Representations.

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