

Rampion 2 Offshore Windfarm ENO101176
Written Representation to Planning Inspectorate
Clymping Parish Council
Interested Party Reference number: 20042080
Deadline 1 28 February 2024

1. Clymping is a small rural parish of 690 hectares on the south coast to the west of Littlehampton. It is bisected roughly east to west by the A259 Littlehampton to Bognor Road. The other through routes in the parish are the B2233 leading from the Oystercatcher Junction with the A259 north-west to Yapton and Church Lane that runs northward to Ford and Arundel respectively. The village faces numerous issues including coastal erosion threatening homes and livelihoods, housing development that will double the size of the village and traffic issues that lie behind a major upgrade proposed for the A259 through the village. Rampion 2 will only exacerbate all these pressures as we worry timings could coincide. This would considerably affect residents' lives and the applicant's ability to access and work in the operational areas proposed to the north and south of A259 in the village.
2. Clymping Parish Council has engaged in the consultation process for the proposed Rampion 2 Offshore Windfarm.

Through the process the Parish Council, using our local knowledge and experience, has registered the following principal concerns of Council, residents, and local businesses:

- Once Operational:
 - The visual impact of the turbines that will dominate the horizon viewed from Clymping beach, a popular community and visitor amenity.
 - The landscape that will be left, post construction, in the Littlehampton to Middleton gap that is a protected open, rural landscape within the Arun Local Plan.
- During Construction:
 - A single landfall site on Clymping beach connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques.
 - Offshore impacts of marine trenching in an area currently the focus of rewilding as part of the Weald to Waves project and work to restore the kelp forest.
 - Onshore construction disruption to village life and amenities through additional traffic on the local roads and the operational activities that will impact the village daily for several years.
 - Onshore construction/operational impacts on the local environment in the countryside.
 - The final details on the precise line of cable routing, where the cable is trenched and the areas to be drilled horizontally.

- The Transport Assessment including the additional HGV and LGV traffic movements, their routing and access points to the work areas.
3. The Parish noted that during the Inspectorate's hearings held on February 7th, 2024, that Traffic Assessment details are still awaited by National Highways and West Sussex County Council to enable them to comment. The Parish Council is in the same position.

That said, the Parish object strongly to any use of Crookthorn Lane, Brookpit Lane and Byway 197, Bread Lane as access to the work areas south of A259. The lanes are narrow with blind corners and they are simply not suitable for additional works traffic and heavy vehicles. The grass edges that are easily damaged and prone to flooding. They provide the primary driven and walking access to the primary school. There are no pavements. The limitations of the lanes are such that at busy times the school operates a voluntary one system for parents driving their children to and from school.

Bread Lane passes directly past the school entrance and the byway is the community's primary walking route to the beach and open countryside of the Littlehampton to Middleton gap in this area. Although unrestricted it is not suitable for use by heavy vehicles.

The Parish is pressing for an alternative dedicated route south from Ferry Road as this would be far more suitable and less disruptive.

The Parish is also keen to see works traffic banned from other local roads including Horesemere Green Lane and Climping Street.

4. It was also of note during the hearing on 7th February that no specific issues were raised about the A259 as it runs through Clymping. The road is already under significant traffic pressure and project proposals are in an advanced stage of development for a significant upgrade of this section of road. There will be new or significantly modified junctions at Littlehampton (Tesco roundabout), Ferry Road, Church Lane, the Oystercatcher and Comet Corner. If the timings of these works and the applicant's project works coincide, they will not only limit both access to the operational areas and but disrupt residents' lives and local business activities severely.
5. In addition, the Inspectorate should note that a major strategic housing development is planned to the west of Church Lane with its primary access opposite and near the applicants proposed access to Work Areas on the same stretch of Church Lane. The development was approved on appeal in 2018 (CM/1/17/OUT) and Reserved Matters (CM/48/21/RES) approved by Arun District Council in December 2023. Significant disruption in Church Lane is anticipated, entirely irrespective of the Rampion project.

The proposed sustainable drainage scheme (SUDS) for the site has yet to be finalised with Arun District Council but will inevitably need to drain through Work Areas 9,10, 11,13,14,15 towards the river Arun. It will be important for

the applicant to show that its work activities will not disrupt this drainage to avoid flooding in the village.

6. Clymping Parish Council endorses the Local Impact Assessment undertaken by Arun District Council and approved by Arun Planning Committee on 17 January 2024. We are concerned about the activities within the work areas in the village to the north and south of A259. More detail is required on the precise scope of these operations, their visual impact in the open countryside, excess noise over ambient levels (+ 45 dBA -rural background 45dBA. Rampion have confirmed drilling will be continuous at 90 dBA) vibration, dust generation, and night-time lighting in dark skies areas. Above all, clarity is required with regards the timing of daily operations and works traffic (daily start and finish times), the extent of 24-hour drilling operations and the overall timescales envisaged for what is referred to as a "temporary" construction phase. All these factors could impact the daily lives of residents and negatively impact to local natural environment. We have yet to see a detailed construction management plan. We have also yet to see the steps the applicant plans to take to mitigate the impacts on the community and local environment.

The Parish Council have concerns that at least two residential areas could be subject to statutory nuisance, Clymping Park residential caravan site and Norden House, a recently completed purpose - built 64 bed dementia care home located at the junction of Clymping street and the A259. Loud and persistent noise may be particularly over stimulating and disturbing for someone living with dementia which can trigger experiences of ill being. We are naturally concerned that the noise of drilling operations particularly at nighttime will have a negative effect on individuals living at the home.

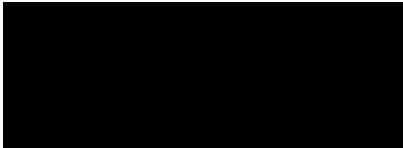
The owner of Clymping Mill Cottage on the seafront maintains grave concerns his property will be adversely affected by the Proposed Development in terms of visual amenity during construction, operation and maintenance, or decommissioning phases.

7. The hearing on February 7th highlighted the risks association with coastal erosion at Clymping where the applicant plans to bring the offshore cable onshore. The coast has been subject to significant erosion and its defences breached in early 2020 extensively flooding Work Areas 7, 8, and 9 south of the A259. Recent flooding in October and November 2023 is a reminder of the fragility of the remaining shingle bunds maintained by the Environment Agency. These are the only remaining coastal defence, with shingle replenishment funded increasingly by the landowner and local threatened homeowners with some support from the Parish Council.
8. The Inspectorate should note the threat that the Environment Agency will withdraw further work if they judge further maintenance uneconomic. The current plans are to allow the coastline to retreat but the extent of this retreat remains a matter of conjecture and the ongoing threat of storm damage is real. However, this does raise the question whether or not the choice of Clymping as the landfall location, bearing in mind the 30year life of the

Rampion project, is now a viable option. The risk to plans for works south A259 are therefore material, and we want to understand the threat to the integrity of the cable and the applicant's contingency plans.

In conclusion, homeowners in especially close proximity with the proposed works and work site are deeply concerned, as is this Parish Council, to the protracted upheaval and harm that will doubtless be caused to them should the project go ahead.

The Parish Council would be happy to provide further written and oral evidence if required and would like to be registered to attend future hearings that may be scheduled.



Mrs Nadine Phibbs
Clerk to Clymping Parish Council
On behalf of Clymping Parish Council
24th February 2024