

# Horsham District Council

## Written Representations

EN010117: Rampion 2 Offshore Wind Farm  
February 2024

## **1. Introduction**

- 1.1 These Written Representations submitted by Horsham District Council (HDC) should be read together with the Council's Local Impact Report and Relevant Representation submissions, in response to the application by Rampion Extension Limited for the Rampion 2 Offshore Wind Farm ('the Project').
- 1.2 Its purpose is to allow HDC to highlight in a concise manner and provide advice to the Examining Authority (ExA), on certain concerns raised by the communities, business, and residents of Horsham District, as set out below.

## **2. Traffic and Access**

- 2.1 HDC welcomes and supports the ExA's Action points arising from Issue Specific Hearing 1, requiring the applicant to provide options for ensuring HGVs do not arrive on site outside of the agreed construction hours, and to consider whether construction hours should form a requirement in the draft DCO.
- 2.2 It is expected that the applicant's responses to these Action points would offer further measures, embedded in commitments and requirements, to address HDC's concerns identified in its Local Impact Report regarding the need for appropriate mitigation of adverse harms arising from the construction phase onto sensitive receptors, such as the community of Washington village.
- 2.3 HDC also welcomes and fully supports the ExA's Action points arising from Issue Specific Hearing 1, requiring the applicant to:
- demonstrate why areas serviced from A61 and A64 off Kent Street cannot be serviced by a haul road from Access A63 Oakendene substation compound;
  - provide a Traffic Management Plan for Kent Street which considers, or signposts, an assessment of the effect of the construction egress on its rural character to be submitted;
  - explore the feasibility of HGVs accessing the areas serviced by A57, A56, A53 and A52 via haul roads south from A63 or North from A50;
  - provide LGV and workforce vehicle numbers travelling through Cowfield AQMA to A57, A56, A53 and A52 and what these equate to in numbers and percentage in comparison to predicted traffic flows without the Project;

- consider and report on alternatives to the use of Dragons Lane for exceptional HGV use during the operational phase of the Project;
- provide details on how HGVs would negotiate Dragons Lane in exceptional circumstances during the operational phase of the Project;

2.4 Whilst highway matters are outside of the authority remit of Horsham District Council (and therefore matters not directly addressed in its Local Impact Report), the socio-economic disruption impacts arising from the Project onto the Local Highway Network, is an important concern voiced by communities, businesses and residents of the district and as such, the Council supports the ExA's identification of these issues and the need for additional evidence to support the DCO submission, through the above listed Action points identified at the Issue Specific Hearing 1.

2.5 HDC expects that the applicant's responses to these Action Points would offer further measures, embedded in commitments and requirements, to mitigate those harms expressed by the district residents at the hearing, as well as socio-economic disruption identified in HDC's Local Impact Report.

### **3. Terrestrial Ecology and Landscape and Visual Impact**

3.1 From submitted Relevant Representation and participation at the Issue Specific Hearing 1 HDC notes the concerns raised by Interested Parties, with particular regards to;

1. lowland meadow not being identified within the DCO limit (priority habitat under Section 41 of NERC Act 2006), and
2. inadequate survey effort on waterbodies for great crested newt.

3.2 To address these concerns, HDC advises further information to be provided by the Applicant. HDC notes that the Phase 1 Habitat Survey (Appendix 22.3) was undertaken 'between April 2020 and March 2023'. Given this is a very large range, HDC would request the specific months of survey for different sections of the DCO be provided to demonstrate that habitats that are more likely to be incorrectly classified (e.g., grassland habitats) were surveyed at optimal times of the year. In addition to this, HDC would seek confirmation that for all waterbodies that were excluded from great crested newt eDNA surveys due to inaccessibility or availability of sampling kits, great crested newt presence is assumed (Para 2.4 from Appendix 22.7).

3.3 HDC also welcomes the ExA's Action points arising from Issue Specific Hearing 1, requiring the applicant to:

- Review C-5 and C-17 of the Commitments Register, and the Trenchless Crossing plans, to remove ambiguity on the use of trenchless crossing and to affirm trenchless crossing means that set out in the Crossing Schedule;
- Provide details of length and area of temporary and permanent vegetation removal and reinstatement in the form of tabular data for: - Length of hedgerow - Length of important hedgerow - Length of potentially important hedgerow - Length of treeline - Area of woodland - Number of trees;
- Review all bell mouth access points on whether necessary hedgerow removal has been taken into account;
- ensure consistency between the Environmental Statement and Arboricultural Impact Assessment regarding tree and hedgerow loss and clearly explain any necessary differences;
- consider amendment to Commitment C-216 of the Commitments Register wording to make a clearer commitment regarding ancient woodland. Suggestion to remove the word 'where' in the first sentence.

3.4 It is expected that the applicant's responses to HDC advise and the ExA's Action Points would offer further measures, embedded in commitments and requirements, to mitigate those harms expressed by the district residents at the hearing, as well as impacts onto terrestrial ecology and landscape and visual impact identified in HDC's Local Impact Report.

#### **4. Compensation**

4.1 Where mitigation is not possible, HDC believes strongly that communities should feel they are positively benefitting from host electricity transmission network infrastructure that is to support the delivery of national objectives.

4.2 As advised by the ExA at the Hearing, HDC has set out in its Local Impact Report proposed compensation measures which seek to address residual harms on air quality (contributions sought for purchase of practitioner equipment to be used by the Council in monitoring affected AQMAs), and terrestrial ecology and landscape and visual impacts (contributions sought toward nature recovery interventions funded by the Council's Wilder Horsham District Initiative in the vicinity of the Project), that have been evidenced by the applicant cannot be mitigated. In the Council's view, these have been demonstrated to meet the planning tests that they are necessary to make the development acceptable in planning terms.

- 4.3 In addition to this, the Council would very much welcome the applicant to consider the following works identified in the Horsham District Council Draft Infrastructure Delivery Plan (IDP Dec 2023)<sup>1</sup>, to compensate for the residual harms to air quality and socio-economic disruption identified in the Council's Local Impact Report that would arise from the Project and evidenced by the applicant cannot be mitigated.
- 4.4 These works when completed would reduce vehicular traffic through the Cowfold AQMA, thereby compensating for residual harms arising from the development throughout the construction phase (3- 5 years) and evidenced by the applicant cannot be mitigated, so are necessary and directed related to the Project.
- 4.5 The suggested works are considered fairly and reasonably related in scale and kind to the Project, especially in the context of the Government's response (Nov 2023) to its consultation on developing voluntary guidance/mandatory scheme for community wide benefits in hosting electricity transmission network infrastructure (whilst recognising any mandatory scheme will remain separate to the planning process and not a material consideration in planning decisions, and not secured through those decisions).

From south of A272, bridleway links south toward existing BW1758 and safe crossing point of A281 linking to bridleways leading to Shermanbury. Also cycle rights created to improve access from developments into the village centre facilities. Safe crossing points between sites to north and south of A272 for horses, cyclists and pedestrians. North of A272, bridleway links north to existing bridleway network	Guidance from West Sussex County Council relating to bridleways and other improvements to provide access for walkers, cyclist and horse riders  Cowfold settlement site allocations: Strategic Policy HA8 / CW1, CW2 & CW3	WSSC / Developer	TBD	TBD	Developer and WSSC funding	Desirable
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- 4.6 Should you have any questions regarding this response, please contact, Matthew Porter, Senior Planning Officer, Planning, at [REDACTED] [@horsham.gov.uk](mailto:[REDACTED]@horsham.gov.uk) in the first instance.

Yours sincerely



**Barbara Childs**  
Director of Place

<sup>1</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0011/131789/Reg-19-Draft-IDP-Dec-2023.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0011/131789/Reg-19-Draft-IDP-Dec-2023.pdf)