Rampion 2 Wind Farm

Category 8: Examination Documents

Applicant's Response to Action Points Arising from Issue Specific Hearing 1

Date: February 2024

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1 Introduction

1.1 Project Overview

1.1.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the 'Applicant') is developing the Rampion 2 Offshore Wind Farm Project ('Rampion 2') located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.

1.1.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km. A detailed description of the Proposed Development is set out in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) **[APP-045]**, submitted with the Development Consent Order (DCO) Application.

1.2 Purpose of this document

1.2.1 This document is prepared by the Applicant to provide responses to the Examining Authority's Action Points **[EV3-020]** where responses were required for Deadline 1.

2 Issue Specific Hearing 1

Table 2-1: Issue Specific Hearing 1 – Onshore Effects

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
Agenda Item 2 - The Proposed Development and Alternatives		
1	Applicant to make Development Consent Order (DCO) wording tighter with regards to limiting development to uniform turbine type, height and rotor diameter.	This will be addressed in the next iteration of the draft DCO due for submission at Deadline 2.
2	Applicant to make response in detail as to level of wind resource in the Channel.	The developer for Rampion 2, RWE, has over 20 years of experience in constructing and operating offshore wind farms, and has determined that Rampion 2 is a viable site and productive location for wind energy generation, with a predicted wind speed of ~9.3 m/s. The latest figures show that the operating Rampion Wind Farm exceeded target generation by 15% in 2023. Rampion has exceeded its target for three of the four complete years of operation from 2020-23 and in terms of total generation across this period, Rampion has exceeded the target by 8%[2]. It is not only the wind resource that makes Rampion 2 a good location for an offshore wind farm. With the southeast of England being one of the most densely populated regions in Europe, it is a huge demand centre for electricity. Rampion 2 can therefore create a greater contribution to electricity generation close to where the demand centre is located, which reduces transmission losses and requires no transmission grid upgrades. 1. Target generation is 1,367GWh per year. Assumed capacity factors for offshore wind, The Contracts for Difference (Standard Terms) Regulations August 2014, DECC. Generation: 400MW x 0.39 x 8760 x 1,000 = 1,366,560,000KWh / 1,367GWh pa) 2. Total target for 2020 – 2023 = 5,468GWh (4 x 1,367GWh). Total actual generation for 2020 – 2023 = 5,919GWh (2020 = 1,600GWh, 2021 = 1,363GWh, 2022 = 1,376, 2023 = 1,580GWh.
3	Applicant to provide additional evidence and justification to explain why the National Grid substation at Fawley and Dungeness were discounted – the substations which would have avoided an onshore cable route – including information on the challenges of crossing the shipping lanes at Southampton and the designated Inshore Traffic Zone.	Response included in Appendix 1 - Further information for Action Point 3 - Fawley and Dungeness (Document reference 8.25.1) submitted at Deadline 1.
4	Applicant to provide additional evidence and justification to explain why the Wineham Lane North site was discounted for the onshore substation, with a focus on the engineering and environmental constraints of site.	Response included in Appendix 2 - Further information for Action Point 4 - Wineham Lane North (Document reference 8.25.2) submitted at Deadline 1.
5	Confirmation of onshore cable route – including points of leaving and entering the South Downs National Park.	The principal elements of the onshore works comprise Work Nos. 7-20 as described in Part 1 of Schedule 1 of the dDCO and the spatial extent with which each of these works may be carried out are shown on the onshore works plans (Examination Library Reference: PEPD-005).

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
		The location of the onshore cable route in relation to the jurisdiction of the South Downs National Park is best understood by looking at figures 18.6a Landscape Designations and 18.6b Landscape Designations Environmental Statement – in Volume 3 Chapter 18 Landscape and visual impact assessment - Figures (Part 1 of 6) [APP-098]. The onshore cable route enters the SNDP from the South crossing the A27 near Hammerpot. There is a short deviation from the National Park area as the cable route twice crosses The Pike at Washington. And it leaves the park by crossing the A283 near Chanctonbury Ring Road.
6	Provide more evidence to corroborate Applicant's conclusions regarding effects on setting of Oakendene Manor including the viewpoint from the South East corner of the site.	In response to the action point raised by the ExA on this matter, the Applicant refers to their statement made at the hearing (see Applicant's post hearing submission - Issue specific hearing 1 (Document reference 8.31) which summarised the extensive baseline work undertaken to support the pre-Application onshore substation design process and the assessment presented in the ES. The Applicant also highlights the embedded environmental measures which seek to avoid, reduce and minimise the impacts associated with the Oakendene site and are secured in the Design and Access Statement (DAS) [AS-003], which include: • Siting the maximum footprint of the onshore substation within the area best screened by existing trees and vegetation and provision of trenchless crossings to maintain this screening and habitat where the onshore cable route enters the onshore substation site and the onward connection to the National Grid Bolney substation site; • Siting the maximum footprint to avoid interrupting the view between Oakendene Manor house and the boating lake to the south of the site; • Planting of further woodland to strengthen the existing screening around the site and provision of scrub, hedgerow and parkland style planting to provide mitigation and enhancement. These measures are secured in the design principles within the Design and Access Statement **[AS-003]** with which the detailed design of the onshore substation and landscaping must comply as per draft DCO requirements 8 (2) and 12 (3). The Applicant's conclusion is corroborated by the Relevant Representation made by Horsham District Council **[RR-148]**, the relevant planning authority with responsibility for listed buildings, which states: > HDC confirms that, having reviewed the location of designated above-ground heritage assets within the vicinity of the development and evaluated the contribution that their settings make to the significance of the asset, the impact of the development, including the substation, on these would be less than substantial at the lower end of the scale of that category in all cases of the historic environment and individual heritage asserts. In response to the request for further information made by WSCC, the Applicant confirms that they are in the process of seeking to agree access to Oakendene Manor to undertake viewpoint photography directly from the manor house, in line with viewpoint *HE 01*, as identified in Figure 25.5h of the ES, Volume 3 (Examination Library Reference: APP-114). Further photography will be undertaken from other locations within the vicinity of Oakendene and reviewed to determine appropriateness for generating further visualisations for submission. The Applicant will engage with WSCC, and Horsham District Council, in this process and supply visualisations of additional viewpoint photography at a deadline subsequent to completion of this work, where required.
7	Applicant to provide more detail on Horizontal Directional Drilling (HDD) including depths of cables at the landfall, under Climping Beach.	Response included in Appendix 6 - Further Information for Action Point 7 - HDD at Climping Beach (Document reference 8.25.6) submitted at Deadline 1.
Agenda Item 3 - Traffic and Access		
8	Note to be provided on the principal differences between the 1993 and 2023 Institute of Environmental Management's Traffic Assessment Guidance documents and whether there would be	This will be addressed in the submissions at Deadline 2

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
	difference in the outcome of the assessment if the latter was used.	
9	Submission of detailed information on the proposed design of accesses and HDD proposals at A27 Hammerpot, as raised by National Highways.	The Applicant has developed proposals for the A27 at Hammerpot and has shared these with National Highways as part of the ongoing engagement to reach agreement in principle on this matter. The Applicant will provide an update on progress in forthcoming submissions. The Applicant seeks to clarify that it is not the intention to submit detailed design information into the Examination for approval; this would be provided to discharge the draft DCO requirement 15 or16 subject to development consent being granted.
10	Applicant to review Fig 7.6.8 + 7.6.9C of Construction Traffic Assessment plan and re-submit clarifying that areas of Bolney will not be used for construction traffic.	The Applicant has reviewed the figures and has submitted an updated Outline Construction Traffic Management Plan (Document reference 7.6, Revision C) as part of its Deadline 1 submission.
11	A Traffic Management Plan for Michelgrove Lane is to be provided.	As per the Applicant's oral submission ((summarised in the Applicant's post hearing submission - Issue specific hearing 1 (Document reference 8.31)), engagement is ongoing with West Sussex County Council to develop a traffic management strategy that considers how safe access can be achieved at access A-26, A-28 and along Michelgrove Lane. This includes consideration of traffic management measures. The Applicant seeks to clarify that this engagement should take place before submission of this information and therefore intends to provide an update to the Outline CTMP by Deadline 3. It is noted that the draft DCO includes requirement 24 for provision of a construction traffic management plan, to be produced in accordance with the Outline Construction Traffic Management Plan [PEPD-035a] and therefore it is proposed to provide any additional measures in the Outline CTMP. The stage specific CTMP which must be in accordance with the Outline CTMP is to be provided by the delivery contractor (who is yet to be appointed) for approval of WSCC at the appropriate time if development consent is granted].
12	Note to be provided on options for ensuring HGVs do not arrive on site outside of the agreed construction hours.	A number of Relevant Representations and oral submissions made by Interested Parties at Issue Specific Hearing 1 (ISH1) requested a change to the proposed construction working hours to include 'shoulder hours' to minimise potential disruption at the start and finish of the working day. In response, the Applicant will adopt shoulder hours as per the text below. This has been updated in the **Commitments Register [APP-254]** (updated at Deadline 1 submission) and will be amended in the next version of the Outline Code of Construction Practice. *"Core working hours for construction of the onshore components will be 08:00 to 18:00 Monday to Friday, and 08:00 to 13:00 on Saturdays, apart from specific circumstances that are set out in the Outline COCP, where extended and continuous periods of construction are required.* *Prior to and following the core working hours Monday to Friday, a 'shoulder hour' for mobilisation and shut down will be applied (07:00 to 08:00 and 18:00 to 19:00). The activities permitted during the shoulder hours include staff arrivals and departures, briefings and toolbox talks, deliveries to site and unloading, and activities including site and safety inspections and plant maintenance. Such activities shall not include use of heavy plant or activity resulting in impacts, ground breaking or earthworks."* The utilisation of shoulder hours in this way allows for vehicles to arrive on site between 07:00 and 08:00, prior to the commencement of core hours. This means that the originally proposed delivery hour from 06:00 to 07:00 (Paragraph 8.4.13 of the **Outline Construction Traffic Management Plan [PEPD-035a]**) is no longer needed, and has been removed from the **Outline Construction Traffic Management Plan** presented at Deadline 1 (Document reference 7.6).
13	Consideration of whether construction hours should form a requirement in the draft DCO.	This will be considered for the next iteration of the draft Development Consent Order due for submission at Deadline 2.
Agenda Item 4 – Effects of the Proposed Substation at Cowfold/Oakendene		

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
14	Provide a plan demonstrating why areas serviced from A61 and A64 off Kent Street cannot be serviced by a haul road from Access A63 Oakendene substation compound	Response included in Appendix 3 - Further Information for Action Point 14 and 16 - Construction Accesses (Document reference 8.25.3) submitted at Deadline 1.
15	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.	This will be submitted at Deadline 2.
16	Provide a note which explores the feasibility of HGVs accessing the areas serviced by A57, A56, A53 and A52 via haul roads south from A63 or North from A50.	Response included in Appendix 3 - Further Information for Action Point 14 and 16 - Construction Accesses (Document reference 8.25.3) submitted at Deadline 1.
17	Applicant to 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 Proposed Development.	The Applicant has provided the requested figures in the Applicant's response to relevant representation (Document reference 8.24) submitted at Deadline 1 in reply to Cowfold Parish Council **[REP-088]**. The relevant information is included from this response here for ease of reference. "At peak construction, taking account of the construction traffic routing contained within the **Outline CTMP** **[PEPD-035a]** which has been updated at the Deadline 1 submission, the following effects have been identified for Cowfold,. • At A281 south of Cowfold (Receptor 23): o An HGV peak week increase of 12 HGVs per day, equivalent to an increase of 7.5% and approximately one HGV per hour; and o A total construction traffic peak week increase of one HGV per day and 71 light goods vehicles (LGVs) per day (5-6 per hour), equivalent to a 1.1% increase in total traffic flow. • The A281 / A272 in the centre of Cowfold (Receptor 24): o An HGV peak week increase of 39 HGVs, equivalent to an increase of 3.5% and 2-3 HGVs per hour; and o A total construction traffic peak week increase of 19 HGVs and 154 LGVs (11 per hour), equivalent to a 0.7% increase in total traffic flow. • The A272 Station Road west of Cowfold Village centre (Receptor 25): o An HGV peak week increase of 39 HGVs, equivalent to an increase of 4.6% and 2-3 HGVs per hour; and o A total construction traffic peak week increase of 19 HGVs and 154 LGVs (11 per hour), equivalent to a 0.9% increase in total traffic flow • The A272 Bolney Road east of Cowfold Village centre (Receptor E): o An HGV peak week increase of 39 HGVs, equivalent to an increase of 5.5% and 2-3 HGVs per hour; and o A total construction traffic peak week increase of 19 HGVs and 147 LGVs (10-11 per hour), equivalent to a 0.8% increase in total traffic flow. As noted within Institute of Environmental Management and Assessment (IEMA) 1993 publication *Guidelines for the Environment Assessment of Road Traffic* (IEMA, 1993) an increase of less than 10% is not discernible environmental effect as is within day-to-day fluctuations in traffic flow. Therefore, no significant effects are predicted to occur within Cowfold." The Applicant notes the numbers are also included in Table 2-17 to Table 2-20 of the Environmental Statement Addendum (Dcoument reference 6.2.32) provided at Deadline 1.
18	Applicant to consider and report on alternatives to the use of Dragons Lane for exceptional HGV use during the operational phase of the Proposed Development.	The Applicant has developed the cable route and the selection of operational accesses to both meet the needs of the project and also to minimise both potential disruption to local residents as well as adverse effects on the environment. As detailed in the ES, most access requirements to the onshore cable route during operation involve infrequent access by light vehicles such as vans and pick-ups (See Section

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
		4.8 in **Chapter 4: The Proposed Development, Volume 2** of the ES **[APP-045]**). Given this anticipated light use, the applicant has sought to utilise existing access routes for operational purposes, reducing environmental impacts. In exceptional circumstances during unscheduled maintenance or operational faults, a heavy goods vehicle (HGV) may be required to support cable repair works. This would be an unlikely worst case scenario that could involve the need to replace a section of cable, for which HGV access may be needed for materials or equipment. However, the design, the construction and the commissioning of static infrastructure such as the onshore export cable are undertaken in a way to ensure that no replacement or repair is necessary over the lifetime of the asset. It is therefore not reasonable to assess the need for HGVs to access operational access associated with such an unlikely scenario as part of this Application. Dragons Lane is identified for use as an operational access within Work No 15, shown on sheet 31 of the **Onshore Works Plans [PEPD-005]** and sheet 31 of the **Access, Rights of Way and Streets Plan [APP-012]** and marked 'A-58'. It would be used infrequently for inspections and maintenance as set out above. In the unlikely event of such a major cable fault in this area, the fault would be investigated and a suitable vehicle arranged for the repair taking into account the access parameters along Dragons Lane. In the very unlikely event that the operational access proves unsuitable for the type of vehicle required for a repair, further consents and land rights may need to be procured if required for larger vehicle access.
19	Applicant to provide details on how HGVs would negotiate Dragons Lane in exceptional circumstances during the operational phase of the Proposed Development, a matter raised by Mr Crawford Clark.	As mentioned above in response to AP 18, the Applicant is aware of a narrow passage along Dragons Lane that may be prohibitive for HGV-vehicles in the unlikely worst case scenario that could involve the need to replace a section of cable. HGVs are not anticipated to need to negotiate Dragons Lane for a reasonable worst case scenario. Operational accesses have been identified for light vehicle access for cable maintenance and inspection purposes. Dragons Lane is assessed to provide suitable access for these purposes.
20	Applicant to provide additional details of the proposed onshore substation site at Oakendene with site levels in relation to flood risk.	Response included in Appendix 4 - Further information for Action Point 20 - Oakendene Substation Flood Risk (Document reference 8.25.4) submitted at Deadline 1.
Agenda Item 5 – Construction Effects		
21	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.	The Applicant has updated commitments C-5 and C-17 in the Commitments Register provided at Deadline 1 to seek to address the action point as well as C-18 and C-229. These will be reflected in the next update of the Outline Code of Construction Practice **[PEPD-033]** at the next submission of this document, anticipated to be Deadline 3.
22	Applicant to 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	The Applicant is in the process of a review as per the response to AP-23 and should the outcome of this exercise require updates to the numbers provided above, the Applicant currently envisages presenting this information by Deadline 3.

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
	- Number of trees This should also include the length and areas of the above within the South Downs National Park.	
23	Review all bell mouth access points on whether necessary hedgerow removal has been taken into account.	In common with other projects, the Applicant's approach at this stage of project development has been to propose access locations with the detailed design of those accesses to be approved post-grant of the DCO under Requirements 15 and 16 of the **Draft Development Consent Order [PEPD-009]**. In response to this Action Point, the Applicant has re-examined the extent of potential hedgerow removal at a sample of access locations using a template bell mouth design and acknowledges that there may be some instances where the extent of removal may exceed that currently shown on the Vegetation Retention Plans in Appendix B of the **Outline Code of Construction Practice [PEPD-033]**. The Applicant is therefore undertaking a more comprehensive review of all accesses on a similar basis, including undertaking elements of initial detailed design work where requested by the highway authority at a limited number of key locations. Should the outcome of this exercise require updates to the Vegetation Retention Plans or other application documents the Applicant currently envisages presenting this information by Deadline 3.
24	The Applicant to ensure consistency between the Environmental Statement and Arboricultural Impact Assessment regarding tree and hedgerow loss and clearly explain any necessary differences.	The Applicant notes that there is a difference between the definition of 'tree/tree group/woodland/scrub' applied through the ecological assessment and the arboricultural impact assessment. This is due to the different way in which the different survey methodologies classify habitats. The Applicant agreed to ensure a review for consistency between the relevant documents is undertaken, albeit acknowledging different methodologies meaning that they will never be entirely consistent. This is being undertaken alongside the exercise for AP-23 and should the outcome of this exercise require updates, the Applicant currently envisages presenting this information by Deadline 3.
25	Possible 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.	The Applicant has updated commitment C-216 and reworded the commitment in the update to the **Commitments Register [APP-254]** submitted at Deadline 1. This will also be amended in the next revision of the **Outline Code of Construction Practice [PEPD-033]**. Commitment c-216 has been updated to also reflect the ongoing review of all access points noting where specific access works will need to take place within 25m of ancient woodland to ensure safe access from the highway network.
26	Applicant to review the Order limits for Work No.9 and Michelgrove Park Area and Sunnington Hill to remove the central areas not required.	The Applicant has reviewed the DCO corridor width for Works No. 9 at both Sullington Hill and Michelgrove Park. Both locations present non-standard trenchless crossings due to the crossing length required to avoid and protect the designated land areas (Replanted Ancient Woodland, Local Wildlife Site), the site topography and the bedrock geological conditions. The Applicant considers that it is necessary retain the full extent of the existing corridor for Works No. 9 at both locations as per the current Application for the following reasons: • The required flexibility for trenchless crossing construction, which is contingent on results of the ground investigation campaign and engineering design work. The alignments shown on the Appendix A: Crossing Schedule within the **Outline Code of Construction Practice [PEPD-033]** are marked indicative (Sheet 9 for Michelgrove Park and Sheet 12 for Sullington Hill). Up to four parallel installed cable circuits will traverse the crossing obstacle from a trenchless crossing entry pit location within an area marked with Limits of Deviation (LOD) for Trenchless Compound locations to any retrieval pit location on the other side of the crossing obstacle within Works No 9 but not constrained by the LOD. The LOD apply only to the entry pits for the trenchless crossings as shown in the Crossing Schedule. Potential trenchless crossing alignments could be located within the central section of the wider DCO order limits. The Applicant is required under Requirement 22 of the **Draft Development Consent Order [PEPD-009]** to provide a final crossing schedule as part of the detailed stage specific CoCP. • Required Ground Investigation (GI) works involve intrusive surveys within the proposed DCO Order Limits. GI works are required to assess a variety of ground condition parameters across the wider corridor to provide the required construction design inputs. GI locations will be selected so that they do not intersect a potential trenchless alignment, as this could affect the construction along such

REF	Action Point	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
		an alignment. The locations for ground investigation at Michelgrove Park and Sullington Hill are not defined at this point, however they may also include central areas of the corridor. The ground investigation will be undertaken in keeping with the principles as defined in the **Outline Code of Construction Practice [PEPD-033]** in relation to protected areas. • The trenchless compound locations have construction access requirements within the works areas. For this it may be necessary to utilise existing tracks and pathways in the central area of the wider corridor. Some of these accesses may be within or near designated land areas to operate in accordance with commitments made such as commitment C-216 in the **Commitments Register [APP-254]** as secured in the **Outline Code of Construction Practice [PEPD-033]** which is secured through Requirement 22 in the **Draft Development Consent Order [PEPD-009]**. • The open cut cable corridor to and from both ends of the trenchless sections will need flexibility within Works No 9 to connect to the trenchless section, resulting in the wider area of Works No 9 at these crossing locations. • At the Sullington Hill crossing, the re-routing of the South Downs Way as a significant PRoW requires additional DCO corridor flexibility, to ensure that the short term diversion within permissible areas of the construction site can be accommodated in a way which is reasonably convenient to users. The Applicant intends to complete the trenchless crossings at these areas with the minimal impact to the sensitive environmental features and stakeholders. The Applicant therefore requires the flexibility of a wider DCO corridor for Works No. 9 to retain the ability to construct the preferred trenchless crossing alignment in compliance with existing commitments.
Agenda Item 6 - South Downs National Park		
27	Submission of a singular document on the effects of the Proposed development on the special qualities of the South Downs National Park including mitigation and enhancement proposals. The Applicant may, if this cannot be provided, instead submit a sign-posting document to this effect.	Response included in Appendix 5 - Further information for Action Point 27 - South Downs National Park (Document reference 8.25.5) submitted at Deadline 1.

Table 2-2: Issue Specific Hearing 1 – Offshore Effects

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
Agenda Item 9 - Draft Commercial Fishing		
28	Note to set out updated position on liaison/consultation with the fishing industry to be provided, with the current stance of fishing industry.	The concerns of fisheries stakeholders have been considered in defining the scope of the commercial fisheries impact assessment, and in undertaking the assessment. Engagement with the local fishing industry is summarised in Section 10.3 of **Chapter 10: Commercial fisheries, Volume 2** of the ES **[APP-051]**. This engagement has primarily been undertaken via email communications from the Company Fishing Liaison Officer and meetings held with five Fishing Working Groups, three of which already existed for Rampion 1 and two which were created to reflect the change in geographical location of Rampion 2, extending further west. The Commercial Fisheries Working Group (CFWG), Sussex Inshore Fisheries Group (SIFG) and Independent Fishermen's Group (IFG), were carried forward from Rampion 1. The Applicant also sought to engage with the Selsey Fishermen's Association to reflect the geographical location of Rampion 2 extending further west. The Company Fisheries Liaison Officer issued invitations to the four groups to hold initial meetings in February 2021 and while there was no interest from the IFG in meeting at this early stage, the other three meetings were held. The Applicant presented an overview of the early draft proposals and listened to feedback from

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
		fishers on their experiences of the operational Rampion 1 wind farm and their thoughts on Rampion 2. Attendance and a summary of fisheries feedback can be found in para 10.3.30 in **Chapter 10 : Commercial Fisheries [APP- 051]** Subsequent meetings were held with the four groups in September 2021 during the statutory project-wide consultation as set out in Table 5.7 of the **Consultation Report [APP-027].** Attendance can be found in para 10.3.32 and a summary of fisheries feedback in para 10.3.33 of the **Chapter 10 : Commercial Fisheries [APP-051]** Following this second series of meetings, a fisherman from Littlehampton who had been a member of the CFWG for Rampion 1, approached Rampion 2 to propose dedicated meetings were held with the Littlehampton Fisherman's Association, particularly given Rampion 2 was extending further west. The Applicant agreed and for the third series of meetings in November 2022, meetings were held with all five Fisheries Working Groups as set out in Table 6.5 in the **Consultation Report [APP – 027]** A summary of the feedback from these meetings is set out below: • Positive feedback re turbine numbers and spacing • Discussions about fish stocks and fishing methods • Discussions around managing the construction with Fisheries and how the two industries co-exist Fisheries engagement will continue throughout all phases of the Proposed Development in line with the approach to liaison set out in the **Outline Fisheries Liaison and Co-existence Plan [APP-241]** secured through condition 11 (g) Schedule 11 and 12 of the **Draft Development Consent Order [PEPD-009]**.
29	The Applicant to set out the examples of lessons learnt from Rampion 1 that can be incorporated in Rampion 2, including in relation to crab species.	The Applicant has held three series of meetings with Fishing Working Groups, which included seeking feedback on the effects of Rampion 1 on commercial fishing. Feedback from the first series of meetings can be found in para 10.3.30 and from the second series in para 10.3.33 in **Chapter 10 Commercial fisheries [APP-051]** There were mixed reports with some saying there has been an increase in fish stocks as a result of the additional reefs created around the foundations and scour protection, leading to more productive fishing. This contrasts with feedback from trawlers who say they can no longer trawl the site due to issues with insurance. There have been comments received which range widely between these two positions. With particular reference to potting, feedback from one of the first Fishing Working Group meetings indicated that, 'Potting vessels are fishing in the wind farm - fishermen have also seen increased concentrations of mackerel, crabs, lobster, bass and conger eels within the wind farm, and spider crabs were also present possibly due to the [scour] rock protection. The fishing seems to be good with whelks and mussels'. A summary of feedback from the third series of meetings is set out above in response to Action Point 28. A consistent theme of feedback across all groups and meetings in relation to lessons learned from Rampion 1, was the request to relocate spoil material and boulders in one location rather than randomly spread across the seabed, so it can be avoided when fishing and create artificial reefs. Learning from Rampion 1, commercial fishers also expressed a desire for some areas within the Rampion 2 site area to be kept open for fishing during construction.
30	Update the Outline Fisheries Liaison and Co-existence Plan with respect to whether third parties can activate the dispute resolution process, the disruption compensation process, and how this would be secured.	The Applicant has submitted an **Updated Outline Fisheries Liaison and Co-existence Plan (Document Reference 7.19)** at Deadline 1.
31	Information on likely fishing activity in winter	The Applicant has submitted **Appendix 12 – Winter fishing response to Action Point 31 (Document Reference 8.25.12)** at Deadline 1.

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
	months in the array area, with evidence from Rampion 1.	
Agenda Item 10 - Ornithology		
32	The Applicant to explain how the layout of the wind turbine generators in the Proposed Development meets the criteria in EN-3 (2024) paragraph 2.8.240.	The wind farm layout will be designed within the parameters as set in the DCO Application. To minimise bird collision risk, the WTGs will be spread out so that no WTG is closer than 830m to another WTG. In practice, the array layout has been set so that the distance between WTGs will generally be more than 830m and hence will further reduce bird collision risk.
33	The Applicant to submit an updated Kittiwake Implementation and Monitoring Plan into the Examination in light of Natural England's comments. (Already planned)	The Applicant has submitted **Appendix 7 – Kittiwake Implementation and Monitoring Plan (Document Reference 8.25.7)** at Deadline 1.
34	The Applicant to provide: - an In-combination assessment on the impacts on guillemot and razorbill at the Flamborough and Filey Coast Special Protection Area and - an In-combination assessment on the impacts on guillemot at the Farne Islands Special Protection Area. (Already planned)	The Applicant has submitted an updated **Appendix 14 - In Combination Assessment Update for Guillemot and Razorbill (Document Reference 8.25.14)** at Deadline 1.
Agenda Item 11 – Underwater Noise		
35	Applicant to provide a justification supported by figures and	This is addressed in **Appendix 15 - Underwater Noise Clarification Note (Document Reference 8.25.15)** submitted at Deadline 1.

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
	calculations for the worst-case operational noise scenario.	
36	Applicant to respond in detail to Natural England concerns relating to Unexploded Ordnance (UXO) issues.	The Applicant has responded to these points in the Applicant's Response to Relevant Representations (Document reference 8.24) submitted at Deadline 1 in Table 4-6 to 4-13 for Natural England's representation. • Appendix C – Natural England, response: C13, C19, C43, C44, C50, C51, C52, C53, C54, C55 • Appendix D – Natural England, response: D12 • Appendix E – Natural England, response: E48, E50 • Appendix F – Natural England, response: F30
37	To provide clarity on UXO clearance, as raised by the Marine Management Organisation (MMO), including how the clearance is to be licenced and secured.	The Applicant has responded to this in response: 3.2.1 in MMO.
38	To consider the submission of herring and sandeel heat maps using the MarineSpace 2013 methods.	This is addressed in **Appendix 15 - Underwater Noise Clarification Note** **(Document Reference 8.25.15)** submitted at Deadline 1.
39	If there would be potential noise impacts having a behavioural effect on herring, what would be the effect on this species during spawning.	This is addressed in **Appendix 15 - Underwater Noise Clarification Note** **(Document Reference 8.25.15)** submitted at Deadline 1.
40	Confirm extent of consultation with divers to this extent and any agreements or commitments made.	The Applicant will produce a Diving Mitigation Plan setting out how they will manage and minimise the risks posed by construction activities to the diving community. This will include practical protocols and operational procedures which will be implemented prior to the commencement of construction. Mitigation measures such as a diver exclusion zone (managed by guard vessels) will be employed to protect diver safety during piling operations. This will be supported by a range of communication measures as set out in the Outline Diver Communications Plan **Outline Diver Communication Plan** **[APP-242]** which will be taken prior to, and during construction activities, to ramp up engagement with the diving community. These measures include: • Identifying all diving stakeholders in Sussex • Appointment of a Diving Liaison Officer • Dedicated event for the diving community • Articles in the diving media • Dedicated webpage and information sheet for divers • Notices placed on slipways and issued to stakeholder organisations

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
		Other practical mitigation measures to prevent startling divers include soft-start piling and a commitment to use at least one noise abatement technique, likely to be in the form of a low energy hammer to reduce noise levels by at least 6dB. During early development, The Applicant established a Sea Users Project Liaison Group which includes representatives from the diving and sailing community in addition to ports, harbours and marinas. The diving community also received the same promotion of the non-statutory and statutory project-wide consultations, as set out in the **Consultation Report** **[APP – 027]** (4.2 and 5.5).
41	More evidence on the effectiveness of offshore noise abatement measures, taking into account worst case scenarios.	**T**his is addressed in **Appendix 15 - Underwater Noise Clarification Note** **(Document Reference 8.25.15)** submitted at Deadline 1. The Applicant confirms that no specific mitigation technology has been finalised at this stage, as this will depend on the particular type of mitigation required. The Applicant has presented a range of potential measures to provide details and confidence that currently available noise abatement systems can deliver noise reductions to support the approach set out to ensuring a noise threshold, should this be agreed, can be achieved at relevant receptors locations. The effectiveness of bubble curtains can be affected by environmental characteristics in the location they are deployed, but they have been used extensively by offshore wind farm developers across multiple projects, notably including in German waters where it is precisely this target of ensuring a target threshold is not breached at a set distance from the piling activity. For each project, site characteristics are taken into account by the designers of the system to ensure the efficacy of the measure in a site-specific context. It was noted that bubble curtains have been installed in depths of up to 70m. Based on the conditions applicable to the Proposed Development, a bubble curtain system would be anticipated to provide a noise reduction of circa 16 dB (Bellman et al., 2020). The Applicant also notes that it would anticipate further data and information to be forthcoming over the period between this pre-consent stage and the construction of the Proposed Development as this is an active area of study.
Agenda Item 12 – Marine Mammals		
42	The Applicant to submit a 'Working in proximity to wildlife protocol' into the examination, in lieu of an Outline Vessel Management Plan.	The Applicant has submitted an updated **Appendix 16 - Working in Proximity to Wildlife in the Marine Environment Protocol** **(Document Reference 8.25.16)** at Deadline 1.
43	The Applicant to update and resubmit Volume 2, Chapter 11 Marine Mammals of the Environmental Statement (APP-052) to include the missing projects.	The Applicant has submitted an updated **Chapter 11: Marine mammals (tracked & clean) Volume 2, Environmental Statement** **(Document Reference 6.2.11)** at Deadline 1.
44	Applicant to update the bottle nose dolphin assessment to take account change in management areas	The Applicant will be submitting this update at Deadline 2, as agreed during Issue Specific Hearing 1.
Agenda Item 13 – Offshore Physical Processes and Benthic Ecology		

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
45	Consideration of a commitment to use rock bags, including their material.	The Applicant cannot commit to the removal of cable protection in this Application, as this will be subject to a separate licence application to enable decommissioning when it is due to take place. The Applicant would like to keep open the materials used for cable protection works to enable the most appropriate design solution for the situation which evolves after the initial cable burial methods detailed in the Application have been applied. If either rock bags or concrete mattresses are determined as the preferred material for cable protection, the Applicant will seek to find products in the market which do not involve the use of plastics, though this is subject to such products being available in the supply chain and these products being suitable for the application of long-term cable protection. For further details please refer to **Appendix 13 Physical Processes and Benthic Clarification Note (Document Reference 8.25.13)**
46	More details required of proposed alternatives to use of floatation pits, such as gravel beds. The environmental effects of these alternatives should also be assessed in the Environmental Statement.	Please refer to **Appendix 13 Physical Processes and Benthic Clarification Note (Document Reference 8.25.13)**
47	Applicant to directly respond to points raised in Relevant Representations (RRs) regarding the issue of the potential effects on the kelp regeneration projects in Sussex Bay. Signpost bentonite response to Natural England and geo-technical survey during examination	The Applicant has responded to the Environment Agency's concern raised in the Applicant's response to relevant representations (Document reference 8.24) submitted at Deadline 1. For clarity, the Applicant will not be undertaking additional offshore geotechnical surveys at the consent stage. The Applicant undertook a preliminary offshore geotechnical survey in September 2022. Completing this survey at just five locations, the associated laboratory work on the samples and analysis of the results has cost over £2.5m. A full scope geotechnical survey gathering enough information for the detailed design of the proposed infrastructure will cost in the order of tens of millions of pounds. Analysis from the preliminary offshore geotechnical survey has only recently been completed. From a supply chain point of view, geotechnical survey vessels are in high demand and surveys typically have to be planned and tendered at least a year in advance to secure capable vessels. Starting today, a tender exercise for a geotechnical survey would take months to specify and tender. Assuming that it was possible to secure a vessel from a standing start now to begin work in summer 2024, subsequent lab work (which is also supply chain limited in capacity) would not be complete ahead of the examination process for the Proposed Development being completed based upon the experience form the more limited preliminary survey analysis.
48	To provide details including the sign-posting of existing coverage within the Environmental Statement relating to the release of bentonite and its	The Applicant highlights the release of bentonite as drilling fluid during drilling at the landfall is one of the potential impacts in relation to changes to suspended sediment concentrations bed levels and sediment type and that more detailed technical assessment can be found in **Section 2.9 of Volume 4, Appendix 6.3 Coastal processes technical report Impact assessment [APP-131]**, including the nature of that likely plume in the marine environment and the fate of that material (as summarised below). Furthermore, The Applicant notes that we are engaging with the Sussex Kelp Recovery Project (SKRP) and SKRP are aware that the Proposed Development Application has been published on the Planning Inspectorate's website. Whilst we haven't engaged with SKRP on direct impacts on the kelp beds. The assessment

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
	possible environmental effects in the nearshore areas.	we have undertaken in **Volume 2 Chapter 9: Benthic, subtidal and intertidal ecology [APP-050]** has assessed all algae features, including kelp, and has determined there would be no significant effects. Drilling fluid (also referred to as drilling mud) is a high concentration suspension of bentonite clay in water. The drilling fluid is inserted into the drill string under pressure where it is used to lubricate and power the drill head, and to provide a medium for the retrieval of rock cuttings. Bentonite clay is a naturally occurring mineral that is non-toxic and non-reactive and is also normally present (in small proportional quantities) in the marine environment. The concerns raised in the Environment Agency Relevant Representation are assumed to relate to the normal release of a limited volume of drilling fluid under pressure at the time and location of 'punch out' (the initial breach of the drill into the underwater HDD exit pit area). Initially, a dense cloud of high-concentration drilling fluid might form at or near to the seabed, accumulating in any local seabed depressions due to the relatively high fluid density. The bentonite clay in the locally accumulated drilling fluid may de-water and consolidate to some extent over a period of days to weeks, but is likely to become gradually eroded and resuspended (by normal tidal and wave processes), and then widely dispersed (to very low concentrations) into the surrounding water environment. Due to the expected wide area of dispersion in suspension, and the very slow rate of re-settlement once resuspended, the thickness of any local re-settlement of bentonite material would be very limited (likely not measurable). The limited total volume and likely very small (not measurable) thickness that might accumulate in any other location (including nearby kelp beds) presents no likely effect outside of the normal range of natural variability in this location.
Agenda Item 14 – Shipping and Navigation		
49	More details to be provided with regard to the possibility of obtaining a pilot exemption certificate.	The Littlehampton Pilotage Directions can be found in Appendix 1 – Further Information for Action Point 3 – Fawley and Dungeness (Document reference 8.25.1)Error! Reference source not found..
50	Information about potential port development, such as development at Newhaven, and how whether this has been assessed and whether this would be covered by the DCO.	The DCO Application does not include development activities at potential construction ports (for example, this could include delivery of a port masterplan / development of deep water harbour infrastructure). Where necessary, these will be subject to separate consent(s) such as planning permission and/or a Harbour Revision Order. The Applicant has considered ports suitable for the construction base for the offshore elements of the Proposed Development (including ports in Sussex, but also elsewhere in the UK). Although not the main construction port, Shoreham Port has been selected as the construction management port for Rampion 2. Currently, the use of Newhaven Harbour throughout the Proposed Development's lifespan has not been defined.
Agenda Item 15 – Aviation		
51	Update on communication with Ministry of Defence on military aviation issues.	The Applicant was contacted by the Ministry of Defence in December 2023, stating that they would review the Proposed Development assessments and respond in 2024. A further response has not yet been received by the Applicant. The Applicant sent a further email to the Ministry of Defence in February 2024, a response has not yet been received.
Agenda Item 16 – Development Consent Order		

REF	AGENDA ITEM	APPLICANT'S SUMMARY AND RESPONSES TO ACTION POINTS
52 – 62	Development Consent Order	These action points relate to the draft DCO, the Applicant is considering the matters raised and will address them as necessary in the updated version of the draft DCO to be submitted at Deadline 2.


Rampion 2
WIND FARM