From:	Alice Humphries
То:	Rampion2
Cc:	
Subject:	RE: Rampion 2 Offshore Wind Farm Project - Arun District Council"s Local Impact Report
Date:	27 February 2024 17:36:42
Attachments:	image007.png
	image009.png
	image010.png
	Arun District Council Rampion 2 Deadline 1 Submission.pdf

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Thank you Lily.

On behalf of Arun District Council (Interested Party Reference number: 20045300), please also find attached the Council's submission that covers the following:

- Comments on any updates to application documents submitted by the Applicant before or at the PM
- Comments on the Applicant's draft Statement of Commonality of Statements of Common Ground
- Comments on the Applicant's draft Statement of Commonality of Statements of Common Ground

This submission, on behalf of the Council, is in relation to Deadline 1 of the Examination Timetable of the Rule 8 letter.

We would be grateful if you could confirm receipt of the attached.

Many thanks,

Alice

Alice Humphries Senior Consultant, Strategic Planning/EIA

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?	

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From: Alice Humphries @iceniprojects.com> Sent: Friday, February 16, 2024 4:20 PM To: Rampion2 <<u>Rampion2@planninginspectorate.gov.uk</u>> Cc:

Subject: Rampion 2 Offshore Wind Farm Project - Arun District Council's Local Impact Report

You don't often get email from *@iceniprojects.com*.

Good afternoon,

On behalf of Arun District Council, please find attached the Council's Local Impact Report for Rampion 2 Offshore Wind Farm (Interested Party Reference number: 20045300). This submission, on behalf of the Council, is in relation to Deadline 1 of the Examination Timetable of the Rule 8 letter.

We would be grateful if you could confirm receipt of the Council's Local Impact Report at your earliest convenience.

Many thanks,

Alice

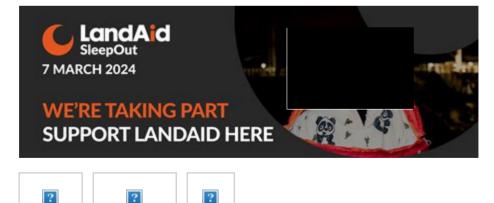
Alice Humphries

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27 February 2024

Please ask for: Neil Crowther Planning Direct Line: 01903 737839

Your Ref: EN010117

Our Ref:

Dear Planning Inspectorate

<u>Rampion 2 Offshore Wind Farm - Comments on Application Submission Documents</u> and Written Representation

This letter provides Arun District Council's (ADC) comments on the updated application submission documents (Deadline 1) for Rampion 2 Offshore Wind Farm submitted by the Applicant prior to the Preliminary Meeting and also incorporates ADC's comments on the draft Statement of Commonality of Statements of Common Ground, together with ADC's Written Representation (also Deadline 1).

Comments on Application Submission Documents (Deadline 1)

Updated Outline Skills and Employment Strategy

Since submitting our Relevant Representation and initial Principal Areas of Disagreement Statement (PADS), together with the preparation of our Local Impact Report, the Applicant has submitted an updated Outline Skills and Employment Strategy (Revision B). Despite this updated Outline Skills and Employment Strategy, the majority of ADC's concerns remain as per the Relevant Representation, PADS and as outlined further in the Local Impact Report.

ADC has previously raised concerns regarding the Council not being consulted regarding the development of the Outline Skills and Employment Strategy. The updated submission now acknowledges ADC as a relevant stakeholder and proposes consultation with ADC. ADC is supportive of being a consultee. As part of this consultation, ADC will seek detail on the strategy and benefits for the District to be included within Outline Skills and Employment Strategy, including long-term investments in local opportunities for apprenticeships and educational institutions in Arun.

The updated Outline Skills and Employment Strategy remains limited in terms of detail and lacks any specifics on the strategy and benefits for the District. Furthermore, the wording remains non-committal throughout, with language such as *'will seek to'*, *'suggested activities'* and *'suggested for the Applicant to consider'*. As set out in previous representations, ADC seeks measures identified in the Outline Skills and Employment Strategy to be secured through the Outline Code of Construction Practice. The Supply Chain initiatives identified in

the Outline Skills and Employment Strategy require definition and commitment. ADC expect this to be secured through the Outline Code of Construction Practice.

The updated Outline Skills and Employment Strategy also remains non-committal in relation to the Community Benefit Package. As set out in previous representations, ADC seeks a commitment and a securing mechanism established for the Community Benefit Package for Arun to adequately compensate and offset significant adverse effects within the District that cannot be otherwise mitigated.

The updated Outline Skills and Employment Strategy includes a Case Study highlighting the success of the Rampion 1 visitor centre in Brighton. As stated in ADC's Local Impact Report, the Applicant should consider the development of a similar visitor centre in Arun, not only for educational purposes, but also to act as a tourist attraction that could offer boat trips to visit the wind farm. The Applicant should consider this as part of their mitigation strategy.

Updated Baseline Sound Report

The updated Baseline Sound Report now covers the additional noise baseline survey data at locations that were highlighted in the Local Impact Report. Baseline noise levels at these locations have now appropriately been characterised through the inclusion of the following noise monitoring locations: NML05; NML14; NML41; NML31 and NML32.

Construction Plant List

Submission.docx Page 2 of 3

Construction plant data is now included for the construction of the temporary construction compound (internal haul roads). The assumed plant type, number of sources and percentage on-time for each plant type appear to be reasonable.

Outline Code of Construction Practice

An additional embedded environmental measure commitment (C-287) is included in the Outline Code of Construction Practice, which states that:

"For the duration of the construction phase in this location, an enhanced acoustic barrier will be installed on the southern edge of the works, north of Brookfield caravan park. The barrier will be of a suitable dimension and sited appropriately to manage noise impacts at this location."

ADC is supportive of this additional commitment.

Comments on the draft Statement of Commonality of Statements of Common Ground (Deadline 1)

ADC has reviewed the draft Statement of Common Ground (SoCG) between the Applicant and the Council and reviewed it against the Statement of Commonality of SoCG. We have also since met with the Applicant to discuss the SoCG, ahead of Deadline 1.

We agree with most of the categorisations of the topics within Table 1-2 of the draft Statement of Commonality of SoCG, as discussions continue. We would note that the Socio-Economics box has the potential to be marked as 'orange' ('some matters under discussion/some matters not agreed') depending on the outcome of forthcoming discussions as outlined below.

nents/Shared Projects/Rampion 2 Offshore Wind Farm/03 Written Repres

Written Representation (Deadline 1)

ADC has previously set out in the Relevant Representation, initial PADS and within the Local Impact Report some concerns regarding disruption and impacts to residents, businesses, the local economy (particularly tourism upon which Arun is heavily reliant upon) and the environment. Furthermore, concerns regarding the adequacy of the application documents and commitments to mitigation and compensation measures within Arun have also been previously raised. Details regarding adequacy of the application documents and commitments to mitigation and compensation measures are given in the initial PADS and within the Local Impact Report. These have not been repeated here. However, we have noted below where there are considered changes/additions to our previous representations:

- Since the preparation of the Local Impact Report for Arun, the reserved matters application (CM/48/21/RES) for Land to the West of Church Lane, South of Horsemere Green Lane, Climping (strategic housing allocation SD10 of the adopted Local Plan) referred to in the Local Impact Report has been approved subject to planning conditions. Given this, there is now a greater likelihood that construction of this residential development is likely to coincide and be built out alongside the operations of Climping Compound; and
- As above, we have reviewed the updated Baseline Sound Report from the Applicant. The additional baseline noise data provided are considered to appropriately characterise the baseline noise environment around the location of the proposed Climping Construction Compound and is considered to satisfy the point raised in paragraph 8.25 of the Local Impact Report.

The Applicant has noted in initial discussions regarding the SoCG that the community benefits package of proposals will be consulted on 'in the second half of 2024' and does not form a legal or DCO requirement. We are seeking discussions with the Applicant on the disruption and impacts as outlined in the Local Impact Report and how this can be adequately mitigated and compensated for.

In addition to the points raised and the above, all other concerns outlined in the Relevant Representation, initial PADS and within the Local Impact Report remain at this stage.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours



Neil Crowther Group Head of Planning

Arun District Council