

**Rampion 2 Offshore Wind Farm (Project Reference: EN010117)**

**Deadline 2 Submission (20 March 2024)**

**West Sussex County Council (IP Reference 200445228)**



**1 Overview**

1.1 This document provides a response at Deadline 2 (20 March 2024) from West Sussex County Council (hereafter 'WSCC') on the following Deadline 1 submissions by Rampion Extension Development Limited (hereafter the 'Applicant');

- Applicants responses to Action Points Arising from Issue Specific Hearing 1 (REP1-018), Appendix 3 (REP1-022), Appendix 4 (REP1-023) and Appendix 6 (REP1-025);
- Environmental Statement (ES) Appendix 23.3 Traffic Generation Technical Note assessment (tracked) (REP1-009);
- Outline Construction Traffic Management Plan (tracked) (REP1-011);
- Commitments Register (tracked) (REP1-016); and
- SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note (REP1-037).

**2 Response to Action Points from Issue Specific Hearing 1**

2.1 Table 1 provides commentary from WSCC on a number of the action points (where relevant) that came out of Issue Specific Hearing 1 (EV3-020), primarily addressing the evidence put forward by the Applicant in response (REP1-018).

Table 1 – WSCC response to action points from Issue Specific Hearing 1

<b>Applicant's Response to Action Points Arising from Issue Specific Hearing 1 (REP1-018)</b>	
1, 52-62	WSCC welcomes the acknowledgement of updates required to the draft DCO, and will provide further response to these updates at Deadline 3 when a subsequent version is submitted to the Examination.
6	The pre-application baseline and ES assessment work undertaken by the Applicant is acknowledged. The embedded environmental measures and design principles are welcomed by WSCC, as set out in the WSCC Local Impact Report (LIR) (REP1-054). The design principles as set out within the Design and Access Statement (AS-003) are secured by draft DCO Requirements 8 and 12. However, as detailed in the WSCC LIR, the principles themselves currently lack specificity and certainty that these reductions in harm can be delivered. The degree to which they can reduce harm to the significance of Oakendene Manor is therefore not fully guaranteed.

<b>Applicant's Response to Action Points Arising from Issue Specific Hearing 1 (REP1-018)</b>	
	The commitment to undertake additional viewpoint photography and additional photography from other locations within the vicinity of the heritage asset, once access can be arranged, is welcomed. The additional evidence arising from this work will clarify the predicted magnitude of change within the setting of the manor, and therefore the degree of harm to the significance of Oakendene Manor which is likely to arise as a result of the Project.
7	Whilst recognising that HDD has become an established technique in the industry, each application of this technique must be assessed against its own setting and suitable mitigations provided for in the engineering design process. Additional information on HDD at Climping Beach, as provided as Appendix 6 (REP1-025) is therefore welcomed.
8	The Applicant's response is noted. WSCC will review and provide further comments when the information is submitted by the Applicant at Deadline 2.
10	The updated figure 7.6.8 and 7.6.9c in the Outline Construction Traffic Management Plan (REP1-011) are noted. With respects to 7.6.9c, routing in and around Bolney remains unchanged. Changes are noted to remove HGV and LGV traffic from routing onto Bob Lane from Wineham Lane and the southern end of Kent Street from Wineham Lane (HGV and LGV traffic will still use the northern end of Kent Street accessing from the A272).
11	The Applicant's commitment to further discussions with WSCC on this point is welcomed with a further formal submission of information at Deadline 3. WSCC is awaiting confirmation from the Applicant on engagement ahead of submission at Deadline 3.
12	The Applicants use of 'shoulder hours' is noted. This will assist in traffic terms to stagger the arrival of workers. The suggested activities permitted within the 'shoulder hours' includes deliveries to the site and unloading. The use of the 'shoulder hours' for deliveries would permit HGVs to arrive and depart on weekdays from 0700 to 1900. Through the WSCC LIR, WSCC has requested that the Applicant seeks to limit the number of HGV movements at network peak times particularly in locations where there are identified congestion issues and in sensitive locations. The use of 'shoulder hours' for deliveries may run contrary to the WSCC recommendation made. The Applicant is requested to revise the intended activities within the 'shoulder hour'.
13	The Applicant's response is noted and WSCC will review following the submission of information by the Applicant at Deadline 2.
14	The Applicant's response (REP1-022) is noted. In principle, WSCC Highways are supportive of the number of temporary accesses being reduced where there are practical options to enable this. However, WSCC are in agreement there are identified constraints and environmental sensitivities (as outlined in REP1-022) that would result in the suggested haul road leading to adverse impacts.
15	The Applicant's response is noted and will be reviewed again following the submission of information at Deadline 2.
16	The Applicant's response (REP1-022) is noted. In principle, WSCC Highways are supportive of the number of temporary accesses being reduced where there are practical options to enable this. However, WSCC are in agreement there are identified constraints and environmental sensitivities (as outlined in REP1-022) that would result in the suggested haul road leading to adverse impacts.
17	The Applicant's response is noted. It's recognised that this response is in relation to comments made by Cowfold Parish Council (REP-088).

<b>Applicant’s Response to Action Points Arising from Issue Specific Hearing 1 (REP1-018)</b>	
18	The issues raised relating to the use of Dragons Lane and potential issues with HGVS are noted. WSCC recognise that an operational access is intended from Dragons Lane. Any development related traffic is anticipated to be infrequent and minimal with HGVs expected only in exceptional circumstances. WSCC consider this to be more of a matter of management to be resolved with the landowners, and secured through outline documents where required, rather than road safety related.
20	WSCC note the submission of REP1-023. Currently the Applicant is using LiDAR to estimate the existing elevations of the ordinary watercourse and the downstream lake. This will need to be checked, and confirmed, as the detailed design progresses. The final design of the substation should meet the principles of the Appendix 26.2: Flood Risk Assessment (FRA), Volume 4 of the ES (APP-216).
21	WSCC awaits the revised OCoCP submitted at Deadline 3 by the Applicant.
22	The response is not clear to WSCC, as to whether the Applicant will provide the ‘tabular data’ requested, it seems to suggest this will be provided only if a review of errata indicates updates are required (as indicated in response to AP-23).
23	The response is welcomed and some examples of conflict have been identified within WSCC’s LIR (REP1-054). Any additional hedgerow loss should be accounted for in the BNG calculations at detailed design.
24	The response is welcomed. Any changes identified from errata should be reflected in all relevant documents including arboricultural documents.
25	The amendments to C-216 are welcomed, although concerns are raised towards C-216.
50	For the purposes of the Traffic Generation Technical Note (REP1-008), Newhaven has been assumed as the operational port. Within the Abnormal Indivisible Loads Assessment (AP-196), Shoreham has been assumed as the likely local port from where AILs would commence their journey. It’s apparent from both documents that these are assumptions. Whilst an AIL Assessment for the relevant port can be secured through the DCO process, there would seem benefit to considering alternate operational port locations or a commitment made to using Newhaven.

**3 Response to submitted documentation by the Applicant at Deadline 1**

3.1 Table 2 below provides WSCC response to a number of revised or newly created documentation by the Applicant at Deadline 1.

Table 2 – WSCC response to documentation submitted at Deadline 1

<b>Commitments Register Rev B (REP1-016)</b>	
General	In general terms this document is welcomed as it now seeks to show where the relevant commitments are referenced and what DCO Requirements they should link to. However, much of what WSCC have already set out in the WSCC LIR still applies, as its still unclear where the control documents specify how the individual commitments are secured and how they will be achieved. For example C19 links to DCO Requirement 10 (for which WSCC have not seen any draft document) and the CoCP which is silent on how phasing of reinstatement will occur.

	Each of the commitments need to be either clearly referenced in the individual requirements, or specifically addressed in individual control documents (if the commitments register says that's the mechanism to secure it). Rampion 1 OWF had 'measures of success' that set out what each of the DCO Requirements had to achieve (the DCO stipulated that each requirement submission had to demonstrate compliance with the measures of success). This example has been shared with the Applicant.
C-216	Amendments to C-216 are welcomed, though where access from the highway is required within 25m of ancient woodland, the concerns with commitment C-220 needs to be considered.
C-220	This commitment remains of concern as it is felt many ' <i>unforeseen circumstances</i> ' will be identified during detailed design. For example, where visibility splays are required at each access to meet DMRB standards (which are not currently shown on VRPs). The commitment only requires the Applicant to ' <i>highlight</i> ' and provide ' <i>justification</i> ' for any unforeseen circumstances which requires the removal of stated habitats; this wording provides no control of material changes which may be highlighted through detailed design.
C-225	The changes to C-225 add further details of possible engineering solutions for avoidance of archaeological remains of high significance, if identified within the cable route. It also confirms that design solutions will be employed to minimise direct impacts upon any such remains. The changes to C-225 are therefore welcomed.  The Commitments are not secured in and of themselves. Therefore, as per the WSCC LIR, methodologies and pathways for securing engineering and design solutions should also be set out within the Outline Onshore WSI (AAP-231), which is secured by draft DCO (PEPD-010) Requirement 19.
<b>Traffic Generation Note, Rev B (REP1-009)</b>	
3.1.51, Table 3.4	The baseline traffic data is noted. For Michelgrove Lane (P) and Kent Street (U), flows are estimated. There is limited information as to how these have been generated. Despite this, the estimates are accepted given that WSCCs interest is more in terms of how development traffic (for which accurate estimates have been provided) is to be mitigated. The need for mitigating measures have been identified through the WSCC LIR.
4.1.13	The core hours are acknowledged. As requested through the WSCC LIR, a commitment should be included to limit the number of HGV movements during network peak hours particularly where there are known congestion issues and sensitive receptors. The shoulder hour referred to in 4.1.14 will assist in spreading general staff movements but further specific comment should be included regarding HGV movements.
4.1.14	There are a number of activities listed as permitted within the shoulder hour. This includes deliveries and unloading. This implies that HGV/deliveries will be made throughout the AM peak hour. This change will allow HGVs to arrive and depart from 0700 until 1900. See concerns raised with this above.
5.3.2, Table 5.1	Two accesses are no longer proposed (A50a and A50b). These were simply spurs off A50, which provides the direct highway access. The actual number of accesses onto the highway remains unchanged.
5.7.2	The construction period is now indicated as five years (2025 to 2030) rather than four.
5.9.1	Reference is made to a maximum construction duration of four years. This is contradicted in 5.7.2 and in Graphic 5-1.

Table 6.1	This table includes four years of construction. Clarification is needed on the correct construction duration and consistently stated through the documentation.
<b>Outline Construction Traffic Management Plan, Rev C (REP1-011)</b>	
3.6.1	Four years is again stated as the construction period. This is already contradicted within the Traffic Generation Note and within 3.6.3 of the OTCMP. This does need to be confirmed.
Tables 4-1 and 4-3	Accesses A50a and A50b are understood to no longer be proposed. These are still included in these tables however.
Table 5-3	There is a difference in the number of HGVs using A56 listed within this table to that listed in table 6-7 in the Traffic Generation Note. The two tables should be checked for consistency and updated.
8.4.7	The core hours are acknowledged. As requested through the WSCC LIR, a commitment should be included to limit the number of HGV movements during network peak hours particularly where there are known congestion issues. The shoulder hour referred to in 8.4.8 will assist in spreading general staff movements but further specific comment should be included regarding HGV movements.
8.4.8	There are a number of activities listed as permitted within the shoulder hour. This includes deliveries and unloading. This implies that HGV/deliveries will be made throughout the AM peak hour.
8.4.14	Again, this includes quite a general point regarding HGV movements taking place during core hours. As already noted, it would be appropriate to limit HGV movements during network peak times where there are known congestion and other concerns.
8.4.17	Whilst this point potentially relates to more amenity related impacts from HGVs, the inclusion of the 'shoulder hour' could be seen as contradictory as this permits HGVs to arrive and depart unrestricted between 0700 and 1900 Monday to Friday.
8.4.28	The strategy should include local residents where these are directly affected. The strategy itself will need to be developed as it's too high level at present. For example, there are no details as how information will be communicated. A website would seem to present the easiest way to communicate information with targeted letter drops/emails for more localised issues. Further engagement with WSCC would be required on this.
8.4.29	Notice periods for works requiring road closures, and consequently Temporary Traffic Regulation Orders, will be governed by WSCC requirements.
Appendix A	There are several amendments to indicate existing accesses are to be used rather than new accesses created. For the most part these changes are self-explanatory with there being clear existing accesses in place. It's not clear for A37 though. In this location, there doesn't appear to be an existing access. This should be clarified by the Applicant. The need for A37 has been raised by WSCC through the LIR, with access seemingly being achievable via A38.
<b>SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note (REP1-037)</b>	
General	This document has not taken account of matters raised by WSCC, in the RR (RR-418) and supplemented in the WSCC LIR. It is acknowledged that there has been an evolution in offshore design and reduction in offshore DCO Limits prior to submission, which has been welcomed by WSCC. However, the iterative changes to the design of the offshore elements has not resulted in a major

	reduction to the potential visual effects upon West Sussex receptors. Further discussions are needed on how design principles for the detailed design elements of the Project would help reduce the significant effects predicted.
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3.2 WSCC have been progressing dialogue with the Applicant on topic areas within the Statement of Common Ground (SoCG) since Deadline 1 and reaching agreement in areas where possible. There are however, areas of disagreement remaining. WSCC wishes to engage proactively with the Applicant to reduce these 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 the construction and long-term operational impacts of the Project.

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