

Rampion 2 Wind Farm

Statement of Common Ground - NATS

July 2024

Rev C

Examination Reference: 8.26

Pursuant to: Infrastructure Planning (Examination Procedure)

Rules 2010, Rule (8)(c)

Ecodoc number: 005114197-01



Revision	Date	Status/Reason for issue	Author	Checked by	Approved by
A	January 2024	Issued to NATS	WSP	RED	RED
B	February 2024	NATS Page Turn	WSP	RED	RED
C	July 2024	Third Issue to NATS	WSP	RED	RED

RWE Renewables UK Swindon Limited:

Windmill Hill Business Park,

Whitehill Way,

Swindon,

Wiltshire SN5 6PB.

T +44 (0) 8456 720 090

Registered in England and Wales no. 02550622

Registered office:

RWE Renewables UK Swindon Limited

Windmill Hill Business Park

Whitehill Way

Swindon

Signatories

Signed	<i>Alasdair Auld</i>
Date	09/07/2024
Name	Alasdair Auld
Position	Safeguarding Team Lead
For	NATS

Signed	<i>K Algate</i>
Date	
Name	Karen Algate
Position	Senior Consents Manager
For	Rampion Extension Development Ltd (RED) (the Applicant)

Contents

1.	Introduction	5
1.1	Background	5
1.2	Approach to SoCG	5
1.3	The Proposed Development	6
2.	NATS Remit	8
2.1	Introduction	8
2.2	Consultation Summary	8
3.	Agreement/Disagreement Log	10
4.	References	13

Tables

Table 2-1 Consultation and Correspondence undertaken with NATS	9
Table 3-1: Position status key.	10
Table 3-2: Status of discussions related to Civil and Military Aviation.	12

1. Introduction

1.1 Background

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared between Rampion Extension Development Ltd (RED) (hereafter referred to as “the Applicant”) and NATS to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Rampion 2 Offshore Wind Farm (hereafter referred to as “RED”).
- 1.1.2 The Applicant has chosen to pursue a SoCG with NATS, beyond the requirements listed within the Rule 6 letter (issued by the Examining Authority on 14th December 2023 [PD-006]), in order to reflect the considerable discussions held between the two parties, and to ensure that aviation concerns are suitably represented within the Statement of Common Ground process.
- 1.1.3 This SoCG is intended to cover all topics where agreement is sought between the Applicant and NATS and covers the topics split by discipline as detailed in the Environmental Impact Assessment (EIA) for RED:
- λ Offshore aspects of the Application:
 - Civil and military aviation.
- 1.1.4 This SoCG has been prepared in accordance with the ‘*Planning Act 2008: Guidance for the examination of applications for development consent*’ (Department for Communities and Local Government (DCLG), 2015 (hereby referred to as ‘DCLG guidance’)).
- 1.1.5 Following detailed discussions undertaken through pre-application consultation, the Applicant has sought to progress a SoCG with NATS. It is the intention that this document provides the Planning Inspectorate with a clear overview of the level of common ground between both parties. This document will facilitate further discussions between the Applicant and NATS and will be updated as discussions progress prior to and during the Examination.

1.2 Approach to SoCG

- 1.2.1 This SoCG has been developed during the pre-examination phase of the Rampion 2 Offshore Wind Farm.
- 1.2.2 The SoCG is structured as follows:
- λ **Section 1: Introduction:** Outlining the background to the development of the SoCG;
 - λ **Section 2: NATS’s role with respect to the SoCG:** Describing the main areas of discussion within the SoCG and a summary of consultation to date;

- λ **Section 3: Agreements/Disagreements Log:** A record of the positions of the Applicant alongside those of NATS as related to the topics of discussion and the status of agreement on those positions.

1.3 The Proposed Development

- 1.3.1 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.
- 1.3.2 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 160km².
- 1.3.3 The key offshore elements of the Proposed Development will be as follows:
 - λ up to 90 offshore wind turbine generators (WTGs) and associated foundations;
 - λ blade tip of the WTGs will be up to 325m above Lowest Astronomical Tide (LAT) and will have a 22m minimum air gap above Mean High Water Springs (MHWS);
 - λ inter-array cables connecting the WTGs to up to three offshore substations;
 - λ up to two offshore interconnector export cables between the offshore substations;
 - λ up to four offshore export cables each in its own trench, will be buried under the seabed within the final cable corridor; and
 - λ the export cable circuits will be High Voltage Alternating Current (HVAC), with a voltage of up to 275kV.
- 1.3.4 The key onshore elements of the Proposed Development will be as follows:
 - λ a single landfall site near Climping, Arun District, connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques;
 - λ buried onshore cables in a single corridor for the maximum route length of up to 38.8km using:
 - trenching and backfilling installation techniques; and
 - trenchless and open cut crossings.
 - λ a new onshore substation, proposed near Cowfold, Horsham District, which will connect to an extension to the existing National Grid Bolney substation, Mid Sussex, via buried onshore cables; and
 - λ extension to and additional infrastructure at the existing National Grid Bolney substation, Mid Sussex District to connect Rampion 2 to the national grid electrical network.

1.3.5 A full description of the Proposed Development is provided in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) [APP-045].

2. NATS Remit

2.1 Introduction

- 2.1.1 NATS (En Route) PLC provides enroute air traffic control services to flights within the UK flight information regions. NATS also provides air traffic control services to 14 UK airports and is regulated and operated under licence from the Civil Aviation Authority (CAA).
- 2.1.2 NATS will have an interest in any of the built elements or construction activities which potentially impact on its above remit.
- 2.1.3 The SoCG covers topics of the DCO application of relevance to NATS, comprising:
- λ Offshore aspects of the Application:
 - Civil and military aviation.

2.2 Consultation Summary

- 2.2.1 This section briefly summarises the consultation that the Applicant has undertaken with NATS including both statutory and non-statutory engagement during the pre-application and post-application phases (See Table 2-1).
- 2.2.2 Non-statutory consultation with NATS has been ongoing since August 2021 in the form of email correspondence.

Table 2-1 Consultation and Correspondence undertaken with NATS

Date and type	Description of consultation
7 September 2021 e-mail correspondence	NATS confirmed that their technical assessment concurred with modelling undertaken of potential impacts on the Pease Pottage radar and that their controllers had expressed concern about the levels of predicted clutter. NATS stated that mitigation was likely to be possible, but that they were unsure as to its scope.
16 February 2022 e-mail correspondence	NATS confirmed that their Safeguarding Team was exploring issues with ATC and Safeguarding and will be in touch to discuss options and look to progress the matter forward.
11 October 2022 e-mail correspondence	NATS re-confirmed their objection and stated that further effort is still required on their part to look into the most suitable mitigation options.
14 December 2023 e-mail correspondence	NATS confirmed there is now a signed off internally Radar Mitigation Scheme available for Rampion 2.
23 February 2024	Page Turn meeting to discuss Rev A of the Statement of Common Ground, and propose clarified positions on discussion matters now responses have been provided to initial concerns.
May - June 2024	Ongoing discussions with RWE legal representation and JMW (NATS legal representative) on the development and implementation of large radar blanking solution for Pease Pottage.

3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and NATS for each relevant component of the Application identified in paragraph 2.1.4. The tables below detail the positions of the Applicant alongside those of NATS and whether the matter is agreed or not agreed.
- 3.1.2 In order to easily identify whether a matter is ‘agreed’, ‘not agreed’ or an ‘ongoing point of discussion’, the agreements log in the tables below are colour coded to represent the status of the position according to the criteria in Table 3-1 below.

Table 3-1: Position status key.

Position Status	Colour Code
The matter is considered to be agreed between the parties	Agreed
The matter is neither ‘agreed’ or ‘not agreed’ and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Ongoing point of discussion
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or NATS is not considered to result in a material outcome on the assessment conclusions.	Not agreed- No material impact
The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or NATS is considered to result in a materially different outcome on the assessment conclusions.	Not agreed- material impact

- 3.1.3 The overview of the status of discussion on all of the themes presented in the Agreement/Disagreement log has been reported throughout the Examination via the Statements of Commonality [APP-8.31]. The opening position of the stakeholder is reported against the evolving position of the Applicant. Where agreement is reached, this indicates that the stakeholder and Applicant mutually support the position stated by the Applicant. The date of agreement is noted and the ‘Record of Progress’ section of the SOCG tables captures how the issue reached the final ‘position status’, as in Table 3-1 above.
- 3.1.4 The Applicant and NATS have agreed that the submitted SOCG at Deadline 5 is up to date. While the status of matters has been finalised as far as possible, some

of the SOCG still report matters as being in the process of discussion. With relevant materials being submitted into Examination at Deadline 5 these need to be considered to close matters and enable the final SOCG to be submitted at Deadline 6.

Table 3-2: Status of discussions related to Civil and Military Aviation.

Civil and Military Aviation

Reference number	Point of Discussion	NATS' position	Applicant's position	Current status	Date of agreement	Comments/notes
NATS01	Radar at Pease Pottage - Objection	NATS raised an OBJECTION to the development at pre-planning due to the impact to our radar at Pease Pottage. We are working with the developer and hope to be able to find a mutually acceptable mitigation.	Considering recent communication from NATS confirming the availability of a Radar Mitigation Scheme for Rampion 2, RED is looking into enter commercial agreements with NATS to implement the radar mitigation	Ongoing Point of Discussion		<p>The Applicant and NATS are finalising an agreement to implement the necessary radar mitigation.</p> <p>There are no material open issues between the parties on the form of the agreement or the wording of the Requirement to be included in the DCO and the Applicant and NATS are confident that the agreement will be finalised and signed before deadline 6 of submission.</p>

4. References

Rampion 2 DCO Project Glossary:

[1.7 Rampion 2 Application Document Tracker \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/17-rampion-2-application-document-tracker)

Examination Library - [EN010117-000419-Rampion 2 Exam Library.pdf](https://www.planninginspectorate.gov.uk/en010117-000419-rampion-2-exam-library.pdf)
([planninginspectorate.gov.uk](https://www.planninginspectorate.gov.uk))

Planning Inspectorate Application Area- [Rampion 2 Offshore Wind Farm - Project Information \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/rampion-2-offshore-wind-farm-project-information)

