

Rampion 2 Wind Farm

Statement of Common Ground - Arun District Council

July 2024

Rev F

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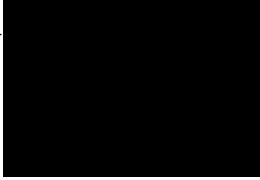
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1. Introduction

1.1 Background

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared between Rampion Extension Development Limited (RED) (hereafter referred to as ‘the Applicant’) and Arun District Council (ADC) 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 “Rampion 2” or “the Proposed Development”).
- 1.1.2 The need for a SoCG between the Applicant and ADC was set out within Rule 6 letter issued by the Examining Authority Inspectorate on 20 September 2023 [**PD-006**]. In this letter, the Examining Authority requested that Interested Parties, such as the ADC, submit Principal Areas of Disagreement Statements (PADS) where the Interested Party: ‘holds a substantive concern or concerns with the Proposed Development’.
- 1.1.3 This SoCG covers all topics where there are areas for agreement and areas for disagreement between the Applicant and ADC, and covers the topics split by discipline as detailed in the Environmental Impact Assessment (EIA) for Rampion 2.
- 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 engagement and consultation, the Applicant and ADC have progressed a SoCG.
- 1.1.6 It is the intention that this document provides the Examining Authority with a clear overview of the level of common ground between both parties. This document will facilitate further discussions between the Applicant and ADC and will be updated as discussions during both the pre-examination and the Examination phase.

1.2 Approach to SoCG

- 1.2.1 This SoCG has been developed during the pre-examination phase and the Examination phase of the Rampion 2 Offshore Wind Farm. ADC issued their relevant representations [**RR-033**] and Principal Areas of Disagreement Summary Statement (PADSS) [**AS-012**] which covers the topics and points of discussion. The SoCG makes reference to other submission documents that set out, in greater detail, the discussions that have taken place between ADC and the Applicant. These documents are:

- **Consultation Report** [**APP-027**];
- **Planning Statement** [**APP-036**];

- **Evidence Plan [APP-243 to APP-253]:** and
- The ‘Consultation’ section included within relevant chapters of the **Environmental Statement, Volume 2 [APP-042 to APP-072]**.

1.2.2 The SoCG is structured as follows:

- **Section 1: Introduction:** outlines the background to the development of the SoCG and provides an overview of the Proposed Development;
- **Section 2: Arun District Council’s remit:** describes the main areas of discussion within the SoCG and a summary of consultation to date; and
- **Section 3: Agreement/Disagreement Log:** provides a record of the positions of the Applicant alongside those of ADC as related to the topics of discussion and the status on those positions.

1.3 The Proposed Development

1.3.1 The Applicant is developing the Rampion 2 Offshore Wind Farm Project (Rampion 2) located adjacent to the existing Rampion Offshore Wind Farm Project 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:

- up to 90 offshore wind turbine generators (WTGs) and associated foundations;
- 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);
- inter-array cables connecting the WTGs to up to three offshore substations;
- up to two offshore interconnector export cables between the offshore substations;
- up to four offshore export cables each in its own trench, will be buried under the seabed within the final cable corridor; and
- 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:

- a single landfall site near Climping, Arun District, connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques;
- 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.

- 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
- 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 ES [APP-045].

2. Arun District Council's remit

2.1 Introduction

- 2.1.1 ADC's remit covers the aspects of the Proposed Development within its local authority area only.
- 2.1.2 ADC's role in relation to the DCO process derives from the Planning Act 2008 (the 'Act') and secondary legislation made under the Act. ADC as a district council is classified as a consultee under section 43 of the Act, meaning applicants must consult with ADC before submitting a Nationally Significant Infrastructure Project (NSIP) application.
- 2.1.3 ADC is the planning authority for Arun, with the exception of the area of the district within the South Downs National Park and will host the Climping compound during the construction phase.
- 2.1.4 In terms of other responsibilities, ADC is responsible for the provision of public services such as planning applications, housing, waste collection, leisure and recreation and revenue collection (Council Tax).
- 2.1.5 The SoCG covers topics of the DCO Application of relevance to ADC, comprising:
- Development Consent Order and Securing Mechanisms
 - Socio Economics
 - Seascape, Landscape and Visual Impact Assessment
 - Terrestrial and Marine Ecology
 - Noise and Vibration
 - Historic Environment; and
 - Principle of Development

2.2 Consultation summary

- 2.2.1 **Table 2-1** in this Section briefly summarises the consultation that the Applicant has undertaken with ADC including both statutory and non-statutory engagement during the pre-application and post-application phases.

Table 2-1 Consultation and correspondence undertaken with Arun District Council pre-application

Date and type	Description of consultation
6 May 2020 Early Engagement email regarding historic environment	Email from RED to ADC with project update with specific reference to historic environment assessment
12 May 2020 Early Engagement email regarding noise and vibration (onshore)	Email from RED to ADC Environmental Health Team for information gathering on key constraints and local sensitivities.
26 May 2020 Early Engagement email regarding EIA scoping information	Email from RED to ADC regarding EIA scoping information for the Proposed Development and including air quality query.
5 June 2020 Further Engagement email regarding private water supplies	Email from RED to ADC covering data requests for information on existing private water supply (PWS) information.
11 June 2020 Microsoft Teams Call	<p>RED Project Call</p> <p>ADC (and Chichester District Council (CDC) at the request of ADC) and Horsham District Council (HDC).</p> <p>To introduce the Proposed Development and the approach to environmental impact assessment (EIA) scoping. Key items covered included an overview of baseline sources, brief characterisation of the historic environment, mitigation approach and planned surveys and likely significant effects.</p>
15 September 2020 Expert Topic Group (ETG)	Rampion 2 ETG meeting – SLVIA/LVIA, Onshore and Offshore Archaeology and Cultural Heritage
10 November 2020 Further Engagement Technical Note regarding LVIA	<p>Technical Note from RED Dated 10 November 2020</p> <p>LVIA Study Area and viewpoint selection was undertaken in November and December 2020 with the South Downs National Park Authority (SDNPA), Natural England (NE),</p>

Date and type	Description of consultation
	West Sussex County Council (WSSCC), HDC, ADC and Mid Sussex District Council (MSDC).
4 December 2020 Further Engagement Technical Note regarding LVIA	Technical Note from RED Dated 4 December 2020 LVIA Study Area and viewpoint selection was undertaken in November and December 2020 with the SDNPA, NE, WSSCC, HDC, ADC and MSDC.
27 October 2020 ETG	Rampion 2 ETG meeting – Transport, Air quality, Noise, Health and Socio-economics
16 March 2021 ETG	Rampion 2 ETG meeting – Traffic, Air Quality, Noise and Socio-economics
18 March 2021 ETG	Rampion 2 ETG meeting – SLVIA/LVIA, Onshore and Offshore Archaeology and Cultural Heritage
Statutory Consultation carried out under Section 42 of the Planning Act 2008 (14 July to 16 September 2021) Statutory consultation response 2021	RED Targeted Onshore Cable Route Consultation Response from ADC dated 14 September 2021 including key topics: Site Selection/Alternatives, SLVIA, Socio-economics & Tourism, Cultural Heritage, biodiversity net gain (BNG), LVIA, Traffic & Transport and Community Liaison.
4 November 2021 ETG	Rampion 2 ETG meeting – Traffic, Air Quality, Noise and Socioeconomics Meeting
4 November 2021 ETG	Rampion 2 ETG meeting – SLVIA/LVIA, Onshore and Offshore Archaeology and Cultural Heritage
Statutory Consultation carried out under Section 42 of the Planning Act 2008 (18 October to 29 November 2022)	Rampion 2 Offshore Wind Farm Supplementary Consultation Response from ADC confirmed no further comments raised beyond the 2021 statutory consultation response.

Date and type	Description of consultation
Statutory consultation response	
17 June 2022 ETG	Rampion 2 Expert Topic Group meeting – Targeted SLVIA Meeting
17 November 2022 ETG	Rampion 2 ETG meeting – Noise & Vibration and Air Quality
22 November 2022 ETG	Rampion 2 ETG meeting – Water environment [Onshore]
25 November 2022 ETG	Rampion 2 ETG meeting – Traffic and Socioeconomics
1 March 2023 ETG	Rampion 2 ETG meeting – Landscape and Visual and Historic Environment
2 March 2023 ETG	Rampion 2 ETG meeting – Noise and Vibration, Air Quality, Soils and Agriculture and Ground Conditions
7 March 2023 ETG	Rampion 2 ETG meeting – Terrestrial Ecology and Water Environment
13 April 2023 Targeted engagement	Email communication with ADC regarding the methodology and scope for construction noise monitoring.
14 June 2023 ETG	Rampion 2 ETG meeting – Landscape and Visual Impact Assessment and Historic Environment
16 June 2023 ETG	Rampion 2 ETG meeting – Air Quality, Noise & Vibration, Soils & Agriculture and Ground Conditions
20 June 2023 ETG	Rampion 2 ETG meeting – Transport and Socio-Economics Discussion

Date and type	Description of consultation
22 June 2023 ETG	Rampion 2 ETG meeting – Terrestrial Ecology and Water Environment
13 February 2024 SoCG Review	Statement of Common Ground Page Turn Review between RED and ADC
15 March 2024 Expert to Expert Meeting	Rampion 2 Expert to Expert Meeting- Noise discussion ADC-R2
18 March 2024	Rampion 2 Expert to Expert BNG Meeting
19 th April 2024 Expert to Expert Meeting	Rampion 2 Expert to Expert Meeting- Socio Economics

3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and ADC for each relevant component of the Application identified in **paragraph 2.1.5**. The tables below detail the positions of the Applicant alongside those of ADC 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 logs 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 Around District Council 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 Arun District Council is considered to result in a materially different outcome on the assessment conclusions.	Not agreed – material impact

- 3.13 The overview of the status of discussion on all of the themes presented in the The Agreement/Disagreement log has been reported throughout the Examination via the Statements of Commonality. 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’ (key for this is found in Table 3-1 above)

Table 3-2 Status of discussions related to Development Consent Order and Securing Mechanisms

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
<p>ADC01</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Climping Construction Compound parameters, use and consultation.</p>	<p>Concerns</p> <p>Concerns regarding the substantial size of Climping Compound covering 6.13ha and limited detailed provided on its use. The draft Development Consent Order (DCO) refers to Work No.10 only as a 'temporary construction compound', although several assessments refer to concrete plant.</p> <p>Concerns that the Environmental Health Department at ADC has not previously been consulted on the proposed final location of Climping Compound.</p> <p>Desired Actions:</p> <p>Whilst ADC appreciate a degree of flexibility is required, further detail of Climping Compound, including on its use and justification for the substantial size, is sought.</p> <p>A description (comparable detail to other Work No. descriptions) of its use is sought in the draft DCO or another document where there is a commitment to comply with the description.</p>	<p>The Climping construction compound was shown on the Works Plans and described in the PEIR as part of the statutory consultation in 2021. ADC had been invited to participate in this consultation.</p> <p>The Statement of Reasons [APP-021] provides an outline of requirement and description of uses for the temporary construction compounds in Paragraph 6.10.5. The associated Appendix 5 Package of Rights provides the description of rights being sought for the compounds.</p> <p>The function and maximum parameters of the compounds are described in Chapter 4 The Proposed Development, Volume 2 of the ES [APP-044] from Paragraph 4.5.35 and Table 4.22. This section has been updated at Deadline 3 to provide more information as requested. For clarity concrete batching plant are temporary equipment used for the cable corridor construction.</p> <p>The Outline Code of Construction Practice (CoCP) [REP4-043] also describes the compounds in section 4.3; this was expanded at Deadline 3 in response to ADC's comments.</p> <p>Commitments are provided in the Commitments Register [REP4-057] in relation to effects of construction compounds during and after construction including:</p> <ul style="list-style-type: none"> • C-27 (Reinstatement); • C-129 (Aggregate for Surface Protection); • C-196 (Landscape Re-instatement); • C-204 (BS5837, tree protection); and 	<p>Not Agreed - No Material Impact</p>	<p>01/07/24</p>	<p>01/07/24: ADC note the description of Climping Compound is now provided in the updated CoCP. ADC still has concerns regarding the compound owing to its size, location and associated activities in proximity to Climping.</p> <p>13/02/24 ADC want clarification on the size of the Climping Compound and more general on visual and noise impact and how it is tied into the phased CoCPs.</p> <p>Residential impact is something flagged by ADC as a request for clarity.</p> <p>ADC would like the points raised in the local impact report reviewed before the applicant's points is responded to.</p> <p>The Applicant is addressing this in Chapter 4 The Proposed Development, of the ES [APP-044] and the Outline Code of Construction Practice (CoCP) [REP3-025] updated at Deadline 3.</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<ul style="list-style-type: none"> C-282 and C-285 (Arboricultural Method Statement). <p>The Environmental Statement (ES) has assessed the effects of the Climping compound during construction. Though impacts will arise, there are no significant effects arising from noise, dust, ecology, settlement / residential areas, Public Rights of Way access and traffic impacts when considering the embedded environmental measures secured in the Outline Code of Construction Practice (CoCP) [REP4-043], the Outline Construction Traffic Management Plan (CTMP) [REP4-045] and Outline Public Rights of Way Management Plan (PRoWMP) [REP3-033]. The Applicant acknowledges that there will be significant landscape and visual effects associated with the presence of the Climping compound on the local landscape character and views from PRoW 168, Church Lane / A259 (partly overlapped with the Arun Way and South Coast Cycle Route), Clymping Village Hall / recreation area and the Climping Caravan Site. These will be temporary and limited by retention of the perimeter vegetation along the A259. Where removal is required (as per the Vegetation Retention Plan – Appendix B of the Outline Code of Construction Practice [REP4-043]), this will be temporary as per the commitment to reinstatement in the Outline Landscape and Ecology Management Plan (LEMP) [REP4-047] is considered. Each of the above plans will be subject to submission of stage specific details for approval (including the CoCP and LEMP) to Arun District Council who will also be consulted on the CTMP and PRoWMP (for approval by West Sussex County Council). This is as per the draft Development Consent Order [REP4-004] requirements 22, 12, 24 and 20 respectively.</p>			

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<p>See below chapters:</p> <ul style="list-style-type: none"> • Chapter 17 Socio-economics, Volume 2 of the ES [APP-058]; • Chapter 18 Landscape and visual impact, Volume 2 of the ES [APP-059]; • Table 2-3 of Appendix 18.3 Landscape assessment, Volume 4 of the ES [APP-169]; • Table 1-3, Table 1-14, Table 1-16, Table 1-35 and Table 1-43 Appendix 18.4 Visual assessment, Volume 4 of the ES [APP-170]; • Chapter 19 Air quality, Volume 2 of the ES [APP-060]; • Chapter 21 Noise and vibration, Volume 2 of the ES [APP-061]; • Chapter 22 Terrestrial ecology and nature conservation, Volume 2 of the ES [APP-062]; and • Chapter 23 Transport, Volume 2 of the ES [APP-063] for further information on the assessment of effects. 			
<p>ADC02 This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Mitigation, Monitoring and Compensation</p>	<p>Concerns Concerns regarding the lack of commitment and securing mechanism of mitigation, monitoring and compensation. For example, the mitigation set out in the Commitments Register refers to where practicable, where feasible, if necessary. Furthermore, some mitigation/compensation such</p>	<p>The Commitments Register [REP4-057] includes a column for the securing mechanism for each embedded environmental measure and its related commitment reference. This cross-refers to the mechanism (e.g. a requirement in Schedule 1 Part 3 of the draft Development Consent Order (DCO) [REP4-004]). Where there is an accompanying document such as an outline plan submitted with the DCO Application with which works must be undertaken accordance, this is also</p>	<p>Not Agreed - no material impact</p>	<p>1/7/24</p>	<p>01/07/24: ADC remains to have some concerns regarding the nature of some of the wording of the commitments but notes the Requirements as a securing mechanism and the commitment by the Applicant to providing a Community Benefits Package in consultation with ADC.</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		<p>as Supply Chain Plan and the Community Benefits Package do not appear to be defined and followed through to a commitment and/or securing mechanism.</p> <p>In addition, the construction communications plan should include Climping Compound.</p> <p>ADC will incur additional expenditure relating to the discharging of Requirements/associated applications.</p> <p>Desired Actions</p> <p>Firmer commitment to mitigation/compensation and these to be followed through to a securing mechanism.</p> <p>ADC is of the opinion that compensation (e.g. community fund such as that for Rampion 1) is required for significant effects that cannot be addressed by embedded mitigation measures, for example, the significant effects on seascape from the Arun coastline.</p> <p>Seek to recover costs associated with discharging Requirements/applications such as S61 applications.</p>	<p>referred to under the 'Relevant Application Documents' column. The Applicant will provide an update to the Commitments Register at Deadline 1 to include further detail e.g. the full reference to DCO requirements and addition of the location of further information within the Application documents.</p> <p>A Community Benefits Package will be consulted upon locally in 2024. This is not part of the DCO application, nor should it be secured within it, as such packages cannot be considered within the planning assessment. The Planning Statement [APP-036] demonstrates that the benefits of the proposed development outweigh the harms.</p> <p>A Planning Performance Agreement is currently in place with ADC, which can be extended to cover requirement discharge.</p>			<p>An updated version of the Commitments Register [REP1-015] was submitted at Deadline 1.</p>
ADC03	Alternatives for Climping Construction Compound.	Concerns Insufficient evidence of reasonable alternative locations (taking account environmental effects) has been given for the temporary construction compound at Climping. Main reasons for	The Applicant carried out an extensive route and site selection process that was guided by detailed specialist engineering, environmental assessment and engagement with local stakeholders, regulatory stakeholders and non-governmental organisations. Details of this process are set out in Chapter 3:	Not agreed - no material impact	13/02/24	.

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		<p>the selection of this location next to a residential area and tourist assets have not been given.</p> <p>During the initial route option process and for the additional land included within the DCO limits at the landfall at Climping during route modification, it is not evident that Climping Site of Special Scientific Interest (SSSI) or the strategic housing allocation were considered as part of the route selection process. Instead, Chapter 3 'Alternatives' of the ES states that one of the key reasons justifying the preferred route was that 'statutory ecological designations are largely avoided along the onshore cable route, and none were identified within the onshore cable corridor at this stage'.</p> <p>Desired Actions</p> <p>ADC requires further information on the options appraisal to demonstrate consideration of environmental, social and economic effects have been taken into account in the selection process for the onshore corridor route at landfall and location of Climping Compound.</p>	<p>Alternatives, Volume 2 of the ES [APP-044]. The Proposed Development requires a temporary construction compound close to the location, and Section 3.4 of this chapter confirms the factors that influenced the selection of the location for Landfall.</p> <p>The site of the Climping compound is primarily driven by its proximity to the landfall location and highway access to support landfall and cable construction in the area. An alternative compound location to the west of Church Lane was considered but was discounted prior to the first statutory consultation due to presence of an approved Outline Application CM/1/17/OUT for the erection of up to 300 dwellings and ancillary development (for more information please see Table 3-1, Page 30, 6.4.5.4 Environmental Statement - Volume 4 Appendix 5.4 Cumulative effects assessment shortlisted developments [APP-128]). Other alternatives were also considered following feedback from the landowner on the first statutory consultation but were discounted due to them being located in Flood Zone 2 and 3.</p> <p>The Climping Beach Site of Special Scientific Interest is specifically acknowledged in Chapter 3 of the ES [APP-044]. To clarify the Applicant's position, at the second statutory consultation the proposed Order Limits were widened to the east to allow for flexibility in the location of the landfall compound. Though this area overlaps with the Climping Beach SSSI, impacts are avoided as the works are limited to underground cable installation as per Work No. 6 and Work No.7 (see Sheet No.1 of the Onshore Works Plans [APP-009]). As per the works description for Work No.6 and 7 in the draft Development Consent Order (DCO) [REP4-004], these are "works consisting of up to four</p>			

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<p>transmission cables and associated cable ducts laid underground by horizontal directional drilling.”</p> <p>The above ground works at landfall are shown by Work No. 8 on the Onshore Works Plans [APP-019] and are outside the SSSI. Dependent on the final alignment (determined during detailed design) these transmission cables may avoid passing underneath the Climping Beach SSSI altogether. The Outline Code of Construction Practice [REP4-043] Table 5-5 and paragraph 5.6.8 to 5.6.15 secure specific commitments related to the SSSI. This includes seasonal restrictions (C-217) on undertaking the HDD works to avoid disturbance to wintering waterbirds using the SSSI and restriction on ground breaking activity and use of vehicles in the area (C-112).</p> <p>The strategic housing allocation was also considered as part of route selection and the design of the cable corridor. The land identified in Policy H SP2b of the Arun Local Plan (2018) is considered within paragraph 4.7.150 of the Planning Statement [APP-036]. This notes the following “Policy H SP2b of the Arun Local Plan (2018) allocates land for residential development of 1,000 units west of Littlehampton but there is no present planning application for the site. The onshore cable corridor crosses this land. Discussions have been held with the landowner to ensure that the Proposed Development would not preclude the allocated site from coming forward. This has involved widening the corridor to the west (modified route MR-02) as described in Section 4 of the PEIR SIR (RED, 2022) as the western area of the site is identified for open space provision (in line with the policy requirements). The Proposed Development would not preclude the site coming forward for the uses proposed in</p>			

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<p>the allocation. "The Applicant considers that the measures set out in the Commitments Register ensure that there are no unacceptable negative environmental, social and economic effects impacts from the onshore corridor route at the landfall and the Climping temporary construction compound.</p>			

Table 3-3 Status of discussions related to Socio Economics

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
<p>ADC04</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	Outline Skills and Employment Strategy	<p>Concerns</p> <p>Concerns that limited detail is given within the Outline Skills and Employment Strategy (SES) and that ADC is not listed as a consultee.</p> <p>Desired Actions</p> <p>ADC to be listed as a consultee.</p> <p>To provide more information on the strategy and benefits for ADC, including linking to apprenticeships and local education institutes in Arun. Objectives need to include support for local SMEs and opportunities for SMEs to access the supply chain.</p> <p>Measures to also be secured through the Outline Code of Construction Practice.</p>	<p>Arun District Council (ADC) have been consulted on the development of the revised OSES which is submitted to the Examining Authority at the pre-examination deadline.</p> <p>The Outline Skills and Employment Strategy (oSES) is deliberately high level. The oSES is an iterative process, based on continuous consultation. The implementation plan will be formed at the end of the process/consultation.</p> <p>The Skills and Employment Strategy will be approved by West Sussex Council in consultation with local planning authorities, secured by Requirement 33.</p>	Agreed	19/04/24	<p>01/07/24: ADC remain of the view that the OSES should be linked to job/skill opportunities, apprenticeships and local education institutes in Arun and that this should be strengthened in the next iteration of the OSES in consultation with ADC.</p> <p>Agreed at Socio Economic meeting 19/04/24</p>
<p>ADC05</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	Community Benefits Package	<p>Concerns</p> <p>Arun is of the opinion that the District will not significantly benefit from the Project, rather the area will experience disruption and significant adverse effects, some of which are unlikely to be mitigated.</p> <p>Concerns about the mechanism regarding which the Community Benefits Package is secured and the criteria/funds involved as not referenced in the draft DCO.</p> <p>Desired Actions</p> <p>Further information on a Community Benefits Package.</p> <p>Commitment (and securing mechanism) needs to be made to ADC for this package to compensate</p>	<p>Adverse impacts of the scheme have been greatly reduced, through evolving design (in response to consultation feedback and survey findings), the identification of mitigation solutions and their subsequent implementation through management plans.</p> <p>While community benefits are not a legal or DCO requirement, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of proposals. In the second half of 2024, the Applicant will therefore be consulting key stakeholders on a package of proposals to benefit Sussex communities, which may include a range of initiatives to benefit business, education and residential communities.</p>	Agreed	19/04/24	<p>01/07/24: ADC raised in the meeting that the Community Benefits Package will be important for ADC. Notes the commitment by the Applicant to providing a Community Benefits Package in consultation with ADC.</p> <p>Agreed at Socio Economic meeting 19/04/24</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		and offset adverse effects within the District.				
ADC06	Jobs	<p>Concerns</p> <p>Job creation (construction and operation) has not been assessed at the district level within the administrative area of Arun.</p> <p>Desired Actions</p> <p>Employment effects, including job numbers should be assessed at district level and not just at County level. Employment relates to the SES insofar as the outcomes of the Strategy in terms of developing skills and employment opportunities may influence the spatial distribution of benefits</p>	<p>It is acknowledged that the number of local jobs during the construction phase is low in comparison to other offshore wind farms. However, it is important to note:</p> <ul style="list-style-type: none"> The 80 full time equivalent (FTE) construction phase jobs quantified in Chapter 17 Socio-economics, Volume 2 of the ES [APP-058] are based on the annual number of jobs supported with suppliers in Sussex or accessed by local residents. This therefore does not include non-Sussex resident construction workers. It is noted that the actual number of peak jobs onsite will be higher than this due to the inclusion of non-local jobs and the variations in construction activity across the construction phase. The assessment is based on a realistic worst-case scenario. This uses conservative assumptions about the level of local sourcing and assumes that the port used for construction will be outside the local Study Area. <p>Operational employment benefits of 100-110 FTE jobs across Sussex are consistent with other offshore wind farm job creation so the Applicant disagrees that this represents a low number of skilled jobs. It should be noted, however, that these jobs are more likely to be accessed by residents of districts closer to the operations and maintenance base (which is likely to be located in Newhaven, East Sussex).</p> <p>It is noted that positive activity and engagement that takes place due to the Outline Skills and Employment Strategy [PEPD-037] and subsequent Skills and Employment Plan will help to increase the local benefits as the Project may be able to achieve more local employment due to the commitments outlined in the plan.</p> <p>ADC is correct to note that preparing and informing local businesses of supply chain opportunities may</p>	Agreed	19/04/24	<p>01/07/24: ADC provided a high-level analysis in the Local Impact Report to estimate the proportion of employment likely to be local in Arun – which is low. It was agreed that no further job estimates would be provided at local level. However, ADC remain of the view that employment benefits to Arun are considered weak.</p> <p>Agreed at Socio Economic meeting 19/04/24</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<p>help the project achieve higher levels of local employment.</p> <p>The Applicant considers that it would not be worthwhile carrying out further study on the localised economic impacts of construction activity as it would be unlikely to resolve issues conclusively.</p>			
<p>ADC07a</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Tourism and Tourism Assets – Construction Stage</p>	<p>Concerns</p> <p>ADC has concerns regarding adverse effects on tourism and tourism assets, including potential displaced tourism from Arun.</p> <p>Chapter 17 of the Environmental Statement (ES) states that regarding construction effects of wind farms 'the research typically focusses on measuring opinions of what the impacts on the visitor economy could be prior to implementation of the scheme.</p> <p>However, ex-post research suggests that even where there have been negative effects, these often occur in the form of displaced tourism with visitors diverting to neighbouring areas instead'. Whilst this may be considered a neutral effect at County level, it suggests areas directly affected by construction such as Arun will experience at least temporary adverse effects, even if Sussex overall has a neutral effect.</p> <p>Chapter 17 also notes that at the local level 'installation activity along the onshore cable corridor may have a negative impact on walking and cycling routes, coastal paths, holiday parks and other tourism-related assets that are located in close proximity to onshore construction</p>	<p>The study being referred to is a report commissioned by Glasgow Caledonian University (Moffat Centre, 2008). The study was used to assess whether government priorities for wind farms in Scotland were likely to have an economic impact on Scottish tourism. The methodology involved a comprehensive literature review of past studies throughout the world; a national visitor intercept survey at four destinations throughout Scotland where windfarms are present; an internet survey of potential visitors to Scotland; GIS and econometric modelling of the impact on local and national visitor economies based on results from the visitor surveys. One of the key aims was to undertake interviews with individuals who had actual experience of wind farms (as opposed to mocked up pictures in before/after studies) in part because some held the belief that individuals inadvertently exaggerated their reactions. The intercept surveys were based on onshore wind farms¹. For onshore wind, displacement of visitors is a greater issue than in offshore wind, particularly in areas that are very close proximity to turbines. This is less of an issue for offshore wind because the turbines are further away and visible along long stretches of the coast. The results are therefore more relevant for onshore wind farms. Nevertheless, the study found that the economic impact on the tourism sector across Scotland would be 'very small'.</p> <p>After this study, given the increase in wind farm development in Scotland, the Scottish Government asked ClimateXChange to identify what new information exists on the impact on tourism of wind farms, and to consider what new conclusions may</p>	<p>Not Agreed - No Material Impact</p>	<p>1/7/24</p>	<p>ADC would like an Expert-to-Expert Discussions between the socio-economic counterparts will be set up to discuss these- Meeting currently being arranged.</p> <p>Tourism- it is reviewed at a county level rather than a district level.</p> <p>A potential impact to the employment in tourism sector. Site specific effects</p> <p>The Applicant states that they are happy to review the mitigation of the harms to tourism.</p> <p>ADC would welcome reference to district tourism projects.</p> <p>The applicant can confirm that the Local Impact Report was submitted at Deadline 1 [REP1-039] and the applicant has subsequently responded at Deadline 2 in Applicant's response to Arun District Council's Deadline 1 Submissions [REP2-021].</p> <p>ADC has noted the updated submission documents and has reviewed and made comments.</p> <p>An expert-to expert discussion between the Applicant and ADC too place on 19th April 2024:</p> <p>-The experts representing ADC highlighted several sensitive locations (tourism and businesses). The concern is that works will cause decreases in tourist numbers and the view of ADC is that it is unrealistic to say there will be no effects.</p>

¹ Braes of Doune Wind far, Buolfruich Wind farm, Causeymire Wind farm, Forss Wind farm, Dunlaw Wind farm and Dalswinton Wind farm

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		<p>works... the assessment concludes that during the construction phase there would be major / moderate, and therefore significant effects on a limited number of tourist destinations.</p> <p>These locations are Climping Beach, Climping Camp Site, Climping Caravan Park and Washington Caravan Park'. Many of these locations are in Arun and there are also other local assets which are omitted which will experience adverse effects. When this is measured at the Sussex the effect is negligible, however, for residents and local businesses in Arun, the effects may be significant and this should be recognised.</p> <p>Desired Actions</p> <p>Further information is necessary on the effects and mitigation at the local – Arun District – level as the list of tourism assets is not considered complete.</p> <p>Furthermore, mitigation such as 'C-33 An Outline COCP will be adopted to minimise temporary disturbance to residential properties, recreational users and existing land users. It will provide details of measures to protect environmental receptors' is not considered actual mitigation as it is an attempt to minimise disruption, which is not to say that significant disruption will not occur.</p> <p>Adverse effects on the tourism and tourism assets will need to be overcome through community compensation notably via the Community Benefits Package. Specific mitigation should be put in</p>	<p>be drawn from this information (ClimateXChange, 2012). This study found no new evidence to suggest that wind farms are having a discernible negative economic impact on tourism in Scotland. More local evidence from the tourism sector ONS employment data pre and during construction of Rampion 1 is presented in Chapter 17 Socio-economics, Volume 2 of the ES [APP-058]. As noted in the assessment this shows continued growth of the sector across Sussex when comparing pre construction to post construction (pre Covid-19 pandemic). Likewise, even through the pandemic, Arun has seen steady growth in tourism sector employment during this period, indicating that Rampion has not led to a decline in the tourism sector in Arun.</p> <p>The Applicant notes that several tourism assets have been raised by ADC which were not included within the assets listed as part of the existing environment within Chapter 17 Socio-economics, Volume 2. The Applicant has considered the additional tourism assets highlighted by Arun. Some of these assets fall outside the impact area used for assessment. The tourism assets outside of the study area are not included within the scope of the assessment as no/very limited localised impacts are anticipated to occur at distance beyond 500m (as is also assumed for the recreation assessment). Where the additional tourism assets do fall within the study area, the Applicant has determined that their inclusion does not alter the assessment of effects on tourism as a result of onshore construction, operation and decommissioning (which would remain Not Significant). Any disruption from construction activity on the would be temporary, short term duration and would be unlikely to be substantial enough to alter visitor perceptions of Arun as a place to visit. C-33 states "It will provide details of measures to protect environmental receptors." If there are no significant noise and other relevant effects, then it is unlikely there will be significant socio-economic effects.</p>			<p>-Following this, the question of what degree of effect can be agreed was raised, how to mitigate, and whether it was material. The experts representing ADC would like to see localised disincentives recognised.</p> <p>– The route was discussed and it was highlighted that the ADC local impact report noted a camping site (glamping) to the north of the compound, separate from the caravan park identified in the discussion. The Applicant notes that this is in the vicinity of the open prison. There are roughly half a dozen sites which ADC are concerned about including combination effects and impacts on the enjoyment of assets.</p> <p>- The experts representing ADC noted that it is difficult to reach any conclusion. ADC are looking more for adequate recognition that there will be some localised effects.</p> <p>- The Applicant suggests that process of assessment at different levels will reach the same conclusion of not significant.</p> <p>- The experts representing ADC do not necessarily agree. Re-iterates main concern of adverse effects been adequately recognised.</p> <p>- The Applicant explained the current assessment and reasoning. If there are no significant noise and other relevant effects, then it is unlikely there will be a significant socio-economic effect. It was suggested that the points discussed would be taken away and considered further.</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		place for Climping Compound regarding nearby tourism assets.				
ADC07b This is a Principal Area of Disagreement identified by Arun District Council	Tourism and Tourism Assets-Operational Stage	<p>Concerns</p> <p>ADC has concerns regarding adverse effects on tourism and tourism assets, including potential displaced tourism from Arun.</p> <p>Chapter 17 of the Environmental Statement (ES) states that regarding construction effects of wind farms 'the research typically focusses on measuring opinions of what the impacts on the visitor economy could be prior to implementation of the scheme.</p> <p>However, ex-post research suggests that even where there have been negative effects, these often occur in the form of displaced tourism with visitors diverting to neighbouring areas instead'. Whilst this may be considered a neutral effect at County level, it suggests areas directly affected by construction such as Arun will experience at least temporary adverse effects, even if Sussex overall has a neutral effect.</p> <p>Chapter 17 also notes that at the local level 'installation activity along the onshore cable corridor may have a negative impact on walking and cycling routes, coastal paths, holiday parks and other tourism-related assets that are located in close proximity to onshore construction works... the assessment concludes that during the construction phase there would be major / moderate, and therefore significant effects on a</p>	<p>The study being referred to is a report commissioned by Glasgow Caledonian University (Moffat Centre, 2008). The study was used to assess whether government priorities for wind farms in Scotland were likely to have an economic impact on Scottish tourism. The methodology involved a comprehensive literature review of past studies throughout the world; a national visitor intercept survey at four destinations throughout Scotland where windfarms are present; an internet survey of potential visitors to Scotland; GIS and econometric modelling of the impact on local and national visitor economies based on results from the visitor surveys. One of the key aims was to undertake interviews with individuals who had actual experience of wind farms (as opposed to mocked up pictures in before/after studies) in part because some held the belief that individuals inadvertently exaggerated their reactions. The intercept surveys were based on onshore wind farms². For onshore wind, displacement of visitors is a greater issue than in offshore wind, particularly in areas that are very close proximity to turbines. This is less of an issue for offshore wind because the turbines are further away and visible along long stretches of the coast. The results are therefore more relevant for onshore wind farms. Nevertheless, the study found that the economic impact on the tourism sector across Scotland would be 'very small'.</p> <p>After this study, given the increase in wind farm development in Scotland, the Scottish Government asked ClimateXChange to identify what new information exists on the impact on tourism of wind farms, and to consider what new conclusions may be drawn from this information (ClimateXChange, 2012). This study found no new evidence to suggest that wind farms are having a discernible negative economic impact on tourism in Scotland.</p>	Agreed	19/04/24	<p>An expert-to expert discussion between the Applicant and ADC too place on 19th April 2024:</p> <ul style="list-style-type: none"> -The experts representing ADC highlighted several sensitive locations (tourism and businesses). The concern is that works will cause decreases in tourist numbers and the view of ADC is that it is unrealistic to say there will be no effects. -Following this, the question of what degree of effect can be agreed was raised, how to mitigate, and whether it was material. The experts representing ADC would like to see localised disincentives recognised. - The route was discussed and it was highlighted that the ADC local impact report noted a camping site (glamping) to the north of the compound, separate from the caravan park identified in the discussion. The Applicant notes that this is in the vicinity of the open prison. There are roughly half a dozen sites which ADC are concerned about including combination effects and impacts on the enjoyment of assets. - The experts representing ADC noted that it is difficult to reach any conclusion. ADC are looking more for adequate recognition that there will be some localised effects. - The Applicant suggests that process of assessment at different levels will reach the same conclusion of not significant. - The experts representing ADC do not necessarily agree. Re-iterates main concern of adverse effects been adequately recognised. - The Applicant explained the current assessment and reasoning. If there are no significant noise

² Braes of Doune Wind far, Buolfruich Wind farm, Causeymire Wind farm, Forss Wind farm, Dunlaw Wind farm and Dalswinton Wind farm

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		<p>limited number of tourist destinations.</p> <p>These locations are Climping Beach, Climping Camp Site, Climping Caravan Park and Washington Caravan Park'. Many of these locations are in Arun and there are also other local assets which are omitted which will experience adverse effects. When this is measured at the Sussex the effect is negligible, however, for residents and local businesses in Arun, the effects may be significant and this should be recognised.</p> <p>Desired Actions</p> <p>Further information is necessary on the effects and mitigation at the local – Arun District – level as the list of tourism assets is not considered complete.</p> <p>Furthermore, mitigation such as 'C-33 An Outline COCP will be adopted to minimise temporary disturbance to residential properties, recreational users and existing land users. It will provide details of measures to protect environmental receptors' is not considered actual mitigation as it is an attempt to minimise disruption, which is not to say that significant disruption will not occur.</p> <p>Adverse effects on the tourism and tourism assets will need to be overcome through community compensation notably via the Community Benefits Package. Specific mitigation should be put in place for Climping Compound regarding nearby tourism assets.</p>	<p>More local evidence from the tourism sector ONS employment data post construction of Rampion 1 is presented in Chapter 17 Socio-economics, Volume 2 of the ES [APP-058]. As noted in the assessment this shows continued growth of the sector across Sussex when comparing pre construction to post construction (pre Covid-19 pandemic). Likewise, even through the pandemic, Arun has seen steady growth in tourism sector employment during this period, indicating that Rampion has not led to a decline in the tourism sector in Arun.</p> <p>The Applicant notes that several tourism assets have been raised by ADC which were not included within the assets listed as part of the existing environment within Chapter 17 Socio-economics, Volume 2. The Applicant has considered the additional tourism assets highlighted by Arun. Some of these assets fall outside the impact area used for assessment. The tourism assets outside of the study area are not included within the scope of the assessment as no/very limited localised impacts are anticipated to occur at distance beyond 500m (as is also assumed for the recreation assessment). Where the additional tourism assets do fall within the study area, the Applicant has determined that their inclusion does not alter the assessment of effects on tourism as a result of operation and decommissioning (which would remain Not Significant).</p>			<p>and other relevant effects, then it is unlikely there will be a significant socio-economic effect. It was suggested that the points discussed would be taken away and considered further.</p> <p>Agreed at Socio Economic meeting 19/04/24</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
ADC08 This is a Principal Area of Disagreement identified by Arun District Council	Strategic Housing Allocation	<p>Concerns</p> <p>The cable route transects through a strategic housing allocation (Policy H SP2b, SD4: Littlehampton – West Bank) identified in ADC's adopted Local Plan. The allocation is for circa 1,000 residential dwellings that will be key to supporting future regeneration of the town and the Littlehampton Economic Growth Area.</p> <p>ADC has significant concerns that the route will sterilise the western part of the allocation and impede the ability to bring forward this site for housing.</p> <p>Desired Actions</p> <p>Details required on what impact the Project is likely to have on the strategic housing allocation, including any sterilisation of land, and the effect on housing delivery within Arun.</p>	<p>The cable route is proposed to be drilled underneath a section of the allocated land, without breaking the surface.</p> <p>This site has been considered within paragraph 4.7.150 of the Planning Statement [APP-036].</p> <p>The project is proposing a 25m wide restriction for four cables. This area could be accommodated by roads and back gardens (i.e. not brick construction). Rampion 2 would not sterilise the site and development could be designed around the constraint. Rampion 2 would compensate for constraints on residential development at this site.</p>	Not agreed - material impact	01/07/24	<p>ADC has noted the comment regarding the proposal to drill underground. ADC does not agree that the point has been addressed at this stage. ADC want clarity on the on the impacts. Nothing new has been flagged for this site.</p> <p>The following points were discussed at the Expert-to-Expert meeting on 19th April on socio-economic matters:</p> <ul style="list-style-type: none"> -The experts representing ADC queried the extent of land which would not be permitted for residential developments (i.e. land over cable routes). -The Applicant noted that the project is proposing a 25m wide restriction for four cables. This area could be accommodated by roads and back gardens (i.e. not brick construction). -The experts representing ADC recognised that the scheme doesn't sterilise the site and it could be designed around; but this would be a constraint. <p>19/04/24 ADC Comment:</p> <p>Regarding the Strategic Housing Allocation, SD4: Littlehampton – West Bank, Arun is maintaining a holding objection. We appreciate that further clarity has been provided by the Applicant that a covenant would be imposed for no buildings/permanent structures above the cables within a defined corridor without receiving permission, which we understand is likely to be a 25m wide restriction and potentially wider in places, if a direct route cannot be implemented. Unless this can be designed as open space, Arun is of the view that this could have a significant impact on deliverability and the allocation coming forward in the future to deliver 1,000 much needed new homes. We appreciate that the proposals for the allocation are unknown at this stage, nevertheless, given the potential for a significant impact on an allocated housing site, we are of the</p>

Reference Number	Point of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
						view that this should be changed to not agreed – material impact.

Table 3-4 Status of discussions related to Seascape, Landscape and Visual Impact Assessment

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
<p>ADC09</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Scale and Extent of Wind Turbine Generators</p>	<p>Concerns</p> <p>The spatial extent is greater than Rampion 1 and ADC continues to have significant concerns regarding the scale relative to the proximity to the coastline and the resulting significant visual effects.</p> <p>Desired Actions</p> <p>We recognise that the spatial extent has been reduced. However, there will still be significant visual effects on the coastline, for example, from Climping Beach and Littlehampton seafront, which are tourist and recreational destinations.</p> <p>ADC is of the opinion that as no further mitigation is possible, compensation is the only route.</p>	<p>The visual impacts of Rampion 2 WTGs are assessed in Chapter 15 of the ES. The Applicant notes that significant effects on views experienced by people have been identified at a number of representative viewpoints from settlements and seafronts along this section of the ADC coastline. The array area is located approximately 14km from the closest point of the Arun coastline. Design principles are described in Section 15.7, which sets out how the design of Rampion 2 provides embedded environmental measures addressing visual effects, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, it's spread and quantity of WTGs within it. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is necessary.</p> <p>The Applicant considers that the visual impacts of the proposed development are outweighed by the significant scheme benefits, expressed in the Planning Statement [APP-036], and thus compensation is not required to make the proposal acceptable in planning terms.</p>	<p>Not Agreed- Material Impact</p>	<p>06/06/24</p>	<p>ADC has noted the comment. ADC would like the Local Impact report reviewed and recognised.</p> <p>The applicant can confirm that the Local Impact Report was submitted at Deadline 1 [REP1-039] and the applicant has subsequently responded at Deadline 2 in Applicant's response to Arun District Council's Deadline 1 Submissions [REP2-021].</p> <p>06/06/24: Applicant has confirmed this as not agreed. The Applicant can confirm that no further mitigation is possible to reduce significant visual effects arising from the WTGs within the array area.</p>

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
ADC10 This is a Principal Area of Disagreement identified by Arun District Council	Climping Construction Compound visual effects	<p>Concerns</p> <p>Concerns regarding visual effects of the landfall construction compound (Work No.8) and Climping Compound (Work No.10); the latter is substantial in size.</p> <p>Desired Actions</p> <p>ADC expect the visual effects from viewpoints (to be agreed with ADC) to be assessed.</p> <p>Seek appropriate landscaping boundary treatments for Climping Compound to be secured and implemented.</p>	<p>The Applicant acknowledges that significant landscape and visual effects associated with the presence of the landfall construction compound and the Climping Compound on the local landscape character and views with the latter affecting the views from PRoW 168, Church Lane / A259 (partly overlapped with the Arun Way and South Coast Cycle Route), Clymping Village Hall / recreation area and the Climping Caravan Site. These will be temporary and limited by mitigation to retain / protect perimeter vegetation along Church Road and the A259, and reversible through the commitment to reinstatement in Section 4 of the Outline Landscape and Ecology Management Plan [REP4-047]. It is noted that each of the above plans will be subject to submission of stage specific details for approval including the CoCP and LEMP for ADC who will also be consulted on the CTMP and PRoWMP (for approval by WSCC). This is as per the draft Development Consent Order [REP4-004] requirements 22, 12, 24 and 20 respectively.</p> <p>See:</p> <ul style="list-style-type: none"> • Chapter 18 Landscape and visual impact, Volume 2 of the ES [APP-059]; • Table 2-3 of Appendix 18.3 Landscape assessment, Volume 4 of the ES [APP-169]; and • Table 1-3, Table 1-14, Table 1-16, Table 1-35 and Table 1-43 Appendix 18.4 Visual assessment, Volume 4 of the ES [APP-170]; <p>Consultation in relation to the LVIA Study Area and viewpoint selection was undertaken in November and December 2020 with Arun District Council and a technical note was issued 10 November 2020 and 4 December 2020 describing the LVIA Study Area and</p>	Agreed	20/05/24	<p>ADC has noted the comment- ADC would like the Local Impact report reviewed and recognised</p> <p>The applicant can confirm that the Local Impact Report was submitted at Deadline 1 [REP1-039] and the applicant has subsequently responded at Deadline 2 in Applicant's response to Arun District Council's Deadline 1 Submissions [REP2-021]. Agreed following Applicant response.</p>

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<p>viewpoint selection process. No response was received from Arun District Council.</p> <p>Through the combination of commitments (C-27, C-196, C-204 and C-285 of the Commitments Register [REP4-057] regarding effects of construction compounds during and after construction and the commitment to reinstatement in Section 4 of the Outline Landscape and Ecology Management Plan [REP4-047], there is the requirement for further detail to be provided including the CoCP and LEMP. It is likely that this would include further information for appropriate landscaping boundary treatments for Climping Compound (vegetation retention, possible additional screen planting, and location of soil bunds / other construction elements to provide perimeter screening).</p>			
ADC11 This is a Principal Area of Disagreement identified by Arun District Council	Permanent Infrastructure Corridor details	<p>Concerns</p> <p>Permanent infrastructure corridor width up to 25m (or wider at trenchless crossing locations).</p> <p>Desired Actions</p> <p>Detail required on the surface treatments within these permanent infrastructure corridors, any requirements for easements in these areas and whether this impacts reinstatement</p>	<p>The commitment to reinstatement along the infrastructure corridor is set out in Section 4 of the Outline Landscape and Ecology Management Plan [REP4-0472]. This accounts for easement requirements for example Annex A of the Outline Landscape and Ecology Management Plan [REP4-047] details the species selection and location of planting to allow for hedgerow reinstatement to comply with the planting and management wayleaves for underground electrical cables. Otherwise, the surface treatments would be reinstated to match existing as set out in Section 4 of the Outline Landscape and Ecology Management Plan [REP4-047].</p>	Agreed	13/02/24	*Agreed at Page Turn Meeting- 13/02/24

Table 3-5 Status of discussions related to Terrestrial and Marine Ecology

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
<p>ADC12</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Climping SSSI</p>	<p>Concerns</p> <p>Significant concerns regarding the cable route passing beneath and near to the Climping SSSI and ecological sensitive areas. Nationally scarce invertebrates have been identified on the sand dunes of Climping beach. We note access would be restricted in the SSSI and no groundbreaking activity.</p> <p>However, there remains the potential for unplanned events and localised degradation of habitat within the SSSI, which is of a concern.</p> <p>Desired Actions</p> <p>To undertake an invertebrate survey of Climping SSSI.</p> <p>To provide an assessment of indirect effects to the SSSI.</p>	<p>The Applicant would not expect any effects on the habitats or invertebrates using the sand dunes associated with works at the landfall. The closest proposed works where construction activity is to take place (Works No. 8 on the Offshore Works Plans [APP-009]) is in excess of 175m from the boundary of the SSSI. All closer works (including beneath the SSSI) are proposed to be either underground (i.e. the HDD) or pedestrian traffic only (e.g. monitoring of the drill head path). Under all normal circumstances indirect effects on the SSSI such as dust deposition, pollutant losses etc. can be effectively managed through the Code of Construction Practice secured through Requirement 22 of the draft Development Consent Order [REP4-004].</p> <p>Only in the event of an unforeseen break-out of drilling fluid to the surface within the SSSI would any effects on habitats and the invertebrates they support be realised. Given the design and ways of working described in the Outline Construction Method Statement [APP-255] and Outline Code of Construction Practice [REP4-043] the risk of this occurring is very low.</p>	<p>Agreed</p>	<p>12/06/24</p>	<p>12/06/24: ADC officer confirmed this agreed on 12 June</p> <p>06/06/24: ADC in their response to the Examining Authorities first written questions state in their answer to TE1.30 has no further concerns regarding construction on ecologically sensitive sites including Climping Beach SSSI.</p> <p>ADC to confirm this point is agreed.</p> <p>ADC is happy with clarification on concerns. First sentence referencing effects on habitats - ADC ecology officer disagrees with this and would like more clarity. ADC requested a profile.</p> <p>The Applicant has confirmed that as per the Written Representations, no surveys will be undertaken.</p> <p>An additional commitment has been made as per the Written Representations</p>
<p>ADC13</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Terrestrial biodiversity net gain – at district level</p>	<p>Concerns</p> <p>Biodiversity net gain has not been assessed at the district level ADC. We would expect biodiversity net gain to be achieved within the administrative area of Arun.</p> <p>Desired Actions</p> <p>To provide biodiversity net gain matrix specifically for the area within Arun.</p> <p>The maintenance programme will need to align and comply with the requirements of the biodiversity net gain for Nationally Significant Infrastructure Projects, which is</p>	<p>The Applicant is committed to delivering Biodiversity Net Gain. Detailed calculation of losses and details of the gains to be made will come forward on a phase-by-phase basis at the detailed design stage. At this juncture calculations will show losses and gains in individual districts, including ADC, enabling an understanding of how local delivery may be achieved. Appendix 22.15: Biodiversity Gain Information, Volume 4 of the ES [APP-193] demonstrates losses based on a realistic worst case to demonstrate that the scale of the overall reduction in biodiversity value can be compensated for and a net gain achieved.</p> <p>Section 5.3 describes how biodiversity units will be sourced, and the prioritisation of local delivery. On current understanding, it is likely that all required biodiversity units could be delivered within 2km of the proposed Order limits. Local delivery is incentivised through the metric, so there is no need for this to be secured further.</p>	<p>Agreed</p>	<p>12/06/24</p>	<p>12/06/24: ADC officer confirmed this agreed on 12 June based on the additional information provided at district level.</p>

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		<p>expected to come into force in 2025.</p> <p>Regarding Requirement 14 in the draft DCO (Part 3), ADC request that it is amended so that the biodiversity net gain strategy for stages that relate to areas within Arun is also submitted to and approved by ADC.</p>				
<p>ADC14</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Marine biodiversity net gain</p>	<p>Concerns</p> <p>To demonstrate marine biodiversity net gain.</p> <p>Desired Actions</p> <p>ADC expect marine benefits to be achieved and contribution to marine restoration projects such as Help the Kelp.</p> <p>Consideration should be given to a marine biodiversity net gain assessment.</p>	<p>Whilst Marine Net Gain is not currently mandated in the same way as onshore (terrestrial) BNG, in recognition of the principles set out in the Draft NPS EN-1 (DESNZ, 2023a), The Applicant is currently exploring opportunities to partner with organisations who are able to deliver marine benefits in the region</p>	<p>Agreed</p>	<p>13.02.24</p>	

Table 3-6 Status of discussions related to Noise and Vibration

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
<p>ADC15</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Potentially detrimental effects of Climping Compound on Land to the west of Church Lane, South of Horsemere Green Lane, Climping (planning ref. CM/48/21/RES, CM/1/17/OUT).</p>	<p>Concerns</p> <p>Climping Compound is located adjacent to Land to the west of Church Lane, South of Horsemere Green Lane, Climping. This site has permission for 300 dwellings and therefore has reasonable certainty of coming forwards and there is the potential for new residents whilst Climping Compound is in use. No assessment of the noise effects of these future residents nearest to the compound has been undertaken.</p> <p>Although classified as 'temporary', this compound will be in place for a minimum of 3.5 years with potential for protracted noise detriment.</p> <p>Desired Actions</p> <p>Provide modelling and assessment of the noise effects on future receptors introduced by the residential development west of Church Lane and adjoining Climping Compound. Location of receptor(s) to be agreed with ADC.</p>	<p>The assessed receptor (Village Hall, Crookthorn Lane, BN17 5SN) in this case is closer to Climping Compound than the proposed residential dwellings at the Land to the West of Church Lane development. Whilst the Applicant has not assessed these receptors within a theoretical development, as the assessment has been undertaken for a closer receptor to the compound, the Land to the West of Church Lane will benefit from the mitigations that have been included for the assessed receptor.</p>	<p>Agreed</p>	<p>15/03/24</p>	<p>Changed to Agreed following Expert to Expert Call 15/03/24.</p>
<p>ADC16</p> <p>This is a Principal Area of Disagreement identified by Arun District Council</p>	<p>Noise from Horizontal Directional Drilling (HDD). Section 61 Applications - The Control of Pollution Act 1974</p>	<p>Concerns</p> <p>Potential for prolonged exposure of sensitive receptors to noisy drilling and ancillary works 24 hours per day over consecutive, often multiple days.</p> <p>Section 61 applications allow the Applicant to apply for prior consent to extend the agreed hours of (noisy) working for specified purposes to be agreed with the Environmental Health Department at ADC. This is likely to apply in the case of HDD for 24-hour consecutive, often multiple days.</p> <p>Desired Actions</p> <p>The Applicant to consider temporary relocation of people affected by 24-hour drilling as a method of mitigation where HDD</p>	<p>The use of Section 61 applications is part of how the Applicant envisages the works will be progressed, but specifically for extraordinary circumstances that are not programmed in from the outset.</p>	<p>Agreed</p>	<p>01/07/24</p>	<p>1/07/24: ADC - based on the Outline NVMP, together with the commitment for BPM employed throughout and regulatory controls through the Section 61 process for works outside of 'normal' work patterns which the Applicant has committed to, this can be agreed.</p>

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		(or other noisy working) is scheduled to proceed for 24 hours per day for longer than 48 consecutive hours.				
ADC17 This is a Principal Area of Disagreement identified by Arun District Council	Determination of Requirement for Mitigation / Section 61 Consents	<p>Concerns</p> <p>Chapter 21 of the ES states with respect to construction noise effects that determination of the need for Section 61 consent will be determined by contractor at detailed design stage following review of construction noise assessments, if it is determined that there is 'significant deviation' from initial predictions.</p> <p>Desired Actions</p> <p>Clarification required on level of competency of contractor to review construction noise predictions.</p> <p>Quantify what is considered a 'significant deviation' from predicted construction noise levels.</p>	If the method changes significantly to what has been assessed, such that where previously no significant impacts were predicted and then the amended method suggests that significant impacts will be experienced, this is where the Section 61 process would be instigated. This will require a competent person to be assessing the construction works for noise once the works are more defined.	Agreed	15/03/24	Changed to Agreed following Expert to Expert Call 15/03/24.
ADC18 This is a Principal Area of Disagreement identified by Arun District Council	Table 21.23 of Chapter 21 of the ES - Construction Noise 'Trigger Values'.	<p>Concerns</p> <p>These values replicate the values set out in Table E.2 of British Standard (BS) 5228 in particular for the 0800 – 1800 time period. Proposed construction hours are stated as 0700 – 1900 hours where for the shoulder hours (0700 – 0800 and 1800 – 1900) Table E.2 suggests a trigger value of 70dB LAeq, T.</p> <p>Desired Actions</p> <p>Confirm that trigger values of to align with lower trigger value as set out in Table E.2 for the proposed construction periods construction Table E.2.</p> <p>Review/update construction noise assessment against revised criterion.</p>	The times indicated in Table 21-15 of Chapter 21 Noise and vibration, Volume 2 of the ES, which replicates BS5228-1 (British Standards Institution (BSI), 2014) Table E.1 are reflective of the times stated within the standard. Therefore, the shoulder hours of 07:00 – 08:00, and 18:00 – 19:00 are within the daytime period, and therefore the higher threshold of significance applies for the ambient noise category for the corresponding receptor.	Agreed	15/03/24	Changed to Agreed following Expert to Expert Call 15/03/24.
ADC19 This is a Principal Area of	Construction Noise Predictions/Assessment outcomes (Tables 21.27 – 21.29)	<p>Concerns</p> <p>For some locations that are close to exceeding the 65dB threshold value, the assessment outcome has been increased to</p>	Whilst uncertainties are addressed, the construction noise assessment uses a worst-case activity level to generate the receptor predictions. Therefore, the Applicant considers	Agreed	15/05/24	Changed to Agreed following Expert to Expert Call 15/03/24.

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
Disagreement identified by Arun District Council		<p>reflect potential impact. This has not been done consistently and where there are predicted values that are also close to the threshold value, the outcome has not been increased.</p> <p>Desired Actions</p> <p>Review construction noise assessment and increase assessment outcomes where they are within 2dB of threshold/trigger values. This will address the inherent uncertainties that are discussed 21.5.10 – 21.5.11.</p>	that determining a magnitude of impact higher than that reported when the predictions are within 2dB of a threshold is unnecessary.			
ADC20 This is a Principal Area of Disagreement identified by Arun District Council	Climping Compound noise modelling assumptions missing	<p>Concerns</p> <p>There are insufficient details of the noise modelling inputs for the operation of the construction compound.</p> <p>Desired Actions</p> <p>Provide noise modelling inputs for the construction compound predictions (such as concrete plant).</p>	<p>The Applicant acknowledges that the plant list table assumed for the operational noise modelling of the construction compounds has not been included in Appendix 21.2: Construction Plant List, Volume 4 of the ES [APP-177]. This will be amended accordingly.</p> <p>It is also worth noting, that the above appendix includes the detailed modelling methodology utilised for the construction modelling and operational modelling of the compounds.</p>	Agreed	16/01/24	
ADC21 This is a Principal Area of Disagreement identified by Arun District Council	Baseline Monitoring Data	<p>Concerns</p> <p>Insufficient baseline for noise sensitive locations in the vicinity of the Climping Compound. Only data for a single location to the south-east of the compound has been presented. This will not accurately characterise existing baseline noise conditions at nearby noise sensitive receptors in particular Climping Village, the caravan park immediately west of the proposed compound, Climping C of E Primary School, Climping Village Hall and play area immediately north of this and glamping at Cuckoo Farm.</p> <p>Desired Actions</p> <p>Provide additional baseline noise data that is representative of existing sound climate at</p>	<p>A decision was taken at the submission stage to use the lowest category A to characterise the receptors near the Climping Compound where baseline data was not available. This is the most conservative approach provided in the standard methodology, and no greater protections would be afforded if sound levels were obtained at the nearest noise sensitive receptors.</p> <p>Since submission, further noise monitoring has been undertaken and supports the initially assumed assessment category (i.e. the baseline ambient levels measured confirmed that selection of the lowest category A was correct).</p>	Agreed	16/01/24	

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
		receptors in the vicinity of Climping Compound.				
ADC22 This is a Principal Area of Disagreement identified by Arun District Council	Transport, traffic and associated noise: Access to cable route west of Benjamin Gray Drive	Concerns Potential noise effects of heavy good vehicles (HGV) movements on existing quiet residential road. No data provided to support assumptions. Desired Actions Evidence required to support assumptions.	The assumptions for HGV movements are obtained from Chapter 23: Transport, Volume 2 of the ES [APP-064] . It is recognised by the Applicant that there will be a noticeable increase of HGVs on quiet roads, but this does not indicate the presence of significant noise generation from said vehicles. There is no construction traffic proposed for Benjamin Gray Drive. The nearest construction access point is approximately 100 m from the closest residential dwelling on Benjamin Gray Drive. The A259 is also approximately 100 m from the closest residential dwelling on Benjamin Gray Drive. Consequently, noise effects from construction traffic using this access point will be negligible.	Agreed	15/03/24	Changed to Agreed following Expert to Expert Call 15/03/24
ADC23 This is a Principal Area of Disagreement identified by Arun District Council	Lack of consultation on Location of Private Water Supplies	Concerns The Environmental Health Department at ADC had not been consulted in this case. Desired Actions As previously requested, please provide a comprehensive list of private water supplies identified for further investigation due to their proximity to the Project.	Engagement with ADC has been ongoing since June 2020 in relation to PWS information, which was used to inform the design of the Proposed Development. The ES contains the specific details of the private water supplies identified within Arun District Council. Table 2.1 of Appendix 26.1: Detailed Water Environment Baseline Information, Volume 4 of the ES [APP-215] lists all of the Private Water Supplies (PWS) which were identified within the Water Environment Study Area, including 15 PWSs within ADC's administrative area, and details the proximity and the potential connection to the Proposed DCO Order Limits. Table 3-2 of Appendix 26.4 Hydrogeological Risk Assessment, Volume 4 of the ES [APP-218] (HRA) also presents these details and presents conceptual hydrogeological information for the PWSs. Those details were used to inform which PWSs were screened in for further assessment within Sections 26.9 to 26.11 of the Chapter 26: Water Environment, Volume 2 of the ES [APP-067] . The ten PWSs screened in were The Old Rectory (P1), Brookbarn Farm (P2), Pauls House (P3), The Decoy (P4), Suzy Smith	Agreed	15/03/24	Changed to Agreed following Expert to Expert Call 15/03/24

Reference Number	Points of Discussion	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
			<p>Racing/Angmering Park Estate (P5), East Cottage (P19), Green Pastures (P20), Myrtelgrove Cottage Stables (P21), The Martins (P22) and Michelgrove (P24). in Table 26-20 of Chapter 26: Water Environment, Volume 2 of the ES [APP-067] a specific embedded mitigation measure (C-253) has been put in place at several of those PWSs which were identified as being in proximity and conceptually linked to the Proposed Development within the HRA and Chapter 26. This sets out that “a water quality monitoring programme will be carried out at private water supplies in proximity of the Order Limits, for instance at Brookbarn Farm, Suzy Smith Racing/ Angmering Park Estate and Michelgrove for an appropriate period prior to, during and post construction of the cable route. Further details of the monitoring regime will be discussed and agreed with Arun District Council at the post DCO stage”.</p>			

Table 3-7 Status of discussions related to Historic Environment

Reference Number	Matter of Contention	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
ADC24 This is a Principal Area of Disagreement identified by Arun District Council	Listed buildings, locally listed buildings and Area of Characters.	<p>Concerns</p> <p>Listed buildings at No's 45-47 South Terrace, locally listed buildings at 4, 8-95 South Terrace & 16 Granville Road and South Terrace Area of Character.</p> <p>Desired Actions</p> <p>To provide an assessment for listed buildings at No's 45-47 South Terrace, locally listed buildings at 48-95 South Terrace & 16 Granville Road and South Terrace Area of Character.</p>	<i>No's 45-47 South Terrace, identified as 6, St Augustine's Road (NHLE 1191074) within Table 5.1, Appendix 25.7: Settings assessment scoping report, Volume 4 of the ES [APP-213], is scoped out of the Environmental Impact Assessment.</i>	Agreed	01/07/24	<p>01/07/24: ADC officer - based on the additional information provided by the Applicant, this can be changed to Agreed.</p> <p>ADC's historic environment officer has not added anything further on this at this stage (Deadline 1).</p> <p>Applicant has now addressed in Deadline 2 response in Applicant's response to Arun District Council's Deadline 1 Submissions [REP2-021].</p> <p>The Applicant has provided a response at deadline 4 to ADC's reply to the ExA written questions submitted at deadline 3 [REP3-067].</p>

Table 3-8 Status of discussions related to Principle of development

Reference Number	Matter of Contention	ADC's Position	Applicant's Position	Current Status	Date of Agreement	Record of Progress
ADC25	Contribution of Rampion 2 to climate change mitigation and the economy	ADC supports renewable energy generation and carbon reduction objectives to meet climate change commitments, whilst also promoting economic development and locally skilled jobs.	The project will contribute materially towards meeting the urgent national need for renewable electricity generation, significantly reducing carbon emissions from energy.	Agreed	06/11/23	

