

Rampion 2 Wind Farm

# **Statement of Common Ground UK Chamber of Shipping**

## **July 2024**

## **Rev C**

Examination Reference: 8.15

Pursuant to: Infrastructure Planning (Examination Procedure)

Rules 2010, Rule (8)(c)

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<b>B</b>	May 2024	Issued to Interested Party	Anatec Limited	RED	RED
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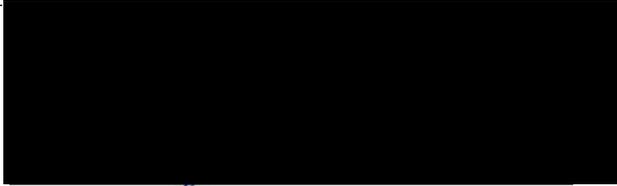
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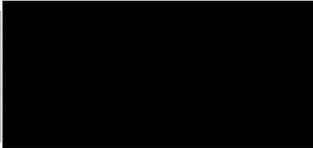
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# 1. Introduction

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## 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 UK Chamber of Shipping (CoS) 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 Applicant has chosen to pursue a SoCG with CoS, beyond the requirements listed within the Rule 6 letter (issued by the Examining Authority on 14<sup>th</sup> December 2023, [PD-006], in order to reflect the considerable discussions held between the two parties, and to ensure that concerns are suitably represented within the Statement of Common Ground Process.
- 1.1.3 This SoCG covers all topics where there are areas for agreement, and areas for disagreement, between the Applicant and CoS, and covers the topics split by discipline as detailed in the Environmental Impact Assessment (EIA) for Rampion 2:
- Principle of Development; and
  - Shipping and navigation.
- 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 and CoS have sought to progress 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 CoS 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 both the pre-examination phase and the Examination phase of Rampion 2. CoS issued their relevant representations [RR-392] 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 CoS 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 (ES), Volume 2 [APP-042 to APP-072]**.

1.2.2 The SoCG is structured as follows:

- **Section 1: Introduction:** outlines the background and approach to the development of the SoCG and provides an overview of the Proposed Development;
- **Section 2: CoS’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 CoS as related to the topics of discussion and the status of agreement on those positions.

## 1.3 The Proposed Development

1.3.1 The Applicant is developing Rampion 2 located adjacent to the existing Rampion Offshore Wind Farm Project (referred to as ‘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 160km<sup>2</sup>.

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 can be found in **Chapter 4: The Proposed Development, Volume 2** of the ES [APP-045].

## 2. UK Chamber of Shipping Remit

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### 2.1 Introduction

2.1.1 CoS is the trade association for the UK shipping industry, representing the interests of commercial shipping companies operating in the UK and globally. CoS primary interest in relation to offshore renewable energy developments is protection of safety, minimisation of navigational risk, and maintenance of commercial efficiencies.

2.1.2 The key offshore elements which of are interest to the CoS include:

- wind turbine generators (WTGs) and associated foundations;
- inter-array cables connecting the WTGs to up to three offshore substations;
- up to two offshore interconnector export cables between the offshore substations; and
- up to four offshore export cables;

2.1.3 The SoCG covers topics of the DCO application of relevance to CoS, comprising:

- Offshore aspects of the Application
  - ▶ Shipping and navigation;
  - ▶ Other Marine Users; and
  - ▶ Socio Economic.

2.1.4 The following matters were agreed as not forming areas of focus for CoS and therefore no statements of common ground are required for these topic areas:

- All onshore matters; and
- All offshore topics excluding shipping and navigation.

### 2.2 Consultation Summary

2.2.1 This section briefly summarises the consultation that the Applicant has undertaken with CoS including both statutory and non-statutory engagement during the pre-application and post-application phases (See **Table 2-1**).

**Table 2-1 Consultation and Correspondence undertaken with CoS**

<b>Date and type</b>	<b>Description of consultation</b>
<b>10 August 2020 Teams Call</b>	Rampion 2 kick-off meeting
<b>23 February 2021 Online Workshop</b>	Hazard Workshop to discuss with local users the hazards associated with shipping and navigation including what risk those hazards may pose and related environmental measures.
<b>21 September 2021 Email Response Section 42 Response</b>	Section 42 Response
<b>25 January 2022 Teams Call</b>	Opportunity to discuss the UK Chamber of Shipping's Section 42 response and introduce the indicative Assessment Boundary for the Environmental Statement (ES).
<b>13 April 2022 Email Correspondence</b>	Response to Rampion 2 meeting minutes
<b>06 September 2022 Online Workshop</b>	Second Hazard Workshop to discuss with local users the hazards associated with shipping and navigation including what risk those hazards may pose and related environmental measures.
<b>21 February 2024</b>	Joint Page Turn meeting to discuss Rev A of all three Statements of Common Ground, and propose clarified positions on discussion matters now responses have been provided to initial concerns.

### 3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and CoS for each relevant component of the DCO Application identified in **paragraph 2.1.3**. The tables below detail the positions of the Applicant alongside those of CoS 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 CoS 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 CoS 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.

**Table 3-2 Status of discussions related to Shipping and Navigation**

Reference number	Point of Discussion	CoS position	Applicants position	Current status	Date of agreement	Comments / notes
CoS01	<b>Consultation</b>	Agreed.	The CoS has been adequately consulted regarding shipping and navigation to date and is satisfied with the outcomes of consultation with other stakeholders.	Agreed	21/02/2024	
CoS02	<b>Vessel Traffic Surveys</b>	Agreed.	The vessel traffic survey data used within <b>Chapter 13: Shipping and Navigation [APP-054]</b> and <b>Appendix 13.1 Navigational Risk Assessment (NRA) [APP-155]</b> is as per the requirements of Marine Guidance Note (MGN) 654 and therefore suitable for use within the assessments.	Agreed	21/02/2024	
CoS03	<b>Baseline Environment</b>	Agreed.	<b>Chapter 13: Shipping and Navigation [APP-054]</b> and <b>Appendix 13.1 NRA [APP-155]</b> adequately characterise the shipping and navigation baseline environment.	Agreed	21/02/2024	
CoS04	<b>Navigational Risk Assessment and Assessment Methodology</b>	Agreed.	<b>Appendix 13.1 NRA [APP-155]</b> is compliant with the requirements of MGN 654 including completion of an MGN 654 checklist. Appropriate legislation, planning policy and guidance relevant to shipping and navigation has been used. The approach to the assessment is also deemed appropriate for the purposes of predicting changes to the baseline environment.	Agreed	21/02/2024	
CoS05	<b>Worst Case Assessment of Proposed DCO Limits</b>	Agreed.	The worst case (Maximum Design Scenario (MDS)) for shipping and navigation has been assessed within <b>Chapter 13: Shipping and Navigation [APP-054]</b> and <b>Appendix 13.1 NRA [APP-155]</b> .	Agreed	21/02/2024	
CoS06	<b>Pre Submission Changes to DCO Limits</b>	The Chamber welcomed the amendments to the DCO limits.	The Development Consent Order (DCO) limits were amended as part of the pre application process to address both shipping and navigation, and search and rescue concerns. This includes: <ul style="list-style-type: none"> <li>• Establishment of the navigation corridor / Helicopter Refuge Area (HRA) located west of Rampion 1. This corridor allows an alternate access route to Littlehampton Harbour.</li> <li>• Establishment of the HRA located south of Rampion 1.</li> <li>• Reduction in DCO limits to avoid overlap with the Dover Straits Inshore Traffic Zone (ITZ) and</li> </ul>	Agreed	21/02/2024	

Reference number	Point of Discussion	CoS position	Applicants position	Current status	Date of agreement	Comments / notes
			<p>minimise deviations for vessel to/from the port of Shoreham.</p> <ul style="list-style-type: none"> <li>Reduction in DCO limits to increase sea room between the array area and the Dover Straits Traffic Separation Scheme (TSS).</li> </ul> <p>Reduction in DCO limits to increase sea room between the array area and the Owers light buoy.</p>			
CoS07	<b>Hazard (Impact) Identification</b>	Agreed.	The hazards (impacts) identified within <b>Chapter 13: Shipping and Navigation [APP-054]</b> and <b>Appendix 13.1 NRA [APP-155]</b> adequately capture the potential effects on shipping and navigation that may result from the Proposed Development.	Agreed	21/02/2024	
CoS08	<b>Risk Level (impact Significance) In Isolation</b>	Ongoing review of NRA documentation	Based on the information provided within <b>Chapter 13: Shipping and Navigation [APP-054]</b> and <b>Appendix 13.1 NRA [APP-155]</b> it is agreed that in isolation hazards (impacts), including main route deviations caused by the project and impacts on search and rescue, are unlikely to be significant with the mitigation measures and required monitoring in place.	Ongoing Point of Discussion		As of 4th July 2024 the CoS are completing a final review of the NRA.
CoS09	<b>Risk Level (impact Significance) Cumulative</b>	Agreed.	Based on the information provided within <b>Chapter 13: Shipping and Navigation [APP-054]</b> and <b>Appendix 13.1 NRA [APP-155]</b> it is agreed that there are no screened in cumulative projects and therefore no cumulative hazards (impacts) for the Proposed Development. This screening process considers data confidence, proximity of cumulative projects and the potential for any interaction.	Agreed	21/02/2024	

## 4. References

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RED (2023). *Rampion 2 DCO Project Glossary*. (Online) Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-000149-1.7 Rampion 2 Glossary.pdf> (Accessed: May 2024).

Planning Inspectorate (2024). *Examination Library*. (Online) Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010117/EN010117-000419-Rampion 2 Exam Library.pdf> (Accessed: May 2024).

Planning Inspectorate (2024). *Rampion 2 Offshore Wind Farm Application Area*. (Online) Available at: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010117> (Accessed: May 2024).

