

Rampion 2 Wind Farm

Statement of Common Ground - Trinity House

July 2024

Rev B

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A	January 2024	Initial draft issued to Trinity House	WSP	RED	RED
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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 Trinity House 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 Trinity House, beyond the requirements listed within the Rule 6 letter (issued by the Examining Authority on 14th December 2023, [PD-006], in order to reflect the considerable discussions held between the two parties, and to ensure that 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 Trinity House, and covers the topics split by discipline as detailed in the Environmental Impact Assessment (EIA) for Rampion 2:
- The Development Consent Order and Securing Mechanisms; 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 Trinity House 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 Trinity House 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. Trinity House issued their relevant representations [RR-081] 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 Trinity House 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: TH'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 Trinity House 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 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 can be found in **Chapter 4: The Proposed Development, Volume 2** of the ES [APP-045].

2. Trinity House's Remit

2.1 Introduction

- 2.1.1 Trinity House are the General Lighthouse Authority (GLA) for England and Wales, the Channel Islands and Gibraltar who safeguard shipping through the implementation and maintenance of navigational aids within these waters.
- 2.1.2 The key offshore elements which are of interest to Trinity House 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 cable 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 Trinity House, comprising:
- Offshore aspects of the Application:
 - Shipping and navigation.
- 2.1.4 The following matters were agreed as not forming areas of focus for Trinity House 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 **Table 2-1** in this section briefly summarises the consultation that the Applicant has undertaken with Trinity House including both statutory and non-statutory engagement during the pre-application and post-application phases.

Table 2-1 Consultation and Correspondence undertaken with Trinity House pre-application

Date and Type	Description of consultation
02 July 2020 Email Correspondence	Agreement on Survey requirements
05 August 2020 Teams Call	Introduction to Rampion 2 and overview of the methodologies being used for the vessel traffic survey and Navigational Risk Assessment (NRA).
23 February 2021 Online Workshop	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.
16 September 2021 Email Response	Section 42 Response
20 December 2021 Teams Call	Discussion around the feedback from the MCA and Trinity House to Section 42 consultation phase.
06 September 2022 Online Workshop	Second Hazard Workshop to discuss with local users the hazards associated with shipping and navigation including any changes following amendments to the Development Consent Order (DCO) Limits.
21 February 2024	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.
11 June 2024	Trinity House response via email confirming agreement to the drafting the DCO/DMLs, with minor requested changes.

3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and Trinity House 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 Trinity House 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 Trinity House 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 Trinity House 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	Matter of Contention	Trinity House's Position	Applicant's Position	Current Status	Date of Agreement	Comments/Notes
TH01	Consultation		Trinity House has been adequately consulted regarding shipping and navigation to date and is satisfied with the outcomes of consultation with other relevant stakeholders.	Agreed		
TH02	Vessel Traffic Surveys		The vessel traffic survey data used within Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 Navigational Risk Assessment (NRA) [APP-155] is as per the requirements of Marine Guidance Note (MGN) 654 and therefore suitable for use within the assessments.	Agreed		
TH03	Baseline Environment		Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 NRA [APP-155] adequately characterise the shipping and navigation baseline environment.	Agreed		
TH04	Navigational Risk Assessment and Assessment Methodology		Appendix 13.1 NRA [APP-155] is compliant with the requirements of MGN 654 including completion of an MGN 654 checklist. Appropriate 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		
TH05	Worst Case Assessment of Proposed DCO Limits		The worst case (Maximum Design Scenario (MDS)) for shipping and navigation has been assessed within Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 NRA [APP-155] .	Agreed		
TH06	Pre Submission Changes to DCO Limits		The Development Consent Order (DCO) limits were amended as part of the pre application process in respect of shipping and navigation, and search and rescue concerns. This includes: <ul style="list-style-type: none"> Establishment of the navigation corridor / Helicopter Refuge Area (HRA) located west of Rampion 1. This corridor allows 	Agreed		

Reference Number	Matter of Contention	Trinity House's Position	Applicant's Position	Current Status	Date of Agreement	Comments/Notes
			<p>an alternate access route to Littlehampton Harbour.</p> <ul style="list-style-type: none"> • Establishment of the HRA located south of Rampion 1. • Reduction in DCO limits to avoid overlap with the Dover Straits Inshore Traffic Zone (ITZ) and minimise deviations for vessel to/from the port of Shoreham. • Reduction in DCO limits to increase sea room between the array area and the Dover Straits Traffic Separation Scheme (TSS). • Reduction in DCO limits to increase sea room between the array area and the Owers light buoy. 			
TH07	Hazard (Impact) Identification		The hazards (impacts) identified within Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 NRA [APP-155] adequately capture the potential effects on shipping and navigation that may result from the Proposed Development.	Agreed		
TH08	Risk Level (Impact Significance) In Isolation		Based on the information provided within Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 NRA [APP-155] it is agreed that in isolation hazards (impacts), including main route deviations caused by the project and impacts on search and rescue, are broadly acceptable or tolerable (unlikely to be significant) with the mitigation measures and required monitoring principles in place.	Agreed		
TH09	Risk Level (Impact Significance Cumulative)		Based on the information provided within Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 NRA [APP-155] 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		

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

Reference Number	Point of Discussion	Trinity House's Position	Applicant's Position	Current Status	Date of Agreement	Comments/Notes
TH10	DCO/DmL Condition Wording		Following suggestions from Trinity House and MCA, the dDCO and dMLs have been amended with changes and justifications detailed in Schedule of Changes for the Draft Development Consent Order (document reference 3.3). This was submitted to the Examination at the procedural deadline on the 16 th Jan 2024, and a further version submitted to the Examination at Deadline 3 on the 25 th April 2024.	Agreed	18/06/24	Response to Trinity House MCA and MMO comments and proposed amends to DCO and DML agreed over email correspondence.

4. References

Rampion 2 DCO Project Glossary:

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

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

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

