

Rampion 2 Wind Farm

Statement of Common Ground – Historic England

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RWE Renewables UK Swindon Limited:

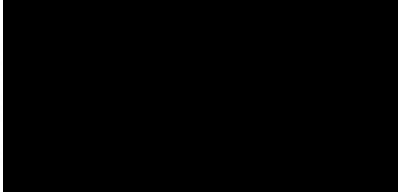
Windmill Hill Business Park,
Whitehill Way,
Swindon,
Wiltshire SN5 6PB.
T +44 (0) 8456 720 090
Registered in England and Wales no. 02550622

Registered office:

RWE Renewables UK Swindon Limited
Windmill Hill Business Park
Whitehill Way
Swindon

Signatories

Signed	Rebecca Lambert
Date	09.07.24
Name	Rebecca Lambert
Position	Inspector of Ancient Monuments
For	Historic England

Signed	
Date	
Name	Karen Algate
Position	Senior Consents Manager
For	Rampion Extension Development Ltd (RED) (the Applicant)

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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 Historic England 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 Historic England 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 Historic England, submit Principal Areas of Disagreement Statements (PADS) where the Interested Party: ‘holds a substantive concern or concerns with the Proposed Development’. Historic England has not submitted a PAD, but raised concerns in relation to heritage within the Relevant and Written Representations.
- 1.1.3 This SoCG is intended to cover all topics where agreement is sought between the Applicant and Historic England and covers the topics split by discipline as detailed in the Environmental Impact Assessment (EIA) for RED:
- Principle of Development;
 - Onshore aspects of the Application:
 - ▶ Historic Environment.
 - Offshore aspects of the Application:
 - ▶ Historic environment (including Marine archaeology).
- 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 discussions undertaken through pre-application consultation, the Applicant has sought to progress a SoCG. It is the intention that this document provides the Planning Inspectorate with a clear overview of the level of common ground between both parties. This document will facilitate further discussions between the Applicant and Historic England and will be updated as discussions progress prior to and during the Examination.

1.2 Approach to SoCG

- 1.2.1 The Applicant started to produce this SoCG during the pre-examination phase of the Rampion 2 Offshore Wind Farm. The SoCG makes reference to other

submission documents that set out, in greater detail, the discussions that have taken place between Historic England 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 [APP-042 to APP-072]**¹.

1.2.2 The SoCG is structured as follows:

- **Section 1: Introduction:** Outlining the background to the development of the SoCG;
- **Section 2: Historic England’s role with respect to the SoCG:** Describing the main areas of discussion within the SoCG and a summary of consultation to date;
- **Section 3: Agreements Log:** A record of the positions of the Applicant alongside those of Historic England as related to the topics of discussion and the status of agreement on those positions.

1.3 The Proposed Development

1.3.1 RED is developing the Rampion 2 Offshore Wind Farm Project (‘Rampion 2’) located adjacent to the existing Rampion Offshore Wind Farm Project (‘Rampion 1’) in the English Channel.

1.3.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km².

1.3.3 The key offshore elements of the Proposed Development will be as follows:

- 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

¹ All documents can be found [here](#) on the Planning Inspectorate website during the DCO decision process, although this is likely to be archived after the decision has been made.

- 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 **Environmental Statement (ES) [APP-045]**.

2. Historic England's Remit

2.1 Introduction

2.1.1 The general duties of Historic England under Section 33 of the National Heritage Act 1983 are as follows: "...so far as is practicable:

- *to secure the preservation of ancient monuments and historic buildings situated in England;*
- *to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and*
- *to promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation."*

2.1.2 Historic England also provides advice in recognition of the English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act 2009, the UK Marine Policy Statement and the objectives and policies of published English marine plans.

2.1.3 As such, Historic England will be particularly interested in the impacts on heritage assets and their significance that built elements of the Rampion 2 development has, as well as excavation of undiscovered buried assets during the construction of the underground cables, and operation of the completed scheme.

2.1.4 The SoCG covers key topics of the DCO application of relevance to Historic England, comprising:

- Onshore aspects of the Application:
 - ▶ Landscape and Visual Impact Assessment (LVIA);
 - ▶ Historic Environment;
- Offshore aspects of the Application:
 - ▶ Historic Environment (including Marine Archaeology).

2.1.5 Other topics may be of relevance and have impact/effect on the historic environment but are not key topics detailed in this SoCG.

2.2 Consultation Summary

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

Table 2-1 Consultation and Correspondence undertaken with Historic England

Date and type	Description of consultation
27 May 2020 Early Engagement MS Teams	MS Teams call RED Introduction To introduce the Proposed Development and the approach to 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
09 September 2020 Steering Group Meeting	Steering Group Meeting to introduce the Proposed Development.
15 September 2020 Expert Topic Group (ETG)	SLVIA/LVIA, Onshore and Offshore Archaeology and Cultural Heritage
16 March 2021 Steering Group Meeting	Steering group meeting to provide an update on the Proposed Development and activities undertaken to date.
18 March 2021 ETG	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	RED Targeted Onshore Cable Route Consultation Response from Historic England dated 15 September 2021 including key topics: Design Envelope, Historic Seascape Character, Terrestrial Heritage assets, Marine Outline Scheme of Archaeology, Commitments Register
1 November 2021 Steering Group	Rampion 2 Steering Group Meeting
4 November 2021	SLVIA/LVIA, Onshore and Offshore Archaeology and Cultural Heritage

Date and type	Description of consultation
10 November 2021 (ETG)	Rampion 2 Expert Topic Group (ETG) Meeting – Historic Environment and Landscape and Visual Impact Assessment (LVIA)
22 March 2022 ETG	Additional targeted Marine Archaeology Meeting.
Statutory Consultation carried out under Section 42 of the Planning Act 2008 (18 October to 29 November 2022) Statutory consultation response	Rampion Offshore Wind Farm Supplementary Consultation (RED) – onshore cable corridor Response from Historic England, dated 29 th November 2022 including key topics: Requirement for surveys, impacts on buried archaeology, impacts on heritage assets and setting
10 November 2022 ETG	ETG Meeting to discuss Historic Environment and Landscape and Visual Impact.
Statutory Consultation carried out under Section 42 of the Planning Act 2008 (4 February – 27 March 2023) Statutory consultation response	Rampion Offshore Wind Farm (RED) Further Supplementary Consultation - Targeted Onshore Consultation (1d) Response from Historic England dated 27 th March 2023 including key topics: Potential for impacts on buried archaeology, requirement for survey
Statutory Consultation carried out under Section 42 of the Planning Act 2008 (28 April – 30 May 2023) Statutory consultation response	Rampion Offshore Wind Farm (RED) Bolney Substation extension Consultation Response from Historic England dated 25 th May 2023 No objection
12 June 2023 Steering Group meeting	Project Update, Review of consultations, Onshore Update Offshore Update, and establishing the DCO timetable and need for Statements of Common Ground.

Date and type	Description of consultation
14 June 2023 ETG	Rampion 2 Expert Topic Group (ETG) Meeting – Landscape and Visual Impact Assessment and Historic Environment
15 February 2024	Statement of Common Ground Page-Turn meeting to review Revision B of the SoCG as previously issued to Historic England within the meeting, and create the new Revision C.
8 March 2024	Meeting to discuss the Written Scheme of Investigation proposed within the DCO suite of documentation.
3 June 2024	Response from Historic England on documents submitted by the Applicant at Deadline 3 (25th April 2024) and in reference to matters addressed at the Issue Specific Hearing held on 16th May.

3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and Historic England 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 Historic England 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 Historic England 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 Historic England is considered to result in a materially different outcome on the assessment conclusions.	Not agreed - material impact

- 3.1.3 The overview of the status of discussion on all of the themes presented in the Agreement/Disagreement log has been reported throughout the Examination via the Statements of Commonality **[APP-8.31]**. The opening position of the stakeholder is reported against the evolving position of the Applicant. Where agreement is reached, this indicates that the stakeholder and Applicant mutually support the position stated by the Applicant. The date of agreement is noted and the ‘Record of Progress’ section of the SOCG tables captures how the issue reached the final ‘position status’, as in Table 3-1 above.

- 3.1.4 The Applicant and Historic England have agreed that the submitted SOCG at Deadline 5 is up to date. While the status of matters has been finalised as far as possible, some of the SOCG still report matters as being in the process of discussion. With relevant materials being submitted into Examination at Deadline 5 these need to be considered to close matters and enable the final SOCG to be submitted at Deadline 6

Table 3-2 Status of discussions related to Historic Environment

Reference Number	Matter of Contention	Historic England's Position	Applicant's Position	Current Status	Date of Agreement	Notes
HE1	Inadequate onshore archaeological baseline assessment and evaluation.	<p>Concern</p> <p>The reporting fails to fully understand that the archaeological resource, in some areas, must be considered at a landscape scale, rather than as individual, spatially defined sites.</p> <p>For example, although the chosen onshore route avoids the scheduled areas of the Blackpatch prehistoric flint mine and barrow cemetery and the New Barn Down monument, it passes through an area of the South Downs that has very high potential for discovery of archaeological remains of equal significance to, and potentially directly related to, the scheduled sites.</p> <p>We raised concerns previously that sufficient archaeological evaluation to understand the impacts on archaeological remains of potentially national significance had not taken place along the onshore route.</p> <p>Desired Action</p> <p>In the embedded environmental measures, Historic England considers there is too much reliance on the recording of archaeological remains as mitigation. Avoiding harm to nationally important heritage assets, not mitigation of impacts, should be the primary objective.</p>	<p>Taking a landscape approach and considering all available desk-based and geophysical survey data, Chapter 25: Historic Environment, Volume 2 of the ES [REP4-024] identifies a high potential for archaeological remains of high heritage significance within the area of the South Downs. The assessment presented in Chapter 25: Historic Environment, Volume 2 of the ES [REP4-024] is based on a worst case scenario.</p> <p>Commitments C-225 and C-79 in the Commitments Register [REP4-057] provide for mitigation through design and archaeological recording. Archaeological interest retained in an asset which is actively conserved is more valuable and actively sought through detailed design, which will be informed by evaluation.</p> <p>The environmental embedded measures were established and adapted through the consultation process. Following recent engagement with WSCC's Archaeologist, proposed changes to the wording of C-225 of the Commitments Register [REP4-057] are made by the Applicant.</p> <p><i>C-225 "Where previously unknown archaeological remains of high heritage significance are identified through surveys along the cable route, and where these locations have not been possible to avoid during earlier design stage, consideration will be made for engineering solutions (e.g., narrowing of the construction corridor, divert cable route within DCO Order Limits, re-siting stockpiles) to avoid impacts in the first instance. Where impacts are not avoidable, these will be minimised where possible through design solutions and an appropriate programme of mitigation will be undertaken to ensure preservation by record. Such measures will be reviewed in consultation with relevant stakeholders (WSCC Archaeologist and Historic England). An onshore outline WSI provides detail of appropriate methodologies to be implemented</i></p>	Ongoing point of discussion		Further discussion on detail of areas for evaluation, phasing of this work, methodologies, and flexibility of approach required. It would be beneficial for this discussion to include the County Archaeological Officer jointly with Historic England, and the applicants consultants/representatives. The results of this then need to be detailed in the oWSI and other key documents where commitments are secured.

Reference Number	Matter of Contention	Historic England's Position	Applicant's Position	Current Status	Date of Agreement	Notes
HE2	Inaccurate assessment of magnitude of impact and significance of effect	<p>Concerns</p> <p>Embedded environmental measures (EEM), such as recording archaeology before any loss, would not reduce harm or magnitude of impact. While investigating archaeology at risk of loss or disturbance is essential and will reduce the loss of knowledge and understanding, it cannot reduce the actual harm.</p> <p>Desired Action</p> <p>Change the downgraded assessment of the impact and the resultant effects being classified as 'Not Significant', as this is misguided and misleading.</p>	<p><i>during the evaluation and mitigation stages of the archaeological works."</i></p> <p>The Applicant has updated the Outline Onshore Written Scheme of Investigation (WSI) [REP3-035] in light of comments from Historic England and other consultees. This WSI sets out an appropriate methodological approach for archaeological investigations which ensures further investigation will be undertaken prior to construction.</p> <p>The Environmental Statement Chapter 25: Historic environment, Volume 2 [REP4-024] provides an assessment of effects in the absence of further mitigation. An agreed scheme of archaeological investigation, recording and dissemination, following any mitigation by detailed design, would still result in loss or truncation of archaeological remains but the archaeological interest would be preserved by record before the loss occurs. Archaeological interest retained in an asset which is actively conserved is more valuable and actively sought through detailed design, which will be informed by evaluation. Mitigation through recording would serve as partial mitigation. The assessment of residual effects takes this mitigation into account in determining the magnitude of change.</p> <p>The Outline Onshore Written Scheme of Investigation (WSI) [REP3-035] (to be updated at Deadline 5) provides the overarching approach to further evaluation and subsequent mitigation, which is to be updated in line with feedback from stakeholders. The Outline Onshore WSI [REP3-035] (to be updated at Deadline 5) provides for the production of site-specific WSIs which will set out the requirements for further investigation where this has not been completed pre-DCO consent, to allow for the agreement of finalised mitigation proposals.</p> <p>The assessment methodology followed in the ES is consistent with the methodology that was set out within the Scoping Report. This approach to the assessment of residual historic environment effects</p>	Not agreed - material impact		Dependent on further review of the topic and any WSI (including site specific WSI's). See also notes for HE1.

Reference Number	Matter of Contention	Historic England's Position	Applicant's Position	Current Status	Date of Agreement	Notes
			is consistent with that used in other applications for development consent.			
HE6	Outline Onshore Written Scheme of Investigation	<p>The outline onshore WSI is comprehensive and reassuring. It is detailed and comprehensive.</p> <p>We are broadly satisfied by the amended Onshore Outline WSI (submitted at Deadline 3 [REP3-035]), subject to the Examination Authorities consideration of the suggested amendments in Historic England's Deadline 4 submissions.</p>	<p>The Applicant welcomes HE's review of the oOWSI contained in their Written Representation [REP3-075].</p> <p>The Applicant has reviewed Historic England's comments within their Deadline 4 submissions [REP4-087] and will incorporate relevant amendments to the Onshore Outline WSI [REP3-035] (to be updated at Deadline 5).</p>	Ongoing point of discussion		Discussed at last meeting as potential for agreement about suitability of oOWSI

Table 3-3 Status of discussions related to Principle of the Proposed Development

Reference Number	Matter of Contention	Historic England's Position	Applicant's Position	Current Status	Date of Agreement	Notes
HE3	Principle of development	Historic England do not object in principle to the Proposed Development. However, we have concerns that harm to the historic environment may result from its construction, operations and maintenance, and decommissioning.	<p>The project will contribute materially towards meeting the urgent national need for renewable energy generation, significantly reducing carbon emissions from energy. The design of the Proposed Development has been an iterative process that has sought to limit the potential for effects on the historic environment. Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] provides an assessment of effects on the historic environment for the construction, operations and maintenance, and decommissioning. The summary of residual effects is presented in Section 26.15. Construction of the Proposed Development will be undertaken in line with embedded environmental measures as listed in Commitments Register [REP1-015], including those developed to address impacts to the historic environment.</p> <p>The Planning Statement [APP-036] outlines the position with regards the planning balance with regard to the benefits of the Proposed Development and the harm to heritage assets that is identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], as per paragraphs 4.7.66 and 5.4.10 of the Planning Statement [APP-036].</p>	Agreed	10-11-23	The applicants position statement does not respond directly to our point regarding concerns for harm to the historic environment. We would expect a note here summarising the process for how this will be addressed (with more detail then provided in individual points in this SoCG).

Table 3-4 Status of discussions related to Marine Archaeology

Reference Number	Matter of Contention	Historic England’s Position	Applicant’s Position	Current Status	Date of Agreement	Notes
HE4	Limitations of marine archaeology evaluation	<p>Concerns</p> <p>Historic England is aware that marine geophysical survey was undertaken in 2020 and in 2021 and Historic England concur with the Applicant that there is the possibility that presently unidentified marine heritage receptors might be discovered within the proposed DCO Order Limits which could be impacted directly or indirectly by the proposed development.</p> <p>Desired Actions</p> <p>The Outline Written Schemes of Investigation (WSI) should provide for geoarchaeological analysis of geotechnical survey materials.</p>	<p>This was discussed during the Evidence Plan Process. The Applicant declared that no geotechnical cores would be collected before the decision on development consent is granted. However, all available information will be used to ensure that the Final WSI and embedded environmental measures clearly state that archaeological input must be sought ahead of geotechnical campaigns (in accordance with C-59). The Applicant responded to this at Deadline 2 as part of the Applicant’s Response to Prescribed Consultee [REP2-026] (Reference: 11.27).</p> <p>Future geoarchaeological assessments will be undertaken using a staged geoarchaeological approach to assessment and analysis of the collected geotechnical data resulting in project reports and a deposit model. The assessments will be used to contribute to seabed mapping and modelling of submerged prehistoric landscapes, resulting in a greater understanding of the prehistoric past and the use and habitation of submerged former terrestrial landscapes. Preliminary, recommended archaeological core locations, based on the 2020 sub-bottom data and desk-based</p>	Ongoing point of discussion		<p>Advised on the 3rd of June 2024 clarified that should consent be obtained, a suitable WSI shall be produced in consultation with Historic England, in accordance with any Deemed Marine Licence, and thereby allow for subsequent survey method statements to be produced in consultation with Historic England.</p> <p>The Applicant acknowledges that all future Method Statements outlining geotechnical works will be produced in consultation with Historic England.</p> <p>Details on the methodical approach to sample collection and subsequent geoarchaeological assessment has been added to the Outline Marine Written Schemes of Investigation, [APP-235] (updated at Deadline 5).</p> <p>An updated Outline Marine Written Scheme of Investigation [REP3-041] has been submitted at Deadline 5 to address concerns raised by Historic</p>

Reference Number	Matter of Contention	Historic England's Position	Applicant's Position	Current Status	Date of Agreement	Notes
			<p>data can be seen in Figure 1-6, Outline Marine Written Schemes of Investigation, [APP-235] (updated at Deadline 3).</p>			<p>England in 'Comments on any further information/submissions received by Deadline 3' [REP4-087] (submitted at Deadline 4). The updates include;</p> <p>Removal of section 5.7.</p> <p>The text "and in consultation with "statutory historic" bodies i.e. Historic England (Generation and Transmission Assets) and West Sussex County Council (Transmission Assets)" has been added to Table 6-4.</p> <p>Section 6.5 has been updated to include possible sample methods (vibrocore and boreholes) as well as a methodical approach to the archaeological assessment of geotechnical cores. Further details have also been added to section 8.4.</p>

4. References

Rampion 2 DCO Project Glossary:

[1.7 Rampion 2 Application Document Tracker \(planninginspectorate.gov.uk\)](https://planninginspectorate.gov.uk/1.7-Rampion-2-Application-Document-Tracker)

Rampion 2 DCO Examination Document Library:

[EN010117-000419-Rampion 2 Exam Library.pdf \(planninginspectorate.gov.uk\)](https://planninginspectorate.gov.uk/EN010117-000419-Rampion-2-Exam-Library.pdf)

