

Rampion 2 Wind Farm

Statement of Common Ground - Maritime and Coastguard Agency

July 2024

Rev D

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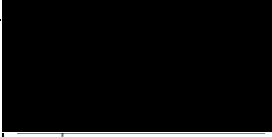
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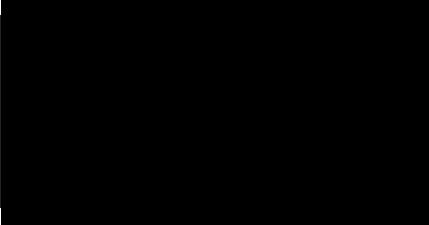
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1. Introduction

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 Maritime and Coastal Agency (MCA) 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 MCA, 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 MCA, and covers the topics split by discipline as detailed in the Environmental Impact Assessment (EIA) for Rampion 2:
- Principle of Development;
 - Offshore aspects of the Application:
 - 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 MCA 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 MCA 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. MCA issued their relevant representations [RR-221] 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 MCA 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: MCA’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 MCA 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 (‘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 is provided in **Chapter 4: The Proposed Development, Volume 2** of the **Environmental Statement (ES) [APP-045]**.

2. Maritime and Coastguard Agency's Remit

2.1 Introduction

- 2.1.1 The MCA is an Executive Agency of the Department for Transport and is responsible for safety of life at sea within the United Kingdoms (UK) waters, and on-board UK flagged vessels. They produce legislation and guidance for all maritime matters including agreement on offshore renewables.
- 2.1.2 The key offshore elements which are of interest to the MCA 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 MCA, comprising:
- Offshore aspects of the Application
 - Shipping and navigation;
- 2.1.4 The following matters were agreed as not forming areas of focus for MCA 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 MCA 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 MCA

Date and type	Description of consultation
02 July 2020 Email Correspondence	Agreement on Survey requirements
29 July 2020 Written Statement	Scoping Response
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.
21 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.
01 February 2022 Email Correspondence	Agreement on implementation of a suitable traffic corridor.
04 March 2022 Teams Call	Discussion of the Rampion 2 site boundary and use of a navigation corridor / Helicopter Refuge Area (HRA).
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.

Date and type	Description of consultation
18 March 2024	Meeting to discuss MCA response to Rule 6 Letter. This included agreement that the MCA feedback received in relation to emergency response and search and rescue will feed into the SAR Checklist undertaken post consent.

3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and MCA 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 MCA 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 MCA 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 MCA 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 MCA 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 Shipping and Navigation

Reference number	Point of Discussion	MCA's position	Applicant's position	Current status	Date of agreement	Comments / notes
MCA1	Consultation	The MCA has been adequately consulted regarding shipping and navigation to date and is satisfied with the outcomes of consultation with other stakeholders.	The Applicant welcomes MCA's support for the consultation process.	Agreed	16/01/24	
MCA2	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.	The Applicant welcomes MCA's support for the baseline data.	Agreed	16/01/24	
MCA3	Baseline Environment	Chapter 13: Shipping and Navigation [APP-054] and Appendix 13.1 NRA [APP-155] adequately characterise the shipping and navigation baseline environment.	The Applicant welcomes MCA's support for the baseline data.	Agreed	16/01/24	
MCA4	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 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.	The Applicant welcomes MCA's support for the baseline data.	Agreed	16/01/24	
MCA5	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] .	The Applicant welcomes MCA's support for the baseline data.	Agreed	16/01/24	

Reference number	Point of Discussion	MCA's position	Applicant's position	Current status	Date of agreement	Comments / notes
MCA6	Pre Submission Changes to DCO Limits	<p>The changes to the Red Line Boundary have led to an overall increase in the navigable sea room available in the vicinity of The Dover Strait TSS to the south, Inshore Traffic Zone (ITZ) to the east and the approaches to the Solent to the west. In addition, the introduction of a structures exclusion zone (NRA Figure 17.1) compliant with MGN 654 to the west of Rampion 1 is welcomed by the MCA.</p> <p>Guidance from MGN 654 has been used to show the minimum width required for the 3.6NM long corridor and 1.3NM as a worst-case scenario is compliant. The inclusion of this structures exclusion zone and the reduction in the western boundary in proximity to Owers Bank and in particular the Owers south cardinal mark, has been welcomed by key stakeholders.</p> <p>MCA is content with these changes and agrees with the assessment and conclusion that it will not pose an unacceptable navigational risk.</p>	<p>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:</p> <ul style="list-style-type: none"> Establishment of the navigation corridor / Helicopter Refuge Area (HRA) located west of Rampion 1. This corridor allows an alternate access route to Littlehampton Harbour. 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. 	Agreed	16/01/24	
MCA7	Hazard (Impact) Identification	<p>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.</p>	<p>The Applicant welcomes MCA's support for the assessment.</p>	Agreed	16/01/24	
MCA8	Risk Level (impact Significance) In Isolation	<p>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</p>	<p>The Applicant welcomes MCA's support for the baseline data.</p>	Agreed	16/01/24	

Reference number	Point of Discussion	MCA's position	Applicant's position	Current status	Date of agreement	Comments / notes
		and impacts on search and rescue, are broadly acceptable or tolerable (unlikely to be significant) with the mitigation measures and required monitoring in place.				

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

Reference Number	Point of Discussion	MCA's Position	Applicant's Position	Current Status	Date of Agreement	Comments/Notes
MCA9	DCO/DmL Condition Wording	The MCA is satisfied with the provisions included in the dDCO / dMLs to safeguard shipping and navigation.	Following suggestions from MCA and Trinity House, 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 16th January 2024, and a further version submitted to the Examination at Deadline 3 on the 25th April 2024.	Agreed	18/03/2024	This was discussed with the MCA in a meeting on 18th March 2024. The Applicant has updated the draft Development Consent Order [PEPD-009] .
MCA10	DCO/DmL Condition Wording: Requirement 16 (2)	MCA disagrees with this wording as it does not secure the requirement to complete the surveys, only to have due regard of the need.	The Applicant notes that the wording reflects that used in Sheringham & Dudgeon and East Anglia One North and Two Orders. We consider that the fact that the overarching survey proposals must have due regard to the need to undertake these surveys, these are secured.	Not agreed - No material impact		
MCA11	DCO/DmL Condition Wording: Schedules 11 & 12 Condition 9 (8)	MCA requests that wording is added to the effect of: <i>"All dropped objects must be reported to the MMO, UKHO and HMCG using the Dropped Object Procedure Form as soon as reasonably practicable and no later than 6 hours of the undertaker becoming aware of an incident. Immediate notification should be made to HM Coastguard via telephone where there is a perceived danger or hazard to navigation. On receipt of the</i>	The Applicant has amended the Condition to remove the previous reference to notice having to be given within five days; notice must therefore be given as soon as reasonably practicable following the undertaker becoming aware of an incident in all instances; this is consistent with the condition imposed on the grant of the Hornsea Four Offshore Wind Farm Order, 2023. There is inconsistency in terms of the drafting and timings suggested by MCA and MMO but, the Applicant's drafting amendment means that this is irrelevant as the Condition secures that	Not agreed - No material impact		MCA and UKHO have reaffirmed their position of needing to know immediately if the dropped object is a navigation hazard for warnings to be issued to mariners via HMCG. Therefore they still support notification within 6 hours. MCA has proposed to the MMO that this becomes standard wording for the dropped objects procedure and while we are still waiting for their position this wording is consistent with other ML authorities in the UK.

		<p><i>Dropped Object Procedure Form, the MMO may require relevant surveys to be carried out by the undertaker (such as side scan sonar) if reasonable to do so and the MMO may require obstructions to be removed from the seabed at the undertaker's expense if reasonable to do so."</i></p>	<p>dropped objects will be reported 'as soon as reasonably practicable'.</p>		
MCA12	<p>DCO/DmL Condition Wording:</p> <p>Schedules 11 & 12</p> <p>Condition 16 (2)</p>	<p>MCA requests that wording is added to the effect of:</p> <p><i>"A swath bathymetric survey to IHO Order 1a of the area within the Offshore Order Limits extending to an appropriate buffer around the site, must be undertaken. This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications. This must be submitted as soon as possible, and no later than [three months] prior to construction. The Order Limit shapefiles must be submitted to MCA.</i></p> <p><i>The Report of Survey must also be sent to the MMO."</i></p>	<p>The Applicant altered draft DCO wording as follows:</p> <p><i>"(2) Subject to receipt from the undertaker of specific proposals pursuant to this condition, the pre-construction survey proposals must have due regard to the need to undertake -</i></p> <p><i>(a) a full sea floor coverage swathbathymetry survey undertaken to IHO Order 1a standard that meets the requirements of MGN654 and its annexes, and side scan sonar of those parts of the offshore Order limits in which it is proposed to carry out the authorised scheme including proposed cable locations and an appropriate buffer. This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications;</i></p> <p>...</p> <p><i>(3) The undertaker must carry out the surveys agreed under sub-paragraph (1) and provide the baseline report to the MMO in the agreed format and in accordance with the agreed timetable, unless otherwise agreed in writing by the MMO and submitted to the MCA as Geographical Information System data referenced to WGS84 datum."</i></p>	<p>Not agreed - No material impact</p>	<p>MCA disagrees with 'must have due regard to the need to undertake...' as the requested amendment is as per MGN hydrographic guidelines in MGN 654 Annex 4 for pre-construction surveys. Having due regard for the need to undertake hydrographic surveys does not secure the requirement to conduct surveys.</p> <p>Once completed, the data must be sent to MCA in either CARIS Project Directory or GSF (Generic Sensor Format) format, as per MGN 654 Annex 4, not as Geographical Information System data.</p>

4. References

Rampion 2 DCO Project Glossary:

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

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

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)

