

Rampion 2 Offshore Wind Farm (Project Reference: EN010117)
Principal Areas of Disagreement Statement (PADS) – Version 2
West Sussex County Council
August 2024



Introduction

This statement has been prepared by West Sussex County Council (WSCC). WSCC is a host authority for the Rampion 2 Offshore Wind Farm DCO, which was accepted on 20 September 2023 by the Planning Inspectorate for Examination. This document identifies the principal areas of disagreement that remain at the close of the Examination, which commenced on 6 February 2024. Version 2 of this statement removes those areas of principal disagreement that have now been satisfied through either engagement with the Applicant or through the provision of information provided by the Applicant through the Examination.

The 'likelihood of being addressed during the Examination' column has been removed, as this is no longer relevant. This statement should be read in conjunction with the signed Statement of Common Ground (SoCG) submitted by the Applicant at Deadline 6, to understand how areas of concern have been addressed.

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|-----------------------------------|---|---|--|
| Assessment of Alternatives | | | |
| 1. | Concern about LACR-01d of the cable route being taken forward as part of the Project. | <p>WSCC remains concerned about option LACR-01d taken forward by the Applicant. The archaeological sensitivity of this section of the route is exceptionally high. The magnitude of harm to the historic environment within this route section cannot be accurately assessed on the basis of the evidence presented by the applicant.</p> <p>WSCC notes the points raised by the Applicant in previous submissions, with regard to the non-intrusive survey work undertaken to advance understanding of significance. An agreement on the revised wording of dDCO requirement 19 has been reached with the Applicant and will be submitted by the Applicant at Deadline 6. This, in conjunction with the changes to C-225 and to the OOWSI, have resulted in a meaningful reduction in the magnitude of risk to nationally significant heritage assets within this area of the Order Limits, as preservation in situ will be secured where appropriate and proportionate by the relevant commitments and control documents</p> <p>Nevertheless, WSCC remains concerned over the scale or harm to archaeological remains in this area, and that the significance of any affected heritage assets is not sufficiently understood due to lack of trial trench evaluation, given the known archaeological</p> | <p>Pre-determination trial trench evaluation of this area of the Order Limits, in order to fully understand the archaeological potential, the significance of any affected archaeological remains, the feasibility of options for avoidance by design and engineering solutions (preservation in situ) and the suitability of mitigation measures set out within the OOWSI. WSCC notes that the Applicant has stated they will not be undertaken such work prior to determination.</p> |

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|--|--|--|--|
| | | context and the unusually high risk for spatially extensive and nationally significant archaeological remains to be present within this section of the Order Limits. | |
| Project Description and Construction Detail | | | |
| 2. | The detailed design for trenchless crossings (HDD) will be confirmed at the detailed design stage as part of Construction Method Statements (CMS) (APP-255). This leaves significant uncertainty as the potential for impacts. | The OCMS suggests for any changes to trenchless crossings (currently identified as preferred options) confirmation will be provided that there are no new or materially different environmental effects arising compared to those assessed in the ES. However, no methodology as to how this will be assessed/established has been provided. | WSCC would be satisfied if the Applicant had chosen to accept the suggested amendments by the ExA of the inclusion of a DCO Requirement for this matter. |
| Seascape, Landscape and Visual Impact (SLVIA) | | | |
| 3. | Development of further offshore design principles. | Concerns about the layout and extent of offshore wind turbines and the securement of a Project with lesser impacts to receptors in West Sussex. | The Applicant has not provided any further design principles to satisfy WSCC that a lesser impactful design can be achieved through detailed design. |
| Socio-Economics | | | |
| 4. | Lack of clarity on how the limited local economic impact of the Project during construction is being addressed. | Concerns have been highlighted on the low local economic impact during construction phase. The submission acknowledges consideration of the issue further without clarifying how and when this will occur. | The Applicant has not clarified what work has been undertaken or is ongoing or planned to address this issue, including any findings or outcomes as relevant. |
| 5. | Concerns about the approach to the methodology | More clarity is requested on aspects of the assessment methodology, including: | The Applicant has not provided clarifications in respect of these aspects of the assessment methodology so these are clearly understood when the assessment is interpreted. In |

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|-----|---|--|--|
| | | <ul style="list-style-type: none"> • Selection of Sussex as a receptor area for economy and impact on volume and value of tourism economy; • Uncertainty over population estimates data; • Implications over data limitations across the assessment; • The implications of not considering induced impacts in respect of economic effects are not explained and is unclear as this is not stated as a limitation; and • Reference to Project impacts and construction methods within the description of the baseline. | <p>respect of induced impacts, an assessment of these should be provided.</p> <p>The Applicant should have referred to impacts and construction methods used in relation to resources and receptors within the Assessment of Effects, rather than baseline conditions.</p> |
| 6. | Lack of measures and commitments that would support a boost to the tourism sector during operation and maintenance. | No identification of measures and commitments that would support a boost to the tourism sector. There is a lack of assertion within the assessment of potential impacts on the perception of Sussex as a place to visit beyond visitor trend analysis for Brighton and Hove which may be influenced by other unrelated factors. | The tourism sector is a priority in economy plans across Sussex. The Applicant has not identified measures and commitments that would support a boost to the tourism sector during operation. |
| 7. | Concerns about Outline Skills and Employment Strategy (OSES) | The OSES lacks detail with regards to existing skills gaps and current levels of provision. Baseline data included has no source/year. OSES also lacks detail on potential initiatives which are directly aligned with local specific issues and need. It provides no explanation on whether it would differentiate between the provision and outputs offered through the DCO versus provision and outputs offered in a | The Applicant has not provided an up-to-date baseline with all sources referenced. The Applicant has not provided details of existing skills gaps and current support provision from a skills and employment perspective. Also, the Applicant has not provided further detail on specific initiatives which are tailored to local issues and need. |

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|------------------------------|--|---|--|
| | | 'business as usual' scenario. It does not demonstrate net additional benefit. | |
| 8. | Opportunities for local business to access the supply chain | The Applicant states they will identify opportunities for companies based or operating in the region to access the supply chain for the Project, and that this is secured through a commitment (C-34) in the OCoCP. This measure, however, is not included within the OCoCP. | The Applicant should provide a firm commitment to this in the OCoCP and outline the mechanism to enable access to the supply chain. The Applicant should clarify what work has been undertaken or is ongoing or planned to address this issue. Further work was expected in respect of local supply chain expenditure, to increase from that forecasted. |
| Traffic and Transport | | | |
| 9. | Insufficient justification and supporting information for proposed temporary and permanent access arrangements. | There is limited information for the accesses themselves. Whilst some design information can be secured through the DCO process and provided as each phase of works progresses, certainty would be required that the accesses indicated are feasible. | Provide sufficient information to support and demonstrate the proposed access arrangements are feasible and can be delivered. Agree the extent of information that is required to support the detailed access designs. |
| Historic Environment | | | |
| 10. | Risk of harm to nationally significant heritage assets within areas of exceptionally high archaeological potential and significance – Cable corridor section LACR-01d. | Risk of harm to nationally significant heritage assets where the cable corridor intersects with an area of exceptionally high archaeological significance, potential and sensitivity. A multi-period prehistoric landscape characterised by Early Neolithic flint mining features. Consideration of alternatives appears to give insufficient weighting to this significant historic environment constraint. | Pre-determination trial trench evaluation should be undertaken within this area of the Order Limits, in order to rule out the presence of nationally significant archaeological remains. This would advance understanding of significance of any affected archaeological remains, the feasibility of options for avoidance by design and engineering solutions (preservation in situ) and the suitability of mitigation measures set out within the OOWSI. WSCC notes that the Applicant has |

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|-----|---|--|---|
| | | <p>WSCC recognises the Applicant’s efforts to avoid or minimise harm to nationally significant heritage assets in this area. The agreed amendments to C-225 and dDCO Requirement 19 (to be submitted by the applicant at Deadline 6), as well as updates to the OOWSI (see WSCC61) have resulted in a meaningful reduction in the magnitude of risk to nationally significant heritage assets. This is because its preservation in situ will be secured where appropriate and proportionate by the relevant commitments and control documents.</p> <p>Nevertheless, the Project still carries risk of harm to heritage assets of high and national significance within this area, in the event that they are assessed as not suitable for preservation in situ, or that the range of design and engineering solutions proposed by the Applicant may not be feasible.</p> <p>A degree of risk and harm therefore still remains.</p> | <p>stated they will not be undertaken such work prior to determination.</p> |
| 11. | <p>Lack of prior archaeological field evaluation within areas of exceptionally high archaeological potential and significance – Cable corridor section LACR-01d</p> | <p>WSCC remains concerned over the absence of any intrusive field evaluation within this area of exceptionally high archaeological potential.</p> <p>Agreed revisions to the wording of dDCO requirement 19 has been reached with the Applicant (to be submitted by the Applicant at Deadline 6), combined with changes to C-225 and to the OOWSI, have resulted in a meaningful reduction in the magnitude of risk to nationally significant heritage assets within this area of the Order Limits, as preservation in situ</p> | <p>Pre-determination trial trench evaluation should be undertaken within this area of the Order Limits, in order to fully understand the archaeological potential, the significance of any affected archaeological remains, the feasibility of options for avoidance by design and engineering solutions (preservation in situ) and the suitability of mitigation measures set out within the OOWSI. WSCC notes that the Applicant has stated they will not be undertaken such work prior to determination.</p> |

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|-----|--|---|--|
| | | <p>will be secured where appropriate and proportionate by the relevant commitments and control documents. See WSCC54.</p> <p>However, WSCC’s position on the lack of field evaluation within this area, and the inability to understand their significance and the suitability of proposed mitigation methods, (as set out in earlier comments below) still stands.</p> | |
| 12. | Effects of proposals upon grade II listed Oakendene Manor (NHLE 1027074) | <p>WSCC is concerned about the proposed harm to grade II listed Oakendene manor, arising via changes within its setting from construction and operation of Oakendene substation and compounds.</p> <p>WSCC welcomes the additional viewpoint photography provided by the Applicant, and considers the assessment is now appropriately evidenced. WSCC is now in a position to agree with the overall assessment of a Medium magnitude of adverse change to Oakendene manor.</p> <p>WSCC disagrees with aspects of the narrative assessment of effects on Oakendene Manor within the ES chapter, which downplay the importance of current key views and the predicted degree of change to these views during and following construction of the substation. This gives a misleading impression of the true magnitude of change to the setting</p> | WSCC requests the Applicant provide an updated, more detailed and nuanced assessment to evidence their conclusion of less than substantial harm. This should be based on the specific impacts of the predicted changes to the asset’s architectural and historic interest and overall significance. And not solely on equating a Medium adverse magnitude of change in EIA terms, to less than substantial harm. |

| Ref | Principal Issue in Question | Concern held | What needs to change/be amended/be included in order to satisfactorily address the concern |
|--|---|---|---|
| | | <p>of Oakendene, and the degree to which the ability to appreciate significance will be reduced. Please see WSCC Deadline 5 submission and WSCC’s response to the ExA’s Further Written Question HE 2.1 for further detail.</p> <p>WSCC also disagrees with the methodology employed for assessing substantial, versus less than substantial harm. Please see WSCC Deadline 5 submission and WSCC’s response to the ExA’s Further Written Question HE 2.1 for further detail.</p> | |
| Draft Development Consent Order and s106 draft principles | | | |
| 13. | Concerns about dDCO wording and securement of required mitigation | WSCC have provided comments on the dDCO and the Applicant has amended some elements to take account of these comments. Principal areas of disagreement remain in relation to various articles and schedules within the Draft DCO, including wording of some of the Requirements. | To update the DCO based upon the comments made in the Closing Position Statement at Deadline 6. |

Rampion 2 Offshore Wind Farm (Project Reference: EN010117)
 Principal Areas of Disagreement Statement – Version 2
 West Sussex County Council
 Submitted on 1 August 2024