

**Agenda Item 9**  
**Report NPA23/24-19**

Report to	<b>South Downs National Park Authority</b>
Date	<b>12 December 2023</b>
By	<b>Director of Planning</b>
Title of Report	<b>Written Representation to Rampion Extension Development Limited's application for 'Development Consent' for the Rampion 2 Offshore Wind Farm</b>
Purpose of Report	<b>To seek comments on and agree the Authority's Written Representation for the Rampion 2 Offshore Wind Farm</b>

**Decision**

---

**Recommendation: The National Park Authority is recommended to:**

- 1. Provide comments on and agree the proposed Written Representation, set out in Appendix 1, to be submitted as the Authority's Written Representation to the Planning Inspectorate (in accordance with the timescales to be confirmed by the Planning Inspectorate) and;**
  - 2. Note the contents of the Local Impact Report to be submitted to the Planning Inspectorate as set out in Appendix 2.**
- 

**Executive Summary**

- Rampion Extension Development Ltd (RED) have submitted a 'Development Consent Order' (DCO) for the Rampion 2 Offshore Wind Farm Scheme. The DCO will be formally examined under the 'Nationally Significant Infrastructure Project' (NSIP) process, managed by the Planning Inspectorate on behalf of the Secretary of State.
- As part of that formal process the South Downs National Park Authority (SDNPA), as a 'relevant Local Authority', is invited to submit a 'Local Impact Report' (setting out the positive, negative and neutral impacts of the proposal) and 'Written Representation' (setting out any objections, concerns or matters of support).
- The South Downs National Park (SDNP) lies to the north of the proposed offshore array, comprising the higher ground and open downland above the Coastal Plain and includes the Heritage Coast east of Seaford to Eastbourne.
- One-third of the proposed onshore cable corridor would run through the National Park, whilst the offshore array and further construction activity including the temporary construction compound at Washington would take place in the setting of the National Park.
- In line with previous consultation responses on the Rampion 2 Offshore Wind Farm approved by the Authority, it is recommended that the SDNPA object to the DCO. Whilst the Authority support the urgent need for renewable energy the DCO application, as submitted, would cause harm to the National Park. This objection is set out in more detail within the Written Representation (see Appendix 1).

- The SDNPA's response (the Local Impact Report and Written Representation) have to be submitted to the Planning Inspectorate in accordance with as yet unannounced deadlines, anticipated to be in early 2024. The six-month examination period is likely to start in Spring 2024 and will be led by the Planning Inspectorate as the Examining Authority.

## I. Background

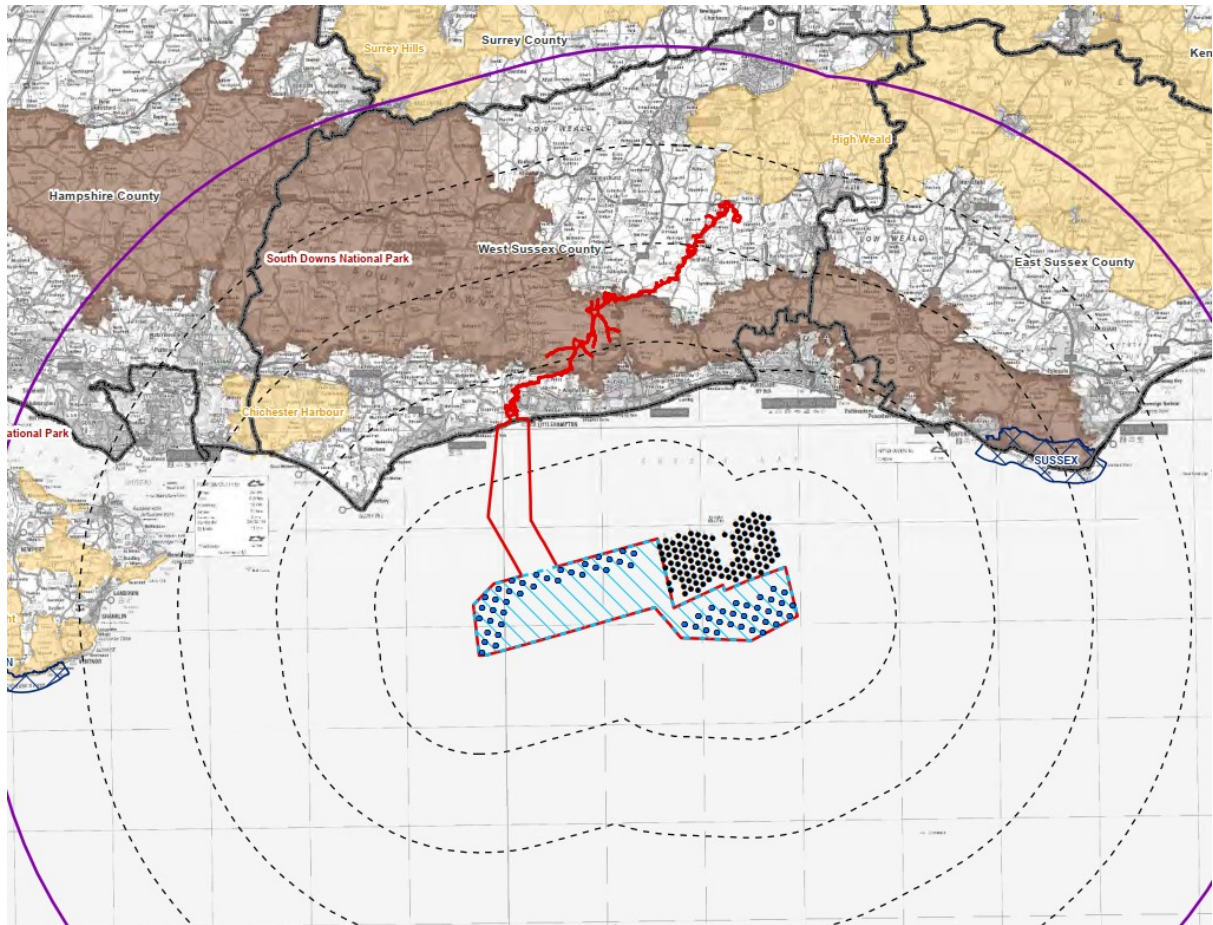
- I.1 RED have submitted a Development Consent Order (DCO) for the proposed Rampion 2 Offshore Wind Farm to the Planning Inspectorate for consideration (on behalf of the Secretary of State) under the 'Nationally Significant Infrastructure Project' (NSIP) process. The Authority (as the Local Planning Authority for approximately 13 km of the onshore cable corridor boundary area) has been invited to submit a 'Local Impact Report' and a 'Written Representation' on our views of the proposal, including the potential impacts as a result of the development itself and to take part in the examination hearings.
- I.2 A 'Local Impact Report' (LIR, as defined in s60(3) of the Planning Act 2008), here to note, is a technical report prepared under delegated authority. The main purpose of the LIR is to make the Examining Authority aware of the Local Plan policies and other material considerations relevant to the proposed development and the extent to which the proposed development accords, or does not accord, with those policies. The Local Impact Report does this under topic-based headings addressing the impacts of the scheme, identifying key issues followed by providing a commentary on the extent to which the proposed Development Consent Order (DCO) addresses these issues. The LIR should be proportionate and not replicate the information provided within the DCO application documents and should not set out any opposition or support for the proposed scheme. If an Authority wants to oppose a scheme, this has to be set out in the 'Written Representation'.
- I.3 The 'Written Representation' is the document in which the Authority sets out its views on the application and whether or not it supports the application (including reasons). Cross references to the LIR are encouraged to assist in keeping any submission as concise as possible.

### The Development Scheme

- I.4 Wind power is at the heart of the UK Government's Energy Strategy, which has a target of delivering over a third of UK electricity from offshore wind by 2030, up from 10% today. The first (and currently only) windfarm off the south coast was granted consent in 2014. This development known as Rampion 1, is now fully operational and has an installed capacity of 400 MW that generates electricity equivalent to supplying 350,000 homes.
- I.5 The current proposal for Rampion 2 would have an installed capacity of up to 1,200 MW, with the offshore components comprising:
- Up to 90 offshore wind turbine generators (WTGs), associated foundations and inter-array cables;
  - Up to three offshore sub-stations;
  - Up to four offshore export cables, each in its own trench.
- The overall area comprising the WTG, substations and inter-array cables is approximately 196km<sup>2</sup> and would be located between 13km – 25km offshore. The WTG would be a maximum of 325m in height (to blade tip), compared to the existing Rampion 1 WTG, which reach a height of 140m to blade tip.
- I.6 The key onshore elements of the proposal are:
- A single onshore landfall site at Climping, West Sussex;
  - Buried onshore cables in a single corridor approximately 38.8km in length running from Climping to Oakendene, which comprise up to four cable circuits in separate trenches – the construction width for which would be a maximum of 40m; and
  - A new onshore substation near Cowfold (Horsham District) that will connect to the existing National Grid Bolney substation (Mid-Sussex), via buried onshore cables.

The proposal in relation to the National Park boundary is shown in Figure 1.

Figure 1 – Overview of the proposed application boundary in relation to the SDNP



- 1.7 The proposed development follows the ‘Rochdale Envelope’ approach. This is employed where the nature of the proposed development means that some details have not been confirmed, and flexibility is sought. In this instance this includes the exact height, location and layout of the WTG and offshore substations. This effectively means that a ‘maximum design scenario’ or ‘worst case’ scenario is presented and assessed by the Examining Authority. In this instance, the maximum design scenario assessed in the Environmental Statement in respect of the turbines would be turbines at up to 325m high, located to the south and west of the existing Rampion 1 array. Officers have based their comments on this scenario.
- 1.8 At the Planning Committee meeting on 09 September 2021, Members agreed that despite supporting in principle the provision of renewable energy, to object to the proposals on the following grounds:
- Insufficient information provided to demonstrate exceptional circumstances justifying Major Development within the National Park, in respect of the onshore cable corridor;
  - The extent of the offshore array, particularly to the east of the existing Rampion 1 array, which had been designated an Exclusion Zone for turbines in Rampion 1;
  - The greater landscape impact of the turbines themselves on the National Park, as a result of the significantly increased height when compared to Rampion 1; and
  - Need for delivery of an extensive mitigation strategy to offset the landscape, visual and ecological harm resulting from the proposals.
- 1.9 Members will note that in response to SDNPA’s previous objection the extent of the offshore array has been reduced and the area east of Rampion 1 array has been omitted from the application boundary for Rampion 2.

**2. Issues for consideration**

- 2.1 Members are asked to provide comments on and agree the Written Representation to the DCO application (as set out in Appendix 1) which in summary is an objection to the proposed scheme due to the significant adverse harm the proposal would cause to the South Downs National Park, contrary to the statutory purpose to conserve and enhance the National Park.
- 2.2 The current proposal fails to clearly demonstrate in the first instance that the tests for Major Development within a National Park have been met. The proposal would also result in significant adverse harm for which RED has failed to secure appropriate mitigation and compensation for the harm caused.
- 2.3 The application has failed to fully appreciate and consider the extent of the South Downs National Park’s remit, including the Partnership Management Plan and the important role nature performs in tackling climate change.

**3. Next Steps**

- 3.1 Members to consider the Written Representation (as set out in Appendix 1) and, if necessary, provide any comments or amendments which will then be implemented prior to submission of the Representation to the Planning Inspectorate (PINS). Members are also asked to note the contents of the Local Impact Report (as set out in Appendix 2) which will be submitted to PINS at the same time.

**4. Other implications**

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No The Written Representation will then form the basis for the examination and any subsequent negotiations undertaken by Officers in due course.
Does the proposal raise any Resource implications?	Yes - officers agreed a Planning Performance Agreement (PPA) with RED to mitigate the costs leading up to the formal submission of the DCO. The PPA cannot cover all costs. Costs will be incurred through the examination process, but these relate to SDNPA’s role as Local Planning Authority and there is a clear expectation that the SDNPA participate and assist with the examination process.
How does the proposal represent Value for Money?	N/A
Which PMP Outcomes/ Corporate plan objectives does this deliver against	PMP Outcome 1 – Landscape & Natural Beauty PMP Outcome 2 – Increasing Resilience PMP Outcome 3 – Habitats & Species PMP Outcome 4 – Arts and Heritage PMP Outcome 5 – Outstanding Experiences
Links to other projects or partner organisations	N/A
How does this decision contribute to the Authority’s climate change objectives	Whilst the provision of renewable energy contributes positively to climate change, the proposal does not recognise the role of nature-based solutions to tackle climate change.

<b>Implication</b>	<b>Yes*/No</b>
Are there any Social Value implications arising from the proposal?	N/A
Have you taken regard of the South Downs National Park Authority’s equality duty as contained within the Equality Act 2010?	Yes – no equalities implications arise directly from this decision. The Planning Inspectorate and Secretary of State will have to have regard to this equality duty in their assessment of RED’s proposals.
Are there any Human Rights implications arising from the proposal?	No
Are there any Crime & Disorder implications arising from the proposal?	No
Are there any Health & Safety implications arising from the proposal?	No
Are there any Data Protection implications?	No

**5. Risks Associated with the Proposed Decision**

<b>Risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Mitigation</b>
Reputational Risk from objecting (or not objecting) to the Scheme	Medium	Low	Risks are mitigated by acting in the best interest of the National Park’s purposes, being evidence led, being clear what we are asking for and holding regular meetings with RED and other stakeholders.
Reputational Risk from not participating in the examination process	Low	Low	Risks are mitigated by participating and acting in the best interest of the National Park’s purposes.

**TIM SLANEY**  
**Director of Planning**  
**South Downs National Park Authority**

Contact Officer: Vicki Colwell, Principal Planning Officer

Tel: 01730 819280

Email: vicki.colwell@southdowns.gov.uk

- Appendices
1. Rampion Offshore Windfarm, Written Representation
  2. Rampion Offshore Windfarm, Local Impact Report

SDNPA Consultees	Director of Countryside Policy and Management; Director of Planning; Chief Finance Officer; Monitoring Officer; Legal Services
External Consultees	None
Background Documents	<a href="#">Rampion Offshore Windfarm – DCO Application</a> <a href="#">Planning Committee 09 September 2021</a>