

Chichester District Council

Planning Committee

Wednesday 8 September 2021

**Consultation on proposed Nationally Significant Infrastructure Project (NSIP) –
21/02208/ADJ Rampion 2, Offshore Windfarm**

1 Contact

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2 Proposals for consolation

Application No.: 21/02208/ADJ

Location: off the coast of West Sussex (known as Rampion 2)

Proposal: Offshore wind farm - notice pursuant to Section 42 of the Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Applicant: Rampion Extension Development Ltd

3 Recommendation

3.1 The Planning Committee is asked to:

i. note the contents of the consultation on the proposed Rampion 2 Offshore Windfarm development and:

ii. comment on and endorse the recommended CDC consultation response set out in section 9.2. Any further comments will be incorporated prior to the response being forwarded to the applicant.

4 Background

- 4.1 The purpose of this application is to consult Chichester District Council (CDC) on the proposals for an offshore windfarm, known as Rampion 2, to be located adjacent to the existing Rampion Offshore Windfarm in the English Channel off the south coast. The site is located approximately 12km (7.5miles) from the coast, south of the coastline from Bognor Regis to Worthing. The consultation is made by Rampion Extension Development Ltd and is a statutory consultation under Section 42 of the Planning Act 2008 (as amended). To summarise, Section 42 of the Planning Act states that CDC must be consulted due to the application being located in waters in or adjacent to England up to the seaward limits of the territorial sea and that part of the application site area is located within the West Sussex County Council area, within which the Chichester District lies, regardless of the fact that the application site does not fall within Chichester District itself. As a result of the consultation, the applicant has a duty to take account of responses to consultation and publicity.
- 4.2 The proposal of an offshore windfarm which constitutes a 'Nationally Significant Infrastructure Project' (NSIP). Rampion 2 falls within Section 15 of the Act as an offshore generating station with a capacity of more than 100 megawatts and as such the applicant will be submitting to the Planning Inspectorate (PINS) an application for a Development Consent Order (DCO) for the construction, operation and maintenance of an Offshore Windfarm.
- 4.3 The development will comprise both on and offshore infrastructure. The onshore infrastructure would be located within Arun, Horsham and Mid Sussex (including the South Downs) with no works proposed within Chichester District. The development will be EIA development under the Planning (Environmental Impact Assessment) Regulations 2017. Once the application is made to PINS it will be examined and a recommendation made to the Secretary of State for Business, Energy and Industrial Strategy who will then make the final determination as to whether or not to approve the DCO.
- 4.4 The applicant has decided to give longer than the statutory consultation period and responses must be received by 16 September 2021.

5 The Application Site

5.1 The application site is predominately a 270km² (104 sq.miles) offshore area adjacent to the existing offshore windfarm south of the south coast between Bognor Regis and Worthing, along with onshore land to allow for connection to the UK Grid. The area comprises a seabed area to the west of the existing windfarm and wrapping around the existing windfarm to the south and east. The onshore works relate to land required for a transmission cable running approximately 36km from landfall at Climping beach at Atherington (within Arun District, approximately 6.5km east of Bognor Regis) to a satellite' substation located in the vicinity of the existing Bolney substation at Twineham, Mid Sussex to which it will then be connected to the wider grid.

6 The Proposals

6.1 The proposals are currently in draft form for consultation, with the final proposals to be finalised in response to the consultation responses received.

6.2 The proposals under consultation include:

- The construction, operation and maintenance of up to 116 wind turbines with a maximum tip height of 325m above lowest astronomical tide and their foundations;
- Up to three offshore substations;
- Cables laid on or beneath the seabed between the wind turbines and offshore substations and between the substations themselves;
- Export cables to transmit electricity from the offshore substations to the shore;
- A landfall located at Climping beach using Horizontal Directional Drilling installation, with transition joint bays to connect the offshore and onshore cables;
- Onshore underground cables with jointing pits to transmit electricity to a new onshore substation. It is expected that the onshore cables will be laid within a corridor, the majority of which shall have a temporary working width of up to 50m;
- The construction and operation of an onshore substation on land in the vicinity of the existing National Grid Bolney substation in Twineham, Mid Sussex;
- Underground cables between the new substation and the existing Bolney substation to connect the offshore wind farm to the National Grid:

7 Consultation Responses

7.1 CDC Environmental Protection

It is evident that extensive consultation has taken place with neighbouring local authorities, in relation to environmental matters. Appropriate criteria and monitoring programmes have been set.

It is considered that by adhering to the criteria, as outlined for receptors in the supporting documentation, neighbouring receptors will be adequately safeguarded. By adhering to criteria thresholds within neighbouring authorities, Chichester residents should be adequately safeguarded. It is noted that on-shore works shall be outside our District.

Our department would however like to be privy to the results of any monitoring and assessments in relation to receptors within our district. Can a mechanism be put in place that we are kept abreast of assessment outcomes as part of any approved development. We would be particularly interested with noise and vibration monitoring results and predictions, as a result of the construction and operational phases of the wind turbines. It is noted the number and specification of turbines is yet to be decided.

7.2 CDC Environmental Strategy Unit

We have reviewed Volume 2 chapter 23 of the Environmental Statement "Terrestrial Ecology and Nature Conservation" (ES). We have not commented on the impacts on marine ecology as these lie outside the terrestrial planning system.

In terms of the ecological impacts of the terrestrial part of the development we recognise that the development lies outside our plan area, but that certain mechanisms of impacts have the potential to affect the wider ecology and sites within or immediately adjacent to the District. In this regard the strategic issues for CDC are the potential impacts on Arun Valley SPA/SAC/Ramsar site and on The Mens SAC, particularly the supporting habitats for bat species. These are assessed in detail in the ES and we agree with the assessment given in Table 23.21 (p.134 of the chapter) that the effect are not significant for these sites. For the Mens SAC the terrestrial development works are only just within the 12km zone of influence and outside of the known bat flightlines. We note that there will be significant localised impacts on Local Wildlife Sites and on protected species, and that further survey work is ongoing at present. These impacts will occur well outside Chichester District and the detailed assessment of them and the linked mitigation measures is best left to the planning authorities in which they may occur.

7.3 CDC Archaeology – No objection

7.4 CDC Drainage – No objection

7.5 Birdham Parish Council – does not object to this application but has two recommendations/observations that they would like taken into consideration.

- That the navigation routes through the proposed wind-farm be maintained to avoid the rocks of Selsey Bill, ensuring that they are not compromised and thus retaining "inshore Passage Navigation", and maintaining the North/South routing for boats leaving the nearby harbours in transit across the Channel
- Ensure the proposed ecological and ornithological mitigation proposals are fully adhered to in perpetuity.

8 Considerations

8.1 The key considerations in relation to this consultation are:

- i. Principle of Development
- ii. Views from Chichester District
- iii. Noise
- iv. Highways Impact
- v. Ecology
- vi. Economic Benefits

i. Principle of Development

8.2 The need for the development is explained by the applicant as being a response to the Climate Emergency declared by the UK Government on 9 October 2019. In response to the emergency declaration, the UK Government is targeting offshore wind as an important energy source, with the aim of 40 gigawatts of offshore wind capacity by 2030, quadruple the current capacity (2020). Renewable energy sources are also required to replace the 5% UK electricity supplied by coal, which is to be phased out as soon as possible, likely over the next 2-3 years. The applicant states that the future reliance on green technology will only be carbon neutral if the energy needed to operate such technology is itself created from a renewable energy source. Ultimately, the overarching aim of the UK government's climate change mitigation strategy is to avoid the 1.5-degree Celsius warming level above pre-industrial levels to prevent 'catastrophic and irreversible impacts on climate', as declared by the IPCC.

- 8.3 This is reflected in national level planning policies through the National Planning Policy Framework (NPPF). Section 14 of the NPPF (2021) addresses ‘the challenge of climate change, flooding and coastal change’. Within this, paragraph 152 states that “*the planning system should support the transition to a low carbon future in a changing climate...and support renewable and low carbon energy and associated infrastructure*”. Paragraph 158 goes on to state that “*when determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions*”. This demonstrates the strength of national level support for renewable energy development.
- 8.4 At a local level, Chichester District Council also declared its own Climate Emergency on 9 July 2019. In response, the Climate Emergency Detailed Action Plan was approved by Chichester District Council on 19 January 2021. The plan targets a 10% reduction of greenhouse gas emissions year-on-year from 2019 until 2025, which would result in an almost halving of the 2019 levels. Whilst the Action Plan deals with measures to be implemented within Chichester District itself, it does also show support for large scale renewable energy projects, with section 3.8 and table 14 showing the goal of setting up a working group of organisations that want to progress such works.
- 8.5 Whilst no part of the applicant site is located within Chichester District and therefore the policies within the Chichester Local Plan (2014-2019) are not directly relevant to its future determination, Policy 41 of the Local Plan does demonstrate the support that CDC gives to offsite renewable energy developments. This includes wind generated energy development and its support of such development subject to there being no adverse impact on landscape character, ecology or heritage; no adverse impacts on local amenity, health, noise, emissions or outlook and; no adverse impacts on highways safety. Any environmental impact would require mitigation measures. These matters are discussed below. Given the support given to such developments within the District itself, it is considered that the principle of this adjacent windfarm development is also supportable subject to the criteria of Policy 41 of the Local Plan.
- 8.6 In addition, the Marine Management Organisation (MMO) have a South East Marine Plan which sets out policies for the management and development on the waters around the south-east of England. Relevant policies are discussed below.

- 8.7 **Policy S-PS-2 Ports and shipping** - Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance must not be authorised within International Maritime Organization routing systems unless there are exceptional circumstances.
- 8.8 Officer Comment: The site falls outside of the shipping routes off of the south coast of England which finish to the south-east of the application site boundary.
- 8.9 **Policy S-BIO-1 Biodiversity** - Proposals that may have significant adverse impacts on natural habitat and species adaptation, migration and connectivity must demonstrate that they will, in order of preference: avoid; minimise and; mitigate significant adverse impacts.
- 8.10 Officer Comment: Whilst there are no ecological implications for sites within Chichester District itself as a result of the proposals, it is recognised by officers that there will be significant localised impacts on Local Wildlife Sites and on protected species, and that the applicant is undertaking further survey work at present. CDC's Environmental Strategy Unit suggests that as these impacts will occur well outside Chichester District, the detailed assessment of them and the linked mitigation measures is best left to the planning authorities in which they may occur. Notwithstanding this, it is recommended that the impact on habitat and species be minimised where it cannot be avoided, in line with the policy's order of preference.
- 8.11 **Policy S-CAB-1 Cabling** - Preference should be given to proposals for cable installation where the method of installation is burial.
- 8.12 Officer Comment: It is proposed that the cabling will be buried below the seabed (offshore) and underground (onshore).
- 8.13 **Policy S-FISH-2 Fisheries** - Proposals that may have significant adverse impacts on access to, or within, sustainable fishing or aquaculture sites must demonstrate that they will: avoid; minimise and; mitigate significant adverse impacts.

- 8.14 Officer Comment: The proposals would result in a localised loss of access to fishing grounds during the construction period and as a result of the installed infrastructure, with displacement and increased pressure on surrounding fishing grounds. Policy S-FISH-2 requires that the applicant demonstrates how this impact can be minimised and mitigated. It is noted that vessels are currently able to undertake some commercial fishing activities within Rampion 1 and pass through the existing windfarm to access waters beyond. As part of this consultation, it is recommended that the response include a request for the impacts on commercial fishing to be minimised where it cannot be avoided, in line with the policy's order of preference.
- 8.15 **S-REN-1 Renewable energy** - Proposals that support the development of supply chains associated with the deployment of renewable energy will be supported.
- 8.16 Officer Comment: This policy supports the principle of development related to renewable energy generation.
- 8.17 To summarise, the creation of offshore windfarms, as part of the strategy to generate renewable energy sources, is a crucial component of the UK Government's strategy to limit climate change. Chichester District Council is itself a proactive authority recognising the need to limit climate change through the declaration of a Climate Emergency. Policy 41 of the CLP also supports the principle of the development of renewable energy sources. As such, it is considered that the principle of developing an offshore windfarm to feed into the UK national energy grid is acceptable and supportable, subject to the consideration of the aforementioned issues. These are discussed in turn below.

ii. Views from Chichester District

- 8.18 The proposed development would be visible from Chichester District to the south-east, namely from the shoreline at Selsey and Church Norton. Views of the existing Rampion Windfarm are extremely limited. During the officer's site visit to Church Norton on a clear day, the existing turbines were only just visible, and not able to be captured on camera. The proposed development would result turbines being located closer to Chichester District with the proposed development proposed to be located to the west of the existing windfarm. However, given the proposed distance of approximately 11km (6.9miles) at its closest point to Chichester District it is still considered that the impact on the development on views from Selsey and Church Norton would be minimal. It should be noted that there is no right to a private view and that any impact on public views from the coastline would likely be outweighed by the national need and public benefit of the proposals.

iii. Noise and Vibration

- 8.19 The Council's Environmental Protection Officers have reviewed and commented upon the proposals. They find that proposals outlined in this consultation would safeguard Chichester residents from noise and vibration impacts, both at construction and operational stages.
- 8.20 The noise report submitted with the consultation finds that the key noise receptors of the construction phases will be those in the vicinity of the onshore works which fall outside of Chichester District. It finds that the distance of the offshore works to onshore receptors would not likely result in any disruption from noise or vibration.
- 8.21 It also finds that that during the operation phase, noise would be limited to low levels associated the negligible associated road traffic and limited maintenance activities at the onshore substation. Officer concur with the report's findings
- 8.22 CDC's Environmental Protection Team wish to be included in the dissemination of survey findings in relation any assessments of noise and vibration and, as such, this is recommended for inclusion in the consultation response.

iv. Highways Impact

- 8.23 The Preliminary Environmental Information Report looked at the worst-case impact on the highways network. It identifies study areas including key highways links that could be used during the construction and operation of the development. Study Area 1 focuses on key routes related to onshore works and their impacts, and Study Area 2 focuses on onshore impacts of the offshore works. The transport report identifies 35 highways links in Study Area 1 and 5 highways links in Study Area 2.
- 8.24 None of these roads are located in the Chichester District and the overall assessment of the residual effects result in a Negligible and Not Significant effect in EIA terms for all routes.

v. Ecology

- 8.25 Whilst the impacts on marine ecology lie outside the terrestrial planning system, it is noted that the application site falls outside of any Marine Conservation Zone.
- 8.26 In terms of the ecological impacts of the terrestrial part of the development there are no sites in Chichester District that would be impacted by the development and officers agree with the submitted documentation that any effect on neighbouring Arun District are not significant.
- 8.27 Notwithstanding this, it is acknowledged that sites in the vicinity of the proposed onshore works may be more greatly impacted upon and so it is recommended that the consultation response include the request for such impacts to be minimised where they cannot be avoided.

vi. Economic Benefits

- 8.28 As a result of the construction, operation and maintenance phases of the proposed windfarm, it is likely that the development will have economic benefits to this section of the south-coast through the creation of jobs and tourist opportunities (with windfarm tours currently operating at Rampion 1). This is considered to be a general benefit for the wider area which may or may not benefit residents of Chichester District, as it is not possible to ascertain this at present.

9 Recommended CDC Consultation Response

- 9.1 It is recommended that the following consultation response be made to the consultation application:
- 9.2 Chichester District Council **SUPPORTS, IN PRINCIPLE**, the development of renewable energy sources and offers **NO OBJECTION** to the proposals at Rampion 2, subject to:
- a) Chichester District Council's Environmental Protection Team being included in the dissemination of survey findings in relation to any assessments of noise and vibration;
 - b) the implications for ornithological and marine species and commercial fishing to be minimised as part of the final application preparation and submission and that any mitigation measures approved are retained for the lifetime of development and;
 - c) Maintaining and avoiding disruption to routes and passageways for fishing and other small vessels through the development.

10 Background Documents

- 10.1 The submitted documentation to support this consultation application can be found via the Council's public access page using reference 21/02208/ADJ: [Comment or search on a planning application: Chichester District Council](#)