

Rampion 2 Wind Farm

Statement of Common Ground – Post Examination Herring Issues Marine Management Organisation November 2024

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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 the Marine Management Organisation (MMO) 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 This SoCG covers issues related to impacts on spawning herring, where progress has been made post-examination, to address the two main remaining concerns raised by the MMO in their Deadline 6 submission **[REP6-302]**:
- The MMO raised a concern that the herring potential spawning habitat heatmaps submitted at Deadline 1 **[REP1-020]**, and updated by the Applicant at Deadline 4 **[REP4-061]** were not completely aligned with the heatmap methodologies preferred by the MMO, namely Reach et al., (2013) and MarineSpace (2013). The Applicant updated the heatmaps at Deadline 6 **[REP6-250]** following the MMO’s preferred methodology, but the MMO had not had the opportunity to review this update in time for their Deadline 6 submission **[REP6-302]**. During a meeting with the MMO on the 16 October 2024, the MMO confirmed that the heatmaps are now in accordance with the suggested methodology. As such, this concern has now been resolved.
 - The MMO also had concerns regarding the level of noise abatement that could be achieved by the commitment to using double big bubble curtains (DBBC) throughout the piling campaign in the deeper areas of the Rampion 2 array area. This concern was raised following the Deadline 4 submission by the Applicant of **Information to support efficacy of noise mitigation / abatement techniques with respect to site conditions at Rampion 2 Offshore Windfarm [REP4-067]** which detailed that the efficacy of DBBC may be reduced by 1 to 2 decibels (dB) in waters deeper than 40m, reducing the overall predicted dB reduction from -15dB to -13dB. The Applicant has since shared with the MMO noise modelling for herring, showing the underwater noise impact ranges, relative to herring larval densities (displayed as a heatmap) with a predicted -13dB reduction as the worst-case mitigated piling scenario. The updated heatmaps are provided in this document in **Appendix 1**.

1.2 The Proposed Development

- 1.2.1 The Applicant 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.
- 1.2.2 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.

- 1.2.3 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.
- 1.2.4 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.

A full description of the Proposed Development is provided in **Chapter 4: The Proposed Development, Volume 2** of the ES [REP6-172].

2. Marine Management Organisation's Remit

2.1 Introduction

2.1.1 The MMO is an executive non-departmental public body whose purpose is to protect and enhance the marine environment in English waters and support economic growth by enabling sustainable marine development.

2.1.2 The MMO's role in relation to the Planning Act 2008 are as follows:

- as a statutory consultee at the pre-application stage under s.42(1)(aa) of the 2008 Act and as an interested party during the examination stage; and
- as a licensing and consenting body.

2.1.3 The SoCG covers topics of the DCO application of relevance to the MMO, comprising:

- DCO and Securing Mechanisms;
 - ▶ Fish & Shellfish Ecology;

2.2 Consultation Summary

2.2.1 This section briefly summarises the consultation, specific to underwater noise and spawning herring, that the Applicant has undertaken with the MMO including both statutory and non-statutory engagement during the pre-application, post-application, and post-examination phases (See **Table 2-1**).

Table 2-1 Consultation and Correspondence undertaken with MMO pre-application

| Date and type | Description of consultation |
|---|--|
| 24 February 2022 Targeted Meeting | Additional targeted Underwater Noise (UWN) mitigation meeting. |
| 12 September 2022 Targeted Meeting | Underwater noise Black Bream. |
| 30 March 2023 Targeted meeting | Underwater noise in Black Bream |
| 19 April 2024 Expert to Expert Meeting | Expert to Expert Underwater Noise Meeting |
| 24 June 2024 Expert to Expert Meeting | Expert to Expert Underwater Noise Meeting |
| 16 October 2024 Expert to Expert Meeting | Expert to Expert Meeting: Underwater Noise and Herring |

3. Agreement/Disagreement Log

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and the MMO for each relevant component of the Application identified in **paragraph 2.1.3**. The tables below detail the positions of the Applicant alongside those of the MMO 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 not agreed between the parties, however the outcome of the approach taken by either the Applicant or the MMO 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 the MMO is considered to result in a materially different outcome on the assessment conclusions. | Not agreed- material impact |

Table 3-2 Status of discussions with the MMO

| Reference number | Matter of contention | MMO'S position | Applicant's position | Current Status | Date of agreement |
|------------------|--|---|---|----------------|-------------------|
| MMO1 | DCO condition wording amendment -piling ban eastern array area | The MMO is content with the inclusion of the condition, but it may be subject to minor alterations. | <p>Following the presentation of Figure 4 (see Appendix 1) to the MMO, the Applicant has provided the Herring Spawning Restriction Plan (Appendix 2, Figure 5), which is a simplified version of Figure 4 and will be provided with the DML, with the following suggested wording for the condition. This has been provided on a without prejudice basis, depending on if the Secretary of State agrees a piling ban for spawning herring is necessary.</p> <ol style="list-style-type: none"> 1) No piling activity can commence within the eastern array area during the herring spawning season until a spawning herring piling restriction plan (in accordance with the outline spawning herring piling restriction plan) containing updated underwater noise modelling has been submitted to and approved by the MMO. The updated underwater noise model shall be based on final project parameters to be used to install piles in the eastern array area and shall include details of any verified mitigation measures to be employed. 2) If the herring spawning plan demonstrates that noise levels associated with piling activity in the eastern array area during the herring spawning season will exceed the levels shown on the spawning herring piling restriction plan then no piling activity may be undertaken within the eastern array area during the herring spawning season without the approval of the MMO 3) All piling activity within the eastern array area during the herring spawning season must be undertaken in accordance with the details approved under sub-paragraph (1) or as required as a condition of approval under sub-paragraph (2) 4) In this condition: <ol style="list-style-type: none"> a) "eastern array area" means the area identified as the eastern array area within the spawning herring piling restriction plan; b) "outline spawning herring piling restriction plan" means the plan certified as the outline spawning herring piling restriction plan by the Secretary of State for the purposes of the Order under article 51; and c) "herring spawning season" means 1 November to 31 January inclusive. | Agreed | 11/11/2024 |
| MMO2 | Piling ban - western array area | The MMO is content that with the inclusion of year-round double-big bubble-curtains no ban is required in the western area. | As demonstrated by the modelling shared with the MMO in the meeting on 16 October 2024, with the implementation of year-round double big bubble curtains (C-265, as secured by 11(1)(k) of the dMLS, Schedule 11 and 12 of the DCO) [REP6-007] there will be a very small impact on areas of potential high herring larval abundance and subsequently a | Agreed | 16/10/2024 |

| Reference number | Matter of contention | MMO'S position | Applicant's position | Current Status | Date of agreement |
|------------------|-------------------------------------|---|--|----------------|-------------------|
| | | | herring piling ban is not required in the western array area during the herring spawning period. | | |
| MMO3 | Herring potential spawning heatmaps | The MMO raised a concern that the herring potential spawning habitat heatmaps submitted at Deadline 1 [REP1-020] , and updated by the Applicant at Deadline 4 [REP4-061] were not completely aligned with the heatmap methodologies preferred by the MMO, namely Reach et al., (2013) and MarineSpace (2013). The Applicant updated the heatmaps at Deadline 6 [REP6-250] following the MMO's preferred methodology, but the MMO had not had the opportunity to review this update in time for their Deadline 6 submission. The MMO is content this has been resolved. | During the meeting with the MMO on 16 October 2024, the MMO confirmed that the heatmaps are now in accordance with the suggested methodology. As such, this concern has now been resolved. | Agreed | 16/10/2024 |

Appendix 1 – Images shared in meeting with the MMO 16 October 2024

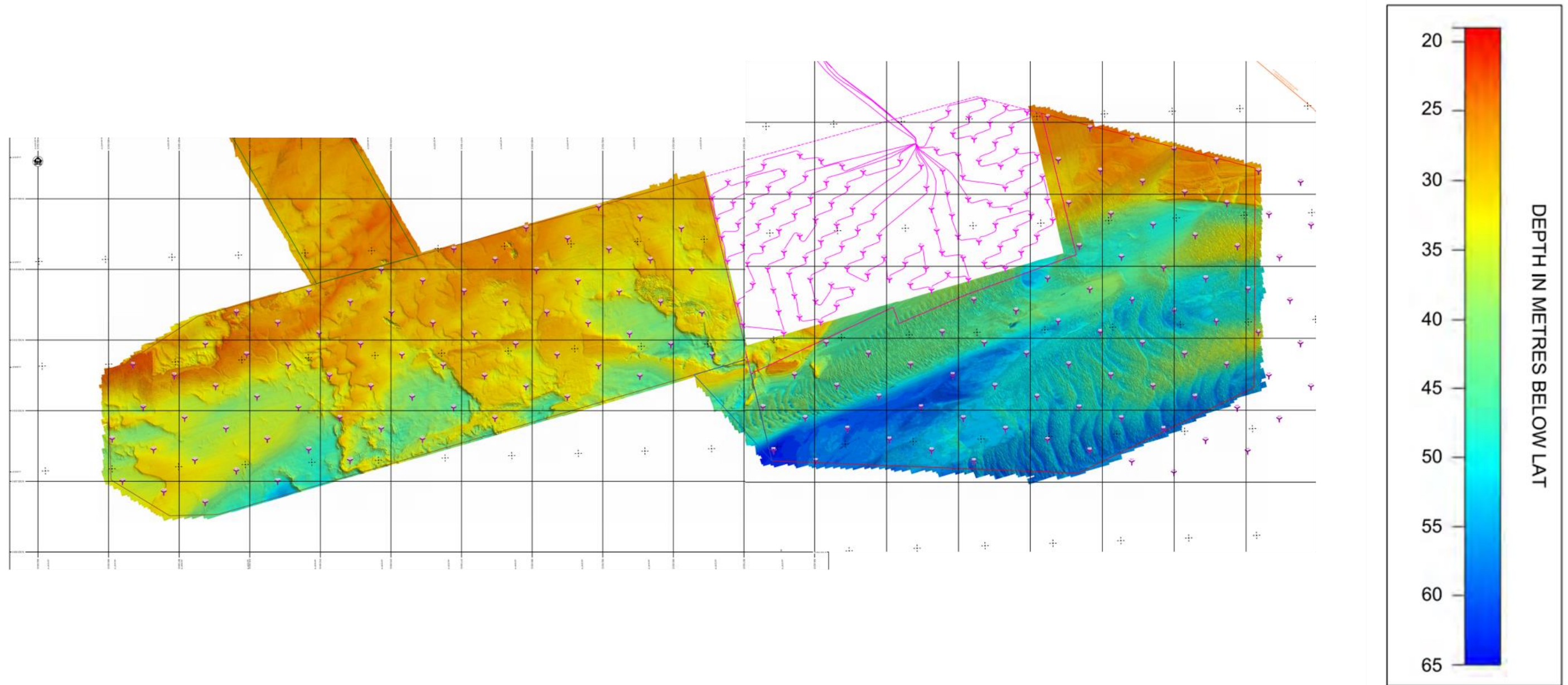


Figure 1 Bathymetry of Rampion 2 Array Area

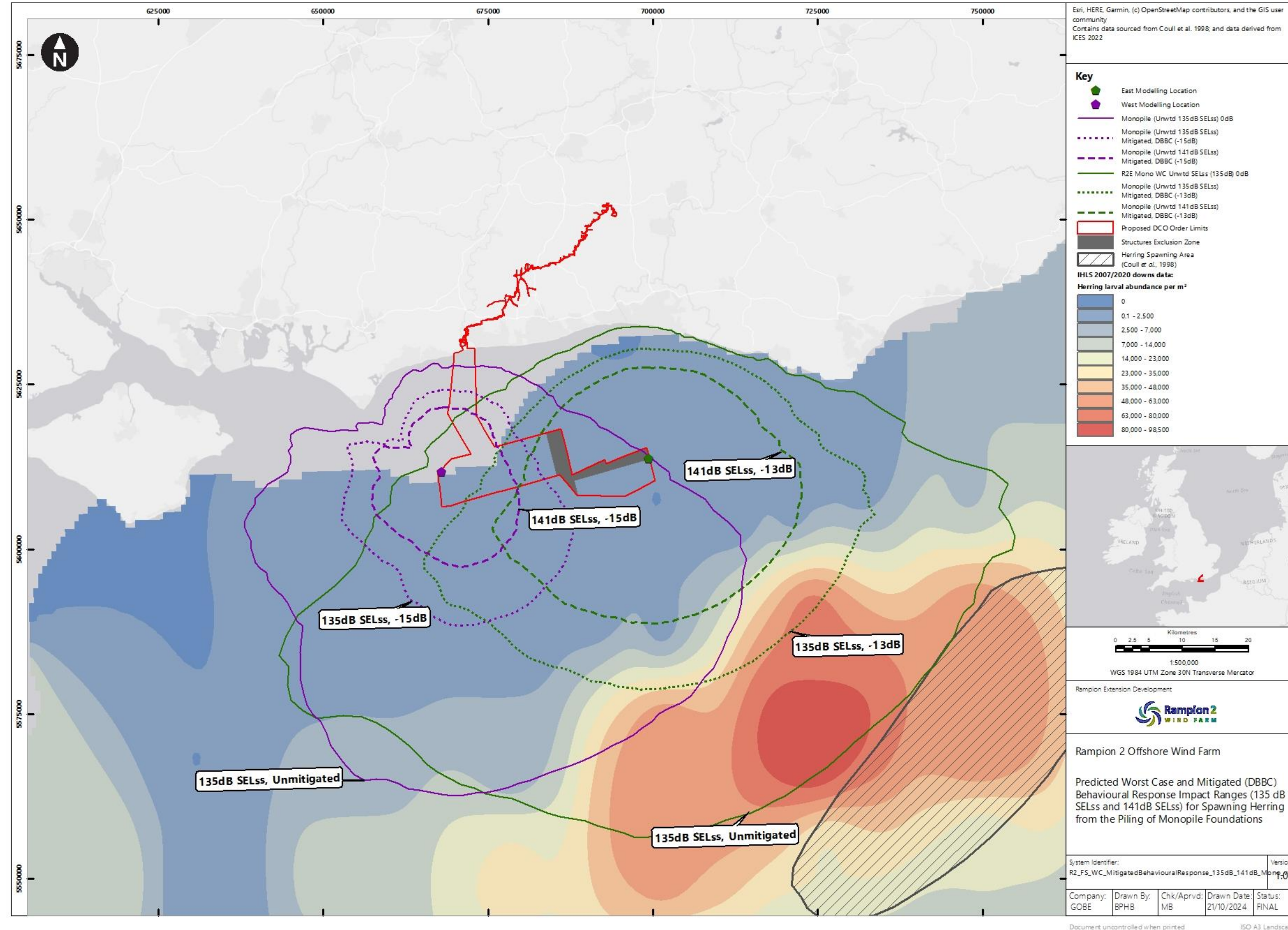


Figure 2 Predicted Worst Case and Mitigated (DBBC) Behavioural Response Impact Ranges (135dB SELss and 141dB SELss) for Spawning Herring from the Piling of Monopile Foundations

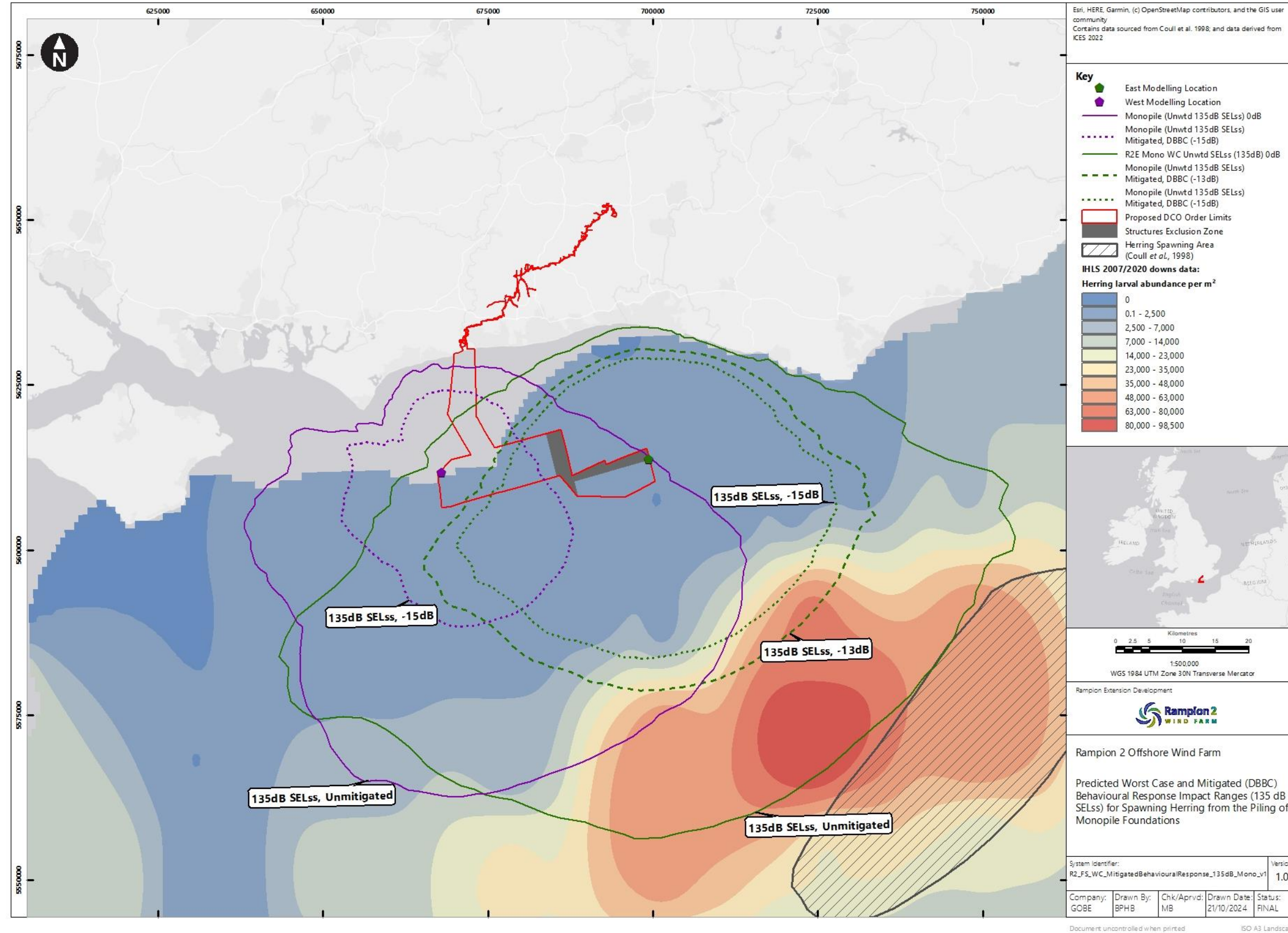


Figure 3 Predicted Worst Case and Mitigated (DBBC) Behavioural Response Impact Ranges (135dB SELss) for Spawning Herring from the Piling of Monopile Foundations

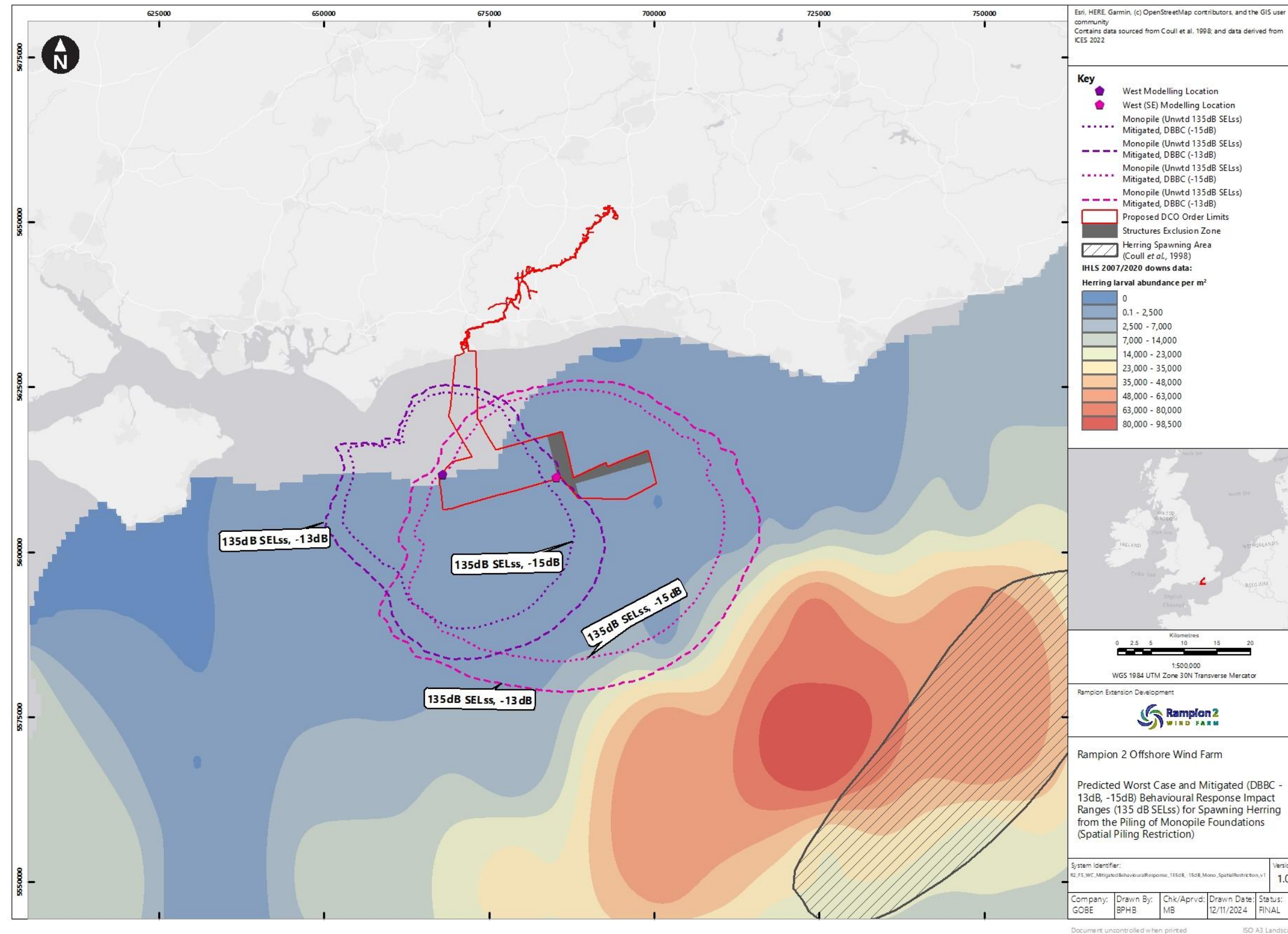


Figure 4 Predicted Worst Case and Mitigated (DBBC, -13dB, -15dB) Behavioural Response Impact Ranges (135dB SELss) for Spawning Herring from the Piling of Monopile Foundations (Spatial Piling Restriction)

Outline Spawning Herring Piling Restriction Plan showing agreement with the MMO, as referred to in the DML condition.

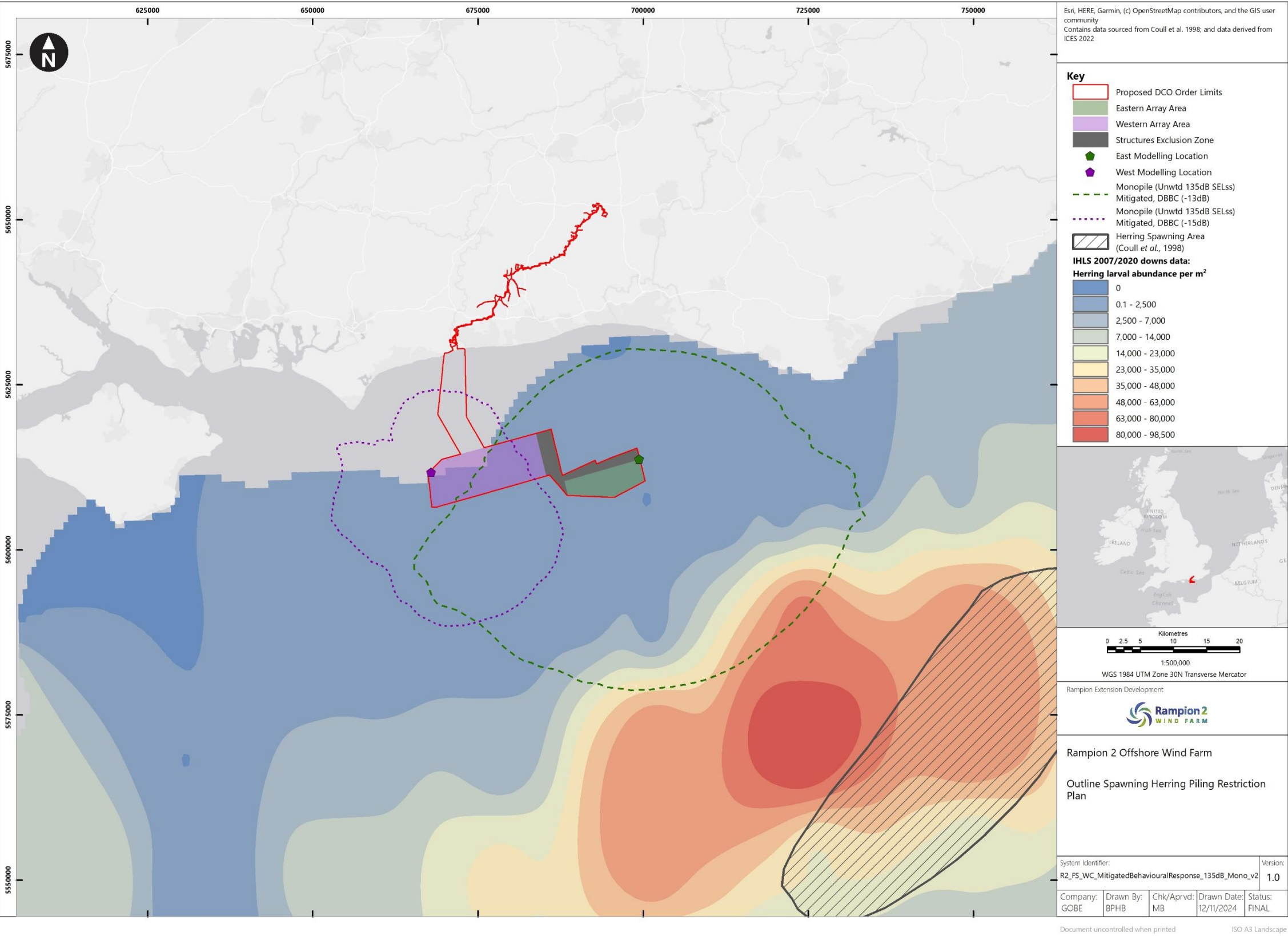


Figure 5 Outline Spawning Herring Piling Restriction Plan

4. References

Rampion 2 DCO Project Glossary:

[1.7 Rampion 2 Application Document Tracker \(planninginspectorate.gov.uk\)](#)

Examination Library - [EN010117-000419-Rampion 2 Exam Library.pdf \(planninginspectorate.gov.uk\)](#)

Planning Inspectorate Application Area- [Rampion 2 Offshore Wind Farm - Project Information \(planninginspectorate.gov.uk\)](#)

