

Councillor Dr. James Walsh KStJ RD  
Leader of the Council & Cabinet Member for Economy  
Arun District Council

Councillor Paul Marshall (Cabinet Chairman)  
West Sussex County Council

30 March 2021

Subject: Community input to the Statement of Community Consultation (SoCC)  
Proposed Rampion Windfarm Extension: Pre-Application Stage

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Dear Councillors,

We understand the Rampion-2 Statement of Community Consultation (SoCC) will soon be finalised in conversations between the proponent RWE and Councils.

For your kind consideration, we offer some local community input to those conversations. The RWE website indicates its SoCC will set out the schedule for, "What we will consult on, Who we will consult, How we will consult, How we process the feedback we receive."

The attached 2-page summary indicates how we as community organisations would like to be consulted and on what, to help enhance the adequacy of consultations going forward. Admittedly this is a novel approach (unsolicited), but nevertheless one for novel virus times.

The relevant Planning Act (2008) Guidance also says the Development Consent regime for Windfarms (as NSIPs) front-loads local community consultations into the pre-application stage, "to ensure a more transparent and efficient examination process". A precedent for community initiative in statutory consultations was the Public meetings to help inform the Arun District Leisure Strategy.

In the 2-page Summary attached, we offer to help lift these consultations:

- by holding two community organised and led public meetings on the Rampion Extension proposal as indicated, when it is possible to meet again face-to-face normally; and
- we ask to have information on these meetings recorded as formal SoCC consultation input, and shared with other coastal communities and the wider public as indicated.

Our members will also share directly with other impacted coastal community organisations, as well as the Coastal Community Project Liaison Group (PLG) that RWE manages. And our members will shortly elaborate this initial input to the SoCC adding context and initial key questions.

RWE's website says it aims to submit an application for Development Consent this year. Given the compressed timetable and context, we draw your attention now to a key recommendation Natural England (NE) made in the EIA Scoping Opinion Report (12 August 2020), namely that;

***".. given the potential significant issues NE has raised as part of this scoping document and the issues we previously raised in relation to Rampion 1 we advise that there is a risk that the scale of the proposed combined development maybe beyond what could be considered acceptable. Therefore we strongly advise each individual project, i.e. extension and Rampion 2 are assessed individually and combined to provide consenting options for decision makers ... It is not clear to Natural England from the scoping report what is actually being proposed under the umbrella of the 'Rampion 2 Offshore Wind farm' NSIP project. We believe that the extension to the original project under the 2017 extension round will have a capacity of 400MW (equivalent to the original Rampion project) and be located to the west of this project. And in addition there is also being proposed a further Round 3 projects known as Rampion 2 located to the south and east of the original project, which will have a capacity of 800MW. The combined capacity of these two projects is 1200MW which would quadruple the scale of the existing project capacity.***

We very much support and hope that NE recommendation is adopted in the EIA Alternatives Assessment work that RWE is currently undertaking – hence noted in the SoCC.

The situation as we understand it now is the EIA Scoping offers a single 1,200 MW development proposal with no "reasonable" alternatives; and that RWE will present refined plans for only this scheme, during statutory formal consultations from this Spring.

For context, criteria in the 2017 bid round for seabed rights to extend existing UK windfarms stipulated extensions could be no larger than the existing scheme (here 400 MW).

We feel most people in coastal West Sussex enthusiastically support the national ambition of 40 GW of windpower by 2030 – implemented as announced by the Prime Minister on the 6th October 2020, specifically to be met by large windfarms sited "**far out in the deepest waters**".

However, by UK Maritime Management Organisation (MMO) definitions, Rampion starts in **inshore waters** 8 miles out at 15-60m depth. Thus many concerns of West Sussex coastal communities, like Littlehampton, relate to the scale and proximity to the shore that in turn multiplies the scale of impacts across all categories. This 1,200 MW scheme has up to 116 turbines as tall as the Eiffel Tower, each three times the swept area of the London Eye, transforming the seascape.

All this underscores the need to ensure that all "reasonable" alternatives are on the table for the formal community and wider public consultation, and as normally provided by EIA 2017 regulations.

We thus hope the statutory SoCC can reflect these concerns and our offer herein.

Our sense is RWE's formal consultation should be sensibly paused until normal face-to-face interactions in indoor public meetings and 2-way conversations in the community are again possible. That most likely means until later this year in 2021 or next year in 2022.

Respectfully yours,

On behalf of the East Beach Residents' Association  
In cooperation with the Littlehampton Society

Lawrence Haas and Faye Christensen,  
[REDACTED]

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Attachment:  
Summary Community input to the Statement of Community Consultation (SoCC): Pre-Application

Cc:

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# Proposed Rampion-2 Windfarm Extension on the West Sussex Coastline

## Community input to the Statement of Community Consultation (SoCC) Pre-Application Stage

Two Page Summary: 29 March 2021

### About this Input:

After the Planning Act (2008) Section 47 and Guidance for pre-application consultations on large windfarms,<sup>1</sup> the aims of this input are threefold:<sup>2</sup>

1. Firstly, to explain how our local community organisations would like to be engaged in 2-way conversations and consultations on the proposed RWE development.

Many in our community feel COVID lockdown has compromised the quality of statutory consultations as envisaged by the Guidance for pre-applications. Herein we offer and detail community initiatives to help lift them to a higher standard.

2. Secondly, while framed on behalf of Littlehampton community organisations, a further aim is to strengthen existing links and sharing with other coastal community organisations similarly affected by the proposed RWE scheme, who in turn may speak to their local authorities,

This would include sharing with the Coastal Community Project Liaison Group (PLG) that RWE manages, and

3. Thirdly, to strengthen future-oriented conversations with interested civil society organisations on better informing upfront thinking and creative ways to manage key assets on the West Sussex coast that we collectively value, including the seabed.

We understand that Rampion Extension Development Ltd. (RWE) will consult with local authorities on how best to conduct consultations, and as noted on the RWE website, their SoCC will set out the schedule for, "What we will consult on, Who we will consult, How we will consult, How we process the feedback we receive."

As per the Planning Guidelines, Local Authorities then provide advice on the appropriateness of the RWE consultation techniques and methods in virtual pre-consultation conversations and sign off within 30 days.<sup>3</sup>

We feel this offer of community input to the SoCC development is a novel, but nevertheless necessary and constructive step to help lift and improve the statutory consultations; both in view of COVID constraints and in view of the compressed timetable where RWE aims to submit an application for a Development Consent Order (DCO) this year.

Our hope is that formal consultations can be sensibly paused until normal human interactions and 2-way conversations are again possible; which means later this year or in 2022.

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<sup>1</sup> As Nationally Significant Infrastructure Projects (NSIPs) requiring a Development Consent Order (DCO)

<sup>2</sup> On behalf of Littlehampton community organisations, one of many interested and affected communities along the West Sussex Coast.

<sup>3</sup> Para 34-42, "Planning Act 2008: Guidance on the pre-application process: Consultation"

<https://www.gov.uk/government/publications/guidance-on-the-pre-application-process-for-major-infrastructure-projects>

# Overview

We offer to help improve statutory consultations to be undertaken by RWE on the proposed Rampion Extension windfarm development in three ways, namely via:

## **Part A: Community-led Public meetings**

- An initial community-led Public meeting: with Members open to the public and media to exchange views, information and formulate key questions to be addressed.
- A second community-led Public meeting: held during formal consultation period inviting RWE and other speakers to make presentations, respond to key questions and have open Q&A, also inviting West Sussex County, LTC, ADC, Natural England and other consultees.
- Requesting models, visual materials and simulations that RWE may prepare to show at these Public meetings (like specific visual representations of turbines on clear days and nights)

## **Part B: Community contribution to Consultation documentation**

As well as participating in consultations managed directly by RWE, Part A information / documentation should then be made available by RWE and by West Sussex County Council on their websites to be easily accessible to the wider Public and consultees, and also via the Coastal Community Project Liaison Group (PLG). To include, for example:

- announcements of the Part A Public meetings, key questions and their responses, and community meeting presentations and minutes;
- Similarly making physical models, print or electronic visual materials requested of RWE for Part A accessible to the wider Public and other RWE consultees, as and where appropriate;
- Otherwise asking RWE and Councils to include the above in Rampion-2 outreach (where possible) such as: their consultation events, websites, stakeholder meetings, literature and leaflets, feedback forums, newsletters, local media advertising, and social media.

## **Part C: Information sharing among coastal community organisations**

Related to RWE consultations initially, then more broadly future-oriented so that West Sussex coastal community organisations can in future creatively contribute (early) to sustainable development and management thinking on various West Sussex coastal assets and the seabed, including:

- Awareness and information sharing among local community organisations in coastal communities interested and directly affected by the proposed Rampion Extension scheme (e.g. via conversations, sharing of Part A information, other exchanges and meetings when permitted);
- Drawing lessons from this pre-application to understand how community organisations and the Public may better inform future policy & planning actions (including Crown Estate's) on sustainable management of our sea heritage and seabed, as well as identify individual and local opportunities for climate action;
- Eventually, collaborating with interested West Sussex coastal community organisations or their Members and NGOs to explore the scope, merits, and engagements needed to prepare a common Coastal Community Vision Statement and Sustainability Charter.<sup>4</sup>

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<sup>4</sup> Focused on sea, shore and future seabed development and management concerns like climate action and sustainable fisheries, and in particular to reflect socio culture, socio-economic, ecological and other conservation aspects and community values; and future-proof against surprises like Rampion-2.