



ANDREW GRIFFITH MP

MEMBER OF PARLIAMENT FOR ARUNDEL AND SOUTH DOWNS

HOUSE OF COMMONS
LONDON SW1A 0AA

Mr Vaughan Weighill
Project Manager for Rampion 2 Offshore Windfarm
Rampion Extension Development Ltd

By email

16th September 2021

160921JF

Dear Vaughan,

Rampion 2 Offshore Windfarm Statutory Consultation

I am writing to you to express my comments, on behalf of the residents of Arundel & South Downs, in relation to the proposed Rampion 2 Offshore Windfarm.

Background

I am the Member of Parliament for the rural constituency of Arundel & South Downs in West Sussex. A map of my constituency can be found here: bit.ly/3BN1i7M. Critically, kilometre 4 to kilometre 32 of Onshore Cable Corridor element of the Rampion 2 Offshore Windfarm proposals sits within the constituency of Arundel & South Downs, making up more than three-quarters of the length of the entire cable route. In my role as a Member of Parliament, I also chair the All-Party Parliamentary Group for Dark Skies.

I am entirely supportive of renewable power in general and in particular of this Government's plans to transition to a low carbon economy and reach Net Zero by 2050, securing our place as a global climate leader. I am glad that the UK Government has set some of the world's most ambitious climate change targets with the sixth carbon budget being to reduce emissions by 78% by 2035 compared to 1990 levels.

In order to most accurately represent the views of my constituents, I conducted a survey relating to the Rampion 2 proposals advertised through my social media channels and monthly e-newsletter. A total of 362 residents responded and the results are referenced throughout my submission accordingly.



1. Onshore Cable Corridor Element

1.1 Visual impact

As the Member of Parliament of the most affected rural constituency, my primary concern in relation to the proposed Windfarm is the Onshore Cable Corridor. My view is that this proposed Onshore Cable Corridor will unnecessarily negatively affect a significant number of residents across the South Downs, from landowners to businesses. I share the South Down National Park Authority's ('SDNPA') view that RWE's assessment of the Onshore Cable Corridor in their Landscape and Visual Impact Assessment ('LVIA') presents too rosy a picture. As the SDNPA noted in their consultation response, topography is a very sensitive landscape characteristic that does not appear to have been addressed in the LVIA, which was predicated on the premise that there would be no change due to restoration following construction of the Onshore Cable Corridor. Our National Parks are some of our last remaining natural areas and wherever possible they should be protected from development. This is a statement that more than 80% of the respondents to my survey agreed with.

There is evidence to demonstrate that, at least in the medium-term, the Rampion 1 Onshore Cable Corridor has not been as successfully restored as RWE claims – for example where new planting has either not been undertaken or has not been effective. Examples of this are land-scarring at Freshcombe Farm near Truleigh Hill and Lambleys Farm near Sompting. In light of this, it is, in my view, inappropriate to consider the Onshore Cable Corridor to be of only agricultural relevance.

These concerns are made considerably more pertinent in view of the proposal to expand the Onshore Cable Corridor to 50-metres wide. This is twenty metres wider than the equivalent Corridor constructed during the implementation of Rampion 1's onshore element. The excavation of a 36km trench, at 50-meters wide, across the South Downs will constitute an adverse and avoidable visual impact on a vulnerable and highly-sensitive landscape formed. I strongly advocate that RWE reduce their 'land ask' in this respect.

Fully 278 of the respondents to my survey were concerned about the short-term and long-term impact on the appearance of the landscape affected by the Onshore Cable Corridor.

1.2 Impact on ecology, wildlife and the environment

I share the view of many constituents who are concerned about the proposed Offshore Cable Corridor's impact on the preservation of ecology, wildlife and the environment. One example is the impact of the proposed route on Sullington Hill, a renowned habitat of the Duke of Burgundy butterfly, which is on the UK's Biodiversity Action List, has seen an increase in population as a result of extensive conservation work such as the preservation of wild grassland. Indeed, 57% of respondents to my survey were concerned about the



impact on ecology and biodiversity. Additionally, ancient woodland and hedges which are notably proximate to many parts of the proposed routing are home to a number of protected species such as barn owls, nightingales, badgers, bats, newts and dormice.

Furthermore, arable farmland, which would likely be compromised by this proposal, has been key in the national recovery of Grey Partridge numbers. I have concerns, which are also highlighted in the submission by the SDNPA, that the very fragile chalk grassland ecosystem is problematic to completely restore. I am unsatisfied that adequate measures have been identified to mitigate these factors in the LVIA.

1.3 Impact on archaeology

It is clear to me, as also raised by a number of my constituents, that the impact on archaeological interests by the Onshore Cable Corridor is a genuine concern. There are extensive elements of geoarchaeological remains across the proposed cable corridor. Examples include, but are not limited to, the unexplored site of Warningcamp Barracks near Arundel, Roman Field at Buncton Crossroads and sites at Eatons Farm at Ashurst, listed in the Domesday Book as 'Etune'.

1.4 Impact of Horizontal Drilling Compounds

Although RWE have proposed to mitigate the impact in certain sensitive areas, for example in Wiston, by utilising Horizontal Drilling, a number of constituents have expressed concerns that the large compounds required at each end of the drilling sites will themselves result in excessive disturbance. Should any construction go ahead it is important that these compounds are no larger than necessary, nor remain in situ for longer than the bare minimum time required. Any compound should properly take into account access, noting the rural setting of many of the proposed Horizontal Drilling sites. Much greater consultation with local stakeholders, such as landowners and Parish Councils, should take place in relation to these compounds.

1.5 Making use of alternative infrastructure

An overarching point raised with me by constituents is the opportunity to make use of existing infrastructure. A Cable Corridor is already fully in situ from Lancing to the Bolney substation. Making use of this existing Corridor would constitute a far less disruptive alternative to a second 36km Corridor bisecting the South Downs National Park. Furthermore, landowners on this existing Corridor already have an established relationship with RWE and this would ensure more straightforward processes in the negotiations around land and access. I have raised this repeatedly in every meeting with RWE and I have yet to be satisfied that this option has been properly and independently evaluated.



Alternatively, there is the possibility of Rampion 2 making use of other substations along the coast to either the west or east which would simply require cabling undersea to be laid on the bed of the English Channel. It is my view that the operational disadvantages of laying this cable would be offset by the advantages of avoiding disruption ashore in West Sussex.

1.6 Alternative cable corridor routings

Notwithstanding the aforementioned prospect of utilising existing infrastructure, stakeholders along the current proposed route have expressed support for particular alternatives were Rampion 2 to proceed.

- In reference to Warningcamp, I associate myself with the Parish Council's preference for the 'Warningcamp A' route which would avoid extensive impact on a Grade II listed wall and impact on homes due to proximity that would come with 'Warningcamp B'.
- Crossbush and Lyminster Parish Council have also expressed a clear preference to me for 'Warningcamp A' as both 'Warningcamp B' and Warningcamp C' would have a direct impact on the village of Crossbush. Again, I associate my consultation response with this preference for 'Warningcamp A'.
- I support Burpham & Wepham Parish Council's preference for 'Norfolk Clump B' route as this would mean the Corridor would be completely out of site of the village with minimal impact on the environment or private property.
- I associate myself with Wiston Parish Council's proposal to substantially reroute the Onshore Cable Corridor between Kilometre 15 and Kilometre 22 to the South of Washington village. This would minimise impact on the sensitivities at Sullington Hill and impact on farmland along the originally proposed route.
- Shermanbury Parish Council made clear their view traffic management systems should not be used around the Bolney substation works relating to Rampion 2 as they were during the construction of Rampion 1, as this led to a significant congestion problem around the village during its construction. Furthermore, they stress that extra consideration should be taken into using rural lanes as access roads, and that Kent Street and Wineham Lane are unsuitable for access. I associate myself with the Parish Council's comments.
- The proposals for an Onshore Cable Corridor include a temporary access road immediately adjacent to Brookside Caravan Park at Lyminster to facilitate construction of the Corridor parallel to the River Arun. Users of the Caravan Park and its management have expressed concerns around the noise, visual and environmental impact of this access road. I support moving this access road further



away from the boundary of the Caravan Park to limit this impact. More generally, 54% of respondents to my survey are concerned about the impact of construction traffic on local roads.

I also associate myself fully with those submissions shared with me by constituents which are listed in the appendix.

Offshore Element

Whilst Arundel & South Downs is not an immediately coastal constituency I appreciate the concerns of many that the Offshore Element of the development are insufficiently distant away from the shore (or the South Downs National Park) to limit visual disturbance. OESEA3 recommends that larger turbines such as those proposed for use by Rampion 2 should be constructed at least 25 miles out to sea.

Should construction go ahead, Rampion 2's turbines would be the largest of their type this close the coast of the United Kingdom. Constituents have raised concerns with me that this proposed windfarm is 'inshore, rather than offshore'. I share the concerns of many residents that the 8 miles proposed by RWE will be sufficient to limit visual impact from the South Downs National Park.

Consultation process

Throughout my meetings with affected landowners and residents, a recurring theme has been the lack of information and consultation. Varying answers have been provided to landowners during their communication with RWE and Carter Jonas relating to the period of time of which their land will be inaccessible due to the construction of the Onshore element. Furthermore, a number of Parish Councils have not received responses when enquiring about how specific elements of the Onshore Cable Corridor will affect their residents.

I also understand that funding arrangements relating to agents fees (which ensure proper representation and a fully informed understanding of the very complex issues around land ownership, environmental and ecological factors, and land usage) have not been assured as they were during the development of the Rampion 1 project. This is something that must be resolved moving forward.

Although I accept the promoters of Rampion 2 have acted in good faith, I remain to be convinced given the feedback that I have received from residents that proper consultation and adequate preliminary discussions have been carried out by RWE with affected stakeholders. Indeed, 58% of respondents to my survey, themselves likely to be more



engaged than average, were either only 'Somewhat aware', 'Not very aware' or 'Not aware at all' of RWE's proposals.

As such, I would urge RWE to look again at what more can be done to ensure no stone is left unturned.

Conclusion

Expansion of low carbon renewable energy, such as offshore power, is an exciting and positive prospect. This view is shared by my constituents, with 75% of respondents to my survey being supportive. However, I am unconvinced that a proposal which requires a considerably disruptive second Onshore Cable Corridor, dividing once again the South Downs National Park and its landscape, is the most appropriate way to secure this prospect. There are less harmful opportunities in the North Sea such as the Dogger Bank (that do not require 36km Onshore Cable Corridors constructed through a National Park) for additional wind power capacity to be added to help us fulfil our climate goals as a nation which are simultaneously less disruptive.

Kind regards,

A handwritten signature in blue ink, consisting of several sweeping, overlapping strokes that form the name 'Andrew Griffith'.

Andrew Griffith MP



Third party submissions to RWE which I am happy to offer support:

- *South Downs National Park Authority to RWE*
- *Joint submission from Wiston Parish Council and Washington Parish Council to RWE*
- *Submission from Tim Worley, Chairman of Warningcamp Parish Meeting to RWE*
- *Submission from Shermanbury Parish Council to RWE*
- *Submission from Washington Parish Council to RWE*
- *Submission from Lyminster and Crossbush Parish Council to RWE*
- *Comments made by Mr John Goring*
- *Comments made by Mr Michael Sefi*
- *Comments made by Mr Martin Ong*

Note: There may be many additional submissions whose comments I would also offer support; however, as of 1600hrs 16th September 2021, I have not had sight of these.