

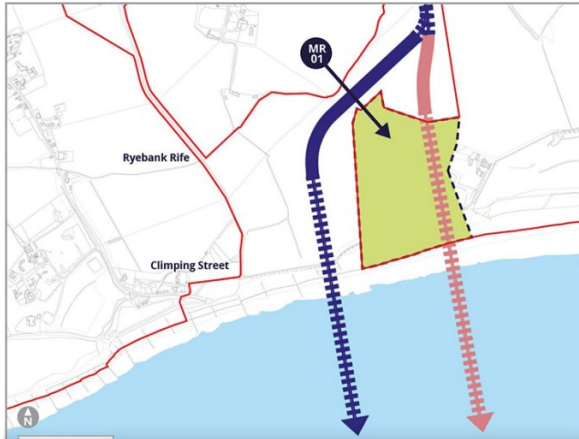
**Rampion 2 Offshore Windfarm**  
**Submission to Planning Inspectorate**  
**Clymping Parish Council**  
**November 2023**

1. Clymping is a small rural parish of 690 hectares on the south coast to the west of Littlehampton. It is bisected roughly east to west by the A259 Littlehampton to Bognor Road. The other through routes in the parish are the B2233 and Church Lane going from their junctions with the A259 north-west to Yapton and northward to Ford and Arundel respectively. It faces considerable issues with coastal erosion threatening homes and livelihoods, housing development that will double the size of the village and traffic issues that lie behind a major upgrade of the A259 in the village. Rampion 2 will only add to the pressures on the community.
2. When Rampion made the proposal to bring the cabling ashore at Clymping beach, it was immediately clear that the village is likely to be disproportionately impacted by this development. It is likely to suffer severe disruption during the works to bring the power cables ashore and the onshore construction works. The visual impact of the turbines will affect the setting of this coastal community and the beach amenity.
3. Clymping Parish Council has engaged in the consultation process for the proposed Rampion 2 Offshore Windfarm.

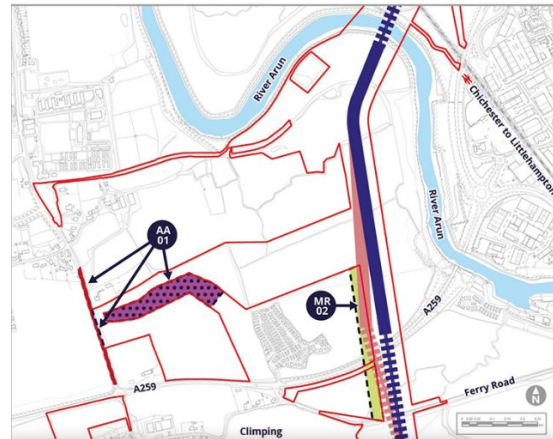
Through the process we have registered the following principal concerns of Council, residents, and local businesses:

- Once Operational:
    - The visual impact of the turbines that will dominate the horizon viewed from Clymping beach, a popular community and visitor amenity.
    - The post construction landscape in the Littlehampton to Middleton gap that is protected within the Arun Local Plan.
  - During Construction:
    - Offshore impacts of marine trenching in an area currently the focus of rewilding as part of the Weald to Waves project and work to restore the kelp forest.
    - Onshore construction disruption to village life and amenities
    - The precise line of cable routing, areas trenched and those drilled horizontally.
4. The impact of onshore activities was the focus of our submission to the cable routing consultation in November 2022, which is attached for completeness. The proposed revised cable routing in Clymping was shown in areas 1a and 1b in pink (rather than that originally considered in blue). The solid route lines shows where the cable was to be trenched. The hatched sections are to be drilled horizontally, for instance under the beach.

## Area 1a: Climping Beach to Ferry Road



## Area 1b: Ferry Road and the A259



Our conclusions were as follows, as they related to this consultation.

*The Parish Council are strongly opposed to the compounds/operational sites as they affect the Church Green, to the north and west of the school and down Bread Lane.*

*The reasons for this view are:*

- *There will be considerable disruption in the village for 3 years 2026-29*
- *This will be compounded by the timing of the A259 developments and the Strategic housing site which are extremely likely to coincide with these proposals. These include a new roundabout on the A259, works at Ferry Road junction, a new roundabout near the Oystercatcher. The proposed access AA01 will be opposite a new access to the 300 House development.*
- *Locating a compound to the north and west of the school is unacceptable due to disruption, noise, dust in dry weather depending on the as yet undefined operations. This compound and the access down Bread Lane should be withdrawn given the proposals to move the cable east towards the river Arun for which access from Ferry Road is more suitable.*
- *Residents have made it clear to the Parish Council that the operational area at Church Green is unacceptable given the sensitivity of the green for the village as an area of memorial and the setting of the Church and Church Hall. [Additionally, there has been bulb planting carried out over the last few years, which will also be impacted in the Spring of each of the years.] It should be removed given the proposed increase in operational flexibility south of Field Place and access to MR02.*
- *There is no information or assessment of the drainage through the area south of Field Place. This is a serious omission given the critical importance of proposals for drainage from the Climping strategic housing site through this area.*

*It is the Parish Council's recommendation that site MR01 be used as the sole operational and construction compound south of A259 routing from Ferry Road. The Parish Council also strongly recommends that the proposals for operations and access from Church Green are withdrawn given the proposal to expand flexibility of operations south of Field Place with the inclusion of area AA01 shown on Plan 1b.*

- *Routing from Ferry Road removes the impact on Bread Lane, a very popular walking route to the beach.*
- *Any access from Ferry Road however, requires careful timing consideration, in conjunction with the proposed A259 works at Ferry Road/Climping Park.*
- *All this work is critically dependant on the EA maintaining the bund sea defences for an extended period, rather than seeing "what they can do" annually. Emergency works were underway this weekend owing to overtopping and flooding due to storm damage to the bund. The project should be encouraged to contribute to the shingle moving costs annually whilst the works compound is in situ.*
- *Access south of Field Place removes the impact on the Grade 1 listed heritage Church and the Church Green.*

*Supporting these concerns, with specific reference to the cumulative effects of traffic flows on the A259 and the wider road network around Clymping, is the apparent lack of comprehension and understanding of the current traffic issues, and no detail or modelling of future traffic flows. Any traffic assessment must look at the cumulative effects and not just on the additional traffic movements from this project.*

5. The Examination Library of Documents deposited with the Planning Inspectorate as part of the submission are very extensive, detailed, and technical. A small Parish like us has to focus its detailed and constructive comments on those aspects of most concern to the community e.g.:

- APP-007 Land Plans Onshore (2.1.2)
- APP-009 Onshore Work Plans (2.2.2)
- APP-012 Access, Rights of Way and Streets Plan (2.5)
- APP-032 Statutory Nuisance statement (5.3)

And specific parts of the Environmental Statement:

- APP-059 Landscape and Visual Impact (6.2.18),
- APP-060 Air Quality (6.2.19),
- APP-062 Noise and vibration (6.2.21),
- APP-064 Transport (6.2.23)
- APP-224 Code of Construction Practice (7.2)
- APP-232 Landscape and Outline Ecology Management Plan

6. We are pleased to note that our concerns have been heeded in relation to the removal of:
- A works area adjacent to the north and west of St Mary's Primary school.
  - The use of Church Green and the access to the north and very close to St Mary's Church (Grade 1 listed building).
7. We object to the use of Crookthorn Lane, Brookpit Lane and Byway 197, Bread Lane as access to the work areas south of A259. The lanes are not suitable for heavy vehicles and provide the main access to the primary school. They are narrow with limited visibility and with grass edges that are easily damaged and prone to flooding. Recognising the limitations of the lanes at busy times the school operates a voluntary one system for parents driving their children to and from school.

Bread Lane is the community's primary walking route to the beach and open countryside of the Littlehampton to Middleton gap in this area. Although unrestricted, it passes very close to the school and is not suitable for use by heavy vehicles.

An alternative route south from Ferry Road would be far more suitable.

8. We have several remaining concerns that should be considered carefully, and suitable planning conditions and mitigation applied:
- The critical importance of the area south of Field Place (Works areas 10, 14, & 15) which is the sole drainage route from the strategic development of 300 homes on the western side of Church Lane and its SUDS scheme. At the end of October and into November the development site has suffered severe surface water flooding with run-off across Church Lane resulting in flooding of the grounds of Field Place.
  - The noise and lighting associated with the 24-hour drilling operations undertaken within work areas No 7 and No 8 to the south of A259. This will affect wildlife in the open countryside and residents close by will potentially suffer a significant loss of amenity if these works are insufficiently screened.
  - We are seeking assurance that the internal operations within the works compounds will be conditioned and enforced in such a way to minimise disturbance to residents.
  - We want to ensure that operational hours and times are adhered to and that suitable penalties are in place if they are not.
  - We want to ensure that traffic orders are in place to ensure no works vehicles use Horsemere Green Lane as a cut through.
  - It is essential that the open landscape is required to be returned to its original condition and agricultural quality.
9. General concerns that the Inspector should consider are:

- The instability of the coastline shown as Work Area 6 in document APP – 009. The coast has been subject to significant erosion and its defences breached in early 2020 extensively flooding Work Areas 7, 8, and 9 south of the A259 see attachment 2). Recent flooding in October and November 2023 is a reminder of the fragility of the remaining shingle bunds maintained by the Environment Agency. The Inspector should note the threat that the Environment Agency will withdraw further work if they judge further maintenance uneconomic.
- The cumulative impact of the proposed Rampion 2 development works, traffic being undertaken on a similar timescale to West Sussex County Council plans to upgrade the A259 through Clymping, and the Arun District Council strategic housing development just to the west of Church Lane. Together these are likely to cause major disruption to the lives of residents by seriously restricting travel, both private and public, and access by emergency services.
- We feel that the documentation fails to recognise today's coastal, travel chaos and development pressures on the Clymping community and to which Rampion 2 will only add. We wonder what steps the Project will take to compensate the community. So far, we see only evidence of the downsides of this project locally.

The Parish Council would be happy to provide further written and oral evidence if required.

Cllr. C.J. Humphris

On behalf of Clymping Parish Council

6<sup>th</sup> November 2023

## Attachment 1

### CLYMPING PARISH COUNCIL

### RESPONSE TO RAMPION 2 CONSULTATION ON POTENTIAL CABLE ROUTE CHANGES.

#### CONTEXT

The Government has set ambitious targets for offshore wind which has a key role to play in tackling climate change and the UK's move towards Net Zero, setting a target to deliver up to 50GW by 2030, including up to 5GW of floating wind.

Rampion 2 was first consulted on in 2021, the Parish Council raised the following concerns which are relevant to this round of consultation which deals with onshore cable route changes:

- The details of the construction plan and the impact on the village of the construction and installation works, the construction traffic and where equipment might be stored locally.
- The detail of the proposed horizontal drilling works and the potential risks of this to the fragile coastline and sea defences at Clymping.

The Parish Council have looked in detail at the issues raised in Areas 1a and 1b of the consultation documents and carefully considered the supporting PEIR SIR. It is very clear that Clymping faces disproportionate impacts on village life and the Parish Council cannot support the proposals until suitable impact mitigation measures have been agreed.

#### 1. Horizontal Directional Drilling MR01 and MR02 North of A259

The modified route shown in brown would reduce the length of cabling needed, but noise and vibration would be a major concern. The Parish Council have been advised that the drilling operation would be 24 hours continuously with a noise level of 90decibels. The background noise

level for this rural area in daytime is approximately 50 decibels. There is no detail of any noise reduction measures.

There is no detail of any monitoring or remedial actions.

No details of the period of time for drilling has been shown. The Parish Council anticipates noise nuisance.

For a 24 hour operation night time lighting will also be required. There appears to be no evidence of any lighting assessment.

*The Parish Council strongly oppose drilling in MR01 and MR02 unless there are adequate steps to mitigate the operational noise and the impact of lighting especially on the residents of Climping Park and Brookpit Lane.*

## 2. Landscape Features

There are insufficient details in the PEIR SIR to understand the type of landscape features which may be lost during the construction phase and also no details of the types of planting during reinstatement. The cable corridor may look very different during operation compared with preconstruction.

The Parish Council are aware that the local land owner is developing a wild life corridor across this area, but can find no evidence to suggest this matter has been looked at or considered as part of the proposals. The Parish have been informed that remedial works on the Coastal Path (path 829) are scheduled for early 2023. The proposals will have implications for this work and the proposed English Coastal Pathway, but there is no evidence that this has been given any consideration.

*Until there is clarity, the Parish Council will oppose cabling works in this area.*

## 3. Impact on the School and Community Amenities

A number of routes and construction compounds are shown in Areas 1a and 1b. There is no information on the types of vehicles and plant to be used or stored there during the construction/operational phase or the steps that will be taken to manage the operations. Is it proposed to produce a construction Traffic management plan and will Parishes have an input?

The Parish Council are strongly opposed to the compounds/operational sites as they affect the Church Green and to the north and west of the school and down Bread Lane.

The reasons for this view are:

- There will be considerable disruption in the village for 3 years 2026-29
- This will be compounded by the timing of the A259 developments and the Strategic housing site which are likely to coincide with these proposals. These include a new roundabout on the A259, works at Ferry Road junction, a new roundabout near the Oystercatcher. The proposed access AA01 will be opposite a new access to the 300 House development
- Locating a compound to the north and west of the school is unacceptable due to disruption, noise, dust in dry weather depending on the as yet undefined operations. This compound and the access down Bread Lane should be withdrawn given the proposals to move the cable east towards the River Arun for which access from Ferry Road is more suitable.
- Residents have made it clear to the Parish Council that the operational area at Church Green is unacceptable given the sensitivity of the green for the village as an area of memorial and the setting of the Church and Church Hall. It should be removed given the proposed increase in operational flexibility south of Field Place and access to MR02.
- There is no information or assessment of the drainage through the area south of Field Place. This is a serious omission given the critical importance of proposals for drainage from the Clymping strategic housing site through this area.

*It is the Parish Council's recommendation that site MR01 be used as the sole operational and construction compound south of A259 routing from Ferry Road. The Parish Council also strongly recommends that the proposals for operations and access from Church Green are withdrawn given the proposal to expand flexibility of operations south of Field Place given the inclusion of area AA01 shown on Plan 1b.*

- Routing from Ferry Road removes the impact on Bread Lane a very popular walking route to the beach.



- Any access from Ferry Road however requires careful timing consideration with the proposed A259 works at Ferry Road/Clymping Park.
- All this work is critically dependant on the EA maintaining the bund sea defences for an extended period rather than seeing “what they can do” annually. Emergency works were underway this weekend owing to overtopping and flooding due to storm damage to the bund. The project should be encouraged to contribute to the shingle moving costs.
- Access south of Field Place removes the impact on the Grade 1 listed heritage Church and the Church Green.

Supporting these concerns, with specific reference to the cumulative effects of traffic flows on the A259 and the wider road network around Clymping, is the lack of comprehension and understanding of the current traffic issues, and no detail or modelling of future traffic flows. Any traffic assessment must look at the cumulative effects and not just on the additional traffic movements from this project.

The PEIR SIR refers to meetings and discussions with various stakeholders, but Parish Councils have only been aware of high-level detail through the liaison group. This means local knowledge and experience have not been given the appropriate weighting.

Clymping Parish Council remains open to further detailed discussion of all the points above but cannot support the proposals as they stand.

Submitted on behalf of Clymping Parish Council  
29<sup>th</sup> November 2022

Attachment 2

Flooding of land in Work Areas 7, 8 & 9 in 2020

