**Rampion 2 Offshore Windfarm**

**Development Consent Order**

**Representation from Washington Parish Council**

This representation is made by Washington Parish Council representing the local community in our area. The Parish Council is separately the Charity Trustee of the Washington Recreation Ground which is a protected Green Space in the adopted joint Storrington & Sullington and Washington Neighbourhood Plan, and a registered Community Asset. The Parish Council as Trustee will register separately as an Interested Party. Nothing in this representation should be taken to prejudice the position of the Trustee in any future negotiations.

The Parish Council does not oppose the principle of the development but considers that the proposed route causes unnecessary and avoidable impact on Washington village and its residents. We made representations during the consultation process in support of the more southerly alternative Route A for the cable, which avoids the village. We have never been provided with a proper explanation as to why this is not viable or seen an evaluation of the costs/benefits in comparison to the proposed Route B. We are also concerned about the options proposed for the location of a construction compound adjacent to the village which would serve the whole of the central part of the project area. It is impossible for us to comment more specifically since we have not been informed of the final site selection prior to the DCO submission – something we find discourteous and unhelpful.

As indicated above, our concerns arise in part from what we do know about the proposed route and its potential impact, and in part from the absence of detailed information provided by the applicant. We intend to participate constructively in the DCO Inquiry and we look to the Examining Authority to ensure that the applicant is required to provide detailed and comprehensive evidence which is then thoroughly tested before any decision is reached.

The Parish Council’s principal issues of concern are as follows:

* **Traffic and Road Safety:**

Despite our requests Rampion Extension Development (RED) has not confirmed its preferred location for the construction works compound (one of only three or four for the entire project) which it would appear will be located in or near our parish. We recognise that this will be identified in the final submission but it would have been helpful and considerate for RED to engage with the community more openly on this matter. We raised serious concerns in our consultation responses about any option being considered for a compound adjacent to the working quarry at Rock Common and the impact of additional traffic in this location accessing the A283. These concerns are compounded by the possible impact of restoration proposals at the quarry, and by the delay to the programming of delivery of the A27 Arundel Bypass.

We consider that the impact of additional HGVs and traffic which may be generated by the construction process has not yet been properly assessed and could have an adverse effect on local road network and access points. There could be significant additional pressure on the A24 Washington roundabout which receives traffic from Steyning on the A283 (east), from Ashington and Horsham on the A24 (north), Worthing and Findon (south), and Storrington on the A283 (west). The parish is near Storrington which is an Air Quality Management Area and any additional construction related traffic passing through this area would be unacceptable.

We ask the Examining Authority to test the proposals thoroughly taking into account local knowledge and concerns as well as the ‘higher level’ assessment made by the highway authority.

* **Potential impact on Ecology and the Local Environment:**

We are concerned that it has not been possible, using the information provided so far, to properly evaluate the full ecological/environmental impact of the cable route adjacent to and through the Washington Recreation Ground, which has a number of mature trees and hedgerows. RED has provided bland assurances that there will be no ‘above ground’ impact either during construction or in the longer term but we have not been satisfied with the information or level of detail provided thus far. The recreation ground is a vital community asset and important to the setting of the village and it is imperative that no harm is done either during installation or future maintenance to its existing landscape value. Our position is that this is best and most easily achieved by avoiding the area entirely but given that the application has not proposed to do so, these impacts become critical in determining whether the proposal is acceptable.

* **Horizontal Drilling Compounds:**

RED has proposed to mitigate the impact of the route by using Horizontal Directional Drilling to install the cable under the recreation ground and adjacent land. Despite our requests we have not been provided with detailed information about the large compounds required at each end of the drilling site on the east side of the A24. We ask that the Examining Authority specifically investigates the nature and impact of the drilling operation, its duration and what measures will be taken to minimise the disturbance to local residents and to normal use of the facilities.

* **Future use of the Recreation Ground:**

It is essential that the future use of the recreation ground by our community is not compromised or put at risk by the presence of the supply cable at any point during its lifetime. This is best achieved by routing the cable elsewhere and therefore avoiding the recreation ground altogether. However, acknowledging that this is not the current proposal, we believe it is essential to have complete reassurance that the presence of the cable can be effectively ‘forgotten’ for all practical purposes in the use, maintenance and repair of the recreation ground, with no constraints or requirements to seek consents from the cable owner for routine operations. We are also concerned that it should not prejudice the future extension of facilities, such as the sports pavilion, at the recreation ground. We cannot accept a situation where the presence of the cable becomes the most important determinant of how and when our community makes use of its own recreation facilities.

* **Consultation process:**

We have made repeated requests for clearer and more easily understood maps and plans to aid community understanding of the proposals. We recognise that there is an evolving design process. However, the sheer volume of material produced by the applicant has often made it difficult for us to be clear about the proposals and their potential impact. In some cases options are put forward for consultation with no subsequent explanation as to how a final selection has been made – for instance in relation to construction compounds. The volume and presentation of material has also obscured the location or impact of elements of the scheme or its chronology. The applicant has constantly advised that details of the final proposals will become available when the DCO is submitted which may be true but is unhelpful and not in the spirit of good public engagement.

At the public meeting held in September 2021 we (meaning the residents of our community) asked the developer to reconsider a route which avoids the middle of the parish and the village. The community asked that serious consideration be given to reverting to the original preferred Route A option south of the village, about which Wiston Estate later provided significant supporting information. Our concerns were raised in the written responses to the 2021, 2022 and targeted 2023 consultations, with a request that the other route option, which would avoid the village, is robustly evaluated. There is no evidence that this has been done nor has the Parish Council received a satisfactory response to its requests for additional information. It is therefore no surprise that residents feel let down by the consultation process. This is one of the key issues that we hope the Examining Authority will investigate during the Inquiry.

* **Funding arrangements for Professional Fees:**

The Parish Council (as community representative) also wishes to raise the concern that landowners, such as the Parish Council as Trustee, are faced with a developer’s cap on the reimbursement of professional fees. The effect of this is to limit their ability to properly consult an agent for advice or to take legal advice in relation to property interests. There is no justification for residents of our small community being required to pick up a large bill so that it can deal with a property matter which is entirely of benefit to a commercial entity. We urge the Examining Authority to ensure that this cap is removed and that all reasonable costs are reimbursed by RED.

* **Conclusion:**

These issues are all material to the DCO process. The Parish Council has a specific interest as a community representative to participate in the Inquiry and looks forward to being given the opportunity to raise these matters as an Interested Party.