

Rampion 2 Wind Farm

Category 5:

Reports

Consultation Report

Appendix 11

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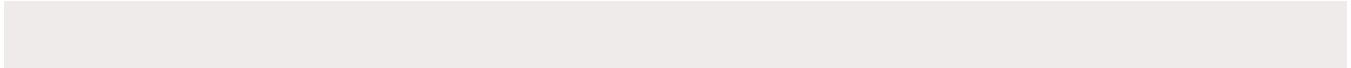
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Rampion 2

WIND FARM

Consultation Report

Annex 3: Appendix 11

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations, 2009 - Regulation 5(2)(q)

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Applicant: Rampion Extension Development Limited

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11. Consultation responses from statutory consultees referenced in the Environmental Statement

These responses have been extracted from the Rampion 2 Environmental Statement.

Table 6-1 Formal Consultation feedback – Volume 2, Chapter 6, Coastal Processes

Stakeholder	Theme	How this is addressed in this ES
Natural England	<i>“We are concerned that insufficient baseline data has been gathered to allow adequate baseline characterisation of the marine and coastal environment and processes“</i>	Detailed baseline information is provided as Appendix 6.1: Technical report: baseline description, Volume 4 of the ES (Document Reference: 6.4.6.1).
Natural England	<i>“We are concerned with the applicability and relevance of the use of large sections of the Hornsea Three PEIR Volume 5 Annex 11 Marine Processes Technical Report in the Rampion 2 Physical Processes Chapter.”</i>	Concerns were discussed as part of the ETG meetings. It was noted that the assessment for Rampion 2 is undertaken on a site specific basis and any evidence or assessments from other developments are only used where suitably applicable.
Natural England	<i>“We have specific concerns regarding WCS [worst case scenario] including calculations of sandwave clearance, potential impacts of TFPs [Temporary flotation pits] in the nearshore, cable protection in the nearshore, scour impacts due to foundation installation.”</i>	Concerns were discussed as part of the ETG meetings. The project design envelope has been reviewed and the relevant named assessment sections of the ES were reviewed in terms of the WCS used. TFPs in the nearshore have since been removed from the design envelope.
Natural England	<i>“Plume modelling results are not shown schematically across the array area.”</i>	The assessment of plume dispersion has been completed using spreadsheet-based modelling. The assessment is detailed in Section 2 of Appendix 6.3: Technical report: impact assessment, Volume 4 of the ES (Document

Stakeholder	Theme	How this is addressed in this ES
Natural England	<i>“Evidence should be provided to show both near- and far-field effects on the tidal regime due to the development (and in-combination with Rampion 1).”</i>	Reference: 6.4.6.3) with results provided in tables showing distance from release. The assessment (including potential in-combination effects with Rampion 1) has been based on fluid dynamics theory which concludes that the wake length distance is significantly less than the corresponding tidal excursion distance with effects limited both in space and magnitude. This is in line with numerical modelling for numerous other windfarms. Detail is provided in Section 4 of Appendix 6.3: Technical report: impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3)
Natural England	<i>“The potential impact of the following aspects of the project have not been adequately assessed: Temporary Floatation Pits (TFPs) in the nearshore zone (potentially for up to 5 years)”</i>	Following a review of the planned installation options, TFPs in the nearshore have since been removed from the design envelope.
Natural England	<i>“We advise the Applicant to consider avoiding the use of Temporary Floatation Pits. For example, by extending the length of each duct from the HDD drill compound location to a pop-out location at a subtidal water depth which is sufficient to facilitate the safe operating depth of the Cable Lay Vessel.”</i>	Following a review of the planned installation options, TFPs in the nearshore have since been removed from the design envelope.
Natural England	<i>“The Applicant should also consider historical morphological change of the sandbanks in order to understand how the sandbanks might be affected by the project.”</i>	The primary process mechanisms driving sediment transport (affecting sandbank morphology) are waves and tides. The EIA has assessed that these pathways of effect

Stakeholder	Theme	How this is addressed in this ES
Natural England	<i>“Given the proximity to the Offshore Overfalls MCZ, we would wish to see the predictions and a plot of suspended sediment concentrations and the spatial extent of potential cumulative sediment plumes generated by the AQUIND interconnector cable installation/maintenance activities and the Rampion 2 cable/foundation installation activities”</i>	<p>and so the potential impacts on the (sandbank) receptor are limited (no measurable effect). As such, even more detailed baseline assessments of historic patterns of morphological change through natural processes would not influence the outcome of the assessment.</p> <p>The assessment of plume dispersion (including potential cumulative effects with the AQUIND interconnector cable) has been completed using spreadsheet-based modelling. The assessment is detailed in Section 2.8 of Appendix 6.3: Technical report: impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3) with results provided in tables showing distance from release.</p>
Natural England	<i>“Given the potential for local and short-term increases in SSCs that is predicted during the foundation preparation and cable burial operations, it is recommended that sampling of in-water suspended sediment concentrations should be undertaken during these operations.”</i>	<p>The increase in SSC does not affect coastal process receptors and therefore no monitoring is required. Refer to the following chapters for potential monitoring requirements for other receptors: Chapter 8: Fish and shellfish ecology; Chapter 9: Benthic subtidal and intertidal ecology; Chapter 10: Commercial fisheries; Chapter 11: Marine mammals; Chapter 12: Offshore ornithology; and Chapter 26: Water environment, Volume 2 of the ES (Document Reference: 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12 and 6.2.26 respectively).</p>
Natural England	<i>“Please can the Applicant provide a separate assessment that considers whether</i>	<p>Concerns were discussed as part of the ETG meetings. It was agreed that no measurable</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>sandwave clearance (as well as any material disposal), could influence patterns of sediment transport, resulting in morphological change? We would also like to see an assessment of the potential adverse impact on adjacent sandbank systems due to the removal of sandwaves (or other significant bedforms).“</i></p>	<p>change is assessed as likely to occur to the wave climate or tidal regimes affecting the banks, and therefore, there would logically be no change to regional sediment transport patterns interacting with the banks. Sandwave levelling will only redistribute sediment locally and so is also unlikely to cause changes to relatively distant features.</p>
<p>Natural England</p>	<p><i>“The potential environmental impacts on nearshore hydrodynamics and the sediment transport regime should be assessed for a WCS whereby the 16 TFPs remain in situ for up to 5 years.“</i></p>	<p>Following a review of the planned installation options, TFPs in the nearshore have since been removed from the design envelope.</p>
<p>Natural England</p>	<p><i>“It will be important for a full assessment of coastal variability to be undertaken under a range of coastal management and climate change scenarios...this will enable appropriate setback distances for the Transition Jointing Bays (TJBs)“</i></p>	<p>Concerns were discussed as part of the ETG meetings. It was discussed that future management decisions by other third-parties (e.g. the Environment Agency) will control the future evolution of the coastline, incorporating but otherwise irrespective of the landfall design chosen in the present by Rampion 2.</p> <p>A commitment has been made (C-247 in Table 6-12) to undertake ground investigation at the landfall site at the post-DCO application stage. This would be carried out to inform the exact siting and detailed design of the TJB and associated apparatus. In addition, this would inform a 'coastal erosion and future beach profile estimation assessment', which in turn would</p>

Stakeholder	Theme	How this is addressed in this ES
		inform the need for and design of any further mitigation and adaptive measures to help minimise the vulnerability of these assets from future coastal erosion and tidal flooding.
MMO	<i>“The PEIR should address the spatial scale and consequences of UXO and boulder clearance, as well as the potential for any sandwave clearance requirement”</i>	Assessment of impacts of UXO clearance will be undertaken in line with industry standard approaches as part of post consent licencing requirements when further details are known.
MMO	<i>“It would be valuable to provide graphic spatial representation of the data [spreadsheet model outputs] as calculated versus (perhaps) measured or other (process) modelled data to illustrate the efficacy of the method and to understand the difference in spatial representation of impact that is implied.”</i>	The maximum spatial extent of varying levels of impact on suspended sediment concentrations and corresponding sediment deposition for all activities is illustrated in a new Figure 6.3.4 in Section 2.9 of Appendix 6.3: Technical report: impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3).
MMO	<i>“Due to the desktop methods adopted, there is no clear spatial representation of impacts in either Section 6 or Chapter 6 appendices (other than the wave impact extents on Graphics A-6 to A-20) – impacts are resented solely as tabulated data. Where data has not been modelled in the same way (e.g., suspended sediment plume and deposition extents), a representative graphic would be of value, in order to illustrate how the spreadsheet method translates to a map view for impact assessment.”</i>	
MMO	<i>“Chapter 5, Section 5.7.2 identifies a need to define both a present and future baseline. The</i>	The future baseline is more clearly defined, in Section 6.6 paragraph 6.6.9 .

Stakeholder	Theme	How this is addressed in this ES
	<i>MMO notes that the latter is not clearly defined and requests that this is updated within the ES.</i>	
MMO	<i>“References are made to situations which will not be permitted to arise e.g., Chapter 6 Appendix Table 2-6 and associated text suggest that sediment deposition (such as associated with drilling and dredging for WTG locations) will not be permitted to thicknesses over 4-5m thick, limited by ‘drilling protocols’. However, this is not explained and questions arise such as how will this be limited and where will any other sediment go? This mitigation should be explained in more detail in the ES.”</i>	The distribution of deposited sediment volume can be managed during the construction period. Either through selective placement of the material in the first place, or through redistribution of sediment afterwards. These limits are presented as a realistic limitation on the maximum design scenario. As part of the construction method statement, RED will produce a foundation installation methodology, including a dredging protocol, drilling methods and disposal of drill arisings and material extracted (C-279) in Table 6-12 .
MMO	<i>“The assessment of plumes and sediment suspension and deposition has largely assumed a sediment type based on sand (quartz density etc). However, the underlying bed contains both sand and area of chalk. The assessment has not addressed the differences that may arise as a result of this difference in sediment type this should be updated in the ES.”</i>	Additional comment and assessment are included in the relevant sections of Appendix 6.3: Technical report: impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3) for the possibility of some or all of sediment arisings being chalk.
Clymping Parish Council	<i>“Will this increase or decrease the risk of flooding from the sea at Clymping?”</i>	A separate Flood Risk Assessment is provided in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2).
Clymping Parish Council	<i>“ [Provide detail of] The detail of the proposed horizontal drilling works and the potential risks of</i>	Horizontal drilling techniques avoid direct disturbance of the upper soil layers by design. As such, there is minimal

Stakeholder	Theme	How this is addressed in this ES
	<i>this to the fragile coastline and sea defences at Clymping.</i>	disturbance to the fabric of the coastline and so minimal risk of affecting the naturally occurring patterns of coastline evolution.

Table 7-5 Statutory Consultation feedback – Volume 2, Chapter 7, Other Marine Users

Stakeholder	Theme	How this is addressed in this ES
Marine Management Organisation	7.1.1 [ID 64] SENSITIVITY MATRICES: <i>“matrices for sensitivity are different to the shipping and navigation and commercial fisheries therefore when cross referencing impacts to marine users this could cause confusion”</i>	The matrices within this OMU assessment are consistent with Chapter 10: Commercial Fisheries, Volume 2 of the ES of the ES (Document Reference 6.2.10) and other ES chapters and so remain unchanged. However, Chapter 13: Shipping and navigation, Volume 2 of the ES of the ES (Document Reference 6.2.13) Shipping and Navigation maintains aspect-specific terminology so will differ to other ES chapters.
Natural England	7.6.42 [ID 1014]: AQUACULTURE <i>“potential for parties to come forward considering aquaculture (particularly seaweed farming) in the general area.”</i>	Updates have been made from a review of the MMO public register of licences and TCE leases to take account of any recent aquaculture proposals, however the outcome of the assessment is unchanged.
Natural England	7.6.23 [ID 1015]: CABLES <i>“Have possible in combination effects [for the now completed IFA2 cable] during the operational phase been considered?”</i> 7.6.43 [ID 1016]: CABLES <i>“CrossChannel Fibre cable....should be kept under review. Based on its landfall at Brighton it seems possible it could interact with the array.”</i>	IFA2 was included in CEA Table 7-22 of the cumulative assessment but is now also added into Table 7-23 in terms of sediment and follow-on assessment. CrossChannel Fibre became operational December 2021 and updates made. The outcome of the assessment is unchanged.

<p>Natural England</p>	<p>Table 7-16 [ID 1017]: SEDIMENT (Table 7-19 in ES) For Offshore trenching for cables, Offshore ECC and Array, the local sediment deposition in PEIR (and MCZ within) may be <i>“much more of a potential issue than is described in some of the nature conservation-based chapters”</i> and relevant details <i>“should be included in, and inform, the relevant chapters and within the cumulative impacts assessments presented within them.”</i></p>	<p>Predicted levels of sediment deposition are described in detail in Chapter 6: Coastal Processes, Volume 2 of the ES of the ES (Document Reference 6.2.6). That chapter has been used to inform this assessment of OMU – see Section 7.9.</p>
<p>Natural England</p>	<p>7.12.11- 7.12.16 [ID 1019]: SEDIMENT <i>“With the AQUIND Interconnector cable and multiple aggregates dredging sites within, and in extremely close proximity to, the PEIR Boundary it is not seen as sufficient to dismiss the potential for cumulative impacts based on arguments around ‘fast flows’ and reports that are over 10 years old. The modelling referred to was conducted to examine cumulative impacts with the aggregates sites for Rampion 1, because it was required to understand that impact. Therefore, the same level of consideration should be applied to this project. Given that Rampion 2 is located in extremely close proximity to the aggregates sites, and the licenses have been updated, it follows that up-to-date modelling should be provided. It should be noted that the aggregates companies themselves are required to undertake regular monitoring as part of their license in relation to the sensitivity of ecological receptors in this area.”</i></p>	<p>Predicted levels of suspended sediment and sediment deposition have been modelled and are described in detail in Chapter 6: Coastal Processes, Volume 2 of the ES of the ES (Document Reference 6.2.6) and are also summarised in Table 7-17. That chapter has been used to inform an assessment of cumulative impacts on OMU (including with the AQUIND Interconnector and aggregate sites) – this is presented in Section 7.12.</p>
<p>Mulberry Marine</p>	<p>Table 7-16 [ID 8]: SEDIMENT</p>	<p>Para text amended, 8 / 16km is correct. Distances updated to nm as well in Table.</p>

Experiences Ltd	<p><i>“It would be helpful if distances could be provided in nm and thus directly measurable on a chart”</i> Para 7.9.120 [ID 10]: SEDIMENT Disagreement between statements with <i>“SSC travelling approximately 5km whereas the Table quotes 16km / 8km.”</i></p>	
SWT & TWT	<p>Para 7.6.30 [ID 10]: DIVING (BASELINE) <i>Clarify that “SeaSearch...point data...[has records]...dating back more than 20 years”</i></p>	<p>Text has been amended, though data before 2014 is not used in assessment due to its age Seasearch data from 2014 to 2021 has been used.</p>
Mulberry Marine Experiences Ltd	<p>Para 7.6.30 [ID 1]: DIVING Figure 7.8 <i>“title is misleading”</i> given the data source. There are also many more <i>“dive sites within and immediately adjacent to the PEIR Leach Assessment Boundary”</i> as the figure is <i>“based on an incomplete dataset”</i>. Therefore <i>“the impact on diving activities will have been significantly under-estimated.”</i> Para 7.6.31 [ID 2]: DIVING (EVIDENCE / BASELINE) Concern that dive centres, charter vessels and dive clubs have not been determined, neither in situ or those across Southern England...[and] Greater London that will use Littlehampton / Selsey / Newhaven and charter vessels</p>	<p>Figure title amended to show indicative dive locations. As a proxy for diving baseline, in the absence of any regional club data (which was requested but not received), the figure is now updated to show dive vessel charter routes; and wrecks and obstructions. The Figure has not been updated with 2022 SeaSearch data as this is not publicly available at the time of writing (although data up to end of 2021 has now been included). Dive clubs, centres and schools were included in text at PEIR but further detail added in ES. Additional information added for UK regional survey data on watersport participation, specific to diving.</p>
Mulberry Marine Experiences Ltd	<p>Para 7.9.14 [ID 4]: DIVING <i>“This is based on an incomplete dataset and the impact on diving activities will have been significantly under-estimated.... The conclusion of the paragraph is considered correct – second sentence and first clause of third sentence should be removed.”</i> Para 7.9.35 [ID 5]: DIVING <i>“Remove references to majority of sites outside PEIR since not proven / incomplete dataset”</i></p>	<p>Evidence base has been updated as above and is considered to be appropriate for the purposes of EIA. Second sentence and third sentence/ first clause removed (which include references to majority of sites being outside of project boundary). The outcome of the assessment is unchanged.</p>
Mulberry Marine	<p>Para 7.9.110 [ID 9]: DIVING</p>	<p>The predicted changes in Suspended Sediment</p>

Experiences Ltd

Emphasis made on impacts to “*dive sites between Selsey and the Export Corridor...[and]...Selsey out to the Owers*”. Opposite Pagham, Outer(Far) Mulberry is “*extremely popular ...accessible to all levels of diver ...used to introduce people to UK Sea Diving ...the most popular dive site on our Boat Schedule (typically 30% of our dives will be to this one site) and...varied and numerous marine life and soft/hard corals.*” In this region “*visibility is usually best on the ebb tide*”. Particular impacts not sufficient as the site “*is within the quoted maximum Neap range for the Plume [and...] therefore likely to have a significant adverse impact*” Activity will not be displaced as “*Dive sites [within Sussex] to the West of the Bill (namely Bracklesham Bay) do not have the same depth / variety / marine life / water visibility as those to the East...[and so] can expect a corresponding decline in business for this period. Dive Sites [outside of Sussex] to the South West are [not as good as] historically lower visibility than those to the East due to the influence of the Solent and the NAB dredging ground.*” Para 7.9.146 [ID 13]: DIVING (SEDIMENT) Impacts not sufficient as “*every dive site East of Selsey is potentially going to be impacted by the Plume [during construction]*”, potentially “*worsened by the weather*” and “*with risk that once divers understand [this]... they will simply go elsewhere...until the work is completed.*”

Concentration (SSC) are presented in **Table 7-17** and effects on diving **Paragraphs 7.9.9 et seq.** The coastal processes modelling has shown that at 5km from the construction works, the levels of suspended sediment will be within the range of 10m/g to 300mg/l and will reduce to immeasurable levels within two to three days of the works. This is therefore a change of negligible magnitude, which is short term and reversible.

<p>Littlehampton Harbour Board</p>	<p>[ID 3]: DIVING (IMPACTS) Update impacts given “<i>Proper consideration [should be] given to the economic and potential safety impacts on the harbour and its users, whilst leveraging the opportunities to bring mutual benefits to both the project and local marine stakeholders.</i>” [ID 4]: DIVING (EVIDENCE) “<i>I do not believe these have yet been fully and fairly assessed due to vessel traffic assessments occurring during the COVID-19 pandemic and an over reliance on AIS data (which only a small minority of the port’s users are required to have).</i>”</p>	<p>Chapter 13: Shipping and navigation, Volume 2 of the ES (Document Reference 6.2.13) considers the safety risks to vessel operators, and any impediment to transit to regional harbours. Diver charter vessels now included, limited to those with AIS, as well as consideration of consultation responses received. Socioeconomics and tourism chapter considers fully the impact to local businesses. Including harbours and charter vessels. The assessment has been further supported since the publication of PEIR with additional summer vessel surveys to ensure any effect of the COVID-19 pandemic has been addressed. Winter vessel traffic surveys are also planned for Nov 2022. Evidence therefore represents the best available data.</p>
<p>Mulberry Marine Experiences Ltd</p>	<p>Table 7-12 C-99 [ID 3]: DIVING (NOISE) (Now Table 7-14) Missing assessment for “<i>impact that the increased underwater noise from Piling...divers won’t want to be in the water within a considerable distance of the PEIR.</i>”</p>	<p>C-99 addresses divers within immediate vicinity <500m from piling. C-101 addresses divers across larger distances from piling, considering that impact is temporary, short lived and reversible. In the absence of mitigation the impact magnitude may be greater than low (albeit there is no UK evidence that any OWF has displaced recreation diving >500m), but as the project has committed to appropriate mitigation the Applicant considers the conclusion robust and has not changed it. It is very rare for OWFs to impact on diving to date in the UK, though this was the case for Rampion 1, but only within 500m of piling (as addressed here for Rampion 2 by C-101). The Rampion 1 communication plan was considered to be effective in its</p>

implementation and as such should be given a high degree of confidence in managing likely significant effects.

Furthermore, Rampion 2 mitigation for impacts from underwater noise will be implemented, as a minimum including the use of a low noise hammer technology, which will reduce the extents of injurious or startle response extents for human divers as well as for other sensitive receptors such as black seabream and seahorse. The project has therefore proposed appropriate mitigation measures which may also include the use of bubble curtains, depending on the time of year, as defined in the **In principle sensitive features mitigation plan** (Document Reference 7.17).

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Para 7.9.129 [ID]: NOISE
Clarification requested *“It is noted that Piling operations will take place over approximately 48 months”* vs. *“during a Sea Users group meeting it was stated that Piling would take place in a six month period.”*
Para 7.9.138 [ID 11]: NOISE
Para 7.9.144 [ID 12]: NOISE
There is a need for *“expected noise level ...at specific distances”* to map out impacts
Note that *“During Rampion 1, piling could be heard on the Outer Mulberry”* (dull thump, 17 miles); and *“Waldrons and near East Borough Head”* (more noticeable, 11 miles); and *“Figure 8.17 ... confirms our view that when Piling is in the Western zone of the PEIR, that no diving will be feasible from Selsey Bill”*.
Anticipated impacts include *“business...[including] accommodation, food providers*

Text has been updated; a duration of approximately 12 months for piling is correct.
Noise level contour mapping is not considered a requirement for diving impacts, as is consistent with other OWF EIAs, however contours shown for fish and shellfish in **Chapter 8: Fish and shellfish ecology, Volume 2** of the ES (Document Reference 6.2.8) provide a precautionary indication given their greater sensitivity to noise.
Also see response above in regards to exclusion zones, the appointment of a Diving Liaison Officer and the development of a diver communication plan.

	<p><i>etc</i>” and impact should be “<i>Medium</i>”.</p> <p>Mitigation measures will minimise risk to divers “adjacent to the Construction area” but not “<i>Selsey Dive Sites within just 5-6nm of the Construction Area, divers will simply stop diving this area until the work is complete</i>”</p>	
Natural England	<p>7.9.149 [ID 1018]: NOISE</p> <p>“<i>More than only a relatively small portion of the habitats important for fish in the fish and shellfish study area are affected by noise impacts, as shown by contours.</i>”</p>	<p>The noise impact area has been quantified more precisely based on model outputs and are presented in Appendix 11.3, Volume 4 (Document Reference 6.4.11.3). Subsequent effects on fish and shellfish ecology are described in Chapter 8: Fish and shellfish ecology, Volume 2 of the ES (Document Reference 6.2.8).</p>
Fishing Consultee	<p>[ID 24]: DISPLACEMENT</p> <p>More consideration of displacement of other sea users is required as the “<i>current displacement effect, coupled with that from Rampion 1 site, the MCZ, MPA, aggregate extraction sites, shipping lanes and IFCA managed areas, leaves very little space for other sea users</i>”</p>	<p>Other marine users, mainly divers and recreational boating beyond the inshore¹, are not currently displaced from Rampion 1 (apart from during maintenance), aggregates sites (apart from active dredging) or MPAs (unless damaging activities). Existing shipping lanes and IFCA managed areas are not considered in the cumulative effects assessment as they are existing plans or projects and are therefore included in the baseline.</p>

Table 8-6 Statutory Consultation feedback – Volume 2, Chapter 8, Fish and shellfish ecology

Stakeholder	Comment ID	Theme	How this is addressed in this ES
NE	253/282	<p>Design Process.</p> <p>Given that the cable channel chosen runs across known black seabream nesting habitat, it must be clearly demonstrated how Rampion has sought to</p>	<p>To avoid impacting known sensitive features and identify the shortest feasible path, alternate cable routing to microsite around sensitive features will be</p>

	<p>avoid impacts via the design process to date. Have alternative cable routes been considered to minimise the impact on nesting black seabream?</p>	<p>undertaken (Table 8-13). This has involved detailed design work, using geodata and cable engineering expertise. Different trenching methods are also being considered (see Rampion 2 Technical Note: Cable Corridor area mitigation for sensitive features (Evidence Plan Report) (Document Reference 7.21)).</p>
259/260/261/264/266	<p>Data collection Concerns raised regarding the timing of site-specific surveys, which were undertaken outside of the optimum black seabream nesting period and reliance on old data Coull <i>et al.</i> (1998) and Ellis <i>et al.</i> (2010, 2012).</p>	<p>Black seabream nesting can occur in March to July (paragraph 8.6.83). The limitations and uncertainties of using these sources are addressed in Section 8.5. The baseline characterisation data has been agreed through the evidence plan process, in light of the proposed mitigations (paragraph 8.3.16).</p>
275/318	<p>Baseline data NE request evidence that all salmon and sea trout swim in from the west/from the Atlantic. NE request values and figures to illustrate predicted plumes.</p>	<p>Current existing evidence supporting the predominant migratory paths of these species is provided within paragraph 8.6.72. Table 8-12 presents the maximum design scenario associated with increases in suspended sediment concentrations (SSC) and deposition. For detailed information</p>

	<p>38/39/251/254/258/ 276/278/279/280/281/ 310/ 347</p> <p>Black seabream baseline data</p> <p>Concerns that the assessment relies upon spatially discrete data and large data gaps exist. NE request further data on black seabream nesting habitats is collected to adequately characterise the Study Area for black seabream. NE request that potential and existing black seabream nesting habitats are clearly mapped.</p>	<p>on sediment plumes see Chapter 6: Coastal processes, Volume 2 of the ES (Document Reference 6.2.6).</p> <p>RED has used the best available data to provide a representative characterisation of the receiving environment (Table 8-10). The combination of site-specific surveys, and published literature has allowed the characterising species to be noted. The site-specific survey data has included additional data presented in paragraph 8.5.6. Limitations of the data set are discussed within paragraph 8.5.7 to 8.5.14. Recognising the concerns around the potential for under-representation of bream nesting activity in the wider area, RED has made use of all existing information, including 20 years of regional data, as depicted in Figures 8.14a (Document Reference 6.3.8) and 8.14b, Volume 3 (Document Reference 6.3.8), which illustrate the survey boxes showing the black seabream survey</p>
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extents, and the historic and potential nesting areas. Site specific geophysical surveys have also been undertaken, informing the potential locations of nesting areas. Additionally, a precautionary assessment has been undertaken which assumes black seabream nests to be present. It should also be noted that cable routing has been undertaken to microsite the export cable corridor around sensitive features such as black seabream nesting areas, with a focus to route the cable through areas of deeper sediment and areas that have shown a lack of long-term changes to the seabed.

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Noise modelling.

The worst-case scenario has not always been applied correctly in relation to the baseline data. It is unclear if the Applicant is planning on simultaneous piling. If this is the case, then it needs to be considered in all of the models undertaken.

Revised noise modelling has been undertaken to assess the worst-case scenario, which has been applied to the assessment throughout **Section 8.9**. RED confirm that simultaneous piling is being considered, and the worst-case scenario in relation to this has been assessed in **Section 8.9**.

		<p>Details of underwater noise modelling are presented in Appendix 11.3: Underwater noise assessment technical report Volume 4 of the ES (Document Reference 6.4.11.3).</p>
<p>251/ 282/ 308/ 319/ 326</p>	<p>Impacts to black seabream Concerns raised regarding the impacts to black seabream nesting habitats outside of the MCZ. In relation to black seabream some of the key issues relate to the assessment of underwater noise, suspended sediment, direct disturbance, and long-term loss of nesting sites. NE disagree with the conclusion that the magnitude of disturbance would be moderate.</p>	<p>Impacts to black seabream arising from all of the noted sources (underwater noise, suspended sediment, direct disturbance, and long-term loss of habitat) are assessed in Sections 8.9, 8.10, and 8.11. Embedded mitigation to reduce the magnitude of impacts from underwater noise, suspended sediment, direct disturbance and habitat loss have been detailed in Table 8-13.</p>
<p>311/ 327</p>	<p>Black seabream mitigation NE request further evidence on the success of reinstated chalk bedrock as a feasible mitigation measure. We are yet to see sufficient monitoring in relation to the floatation pits for Rampion 1. NE cannot agree that there is a high likelihood of successfully reducing the significant of impact to no significant levels at this stage.</p>	<p>Floatation pits will no longer be considered. Alternate measures have been proposed to eliminate the need for floatation pits (paragraph 8.3.30). Targeted meetings that discussed proposed mitigation options are detailed in paragraph 8.3.39 et seq. Different trenching methods have been considered to minimise the footprint and identify the</p>

		<p>shortest feasible path through the chalk beds and presumed black seabream nests.</p>
<p>40/251/ 257/ 274/ 314</p>	<p>Impacts to Hippocampus species Concern for underwater noise and suspended/deposited sediment impacts. Sensitivities to habitat structure changes, removal of substratum, visual disturbance and deoxygenation should be considered. The assessment should consider impacts to the species outside of designated sites. Additionally, seahorse species should be included here as a largely benthic species with slow swimming speeds, high conservation value and recorded presence within the locality.</p>	<p>Potential impacts from underwater noise, SSC and deposition, changes to habitats and direct disturbance of seahorses have been assessed within Sections 8.9, 8.10 and 8.11 with sensitivities and magnitudes updated as appropriate.</p> <p>In addition, RED have provided mitigation options in the “Rampion 2 Technical Note: Underwater noise mitigation for sensitive feature” which highlights the use of primary and secondary mitigation, to reduce or avoid the effects on seahorse.</p>
<p>41/251/ 325</p>	<p>Impacts to Herring (<i>Clupea harengus</i>) Concerns about the impacts from suspended/deposit sediment and from underwater noise on herring the proximity of the spawning area to the southeast of the array.</p>	<p>Herring have been considered throughout the assessment in Sections 8.9, 8.10 and 8.11 with the sensitivities and magnitudes of impact updated as appropriate. A Technical Note provided by RED, “Rampion 2 Technical Note: Underwater noise mitigation for sensitive feature”</p>

		noted the use of primary and secondary mitigation, to reduce or avoid the effects of underwater noise impacts on herring, based on underwater noise modelling to determine the worst-case ranges for potential impact on spawning herring.
332	EMF Impacts NE request studies of EMF effects relevant to sparid fish to assess sensitivity.	The assessment has been updated based on the most recent available information as presented in Section 8.10.
263/271/272/273	Assessment Impacts NE recommend species, Atlantic salmon, sea lamprey and European native oyster to be included in the assessment. NE recommend an assessment of increased SSC and deposition impact on sandeel.	All recommended species have been included in the assessments throughout Sections 8.9 to 8.10. Sandeel have been considered throughout Sections 8.9, 8.10 and 8.11 and additional data from JNCC (2021) has been added to support the statement made in paragraph 8.6.28.
335-336	Decommissioning If cable protection is left in situ in relation to black seabream this has the potential to make any nesting habitat loss permanent. Potential for suspended sediment is highly dependent on the final scope of the decommissioning works. The worst case for suspended sediment should be considered here.	RED notes that the approach to decommissioning will be detailed in the Decommissioning Plan as detailed within paragraph 8.11.14. Furthermore, potential impacts from the decommissioning of Rampion 2 have been assessed in Section 8.11.

	345	Transboundary Impacts NE note Downs herring spawning is likely to have transboundary effects.	Transboundary effects, including consideration of the Downs herring spawning stock within Section 8.13 .
	346	Inter-related effects Concerns raised regarding potential impacts from inter-related effects on nesting black seabream from directed disturbance, SSC and sediment deposition, and underwater noise.	RED confirms that all Proposed Development lifetime effects are assessed in Chapter 30: Inter-related effects, Volume 2 of the ES (Document Reference 6.2.30).
MMO/Cefas	66/68	Receptors requiring assessment MMO requested that native oyster and blue mussel be included as a receptor for the fish and shellfish ecology assessment and cuttlefish as a species of commercial importance in the assessment. Direct and indirect seabed disturbance leading to the release of sediment contaminants as an impact on demersal spawners should extend to include filter feeding species.	Native oyster, blue mussel and cuttlefish have been included as receptors in Table 8-7 . Impacts from direct and indirect disturbances leading to the release of sediment contaminants on King Scallop, Blue Mussel and Native Oyster have been considered in Sections 8.9 and 8.11 .
	76/88	Underwater noise assessment. MMO recommend seabass should be included in the underwater noise assessment. MMO state if sandeel are to be included in the assessment, when other fish species with spawning grounds in the area have not been included e.g. sole, cod, lemon sole, then this	Seabass have been considered within the assessment (Sections 8.9 to 8.11) as well as 'other fish receptors' including species such as cod, lemon sole, sprat and whiting. Sandeel are considered separately within the assessment due to their demersal

should be justified by also highlighting their benthic spawning nature and close affiliation with the seabed.

spawning behaviours and close affiliation to the seabed.

Modelling thresholds. Concerns were raised regarding the appropriateness of McCauley *et al.* (2000) for use in the assessment of behavioural impacts of underwater noise on fish during topic group meetings in 2020. It was noted that RED has committed to undertake a qualitative assessment of behavioural effects on fish in line with that described in Popper *et al.* (2014), where quantification is not possible. The MMO notes that the McCauley *et al.* (2000) threshold has been included in the modelling for the PEIR. However, in addition, the Hawkins *et al.* (2014) threshold has also been used in the modelling, which the MMO supports.

RED noted that whilst following stakeholder discussions there remained disagreements on a definitive disturbance threshold specifically for black seabream, a threshold of 141dB re 1µPa SELss as defined by Kastelein *et al.* (2017) has been used and potential behavioural impacts on black seabream from underwater noise have been assessed on this basis in **Sections 8.9** and **8.11**. Where a quantifiable assessment was not possible, a qualitative assessment of behavioural effects on fish and shellfish receptors has been undertaken.

82/83

Data Limitations. MMO note the importance of recognising the limitations of data from site specific geophysical survey to supplement existing data on black seabream nesting locations and other limitations such as the age of data, seasonal variations in species presence or abundance,

Data limitations of the geophysical survey are presented in **Section 8.5**.

89/92/93

and fishing methods used to collect data.

Data collection.

MMO notes that the discussion on black seabream nesting sites fails to demonstrate how data collected are representative despite being conducted outside of the spawning and nesting season. If aggregate industry nest site monitoring improves the level of confidence in the data, this should be demonstrated with figures. MMO request a figure to demonstrate the black seabream nest site results identified during the Gardline survey of July/August 2020.

The survey was completed outside of the optimal period however nesting has been observed to the east in Kimmeridge Bay on the Matt Doggett black seabream project in late June to early July (2015).

The 20-year composite dataset used for historic black seabream nesting is taken from the aggregates industry from 2002 to present, which highlights black seabream nest locations predominately within the Kingmere MCZ but also within the cable corridor (**Figures 8.14a** (Document Reference 6.3.8) and **8.14b**, (Document Reference 6.3.8) **Volume 3** of the ES). The combination of the long term and site-specific surveys leads to the conclusion that nests are likely to be present within the export cable corridor (**Paragraphs 8.6.27 to 8.6.89**).

Appendix 9.4: Rampion 2 geophysical survey, Volume 4 of the ES (Document

			Reference 6.4.9.1) presents potential nesting areas as detailed in the Gardline survey (see Chart 7 in Appendix 9.4, Volume 4 of the ES (Document Reference 6.4.9.4)).
	94/98/100-104/109/110	<p>Mitigation. Concerns that construction will result in significant adverse effects on black seabream and herring during their spawning and nesting seasons. MMO require close examination of embedded environmental measures and recommends early engagement prior submission. The MMO believes that piling restrictions during the black seabream spawning and nesting season and the Downs herring spawning season may be required.</p>	Targeted meetings with appropriate stakeholders discussing the technical notes ‘Underwater noise mitigation for sensitive features’ and ‘Cable Corridor area mitigation for sensitive features’ occurred in February 2022. Embedded environmental measures are discussed throughout Sections 8.9 to 8.11 .
	106	<p>Cumulative Impact Assessment. The MMO expect black seabream to be afforded a species-specific cumulative impact assessment within the EIA.</p>	The cumulative effects from other activities are considered at the community scale in Section 8.12 in line with standard practice and the agreed approach during scoping. Black seabream has not therefore been afforded a species-specific cumulative assessment.
<p>Mulberry Marine Experience</p>	14	Concerns raised about the impact of noise and sediment on elasmobranchs and	The impacts from underwater noise, direct disturbance and sediment

		invertebrates, including undulate and thornback rays and scallops.	suspension and deposition on elasmobranchs and invertebrates have been assessed in Sections 8.9, 8.10 and 8.11.
	15	Mulberry Marine Experience noted Spiny and Short-Snouted seahorse sightings within the Selsey Bill and the Hounds MCZ and in areas adjacent to the MCZ towards Pagham recorded on iRecord.	These sightings have been incorporated into the current baseline (Section 8.6).
Fishing Organisations/ Fishermen	23	Concern that all elasmobranch species, cephalopods, some gastropod species and most cetaceans are all detrimentally affected by sub-sea noise, vibration and EMF produced around cabling.	The effects of underwater noise and vibration and EMF are assessed in Sections 8.9, 8.10 and 8.11.

Table 9-6 Statutory Consultation feedback – Volume 2, Chapter 9, Benthic subtidal and intertidal ecology

Stakeholder	Document/ Forum	Theme	How this is addressed in this ES
Sussex Wildlife Trust/ Sussex Kelp Restoration Project (SKRP)	Evidence Plan Process: Offshore Cable Corridor Issues Targeted Meeting (15/02/22)	Consultees expressed concerns regarding micro-siting of offshore export cables around features of conservation interest and the predictions for seabed habitat presented at PEIR (RED, 2021).	Since PEIR further site-specific survey data has been added to habitat mapping. It should be stressed that where site specific data have been collected, this has been prioritised within the predictive habitat map and that an appropriate baseline has been characterised. This Chapter has been updated accordingly and all available data was used in the cable routing and mitigation exercise. Furthermore, pre-construction surveys will be undertaken to inform final cable routing.

<p>Natural England</p>	<p>Evidence Plan Process: Offshore Cable Corridor Issues Targeted Meeting (15/02/22)</p>	<p>Consultees requested confirmation on the use of floatation pits.</p>	<p>Floatation pits will no longer be considered for Rampion 2. RED will commit to using rock filter bags (or similar) for seabed preparation purposes. The placement of rock filter bags are currently RED’s leading solution. One or two layers of rock bags will likely be required. This Chapter has been updated to remove all reference to floatation pits.</p>
<p>Natural England</p>	<p>Evidence Plan Process: Offshore Cable Corridor Issues Targeted Meeting (15/02/22)</p>	<p>Concerns were raised regarding trenching methodology. Consultees understand that RED are committed to minimising the impact but suggested a few different options.</p>	<p>RED can confirm that in terms of the impact from trenching, this has not changed since PEIR (RED, 2021) and a maximum design scenario has been assessed. Embedded environmental measures have been discussed in Section 9.9 to detail how RED is aiming to reduce the impact of these methodologies.</p>
<p>MMO & Natural England</p>	<p>Section 42 Consultation (ID: 42, 351, 359, 458, 160)</p>	<p>Consultees expressed concern regarding the application of predictive habitat mapping, lack of site-specific survey data and baseline characterisation.</p>	<p>Predictive habitat mapping utilised the best available data for the array area and export cable corridor to produce a detailed predictive habitat map at PEIR (RED, 2021). The primary purpose of creating the predictive habitat map was to address data gaps identified at PEIR, due to planned further survey work not being available at that time. Since PEIR, further site-specific survey data has been added to the habitat mapping. It should be stressed that where site specific data have been collected, this has been prioritised within the predictive habitat map and that an appropriate baseline has been characterised.</p>

MMO & Natural England	Section 42 Consultation (ID: 43, 44, 386, 411, 428)	Natural England expressed concern regarding the use of floatation pits and associated impacts and conclusions.	A targeted meeting with appropriate stakeholders took place on the 15 of February 2022 to discuss RED's proposed mitigation options for cable laying in the export cable corridor. As part of this meeting, it was stated that floatation pits will no longer be considered for Rampion 2. RED will commit to using alternative solutions such as rock filter bags (or similar) for seabed preparation purposes. Full details are presented in Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4).
Natural England	Section 42 Consultation (ID: 349, 350, 352, 387, 390, 391, 393, 394, 412)	Natural England expressed concern regarding the wide parameters and worst-case scenario (WCS) applied to the project description at PEIR, which made it challenging to understand the impacts. Clear calculations and links to the proposed development chapter will be beneficial and any mistakes identified in S42 responses reviewed and amended.	The project has been refined for the ES assessment, with the proposed DCO Order Limits being reduced in the west and east of the ES Assessment Boundary. As a result, the maximum design scenario (Table 9-15) has been updated to reflect the changes since PEIR (RED, 2021).
Natural England	Section 42 Consultation (ID: 353, 414, 415, 416, 417, 418, 426)	Natural England expressed concern regarding sediment plume modelling to understand the impacts on designated sites, as well as Annex I/ Section 41 priority habitats.	Detailed quantitative assessments of sediment plumes are provided in Appendix 6.3: Coastal processes impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3), also summarised in Chapter 6: Coastal processes, Volume 2 of the ES (Document Reference: 6.2.6). The detailed effect descriptions are presented in a tabulated

			format and a description of the extent of potential effects from Suspended Sediment Concentrations (SSC) and deposition from any activity at any location within the ES Assessment Boundary is also provided. Details of the impacts on designated sites, as well as Annex I/ Section 41 priority habitats are considered within the assessment (Section 9.9 to Section 9.12).
Natural England	Section 42 Consultation (ID: 354, 402, 410, 408)	Natural England expressed that they did not agree with the definitions of sensitivity currently applied to some biotopes. The assessment matrix itself also appears to be flawed with the addition of 'very high' alongside the use of MarLIN data that does not include a 'very high' category.	The 'very high' sensitivity category has been removed (Table 9-17) as per discussions with Natural England.
Natural England	Section 42 Consultation (ID: 355, 453)	Natural England expressed concerns regarding the cumulative impacts associated with the AQUIND Interconnector Cable. It was also stated that cumulative impacts should be modelled to understand the full extent of impacts.	Detailed assessments on the interaction between neighbouring projects are provided within Section 9.12 and detailed cumulative physical processes assessments are provided in Appendix 6.3: Coastal processes impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3), also summarised in Chapter 6: Coastal processes, Volume 2 of the ES (Document Reference: 6.2.6).
Natural England	Section 42 Consultation (ID: 356)	Natural England advice that Annex I or Annex II habitats or species outside of designated sites should still be considered.	The 'relevance to assessment' section of Table 9-1 has been amended to detail that any Annex I or Annex II habitats/species out-with SACs that are located within the ES study area have

			been considered within the assessment.
Natural England	Section 42 Consultation (ID: 357, 398, 405)	The proposed DCO Order Limits overlaps with the Climping Beach SSSI.	The onshore landfall proposed DCO Order Limits overlaps with Climping SSSI. However, this is to allow for an area of HDD works, which will be underneath the cliff face and the intertidal area. It will not be on the surface of the beach. The overlap with the proposed DCO Order Limits has not been removed, to allow space for the HDD. Potential indirect effects to features have been assessed within Section 9.9 .
Natural England	Section 42 Consultation (ID: 362, 413, 449)	Natural England note that the ZOI for benthic ecology has been informed by the tidal excursion buffer. We note that the study area shown in Figure 9.1 and the Spring tidal excursion buffer shown in Figure 6.5 differ.	The secondary ZOI buffer area has been increased to 16km around the proposed DCO Order Limits to match the 16km tidal excursion zone for SSC (Figure 9.1, Volume 3 of the ES (Document Reference: 6.3.9)).
Natural England	Section 42 Consultation (ID: 363, 429)	The intertidal ecology study area is defined by the intertidal zone extending up to the Mean High-Water Spring (MHWS) mark within the offshore export cable corridor. Natural England understand that the direct impacts will occur within the offshore export cable corridor, however indirect impacts on surrounding intertidal /coastal habitats should also be considered.	Coastal SSSI's have been considered in Table 9-13 . Indirect impacts on intertidal habitats have been considered within Section 9.9 , where appropriate. HDD methods are being employed by the Proposed Development to avoid direct impact to the intertidal zone.
Natural England	Section 42 Consultation (ID: 364, 436)	Where habitat such as Chalk is lost due to construction, Natural England question whether this can be considered temporary in relation to direct habitat loss. Even if the excavated chalk is	A targeted meeting with appropriate stakeholders took place on the 15th of February 2022 to discuss RED's proposed mitigation options for cable laying in the offshore export cable corridor. Different trenching

		used to fill any pits or trenches, if the physical structure of subtidal chalk is altered, it will not recover, and potentially rare elements of the habitats may be completely lost (Natural England - Marine Chalk Characterisation Project Report). This needs to be considered.	methods are being proposed to minimise the footprint and identify the shortest feasible path through the chalk beds. Micrositing of the cable around chalk features where possible will further reduce this impact. Section 9.9 has been updated to assess for permanent loss in the inshore location where impact to chalk habitat can't be avoided.
Natural England	Section 42 Consultation (ID: 365, 392, 395)	Long-term habitat loss/alteration will result from the presence of foundations, scour protection and cable protection. If there is a possibility that any of these aspects will not be removed on decommissioning, then this habitat loss should be considered permanent in the worst-case scenario.	The presence of foundations, scour protection and cable protection has been assessed as permanent in the worst-case scenario for long-term habitat disturbance / alteration within Section 9.9 .
Natural England	Section 42 Consultation (ID: 367, 396, 397, 400, 439, 447)	Natural England expressed concern regarding the direct impacts from EMF generated by the current flowing through the cables buried to <1.5m below the surface, cable exposure has been identified in the Rampion 1 monitoring. The Applicant therefore needs to consider how realistic it is that cable will remain buried, this is particularly important where they are relying on this as part of the mitigation.	The approach to cable burial within the array area and offshore export cable corridor will be considered in the cable burial risk assessment (CBRA). A 1m target depth is considered appropriate for interconnector and array cables and up to 1.5m is considered for the offshore export cable corridor. The CBRA will consider geological conditions in detail. RED will be using different burial equipment on Rampion 2 (compared to Rampion 1) and so the likelihood of exposure is considered much lower. Assessments of burial requirement will be made within the CBRA and detailed burial assessments

			performed for the selection of trenching tools.
Natural England	Section 42 Consultation (ID: 368)	Natural England expressed concerns regarding the availability of the subtidal survey report, associated relevant data and the ability to comment on it prior to submission.	Following a targeted meeting with appropriate stakeholders, including Natural England, on the 15th of February 2022, the Rampion 2 ES Appendix 9.3: Offshore wind farm subtidal benthic characterisation survey report, Volume 4 (Document Reference: 6.4.9.3) was circulated. Rampion 2 ES Appendix 9.3: Offshore wind farm subtidal benthic characterisation survey report, Volume 4 (Document Reference: 6.4.9.3) has been updated to include the missing site-specific data from PEIR (RED, 2021). This information is now included within this Chapter.
Natural England	Section 42 Consultation (ID: 369)	Natural England questioned the habitat model, as they assumed that not all datasets were analogous. Therefore, Natural England questioned how was it decided what data should take precedent? It is assumed that where up to date site specific data is available that this will take precedence over older, more general datasets?	Where site-specific data have been collected, this has been prioritised within the predictive habitat model and supersedes the historical data in the habitat map. Both the predictive seabed mapping methods report (Appendix 9.1: Predictive seabed mapping methods report, Volume 4 of the ES (Document Reference: 6.4.9.1)) and the baseline characterisation (Section 9.6) have been updated to reflect this.
Natural England	Section 42 Consultation (ID: 370, 432)	Natural England questioned if site specific contaminant data will be included within the ES. Furthermore, cannot agree with the findings of the ES.	Rampion 2 ES Appendix 9.3: Offshore wind farm subtidal benthic characterisation survey report, Volume 4 of the ES (Document Reference: 6.4.9.3) has been updated to include the missing site-specific data from PEIR (RED, 2021), including the

			contamination data. As a result, this information has now been presented within Section 9.6 and carried through into the assessment (Section 9.9 to Section 9.12).
Natural England	Section 42 Consultation (ID: 372)	As part of the intertidal surveys a large area of chalk outcrops was present in the upper and mid shore area. The lower shore was fringed with more littoral rocks consisting of chalk pebbles. The Applicant should show that they have in the first instance considered construction methods that avoid impacts on areas of chalk. This includes extending the length of the HDD seaward to avoid the need for floatation pits.	A targeted meeting with appropriate stakeholders took place on 15 February 2022 to discuss RED's proposed mitigation options for cable laying in the offshore export cable corridor. In preparation for this meeting a Technical Note was provided by RED, 'Rampion 2 Technical Note: Cable Corridor area mitigation for sensitive features' (Appendix 9.5: Technical Note: Cable Corridor area mitigation for sensitive features, Volume 4 of the ES (Document Reference: 6.4.9.5)). Different trenching methods are being proposed and floatation pits are no longer considered, to minimise the footprint and identify the shortest feasible path through the chalk beds. HDD will be used to avoid damage to the intertidal chalk.
Natural England	Section 42 Consultation (ID: 373)	Natural England expressed that it wasn't clear if and how the Applicant will seek to avoid damage to habitats protected under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 listed in this section, such as the chalk reef, as well as other habitats of principal importance and Annex I habitats? The opportunities for micro-	As previously discussed, a Technical Note was provided by RED, 'Rampion 2 Technical Note: Cable Corridor area mitigation for sensitive features' (Appendix 9.5: Technical Note: Cable Corridor area mitigation for sensitive features, Volume 4 of the ES (Document Reference: 6.4.9.5)). It is proposed that micro-siting around habitats of principal importance (including chalk reef) and

		siting around such features or extending the use HDD further offshore should be discussed.	Annex I habitats is undertaken where practicable following a pre-construction survey. Where chalk is directly impacted, this has been considered as permanent within the assessment (Section 9.9).
Natural England	Section 42 Consultation (ID: 376)	Habitats and species protected under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 should be considered to be of national importance rather than regional importance, as they are protected by national legislation. It is also unclear why the protection status is listed as 'none' for biotopes that contain habitats that have protected status under this legislation	Table 9-14 has been amended to avoid confusion and provide clarity. As a result, the heading has been changed to 'Designation status'.
	Section 42 Consultation (ID: 377)	Some priority habitats such as blue mussel beds appear to be missing from this list. It is important that this list is updated when it is based on the actual rather than predicted data to ensure all protected habitats and species that are found to present have been included.	Blue mussels are considered in Chapter 8: Fish and shellfish ecology, Volume 2 of the ES (Document Reference: 6.2.8).
Natural England	Section 42 Consultation (ID: 378)	In light of the new Nearshore Trawling Byelaw 2019 which came into effect on 22 March 2021, and the associated ongoing Sussex Kelp Restoration Project (SKRP), the potential for this project to impact upon restoration efforts in this area should be considered.	Additional information on the SKRP has been included in the Section 9.6 Future baseline. RED have been liaising with SKRP as requested by Sussex IFCA to provide results of site-specific ground truth data and to discuss and develop wider mitigation. A representative from SKRP was present at the targeted meeting with appropriate stakeholders which took place on the 15th of February 2022 to discuss

			RED's proposed mitigation options for cable laying in the export cable corridor, which was a positive engagement.
Natural England	Section 42 Consultation (ID: 380)	Natural England note that any cable protection/scour protection for WTG's appears to be missing from the temporary habitat disturbance MDS.	The assessment of cable and scour protection is presented within Section 9.9 under Operation and Maintenance impacts 'Long-term habitat loss / alteration from the presence of foundations, scour protection and cable protection'.
	381, 382, 383	Natural England notes that the requirement for boulder and sandwave clearance contributes to a significant amount of the habitat disturbance.	RED will undertake pre-construction surveys to determine the exact amount of clearance required prior to construction within the array area and the offshore export cable corridor. Micro-sitting around boulders will be considered where appropriate. Furthermore, RED propose to use a plough to remove boulders. This will place boulders to the adjacent area of seabed, which will satisfy Natural England concerns regarding adjacent seabed. Furthermore, high level cable routing is presented in the Technical Note provided by RED, 'Rampion 2 Technical Note: Cable Corridor area mitigation for sensitive features' (Appendix 9.5: Technical Note: Cable Corridor area mitigation for sensitive features, Volume 4 of the ES (Document Reference: 6.4.9.5)).
Natural England	388	Natural England expressed that contamination from water-based drilling muds associated with drilling to install foundations, should this be required.	RED have no detail at this stage until precise machinery is identified, however as part of the construction method statement, RED will produce a foundation installation methodology, including a dredging protocol, drilling

			methods and disposal of drill arisings and material extracted (C-279).
Natural England	354, 404	Natural England do not agree that the magnitude of impact of temporary habitat disturbance relating to construction activities at the Proposed Development will have on benthic subtidal receptors is minor.	A targeted meeting with appropriate stakeholders took place on 15 February 2022 to discuss RED's proposed mitigation options for cable laying in the export cable corridor. Different trenching methods have been considered to minimise the footprint and identify the shortest feasible path through the chalk beds. Therefore, the footprint should be the smallest feasible and the micro-siting of the cable around chalk features where possible will further reduce this impact. Any discernible impact to this feature has been considered within the assessment of habitat disturbance but has been detailed as permanent habitat loss where appropriate.
Natural England Natural England	406	'Where exposed chalk or clay substratum does remain, or where restoration work has emplaced comparable material to restore the habitat, recovery of the biological assemblage is reported to be 'medium', occurring over a period of two to ten years (Tillin and Hill, 2016)'. The physical structure of chalk cannot recover, and this statement relies on comparable material being used to restore the habitat in relation to the biological assemblage.	RED notes this comment and Section 9.9 has been updated accordingly, noting that the impact to chalk has been considered as permanent habitat loss where the impact to this feature cannot be micro-sited.
Natural England	407, 409	Natural England expressed concern that <i>Sabellaria spinulosa</i> was not predicted to be present	The predictive habitat model utilised the best available data for the proposed DCO Order Limits, in addition to

in the predictive modelling given it is known to be widespread in this area. It is not suitable to base the PEIR assessment on encrusting individuals rather than reef habitat, without the data from the baseline surveys.

the results obtained from site-specific surveys, to produce a detailed predictive survey habitat map. The recent subtidal report (**Appendix 9.3: Offshore wind farm subtidal benthic characterisation survey report, Volume 4** of the ES (Document Reference: 6.4.9.3)) describes the potential for *S. spinulosa* reefs across the nearshore ECC and western areas of the proposed DCO Order Limits. However, observations of discrete *S. spinulosa* encrustations were deemed to be low resemblance reef where recorded. The encrusting *S. spinulosa* biotope 'A3.215: [*Sabellaria spinulosa*] with kelp and red seaweeds on sand-influenced infralittoral rock' was therefore included within the model and assessed within **Section 9.9**. Further assessment of habitats/species "of principal importance pursuant to section 41 of the NERC Act 2006" will be undertaken during pre-construction surveys.

<p>Natural England</p>	<p>419</p>	<p>Natural England are concerned about material excavated from HDD exit pits potentially being temporarily stored within the offshore array area or export cable corridor, if and where designated as a spoil disposal area.</p>	<p>RED can confirm that there will be no exit 'pit' in the marine environment. The HDD drill string will protrude from the seabed at the end of the drill, prior to the liner duct being attached and the drill string being retracted towards shore. During the drilling process, drill cuttings are returned to the shoreside entry pit. Some limited cuttings may form at the seabed when the HDD drill first protrudes.</p>
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Natural England	420	Where heavy deposition is likely to occur, this will result in complete burial of the characterising species and the effect of this pressure will be mediated by the length of exposure to the deposit.	An additional sentence is added to direct the reader to Table 9-22 where sensitivities from heavy deposition are detailed. Further information is presented regarding the length of exposure within Section 9.9 to Section 9.12 .
Natural England	423	Throughout this chapter there is reference to overall sensitivity being overall 'worst-case high', we consider that if some receptors are being assigned a high sensitivity then the overall sensitivity should be high.	RED note 'worst-case high' as some sensitivities are low. If any of the biotopes show a high sensitivity, then this is considered the worst-case even though it is not the worst-case for all habitats.
Natural England	424	Natural England understand that the Applicant has referred to information from MarLIN throughout this chapter, however where decisions are being made based on peer reviewed literature or any other literature this should be referenced. Where this has not been provided Natural England are not in a position to agree with the overall conclusions in relation to the potential significance of an effect.	References to MarESA were provided initially in Table 9-20 , however, for ease and clarity these footnotes have been repeated throughout the assessment tables from Section 9.9 to Section 9.12 . The link to the MarESA provide all the associated references to support these sensitivity assessments.
Natural England	425	Where a biotope has been allocated a high sensitivity in the text this should be reflected in the table.	Table 9-20 shows the results of the MarESA. 'Piddocks with a sparse associated fauna in sublittoral very soft chalk or clay' was given a high sensitivity in the text due to its importance within the Kingmere MCZ; this has been detailed within the assessment. If this feature was not found within an MCZ its sensitivity would be 'medium' as per the MarESA.
Natural England	427	Where confidence is low the most precautionary	Further details have been provided to discuss the result

		approach should be taken.	of MarESA when confidence in the assessment is low, as detailed within Section 9.9 to Section 9.12 .
Natural England	430/ 431	Protected intertidal habitats of the Solent and Dorset Coast and Pagham Harbour SPA include mudflats and saltmarsh are not expected to be impacted due to the negligible magnitude recorded for this temporary impact. Natural England do not currently agree with the negligible assessment for the magnitude of impact based on the requirement for further information.	No direct impacts will occur to intertidal habitats. As detailed within Section 9.9 negligible impacts to intertidal habitats are expected through indirect impacts associated with SSC and deposition because the fine material being dispersed from the HDD conduits during excavation is likely to be widely dispersed and quickly form part of the background concentration of SSC along the nearshore. This is further supported by Chapter 6: Coastal Processes, Volume 2 of the ES (Document Reference: 6.2.6) and Appendix 6.3: Coastal processes impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3).
Natural England	435	It is noted by the Applicant that there are potential beneficial effects from long-term habitat loss / alteration, as new habitats for different faunal assemblages to colonise, resulting in a likely increase in biodiversity and biomass. Natural England suggests that this is likely to result in a shift in the type of biotopes present in the area where the underlying habitat has changed. The potential loss of existing biotopes should not be seen to be balanced in anyway with the potential for them to be replaced by different biotopes.	RED has reviewed this comment and additional text has been provided within the assessment to detail that the impact will result in a shift in the baseline despite anticipated increases in biodiversity (Section 9.9).

Natural England	438	In relation to temporary habitat disturbance from jack-up vessels and cable maintenance activities, efforts should be made to avoid known areas of priority habitats and species.	RED has committed to undertake a pre-construction of habitats / species "of principal importance pursuant to section 41 of the NERC Act 2006". Embedded environmental measures will be applied to avoid direct disturbance to sensitive habitats/species "of principal importance pursuant to section 41 of the NERC Act 2006", where practicable and a full appraisal will be provided at this stage of development.
Natural England	440	It is unclear whether the scenario presented in relation to suspension/ deposition sediments considers the possibility that cable repair works could include large sections of multiple cables, and that certain sections eg. those closest to Kingmere MCZ could be more sensitive to this impact.	RED has provided further details within the assessment, which includes details of the Kingmere MCZ in relation to operation and maintenance activities (Section 9.10).
Natural England	441	Natural England do not agree that based on the information provided here scour effects can be considered negligible; scour and cable exposure has been shown to be an issue with regard to Rampion 1. Therefore, Natural England do not have confidence that the design of the project including scour protection at foundations and sufficiently buried cables will 'prevent scour occurring'. The worst-case scenario should therefore consider that some scour will occur and the observed situation in	As detailed within Appendix 6.3: Coastal processes impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3) scour protection will only occur if and where scour protection is not applied. The approach to cable burial will be considered in the CBRA. A 1m target depth is considered appropriate for interconnector and array cables and up to 1.5m is considered for the offshore export cable corridor. The CBRA will appraise geological conditions in detail. Furthermore, RED will be using different burial equipment on Rampion 2

		relation to Rampion 1 should feed into an assessment. Natural England are particularly concerned where scour may occur on cables or foundation, or around scour protection in close proximity to the MCZ's.	(compared to Rampion 1) and so the likelihood of exposure is considered much lower. Assessments of burial requirement will be made within the CBRA and detailed burial assessments performed for the selection of trenching tools. The magnitude of scour is therefore still considered to be negligible.
Natural England	442	Natural England consider external scour protection to be a last resort. Natural England welcome types of scour protection that can potentially be removed, such as geotextile bags. Nevertheless, Natural England are concerned that the introduction of plastics or other foreign materials into the marine environment could be harmful when broken down or degraded. Therefore, careful consideration should be given to the nature of the cable protection materials used.	Adequacy of protection as well as stability, durability and sustainability of the protection materials is being considered. However, at this stage a particular protection has not been decided until further requirements from geophysical survey are obtained. All protection options are outlined in the Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4).
Natural England	444	Natural England note that if MCZ habitats were to be affected by scour, this should be considered particularly sensitive.	RED can confirm that there is no anticipated risk to Kingmere MCZ from scour because cables will be buried. The CBRA will consider geological conditions in detail. RED will be using different burial equipment on Rampion 2 (compared to Rampion 1) and so the likelihood of exposure is considered much lower. Furthermore, there is no anticipated risk from scour to the Offshore Overfalls MCZ, because there will be no anticipated scour outside the proposed DCO Order Limits as detailed within Chapter 6:

		Coastal Processes, Volume 2 of the ES (Document Reference: 6.2.6).	
Natural England	448	Natural England questions whether decommissioning includes the removal of cable.	The details of the proposed decommissioning process will be included within the Decommissioning Programme which will be developed and updated throughout the lifetime of the Proposed Development to account for changing best practice. Some materials may be left in situ, and this will be reviewed closer to the time of decommissioning. As such, the maximum design scenario (Table 9-15) assumes the removal of all infrastructure.
Natural England	451	Natural England question the applicability of sediment modelling conducted to assess cumulative impacts between aggregates activities and Rampion 1. This is because Rampion 2 is not in the same location and therefore it is assumed that the model parameters will need to be altered to compare this different scenario. Additionally, this does not account for any differences that have occurred to the aggregates licenses and the monitoring of these activity that has taken place since 2012.	The assessment of plume dispersion has been completed using spreadsheet-based modelling. The assessment is detailed in Section 2.8 of Appendix 6.3: Coastal processes impact assessment, Volume 4 of the ES (Document Reference: 6.4.6.3) with results provided in tables showing distance from release.
Natural England	452	Is it possible that any cable maintenance works for IFA 2 could interact with the impacts of this development given it runs in very close proximity to the proposed DCO Order Limits and is in the ZOI?	IFA-2 and CrossChannel Fibre have been considered within the CEA, with detail presented in paragraph 9.12.18 .

Natural England	454	The type of habitat that could be lost in relation to each development has not been considered here. If it is being suggest that there is not cumulative effect based on comparable habitats being widespread in the area this needs to be considered.	This has been considered and amended in the CEA (Section 9.12).
Natural England	456	There appear to be a very limited number of benthic chemical samples, but this is difficult to discern give the overlapping points.	The number of chemical samples taken is clarified in the text, paragraph 9.6.7 . The number of samples were presented to Natural England / MMO through the EPP. The stations with the highest silt content were selected as per standard practice. Unfortunately, eight samples of a targeted 15 were unable to be collected for contaminant analysis due to the coarse nature of the sediments sampled at these stations.
Natural England	459	Natural England expressed concerns over the labelling of the intertidal habitat map as 'predicted'.	RED confirm that the habitat map produced for the intertidal area considers the combined analysis of the target notes obtained in the field, the imagery of the quadrats and surrounding imagery taken North, East, South and West of the quadrats, the Unmanned Aerial Vehicle (UAV) imagery and all available historical information. The word 'predicted' has therefore been removed from the intertidal figures (Figure 9.5 to Figures 9.7, Volume 3 of the ES (Document Reference: 6.3.9)).

Table 10-6 Formal Consultation feedback – Volume 2, Chapter 10, Commercial Fisheries

Stakeholder	Theme	How this is addressed in this ES
NFFO	<p>Regarding the assessed impact: Physical presence of Rampion 2 during the operation and array area infrastructure leading to reduction in access to, or exclusion from established fishing grounds.</p> <p>For the purpose of a worst-case scenario applied in the assessment, the extent of maintenance operations including Service Operation Vehicle (SOV) operations should be defined, and the application of safety zones related to these operations.</p>	<p>Impact assessment assumes that temporary 500m safety zones around major maintenance works (see Paragraph 10.6.24).</p> <p>Whilst the Operation and Maintenance Strategy is not yet finalised, it is assumed that major maintenance works could be undertaken by a variety of vessels including Service Operations Vessels, Jack Up Vessels and Heavy Lift Vessels.</p>
NFFO	<p>Regarding the assessed impact: Physical presence of Rampion 2 fishing will resume post-construction array area infrastructure leading to reduction in access to, or exclusion from established fishing grounds.</p> <p>The assessment notes the lack of certainty that towed gear fisheries will resume within the confines of the array (paragraph 10.10.14). The baseline report does, however, provide evidence on the spatial distribution of activities that suggests that vessels using bottom towed gears are avoiding the Rampion 1 project area. This tallies with views brought to our attention by local fishing businesses.</p>	<p>The assessment assumes that fishing will resume post-construction around and between infrastructure within Rampion 2 where possible, with the exception of an assumed 50m operating distance from infrastructure, areas of cable protection, and safety zones around infrastructure undergoing major maintenance or replacement (see Paragraph 10.6.24). Furthermore, the individual decisions made by skippers with their own perception of risk will determine the likelihood of whether their fishing will resume within Rampion 2, and it is observed that Rampion 2 minimum turbine spacing (Table 10-11) exceeds that for Rampion 1 (750m). Inclement weather will be a significant contributor to this risk perception. In addition, it is acknowledged that certain gear types including trawls will not be practically deployed within the operational array (see paragraph 10.10.5).</p>
	<p>Regarding the assessed impact: Physical presence of Rampion 2 assessment assumes that fishing array area infrastructure leading to reduction in access to, or</p>	

	<p>exclusion from established fishing grounds. Given this situation, it will be important that greater certainty can be provided about the prospects for fishing resuming post construction. It is suggested therefore that fishing trials are included as part of the post construction mitigation to provide assurance that activity may resume.</p>	<p>and between infrastructure within Rampion 2 where possible. As confirmed by environmental measure C-45 (see Section 10.7), final details of cable burial and protection will be set out in a Cable Specification and Installation Plan, to be developed post-consent and shared with the fishing industry. The Plan will confirm the intention to undertake post-installation surveys of cables to confirm cable burial, and that any areas of cable protection will be notified to fishermen.</p>
<p>NFFO</p>	<p>It is recommended that the spatial analysis of fishing activity covers more than one year's worth of spatial data (currently 2017).</p>	<p>The description of baseline conditions (Section 10.6, Appendix 10.1: Commercial fisheries baseline technical report, Volume 4 of the ES (Document Reference: 6.4.10.1)) has been updated since PEIR stage to consider multiple years of Vessel Management System (VMS) spatial data, and also include more recently available 2018 and 2019 VMS data. Latest landings statistics for 2020 have also been incorporated into the description of baseline conditions, with landings data for the period 2016 to 2020 analysed and presented alongside other baseline data sources, such as IFCA patrol sightings data. The baseline characterisation is considered to be in line with best practice and fit for the purposes of undertaking EIA.</p>
<p>NFFO</p>	<p>Regarding the assessed impact: Physical presence of Rampion 2 array area infrastructure leading to reduction in access to, or exclusion from established fishing grounds. A transparent, evidence-based process should exist to handle disruption and loss of access to fishing grounds applying both to static and mobile gear fishing operations.</p>	<p>RED has prepared an Outline Fisheries Liaison and Coexistence Plan (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will be finalised post-consent. RED is committed to ongoing liaison with fishermen, based upon FLOWW (2014, 2015) guidance. With respect to any cooperation agreements and associated payments, the procedures as outlined in the FLOWW guidance documents (2014</p>

<p>NFFO</p> <p>Regarding assessed impact: Physical presence of Rampion 2 array area infrastructure leading to gear snagging.</p> <p>It is noted that this impact is assessed in terms of sensitivity, magnitude and significance. As this is safety matter, it is our view that it is more appropriate to treat the matter as a safety risk and use risk criteria as applied in the navigation impact assessment where the objective is to attain as low as reasonably practicable (ALARP) based management. It follows, therefore, that mitigation measures are defined in terms of meeting ALARP obligations.</p>	<p>and 2015) (C-90), will be followed, as described in paragraphs 10.9.19 and 10.9.40.</p> <p>As explained in paragraph 10.10.58, the commercial fisheries assessment considers the impact in terms of potential damage to, or loss of, fishing gear (and resulting implications on costs to fishermen).</p> <p>The health and safety aspects including potential loss of life as a result of snagging risk are assessed within the Shipping and Navigation assessment (see Chapter 13: Shipping and navigation, Volume 2 of the ES (Document Reference: 6.2.13)).</p> <p>Embedded environmental measures (see Table 10-12) will ensure that the location of Rampion 2 works and infrastructure are appropriately notified to the fishing community, and that where a snagging incident occurs, appropriate procedures are followed.</p>
<p>NFFO</p> <p>Regarding assessed impact: Physical presence of Rampion 2 array area infrastructure leading to gear snagging.</p> <p>The assessment is underpinned by assumptions about adequate notification of locations of any snagging hazards and avoiding indicated infrastructure and cable protection (10.10.59). For these assumptions to hold true it will be necessary that:</p> <ul style="list-style-type: none"> • Best practice is followed in the installation of cables. It is our view that cable array design should be part of the process to minimise risk where routing is designed to minimise the occurrence of potential interactions with fishing gears e.g. by bundling cables that cross 	<p>Maintaining the integrity of the cable is a fundamental priority for RED. Cable layouts will seek to avoid physical constraints. To minimise the potential for interaction with fishing gear, cables will be buried wherever practicable (see Section 10.6.24) with target burial depth being defined post-consent, based on cable burial risk assessment. Post-installation surveys will be undertaken to confirm burial to the target depth. Where burial depth is not achieved, cable protection will be applied. As confirmed by environmental measure C-45, final cable burial and protection details will be set out in a Cable Specification and Installation Plan, to be developed post-consent and shared with the fishing industry.</p>

	<p>predominant fishing tows through the site. This is not presently covered under embedded mitigation.</p> <ul style="list-style-type: none"> • Best practice takes place with respect to cable burial via cable burial risk assessment installation of protection measures, and post installation verification. 	
NFFO	<p>The production of a Fisheries Liaison and Coexistence Plan that is submitted as part of the DCO is welcome which should include all relevant mitigation, communication/liaison provisions and arrangements for managing project operations in relation to fishing activities in the area.</p>	<p>RED has prepared an outline Fisheries Liaison and Coexistence Plan confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries. The Plan will be finalised post-consent.</p>
MMO	<p>The MMO highlights that there is a new Sussex IFCA byelaw that has restricted the activity of trawling in close inshore waters. This trawling exclusion area falls short of Kingmere MCZ and now leaves a corridor where fishing activity might be displaced. With the increase in size of Rampion this may cause further distress to the local fishing industry and this should be highlighted within the ES.</p>	<p>The introduction of the Nearshore Trawling Byelaw in 2019 is noted. Baseline data accessed to inform Section 10.6 and Appendix 10.1: Commercial fisheries baseline technical report, Volume 4 of the ES (Document Reference: 6.4.10.6), incorporates landings statistics from 2020 and VMS data from 2019, thus capturing the effects on the introduction of the byelaw on commercial fisheries activity.</p>
MMO	<p>Consultation to local fisherman within Worthing, Shoreham and Brighton Marina and organisations such as 'Brighton and Newhaven Fish Sales (BNFS)' and 'Monteums' should be contacted to provide an opinion from the fishing industry. In Volume 2 Chapter 10 it states they have been in consultation with BNFS however other local industry should be contacted.</p>	<p>Engagement with local fishermen has been undertaken, and includes meetings direct with individual stakeholders, and fisheries working group meetings. Engagement with working groups is ongoing. The local fishermen and organisations referred to by the MMO have been engaged by RED, as describes earlier in Section 10.3.</p>
Sussex IFCA	<p>While the Sussex IFCA has only been invited to participate in the</p>	<p>The description of baseline conditions (Section 10.6, Appendix</p>

	<p>Fish Ecology ETG and not any fisheries working groups informing the process, we welcome the informal consultation meeting sought by developers and subsequent utilisation of our activity, effort and Shellfish Permit catch returns data to help inform potential commercial fisheries impacts within the PEIR.</p>	<p>10.1: Commercial fisheries baseline technical report, Volume 4 of the ES (Document Reference: 6.4.10.1)) has drawn on the IFCA data sources referred to.</p>
<p>Sussex IFCA</p>	<p>The shallow coastal waters off Sussex host some of the most significant commercial fisheries in the UK. Full consideration of potential impacts on these fisheries is key and it is imperative that the developer works closely with the industry to minimise potential effects.</p>	<p>Potential impacts are fully considered in Section 10.9 to Section 10.14.</p>
<p>Sussex IFCA</p>	<p>Baseline datasets: The Authority agree that the PEIR considers all relevant conservation, ecologically and commercially important species. Baseline data sources and the nature of commercial fisheries activity in the Study Area were discussed with the IFCA, who agreed that the baseline data presented to them in the meeting was representative of fishing activity in the Study Area. It was discussed and agreed that understanding the extent to which fishing has continued in the existing Rampion 1 project area should help frame the Rampion 2 impact assessment.</p>	<p>Sussex IFCA’s agreement that the baseline datasets used are appropriate is acknowledged and welcomed. The description of baseline conditions is presented in Section 10.6 and Appendix 10.1: Commercial fisheries baseline technical report, Volume 4 of the ES (Document Reference: 6.4.10.1)). Baseline data sources include most current VMS and landings data, and where available, datasets that incorporate the construction and operational phases of Rampion 1 have been used. Marine traffic survey data has also been referenced to consider levels of fishing activity in operational Rampion 1.</p>
<p>Sussex IFCA</p>	<p>Baseline datasets: In addition to commercial fisheries fleets, the IFCA has previously highlighted the level of activity by local recreational and charter angling vessels which comprise an important industry within Sussex, and requires due consideration in any impact</p>	<p>Recreational fishing and charter angling businesses are addressed in Chapter 7: Other marine users, Volume 2 of the ES (Document Reference: 6.2.7).</p>

assessments and subsequent mitigation considerations.

<p>Sussex IFCA</p>	<p>Likely significant effects: Sussex IFCA refers to our comments in relation to the fish ecology chapter and potential revisiting of significance assessments for selected species, which may impact the current minor adverse effect conclusions for all commercial fisheries.</p>	<p>Relevant elements of the commercial fisheries impact assessment presented in Section 10.9 to Section 10.11 have been updated to reflect revisions to the Fish and Shellfish Ecology assessment presented in Chapter 8: Fish and shellfish ecology, Volume 2 of the ES (Document Reference: 6.2.8).</p>
<p>Sussex IFCA</p>	<p>Likely significant effects: Vanstaen et al (ibid) provides evidence, and a framework, through which to consider cumulative impacts and may be interpreted to suggest (using Sussex case studies) that certain fishing vessels are particularly economically susceptible to losses of fishing opportunity. The likely impact on certain operators based upon cumulative effects, may therefore be significant and need to be fully explored.</p>	<p>The commercial fisheries assessment considers the potential for reduction in access to, or exclusion from established fishing grounds and displacement leading to gear conflict and increased fishing pressure on established fishing grounds resulting from cumulative effects (see Section 10.12). Effects are assessed at fleet level, rather than at individual vessel level. Where there are potential significant effects on individual operators, approaches to managing these will be explored via the Fisheries Liaison and Co-existence Plan.</p>
<p>Sussex IFCA</p>	<p>Mitigation: The Authority notes and supports the commitment to explore options to encourage co-existence and further mitigate effects, including cooperation agreements and associated payments where a significant impact has been identified.</p>	<p>RED has prepared an Outline Commercial Fisheries Liaison and Coexistence Plan (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries. The Plan will be finalised post-consent.</p>
<p>Leach Fishing Enterprises</p>	<p>Rampion 2 is proposing to:- Displacing existing fishing activities from the new windfarm site, many of which were already displaced into this area due to Rampion 1, to fishing grounds more vulnerable to damage or less safe to fish in for inshore vessels.</p>	<p>The commercial fisheries assessment considers the potential for displacement (see Section 10.9 to Section 10.14). RED will seek to ensure that exclusion impacts are appropriately mitigated to minimise the displacement effect (see paragraphs 10.9.51 and 10.9.71); RED has prepared an Outline Commercial Fisheries Liaison and</p>

Coexistence Plan (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries. The Plan will be finalised post-consent.

Leach Fishing Enterprises Rampion 2 is proposing to:- Add to the cumulative effect of areas not available to other sea users (MCZs, MPAs, SPAs, Aggregate extraction sites, shipping lanes, IFCA managed areas, etc).

The commercial fisheries cumulative effects assessment (see **Section 10.12**) considers the reduction in access to, or exclusion from established fishing grounds; and displacement leading to gear conflict and increased fishing pressure on established fishing grounds that may arise from all reasonably foreseeable plans and projects, in accordance with Planning Inspectorate guidance.

Leach Fishing Enterprises Displacement of other sea users from the proposed site is given only a cursory mention in this proposal. This current displacement effect, coupled with that from Rampion 1 site, the MCZ, MPA, aggregate extraction sites, shipping lanes and IFCA managed areas, leaves very little space for other sea users, yet is largely denied by this documentation. Displacement must be taken seriously and is a legal requirement to do so.

The commercial fisheries assessment considers the potential for displacement at a project level and within the cumulative assessment (see **Section 10.9 to Section 10.14**). RED will seek to ensure that exclusion impacts are appropriately mitigated to minimise the displacement effect (see **paragraphs 10.9.51 and 10.9.71**); RED has prepared an **Outline Commercial Fisheries Liaison and Coexistence Plan** (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries. The Plan will be finalised post-consent.

Potential displacement effects on other sea users are assessed in **Chapter 7: Other Marine Users, Volume 2** of the ES (Document Reference: 6.2.7).

Selsey fisherman The western corner of the search area is very hard rock which is some of our best

Potential effects on commercial fisheries activity resulting from exclusion in the footprint of Rampion

fishing ground for lobster and crab; drilling through this rock is a big concern as many fisherman rely on this area to earn a living, also the damage it will cause to the reef is a big concern for future fishing; 10meters of ground disturbance per turbine is a lot of ground lost. As one chair sized rock can house possibly 50 small lobsters and countless crabs plus the food that they eat.

2 infrastructure are assessed in **Section 10.9** to **Section 10.14**. Specific to the potting fishery, this is noted as being of potential moderate adverse significance during the construction phase and RED will seek to ensure that exclusion impacts are appropriately mitigated (see **paragraphs 10.9.51** and **10.9.71**); RED has prepared an **Outline Commercial Fisheries Liaison and Coexistence Plan** (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries (this will include consideration of cooperation agreements and associated payments where appropriate). The Plan will be finalised post-consent. Potential impacts on commercial fisheries resulting from Rampion 2 activities leading to disturbance of commercially important fish and shellfish resources (in turn leading to displacement or disruption of fishing activity) are also assessed in **Section 10.9** to **Section 10.14**, which concludes that they may result in an effect of minor adverse significance for the potting fleet. Ecological effects associated with habitat loss are assessed in **Chapter 9: Benthic and intertidal ecology, Volume 2** of the ES (Document Reference: 6.2.9) and **Chapter 8: Fish and shellfish ecology, Volume 2** of the ES (Document Reference: 6.2.8). Studies investigating the effects of offshore wind farm development on the lobster population and catch rates at Westermost Rough offshore wind farm have indicated no long-term effect of the wind farm on lobster catch rates or size

		distribution; see paragraph 10.10.10 for further detail.
Selsey fisherman	I have concerns as to where all of the fishing boats that fish within this area are going to relocate their pots, as the further west that we go there is more tide, and during the winter months some very large ground swells, which combined with tide and strong winds destroys our rope and pots, this will have a significant financial impact on the fishermen. The ground running south of the Hooe bank is vital to keep our pots safe as well, as some of the ground east of the rectangle in the chart attached especially in very stormy winters. It is a very big concern.	The commercial fisheries assessment considers the potential for displacement (see Section 10.9 to Section 10.14). RED will seek to ensure that exclusion impacts are appropriately mitigated to minimise the displacement effect (e.g. such that displaced pots are not actively deployed during the period of mitigation or if deployed, they are done so in a manner that avoids or minimises gear interaction; see paragraphs 10.9.51 and 10.9.71); RED has prepared an Outline Commercial Fisheries Liaison and Coexistence Plan (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries. The Plan will be finalised post-consent.
Selsey fisherman	We are also concerned on the time it will take to construct the wind farm and how long we will need to vacate each area.	The anticipated maximum construction duration is four years (see Section 10.7), with construction activities completed sequentially. During construction of Rampion 2, commercial fisheries will be prevented from fishing where construction activities are taking place (i.e. not throughout the entire Rampion 2 area). In addition, Safety Zones of 500m diameter will be sought around significant infrastructure under construction. The impact of this exclusion is assessed in Section 10.9 to Section 10.14 ; potentially significant effects on the potting fishery during the construction phase are noted and measures that will be put in place to mitigate the effect are described RED has prepared an Outline Commercial Fisheries Liaison and

		<p>Coexistence Plan (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries (this will include consideration of cooperation agreements and associated payments where appropriate). The Plan will be finalised post-consent.</p>
Selsey fisherman	Another concern is displacement from other vessels.	<p>The commercial fisheries assessment considers the potential for displacement (see Section 10.9 to Section 10.14).</p> <p>RED will seek to ensure that exclusion impacts are appropriately mitigated to minimise the displacement effect (e.g. such that displaced pots are not actively deployed during the period of mitigation or if deployed, they are done so in a manner that avoids or minimises gear interaction; see paragraphs 10.9.51 and 10.9.71); RED has prepared an Outline Commercial Fisheries Liaison and Coexistence Plan (Document Reference: 7.19) that confirms the approach to ongoing liaison with the fishing industry. The Plan will explore options to encourage co-existence and further mitigate any significant effects upon fisheries. The Plan will be finalised post-consent.</p>
Selsey fisherman	Access after completion of the wind farm should it go ahead.	It is expected that potting activity will resume within Rampion 2 (see Section 10.7).
Selsey fisherman	How will the cables be covered or buried that go from the wind farm to the shore, as they are proposed positioning is straight through our spring netting ground where we fish for sole, plaice, brill etc.	As confirmed in Section 10.7 , cables will be buried wherever possible to a target depth confirmed by cable burial risk assessment. Where burial to target depth is not possible, cable protection will be applied.; maximum assumptions regarding this requirement are presented in Table 10-11 . As confirmed by environmental

measure C-45, cable burial and protection will be set out in a Cable Specification Plan, to be developed post-consent.

<p>Selsey fisherman</p>	<p>My brother and I have been fishing from Selsey for over 20 years catching lobster crab whelks and fish. The nature of the seabed there makes it the perfect habitat place for lobsters and crabs to live and breed.</p>	<p>The importance of these fisheries is captured in the commercial fisheries baseline presented in Section 10.6.</p>
<p>Selsey fisherman</p>	<p>Each wind turbine has to be piled into the seabed, from what I gather a circumference of 10 meters around is needed to fix the turbine down, a huge part of the seabed getting destroyed. This cannot be good for nature??</p>	<p>Potential effects on commercial fisheries activity resulting from exclusion in the footprint of Rampion 2 infrastructure are assessed in Section 10.9 to Section 10.14. Potential impacts on commercial fisheries resulting from Rampion 2 activities leading to disturbance of commercially important fish and shellfish resources (in turn leading to displacement or disruption of fishing activity) are also assessed in Section 10.9 to Section 10.14. Ecological effects associated with habitat loss are assessed in Chapter 9: Benthic and intertidal ecology, Volume 2 of the ES (Document Reference: 6.2.9) and Chapter 8: Fish and shellfish ecology, Volume 2 of the ES (Document Reference: 6.2.8).</p>
<p>Selsey fisherman</p>	<p>As this proposed area is our main fishing location where would we move too? We fish all over the place, depending on the time of the year and weather. There are only certain areas where we could re locate our lobster pots due to storms and being safe so displacement of other fishing vessels would be a huge factor all being pushed on top of each other causing havoc.</p>	<p>The commercial fisheries assessment considers the potential for displacement (see Section 10.9 to Section 10.14). RED will seek to ensure that exclusion impacts are appropriately mitigated (the Fisheries Liaison and Co-existence Plan will explore options to encourage co-existence and further mitigate the effect of exclusion on potting, including cooperation agreements and associated payments where appropriate) to minimise the displacement effect, e.g. such that displaced pots are not actively deployed during the period of mitigation (e.g. left open, or stored on land), or if deployed, they are</p>

		<p>done so in a manner that avoids or minimises gear interaction.</p> <p>It is expected that potting activity will resume within Rampion 2 (see Section 10.7 and paragraph 10.10.5). The assessment assumes that fishing will resume around and between infrastructure within Rampion 2 where possible, with the exception of an assumed 50m operating distance from infrastructure, areas of cable protection, and safety zones around infrastructure undergoing major maintenance or replacement. Furthermore, the individual decisions made by skippers with their own perception of risk will determine the likelihood of whether their fishing will resume within Rampion 2.</p>
<p>Selsey fisherman</p>	<p>Will we be able to fish back between the turbines once completed and also will there be any extra rules that we will have to abide by?</p>	<p>Specific to Rampion 1, landings data and IFCA shellfish permit catch data indicate fluctuations in landings of crab and lobster across the wind farm construction and operational phases (Rampion 1 was constructed between 2016 and 2018, and became operational in 2018). Across the period 2015 to 2019, landings of lobster have gradually declined each year and landings of crabs have fluctuated, being at their lowest in 2015 and at their peak in 2016. These trends cannot be directly attributed to wind farm construction and operation, and can be influenced by a number of factors (e.g. market demand). Stock status reports indicate that exploitation of the lobster stock off the south coast is moderate and that the status of the stock has improved between 2017 and 2019. The status of the brown crab stock in the eastern English Channel is unknown. Studies investigating the effects of offshore wind farm development on the lobster population and catch rates at Westermost Rough offshore wind farm have indicated no long-</p>
<p>Selsey fisherman</p>	<p>Has lobster and crab fisheries declined at all after previous wind farms being erected??</p>	

term effect of the wind farm on lobster catch rates or size distribution; see **paragraph 10.10.10** for further detail.

Table 11-6 Formal Consultation feedback – Volume 2, Chapter 11, Marine mammals

Stakeholder	Theme	How this is addressed in this ES
Natural England	According to paragraph 2.6.92 of the Overarching National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3) (July 2011), the Applicant should provide information on the baseline noise levels. This information has not been provided within the marine mammal chapter.	The background noise levels in the sea for UK waters are up to 130 dB re 1 µPa. Additional details background underwater noise levels are presented in Section 2.1 of Appendix 11.3: Underwater noise assessment technical report, Volume 4 of the ES (Document Reference: 6.4.11.3) and Underwater noise study for sea bream disturbance in Appendix D, Evidence Plan Report: (Document Reference: 7.21)
Natural England	To demonstrate that comment 4.6.9 (in relation to the effects of seabed preparation on marine mammals) has been addressed, we advise that the impact assessment of “Changes to prey availability” (paragraph 11.9.74) list the different impact pathways assessed in the fish and shellfish chapter. Furthermore, we consider that impact assessment does not detail the fish and shellfish baseline in sufficient detail (see comment 4.8.3), as it is not clear which species in Table 11-33 are actually present in the area.	The different impact pathways have been listed in paragraph 11.9.75 . Clarification of which species are in the area has been included in Table 1132 with species in the area identified with an asterisk.
Natural England	We advise that this paragraph should be clarified as the current wording is unclear. Furthermore, Natural England considers that the maximum zone of influence for underwater noise should be based on the underwater noise modelling and may be different between species (as per Scoping Opinion comment 4.6.7).	The wording in paragraph 11.4.2 has been amended for clarity. The ZOI is the study area for marine mammals and is not based on noise modelling. There are two study areas on different scales for marine mammals, the local study area which encompasses the survey area and the wider study area which is based on species Management Units (MUs).

Natural England	<p>The total number of piles required across both the WTG and offshore substation foundation installation is 119 monopiles or 482 pin piles. Both the underwater noise technical assessment and the marine mammal assessment only reference the total number of piles/days of piling for the WTG; they have not included the piling for the offshore substation foundation installation.</p>	<p>The worst-case scenario has been updated to 90 monopiles and 360 pin pile. The impact ranges presented in Appendix 11.3: Underwater noise assessment technical report, Volume 4 of the ES (Document Reference: 6.4.11.3) have fed into the marine mammal assessment undertaken in Appendix 11.2: Marine mammal quantitative underwater noise impact assessment, Volume 4 of the ES (Document Reference: 6.4.11.1) and Section 11.9.</p>
Natural England	<p>Natural England notes that in some of the assessments, the worst-case impact ranges arise from pin piles rather than monopiles e.g. maximum PTS ranges for marine mammals (specifically LF cetaceans).</p>	<p>The reference to monopiles giving largest spatial impact in Table 1113 has been removed and the text has been updated to reflect the updated modelling results.</p>
Natural England	<p>Natural England advises that information is included here on the worst-case scenario for concurrent piling. Appendix 11.3 does not assess simultaneous piling; however, Appendix 11.2 has included the possibility of concurrent piling of monopiles at the northwest and east locations. It is unclear if there is the potential for concurrent piling of monopiles and multileg foundations. Given the potential for concurrent piling, we advise that the assessment of simultaneous piling at the NW and E modelled locations are not strictly the full worst- case, because it is possible for concurrent piling to occur at two locations that are further apart within the site i.e. furthest east and west locations.</p>	<p>The worst-case scenario modelling has been updated to include North, South, West and East modelling locations for both monopiles and pin piles (see Appendix 11.3: Underwater noise assessment technical report, Volume 4 of the ES (Document Reference: 6.4.11.3) and paragraph 11.9.5). A worst-case of concurrent (simultaneous) piling at the West and East locations has been assessed in Section 4 of Appendix 11.3 Underwater noise assessment technical report, Volume 4 of the ES (Document Reference: 6.4.11.3) and Sections 3 – 5 of Appendix 11.2: Marine mammal quantitative underwater noise impact assessment, Volume 4 of the ES (Document Reference: 6.4.11.2).</p>
Natural England	<p>Natural England notes that in the assessment of vessel collision risk, the Applicant states that a Marine Wildlife Watching Code (MWWC) will be followed, in order to reduce the risk of collision.</p>	<p>Adherence to a MWWC will be incorporated into the VMP (C-51) further details included in ES chapter (Table 1114). Natural England will be named as a consultee.</p>

	<p>Natural England welcomes the Applicant's commitment to a MWWC. As this measure is being relied on in order to reduce the significance of the impact, we require that adherence to it is secured as a condition in the DCO or DML (or as part of a Plan that is secured in the DCO or DML). Natural England request to be a named consultee of the MWWC.</p>	
Natural England:	<p>It is not the case that all sources have impact ranges <100m for all species. We note that, as per Table 5-4 in Appendix 11.3: Underwater noise assessment technical report, Volume 4 of the ES (Document Reference: 6.4.11.3) the impact (TTS) ranges from suction dredging, rock placement and vessel (large) are all greater than 100m for very high frequency cetaceans.</p>	<p>The text in paragraph 11.9.42 has been updated to reflect the correct TTS ranges.</p>
Natural England	<p>The assessment of magnitude is minor; this is the same as for construction, however the assessment of vessel collision risk from construction also took into account two mitigation measures (a MWWC and a VMP). We do not agree that the magnitude is minor without these mitigation measures. We advise that adherence to a MWWC is undertaken during O&M vessel movements, as best practice.</p>	<p>Adherence to a MWWC as part of the VMP (C-51, Table 1114) has been specified so as to ensure consistency between magnitudes of collision risk at different stages of the project.</p>
Natural England	<p>The Applicant states that animals will return to the area when vessel disturbance has ended. On what timescale might animals return? No information has been provided on the typical duration of vessel presence on site, or time between vessels being on site, therefore it is not possible to determine the extent to which animals will continue to use the site outside of vessel disturbance periods.</p>	<p>Information has been provided in paragraph 11.9.61 on disturbance from vessels.</p>
Natural England	<p>The JNCC and Natural England Suggested Tiers for Cumulative</p>	<p>Tiers for CIA have been included and updated in Table 1133.</p>

	Impact Assessment should be used	
Natural England	We require further clarification as to how the list of other developments were selected, and why other types of development were screened out.	All offshore projects within the relevant marine mammal MU were screened into the CIA long-list. These were screened further to obtain the short-list by screening out impacts that are highly localised, where mitigation will be in place and where the potential impact from Rampion 2 alone was negligible (e.g. PTS, vessel collision). This is detailed in paragraph 11.12.6 et seq.
Natural England	The Applicant has screened out collision with vessels, citing VMPs for offshore energy projects, however two other development types are also being considered – subsea cables and pipelines, and seismic surveys. Our understanding is that VMPs are not used in seismic surveys, therefore collision risk cannot be ruled out and should be screened into the cumulative impact assessment.	Alongside VMPs, vessels for other offshore developments should also be adhering to the MWWC as part of the VMP (C-51), therefore the risk of vessel collision will be minimised.
Natural England	We cannot agree that seal species can be scoped out of the CEA, as no justification has been presented with regards to disturbance from vessel activity. The Applicant has only presented justification for screening them out from cumulative underwater noise disturbance from construction.	Confusion has been made with screening in for HRA and scoping in for EIA. Seals have been included in the CEA for vessel disturbance Table 1145 .
Natural England	Natural England advises that the following projects require consideration for Table 1135 : Awel y Mor, Berwick Bank, Dolphyn project (as potential for driven pile anchors), Dudgeon extension project, Five Estuaries, Marr Bank, North Falls, Sheringham Shoal extension project. All these projects occur within the MUs for marine mammals and have the potential to include piling.	Table 1134 has been updated to include all projects within the species specific MUs.

Natural England	<p>Has the Applicant considered that UXO clearance works may be required as part of the AQUIND Interconnector works? In addition, rock placement may be undertaken as part of the works which has a larger impact (TTS) range than large vessels, based on underwater noise modelling (Appendix 11.3, Table 5-4). Therefore, we do not agree that the AQUIND Interconnector can be screened out of the construction noise cumulative assessment.</p>	<p>Following the SoS decision to refuse consent for AQUIND Interconnector in January 2022, it was subject to a judicial review in November 2022. In January 2023 the decision was overturned and the application is to be redetermined, therefore it remains scoped in for the CEA on marine mammals. As there is the potential for UXO clearance, AQUIND and other Interconnector cables have been scoped into the cumulative noise assessment (Table 1137, Table 1139, Table 1141 and Table 1143), as well as the cumulative vessel assessment (Table 1145).</p>
Natural England	<p>The percentages of the MU presented in this table appear to be incorrect. Based on Appendix 11-1, Volume 4, the reference population is 23,528. So, for example, affecting a total of 395 animals would constitute 1.67%, not 0.11% as is presented.</p>	<p>The MU figures for Table 1140 have been recalculated based on updates to the CEA.</p>
Natural England	<p>The Applicant has not assessed the potential for cumulative vessel disturbance effects during the operation and maintenance phase of the Rampion 2 project. There has not been consideration of projects that do not overlap with the construction phase of the project but may act cumulatively with the O&M phase and associated increase in vessels.</p>	<p>Cumulative vessel disturbance during operation and maintenance has not been included as expected levels of vessel activity during the O&M phase are considerably lower than during construction. Additionally it is expected all vessels will adhere to a MWWC, as part of the VMP (C51), to reduce impacts.</p>
SWT & TWT	<p>Include UXO information from nearby historical projects such as Rampion 1. This will help RWE to provide an indicative figure for UXO clearances specific to Rampion 2. We expect all offshore wind farm developers to undertake more pre-consent surveys to gain a realistic figure of required UXO clearances. We believe UXO clearance activity should be conditioned at the DCO stage, through the inclusion of a dML, then it could be better planned</p>	<p>Historical projects have been reviewed and included in the paragraph 11.9.31 to inform estimates for Rampion 2. Pre-consent surveys will be undertaken to establish the number of UXO and potential UXO within the project boundary and surrounding area. UXO clearance will be controlled through a separate dML.</p>

	and managed in combination with other projects.	
SWT & TWT	<p>We are disappointed that our comment on the Scoping Report regarding the inclusion of the following data sources has not been addressed in the PEIR:</p> <ul style="list-style-type: none"> ○ The Brighton Dolphin Project: Citizen Science research project. (Link corrupted) ○ The Sussex Biodiversity Record Centre: Contains marine and terrestrial data from a variety of sources, including local recorders, members of the public and ecological consultants, https://sxbrc.org.uk/services/dataRequests.php 	<p>The information from Brighton Dolphin Project (now Sussex Dolphin Project) was sought after but not possible to obtain. The information from Sussex Biodiversity Record Centre was sought after but not comprehensive enough for inclusion in the Section 11.5 or as a data source in Table 1110.</p>
SWT & TWT	<p>Noting the comment in Paragraph 11.6.11 that predicting the future trajectories of marine mammal populations has been challenging due to the lack of monitoring data, the development of a strategic approach to monitoring between Rampion 1 and Rampion 2 will yield useful results and maximise the use of resources. As stated in our comments on the Scoping Report, we are disappointed that there has been no discussion of plans for future monitoring at this stage. It is critical that monitoring and mitigation requirements are discussed before examination.</p>	<p>Marine mammal monitoring is detailed in the Offshore In Principle Offshore Monitoring Plan (Document Reference: 7.18). The Draft Piling MMMP (Document Reference: 7.14) and Draft UXO Clearance MMMP (Document Reference: 7.15) which detail the proposed mitigation for marine mammals have been submitted alongside the ES.</p>
SWT & TWT	<p>It should be noted that we do not support the use of high order detonation for most UXO clearance activities. We request that when the draft UXO-specific MMMP is developed, RWE commits to recording and providing information on the success rate of any low order technology used during the project to regulators, SNCBs and other interested parties such as TWT &</p>	<p>A Draft UXO Clearance MMMP (Document Reference: 7.15) has been submitted alongside the ES. Additionally, where practicable the use of low order methods to dispose of UXOs using deflagration will be implemented (C-275).</p>

SWT to confirm the effectiveness of the technique in mitigating the impacts of underwater noise. If RWE intends to use low-yield technology then the requirement to use a bubble curtain should form part of the licence condition, due to the lack of evidence surrounding this technique

<p>SWT & TWT</p>	<p>A great deal more work is required to understand the effectiveness of current mitigation for underwater noise impacts and to develop better options if the current mitigation is found to be inadequate. We suggest that monitoring is undertaken to confirm the effectiveness of ADD if this is utilised.</p>	<p>More assessment into effectiveness of mitigation measures may be required and will be considered for the Final MMMPs when final ADD choice has been made post-consent and just prior to construction.</p>
<p>SWT & TWT</p>	<p>Is RWE satisfied that 525 kg is the maximum worst case charge weight that will be encountered across the project? Is there reason to believe that a charge weight of >525kg (e.g. used for the clearance German land mines) will not be needed for this project?</p>	<p>Given the close proximity of Rampion 2 to Rampion 1, a charge weight of 525kg has been used as the maximum worst case charge weight for the project based on the previous charges found at Rampion 1. This is therefore the maximum that has been considered in Appendix 11.3: Underwater noise assessment technical report, Volume 4 of the ES (Document Reference: 6.4.11.3) and Table 1130.</p>
<p>SWT & TWT</p>	<p>We do not agree that there will be no significant effect on marine mammal food availability during the construction phase. Please refer to comment above on section 8.9.30.</p>	<p>RED have confirmed mitigation measures for sensitive features in a targeted meeting with stakeholders on 24 February 2022. The use of primary and secondary mitigation measures will be used to reduce or avoid the effects on key prey species, see Chapter 8: Fish and shellfish ecology, Volume 2 of the ES (Document Reference 6.2.8) paragraphs 8.9.64 to 8.9.65 and 8.9.259 for more information on mitigation measures for fish.</p>
<p>SWT & TWT</p>	<p>We are disappointed that fishing has been considered as part of the baseline and has not been included in the CEA for marine mammals. Fishing is a licensable</p>	<p>The CEA for marine mammals examines the combined impacts of Rampion 2 in combination with other developments, as fishing is not a development it has not been</p>

activity that has the potential to have an adverse impact on the marine environment, including marine mammals.

assessed in **Section 11.12**. The full list of the types of development included in the CEA are listed in **paragraph 11.12.6** and those excluded from the CEA (including changes in prey availability) are listed in **paragraph 11.12.7**. Impacts to changes in prey availability are assessed in **Sections 11.9, 11.10 and 11.11**.

<p>MMO</p>	<p>To clarify, and as explained on previous occasions, the MMO do not necessarily agree that it is not possible carry out carry out a quantitative assessment of the magnitude or significance of the impact of TTS on marine mammals. Nevertheless, Cefas requested, and are content for the TTS ranges to be presented alongside an estimate of the potential number of animals within these impact ranges, and this was agreed at the ETG meeting in September 2020.</p>	<p>Cefas are content with TTS ranges.</p>
<p>MMO</p>	<p>Appendix 11.2 Paragraph 2.4.3 Temporary threshold shift (TTS) assessment (paragraph 2.4.3 onward on page 15) The information presented in this section only demonstrates what is not known about the significance of TTS – there is no evidence presented to confirm that it isn't significant, only conjecture. One could equally argue that at lower received sound levels, animals are less likely to flee (see Graphic 2-2), and so proportionally more likely to induce TTS than this assessment suggests. The TTS/PTS (Permanent Threshold Shift) assessment seems to consider only an animal fleeing directly away from the source, whereas Graphic 2-2 demonstrates that even at received SEL_{ss} (single strike sound exposure level) of 160 dB, around 10% of animals will not flee, so</p>	<p>The assessment approach is aligned with the most up to date guidance from Natural England. As agreed with CEFAS at the Expert Topic Group meeting dated 18/09/2020 TTS-onset ranges were modelled and presented alongside an estimate of potential number of animals impact but it is not possible to carry out quantitative assessment of sensitivity or magnitude, and therefore cannot reach a conclusion on significance. There is currently no threshold for TTS-onset to indicate level at which they would be biologically significant. This approach has been approved for Hornsea Four Offshore Wind Farm and Awel y Môr Offshore Wind Farm,</p>

there are uncertainties which tend toward underestimation of risk here too

MMO	<p>Appendix 11.2 paragraph 2.5.3 This kind of anthropomorphising is misguided and unhelpful. Marine mammals rely on sound as their primary sensory modality, whereas humans are primarily visual creatures. While audiometric data from humans can be useful to make quantitative extrapolations for marine mammals (since they share a similar inner ear structure), it will be unwise to state that what is considered ‘mild’ hearing loss in humans has any relevance to the severity of consequences of hearing loss in marine mammals</p>	<p>The text in this paragraph has been removed to avoid any anthropomorphising, please see Section 2.5 of Appendix 11.2: Marine mammal quantitative underwater noise impact assessment, Volume 4 of the ES (Document Reference: 6.4.11.2).</p>
	<p>Appendix 11.2 paragraph 2.5.6 All cetaceans have been assessed as having a Medium sensitivity to PTS. RED have not demonstrated that PTS will have merely a medium risk, only that there is uncertainty about how significant PTS may be for individual animals. Until and unless empirical evidence can shed light on whether this opinion holds water, the precautionary principle will continue to apply. The MMO requests that cetaceans should be assessed as having a high sensitivity to PTS.</p>	<p>Sensitivity of marine mammals to PTS has been assessed in Section 3 of Appendix 11.2: Marine mammal quantitative underwater noise impact assessment, Volume 4 of the ES (Document Reference: 6.4.11.2).</p>

Table 12-1 Statutory Consultation feedback – Volume 2, Chapter 12, Offshore and intertidal ornithology

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p>Natural England’s final conclusions on ornithology matters cannot be reached until the full 24 months of baseline survey data are analysed and the results presented in the final Environmental Statement (ES).</p>	<p>The accompanying Appendix 12.1: Baseline technical report, Volume 4 of the ES (Document Reference: 6.4.12.1) provides the full 24 months of baseline survey data and has been used to inform this ES.</p>

Natural England	<p>Natural England do not agree that the initial findings of the cumulative assessments are either ‘de minimis’. Whilst Natural England recognise that the predicted impacts from R2 are not unduly significant in scale, they have the potential to contribute to existing significant cumulative impacts on seabirds at an EIA scale.</p>	<p>The cumulative assessments have been revised following completion of site-specific baseline surveys and also revisions to the assessment methodology (see Section 12.15). While the Applicant recognises that some impacts are sufficient to materially contribute to cumulative impacts at an EIA scale, there remain some impacts where the Applicant considers Rampion 2’s impact is not a material contribution to the cumulative total impact.</p> <p>6. Through discussions with EPP, Natural England have acknowledged the impacts from Rampion 2 are small.</p>
Natural England	<p>In response to the increasing level of cumulative impacts, Natural England therefore recommends that for all relevant future projects located in the North Sea and English Channel, including R2, raising turbine draught height should be considered as standard mitigation practice, and that relevant proposals should include this measure in order to reduce their contributions to the cumulative/in-combination collision totals by as much as is possible.</p>	<p>This is not considered in the ES Chapter as the Applicant has ruled out a draught height above 22m above Mean High Water Spring (MHWS) for this project.</p>
Natural England	<p>Natural England has recently issued a template to assist with the consistency of presentation of the modelled outputs, including both the stipulated parameters to apply in the modelling and the need to present findings for a range of options, e.g. ranges of displacement and species flight speeds for use in CRM. Natural England kindly request that this template is used for the ES submission.</p>	<p>The Applicant has used Natural England’s template as the basis for presenting a range of results for both CRM (= Appendix 12.3: Collision risk modelling, Volume 4 of the ES (Document Reference: 6.4.12.3)) and displacement analysis (Appendix 12.2: Displacement analysis, Volume 4 of the ES (Document Reference: 6.4.12.2)), although modifications have been made to ensure a consistency of</p>

		approach with other application documents.
Natural England	Natural England welcome the intention to undertake further PVA analysis for gannet for which the results will be presented in the ES.	PVA analysis for gannet is presented in Appendix 12.5: Population viability analysis, Volume 4 of the ES (Document Reference: 6.4.12.5).
Natural England	Natural England request that the list of OWF sites included in the final ES is updated to include those for which additional information may be available, most notably Sheringham and Dudgeon Extensions, which have consulted on a PEIR. For all sites under consideration the total impact should include both that assessed for displacement in addition to that assessed for collision, i.e. in combination.	The cumulative assessment in Section 12.15 of this ES has been updated with the latest available data, including the impacts presented at ES for Sheringham and Dudgeon Extensions.
Natural England	Natural England request that CEF totals for Rampion 2 include the presentation of combined impacts for gannet, i.e. so that the predicted impact of both collision and displacement are totalled.	Paragraph 12.15.83 of this ES Chapter presents combined impacts from collision risk and displacement for gannet.
Natural England	The need to present predicted mortality for guillemot and razorbill against the relevant BDMPS or biogeographic scale for a range of displacement (30-70%) and mortality (1-10%). This can be addressed by using the Natural England template.	Predicted mortality for guillemot and razorbill has been assessed against both BDMPS and biogeographic scales for a range of displacement from 30% to 70% and a range of mortality from 1% to 10%, with results presented in Section 12.13 (Table 12-31 and Table 12-32) .
Natural England	Natural England request further consideration of alternative suitable techniques for assessing the collision risk posed to migrant seabirds and the suggest the use of the Wildfowl & Wetlands Trust (WWT) Consultancy and MacArthur Green, 2014 modelling approach, in particular for Sandwich tern.	Full consideration of the collision risk posed to migrant seabirds and non-seabirds is presented in Appendix 12.4: Migratory CRM, Volume 4 of the ES (Document Reference: 6.4.12.4), including assessment of Sandwich tern.
Natural England	Natural England advise that in the final analysis and assessment the cumulative totals for great black-backed gull are presented. This	The cumulative assessment in Section 12.15 of this ES has been updated to include great black-backed gull, including the

	assessment should include the latest cumulative totals, including those available for Dudgeon and Sheringham Extensions, with the potential requirement to also undertake PVA analysis.	impacts presented at PEIR for Sheringham and Dudgeon Extensions (Table 12-50).
Natural England	The need to include an assessment for herring gull in the CIA, consistent with the other species modelled.	The cumulative assessment in Section 12.15 of this ES has been updated to include herring gull, including the impacts presented at for Sheringham and Dudgeon Extensions (Table 12-52).
Natural England	Natural England advise that the revised avoidance rates are applied in the CRM and analysis being undertaken for the R2 final ES.	The approach to CRM has been revised in line with the latest guidance on avoidance rates (Natural England, 2022). Full details are provided in Appendix 12.3: Collision risk modelling, Volume 4 of the ES (Document Reference: 6.4.12.3).
RSPB	Due to a lack of the full 24 months of aerial digital survey data underpinning the assessments for potential impacts on Offshore Ornithology, the RSPB cannot provide an appropriate analysis of the assessments.	The accompanying Appendix 12.1: Baseline technical report, Volume 4 of the ES (Document Reference: 6.4.12.1) provides the full 24 months of baseline survey data and has been used to inform this ES.
RSPB	The RSPB has concern regarding the robustness of conclusions relating to the potential impacts during the operational phase on gannets. Subsequent 'downgrading' of the impacts from moderate to minor (insignificant) through assessments of other OWFs is inappropriate.	The impact assessments have been thoroughly reviewed for this ES and evidence-led justifications for all conclusions are provided.
RSPB	Migratory seabirds and non-seabirds: The RSPB does not consider the use of Rampion 1 OWF assessments of migratory seabirds and non-seabirds as appropriate for Rampion 2 OWF, due to both the use of data at least 9 years ago, alongside the lack of assessment around the combination of effects from Rampion 1 and 2 in unison.	Impacts on migratory birds have been assessed using a modelling approach. Full details are presented in Appendix 12.4: Migratory CRM, Volume 4 of the ES (Document Reference: 6.4.12.4).

RSPB	Flight heights: The RSPB agrees that a review of site-specific flight heights should be completed once the full dataset of aerial digitals surveys are analysed. This could support a number of species collision risk modelling under Band Option 1	The full dataset of aerial digitals surveys have been completed and analysed, and it has been determined that there is insufficient data of an appropriate quality to proceed with site-specific flight height data for Band Option 1 CRM.
RSPB	Nocturnal flight activity: It is not clear to the RSPB which percentages for nocturnal flight activity have been used in RED's collision risk modelling.	Nocturnal activity factors used for assessment have been provided in Appendix 12.3: Collision risk modelling, Volume 4 of the ES (Document Reference: 6.4.12.3).
WWT	We note that throughout the PEIR, ecological surveys remain incomplete or not fully analysed. Full comment cannot be made at this stage, and we are concerned that this may have caused some species or habitat to be undervalued or scoped out prematurely.	The accompanying Appendix 12.1: Baseline technical report, Volume 4 of the ES (Document Reference: 6.4.12.1) provides the full 24 months of baseline survey data, and has been used to inform this ES.
Sussex Ornithological Society	The Collision Risk and Displacement Assessments are based on data for a single year. This is considered to be inadequate. Consequently, SOS is not currently in a position to make any final comments on the assessments.	The accompanying Appendix 12.1: Baseline technical report, Volume 4 of the ES (Document Reference: 6.4.12.1) provides the full 24 months of baseline survey data and has been used to inform this ES and all associated assessments.
Sussex Ornithological Society	The British Trust for Ornithology (BTO) recommendation is that surveys should consist of a combination of boat-based and aerial surveys with radar studies where mass migratory movements through the wind farm area are suspected. This is not mentioned in PEIR and hence no justification is given for the decision to ignore the BTO recommendations and undertake solely aerial surveys.	Conducting aerial surveys alone is recognised across the industry as the standard preferred approach to baseline data collection for offshore wind developments.
Sussex Ornithological Society	For all the reasons set out in 3, 4, 5, 6 in this section (offshore ornithology), we believe that an impact assessment on the numerous passage birds migrating	Impacts on migratory birds have been assessed using a modelling approach. Full details are presented in Appendix 12.4: Migratory

	through the Channel needs to form part of the Rampion justification, and that steps need to be taken to obtain data to support such an assessment.	CRM, Volume 4 of the ES (Document Reference: 6.4.12.4).
Sussex Ornithological Society	The Collision Risk Assessments have all been made on the basis of an array of 116 turbines with a rotor diameter of 210m. It has been suggested elsewhere in PEIR that the array may actually consist of 75 turbines with a rotor diameter of 295m. This is not mentioned in the Offshore Ornithology chapters of PEIR. If it considered that an array of 116 turbines is the worst-case scenario - as it presents a greater collision risk than an array of 75 turbines - then this should be stated in PEIR and the Collision Risk Assessments for the alternative array should be shown in order to demonstrate that they are lower than those for an array of 116 turbines.	CRM has been carried out on the basis of the worst case scenario design parameters, as detailed in Section 12.13 (Table 1219) . Full details are provided in Appendix 12.3: Collision risk modelling, Volume 4 of the ES (Document Reference: 6.4.12.3).
Sussex Ornithological Society	No passerine migrants are mentioned in PEIR. No figures are available for the number of passerines which cross the English Channel each spring but large 'falls' at suitable sites including Climping suggest that many thousands of birds are involved.	Passerine species have been screened out of detailed modelling, as it is expected that most passerine species migrate at flight heights above potential collision height.
Sussex Ornithological Society	Kittiwakes were recorded during eight aerial surveys. The peak estimated abundance of 623 occurred in February 2020 and coincided with the arrival of Storm Ciara. In PEIR it is suggested that this was an unusually high count due to the storm. SOS does not accept that the count was unusual.	The accompanying Appendix 12.11: Baseline technical report, Volume 4 of the ES (Document Reference: 6.4.12.1) provides the full 24 months of baseline survey data, and has been used to inform this ES and all associated assessments.
Sussex Ornithological Society	As part of the embedded environmental measures (Table 1218) SOS would urge RED (Rampion Extension Development Ltd) that, if the OWF is constructed, the one blade of each turbine should be painted a darker colour in order to	The Applicant has considered a range of possible mitigation methods, and the mitigation methods being proposed are presented in Table 12-20 . The decision on which mitigation measures to proceed with depends on a number of

	reduce motion smear and hence reduce the collision risk.	factors, including evidence of effectiveness of a given method and the potential for negative effects (such as greater visual impacts).
Sussex Ornithological Society	Rose diagrams suggests that kittiwakes were passing through the proposed array area as they travelled from their feeding area back to the Seaford colony. The proposed array will present a barrier requiring the Kittiwakes to undertake longer journeys and expend more energy in undertaking <u>their feeding trips.</u>	Section 12.13 of this ES considers the potential barrier effect to kittiwake.

Table 13-6 Statutory Consultation feedback – Volume 2, Chapter 13, Shipping and Navigation

Stakeholder	Theme	How this is addressed in this ES
Shoreham Port	Traffic will be cut off from direct access to the Dover Strait TSS resulting in a need for larger vessels to pass west of Rampion 1 and Rampion 2. This will have a negative impact on the commercial viability of the port.	The proposed DCO Order Limits represent a reduction in total area covered compared to the PEIR Assessment Boundary (see Section 6.1 of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)), including at the eastern extent in proximity to the Dover Strait TSS and Shoreham Port to the east of the proposed DCO Order Limits. There is also an MGN 654 compliant navigation corridor which may be used by vessels accessing Shoreham Port. Reduced access to local ports and harbours including commercial risk is considered in Section 13.9, Section 13.10 and Section 13.11.
Shoreham Port	Some Masters from the east may use the ITZ to reach Shoreham, but in such cases the collision risk will be greater due to the mixing of commercial shipping with leisure craft.	The proposed DCO Order Limits represent a reduction in total area covered compared to the PEIR Assessment Boundary (see Section 6.1 of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)) including no longer intersecting the ITZ, reducing the collision risk associated with commercial shipping within the ITZ. The collision risk

		associated with vessel displacement is considered in Section 13.9, Section 13.10 and Section 13.11.
Trinity House	Intermediate Peripheral Structure (IPS) marking is not being phased out and reference to this being the case should be removed.	IPS marking will be agreed in consultation with Trinity House as noted in Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1).
Trinity House	Layout should not adversely affect the current lines of orientation at Rampion 1.	The proposed DCO Order Limits represent a reduction in total area covered compared to the PEIR Assessment Boundary (see Section 6.1 of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)) including establishing a minimum 1nm clearance from Rampion 1 via two structures exclusion zones which serve as helicopter refuge areas (HRA).
RYA	Recreational activity is unlikely to have returned to normal by August 2020 and the survey only partially fell within the recommended period of 15 June to 15 August (see Paragraph 13.3.12). Accuracy of NRA may be reduced as a result and recommended that additional surveys are undertaken in summer 2022.	A further 14 days of vessel traffic survey data from 16 to 30 June 2022 has been assessed including recreational craft and is incorporated into the baseline characterisation of vessel movements in Section 13.6.
RYA	No further concerns with respect to sea room (navigational squeeze) at the western extent of the PEIR Assessment Boundary with previous concerns addressed by the reduction from the Scoping Boundary.	Noted in the assessment of collision risk associated with vessel displacement which is considered in Section 13.9, Section 13.10 and Section 13.11.
RYA	Assumptions in relation to the sufficient experience of crews of recreational craft should be supported by peer reviewed data and literature to provide justification.	International requirements (SOLAS Chapter V (IMO, 1974)) require all vessels proceeding to sea to adhere to IMO guidelines (as enforced by the MCA) and ensure that they take appreciation of the risks to which they are exposed. This includes

		<p>ensuring the vessel’s navigation is planned, and that there is continuous monitoring of the vessel’s position including weather, tides, navigational warnings and contingency planning. Whilst it is recognised that not all recreational users adhere to this, as it is a requirement, it is assumed that the majority do. If the RYA has evidence to suggest this assumption is incorrect this evidence can be assessed.</p>
<p>RYA</p>	<p>The 860m spacing between structures should be made a condition for the development of Rampion 2.</p>	<p>The final array layout will be agreed with the MCA and Trinity House post-consent as per DCO requirements or Deemed Marine Licence (dML) but will be within the parameters set out in the ES including the 830m minimum spacing (a small decrease from PEIR associated with the reduction in the proposed DCO Order Limits) (see Section 13.7).</p>
<p>RYA</p>	<p>Given the inability of a recreational craft adrift to anchor and risk of capsizing in the event of an allision incident the RYA disagrees with the ranking of frequency of impact as negligible and moderate consequences for drifting allision risk for a recreational vessel. Consideration should be made as to whether the development will allow sufficient time for a response (such as the RNLI) to reach a drifting craft before a collision/allision occurs.</p>	<p>The assessment of drifting allision risk for recreational vessels gives due consideration to the limited options available in terms of emergency action and the level of emergency response resources in the region. The frequency of occurrence has subsequently been amended to ‘extremely unlikely’. However, given the reduced speed at which a drifting allision would likely occur, the severity of consequence remains ‘moderate’ (see Section 13.10).</p>
<p>RYA</p>	<p>MGN 654 has now been superseded and the NRA should be reviewed and revised with respect to the recreational aspects of MGN 654.</p>	<p>This chapter and the NRA are compliant with MGN 654, including the updated MGN checklist (see Annex A of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference 6.4.13.1)).</p>

<p>Littlehampton Harbour Board</p>	<p>Do not believe there is fair consideration of the economic impacts of displacement to all types of leisure and commercial vessels using Littlehampton and local waters due to vessel traffic assessments occurring during the COVID-19 pandemic and an over reliance on AIS data.</p>	<p>A further 14 days of vessel traffic survey data from 16 to 30 June 2022 has been assessed (including vessels not broadcasting on AIS) and is incorporated into the baseline characterisation of vessel movements in Section 13.6. Commercial risk associated with Littlehampton Harbour is assessed in Section 13.9, Section 13.10 and Section 13.11.</p>
<p>Littlehampton Harbour Board</p>	<p>The degree of export cable protection and cable burial depth requires full assessment to ensure the risks of both anchor interaction and reduction in under keel clearance in these areas is properly mitigated.</p>	<p>The need for and location of any external cable protection will be determined via the CBRA post consent, with cable burial to be the preferred option for cable protection (see C-41, C-45, C-96 Table 13-14).</p>
<p>Littlehampton Harbour Board</p>	<p>Concerned with sufficiency of engagement with Littlehampton's commercial fishing fleet.</p>	<p>Separate consultation has been undertaken as part of Chapter 10 Commercial fisheries, Volume 2 of the ES (Document Reference: 6.2.10) and liaison with fishing fleets via a Fisheries Liaison Officer (FLO) is ongoing.</p>
<p>Hanson Aggregates Marine</p>	<p>The risk of anchor snagging across any cable route between landfall and the array area or between the turbine infrastructure requires consideration.</p>	<p>Assessed in the consideration of increased interaction with sub-sea cables in Section 13.10.</p>
<p>Hanson Aggregates Marine</p>	<p>Consideration of marine aggregate dredger routeing between Area 435 and the beaches at Pevensy and Eastbourne needs to be incorporated in the assessment as this data may be excluded or not have occurred during the survey period. Ship movements consisting of two to three weeks of activity can occur associated with beach/coastal protection projects at these locations.</p>	<p>The long-term AIS data analysis (see Annex E of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)) did not indicate marine aggregate dredging activity between Area 435 and beaches at Pevensy and Eastbourne; however, a more general consideration is given to east-west transits of all vessel types within the impact assessment.</p>

MCA	The PEIR chapter and NRA require review and update to reflect MGN 654, including the MGN checklist.	This chapter and the NRA are compliant with MGN 654, including the MGN 654 checklist (see Annex A of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)).
MCA	The terminology and language used in the NRA reflects EIA reporting when it should be consistent with the NRA methodology.	The NRA terminology is amended to reflect the FSA methodology.
MCA	Queried whether grounding risk has been considered.	Grounding risk has been considered as an element of the vessel displacement impact in Section 13.9, Section 13.10 and Section 13.11 .
MCA	Queried whether any more up-to-date Marine Accident Investigation Branch (MAIB) and RNLI data has been considered post-2017 and when Rampion 1 was installed.	The most recently available MAIB and RNLI incident data at the time of the baseline being updated for the ES has been used (2010 to 2019) (see Table 13-9).
UK Chamber of Shipping	Concerned with navigational safety around the full extent of the PEIR Assessment Boundary and in particular the western extent which creates a pinch point with Selsey Bill and effectively cuts off Littlehampton from the south.	The proposed DCO Order Limits represents a reduction in total area covered compared to the PEIR Assessment Boundary, including at the western extent in proximity to Selsey Bill (see Section 6.1 of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.13.1)).
UK Chamber of Shipping	Do not consider there to be any exceptional circumstance in this instance to bypass the Marine Planning Policies in relation to overlap of the red line boundary with the ITZ. Amendment of the red line boundary to avoid the ITZ would reduce the deviation required for vessels accessing Shoreham and the Dover Strait TSS.	The proposed DCO Order Limits represents a reduction in total area covered compared to the PEIR Assessment Boundary (see Section 6.1 of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)) including no longer intersecting the ITZ.
UK Chamber of Shipping	Not supportive of the effective 'blocking off' of	The proposed DCO Order Limits represents a reduction in total area

large areas of sea room as covered compared to the PEIR exhibited by the anticipated Assessment Boundary (see **Section 6.1** of **Appendix 13.1: Navigational Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.13.1)) and a structures exclusion zone (which serves as a navigation corridor) provides an additional option to/from Littlehampton Harbour (see **Section 17** of **Appendix 13.1: Navigational Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.13.1)).

<p>UK Chamber of Shipping</p>	<p>For the purposes of SAR and navigational safety request at least one line of orientation maintained between Rampion 1 and the proposed development. Furthermore, two lines of orientation as set out in MGN 654 are preferred within the proposed development unless a sufficient safety case can be presented to the MCA.</p>	<p>The final layout will be agreed with the MCA and Trinity House post consent as required under the draft DCO (see C-86, Table 13-14). The proposed DCO Order Limits incorporates HRAs to support access for SAR assets, including between Rampion 1 and Rampion 2.</p>
<p>UK Chamber of Shipping</p>	<p>Expect that the ES chapter and updated NRA will be fully compliant with MGN 654.</p>	<p>This chapter and the NRA are compliant with MGN 654, including the MGN 654 checklist (see Annex A of Appendix 13.1: Navigational Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.13.1)).</p>
<p>UK Chamber of Shipping</p>	<p>A single 10-year period is unnecessarily short for accident data and may not accurately reflect historic incidents and safety of navigation.</p>	<p>The most recent 20-year period of MAIB incident data available has been considered (2000 to 2019) (see Table 13-9), noting that the first 10-year period (2000 to 2009) is considered only qualitatively given the changes to safety standards/regulations and poorer levels of reporting of incidents in earlier years.</p>
<p>UK Chamber of Shipping</p>	<p>The future traffic baseline (10% increase) is conservative and a range of up to 30% should be considered particularly given the traffic volumes on the South Coast.</p>	<p>The future traffic baseline is considered in Section 13.6, noting that a 20% future case has now been incorporated in addition to a 10% future case. A 30% future case would be an extreme scenario and</p>

10%/20% is considered
conservative.

Statutory Consultation Feedback - Volume 2, Chapter 14, Civil and Military aviation

Rampion 2's first statutory consultation exercise ran from 14 July to 16 September 2021, a period of nine weeks. The PEIR (RED, 2021) was published as part of Rampion 2's first statutory consultation exercise which provided preliminary information on shipping and navigation within Chapter 15: Civil and military aviation (RED, 2021).

Following feedback to the Statutory Consultation exercise in 2021 it was identified that some coastal residents did not receive consultation leaflets as intended. Therefore, the first Statutory Consultation exercise was reopened between 7 February 2022 to 11 April 2022 for a further nine weeks. The original PEIR published as part of the first Statutory Consultation exercise in 2021 was unchanged and re-provided alongside the reopened Statutory Consultation exercise in early 2022.

The following statutory consultation exercises focussed on changes made to the onshore cable route, onshore substation, and National Grid interface point and did not consider offshore aspects of the Proposed Development.

The second Statutory Consultation exercise was undertaken from 18 October 2022 to 29 November 2022. This was a targeted consultation which focused on updates to the onshore cable route proposals which were being considered following feedback from consultation and further engineering and environmental works. As part of this second Statutory Consultation exercise, RED sought feedback on the potential changes to the onshore cable route proposals to inform the onshore design taken forward to DCO application.

The third Statutory Consultation exercise was undertaken from 24 February 2023 to 27 March 2023. This was a targeted consultation which focused on a further single onshore cable route alternative being considered following feedback from consultation and further engineering and environmental works. As part of this third Statutory Consultation exercise, RED sought feedback on the potential changes to the onshore cable route proposals to inform the onshore design taken forward to DCO Application.

The fourth Statutory Consultation exercise was undertaken from 28 April 2023 to 30 May 2023. This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the Rampion 2 onshore cable route into the national grid electricity infrastructure. As part of this fourth Statutory Consultation exercise, RED sought feedback on the proposed substation extension works to inform the onshore design taken forward to the DCO Application.

The PEIR assessment boundary has changed substantially taking into consideration S42 comments received in order to address concerns, to arrive at the final proposed DCO Order Limits. Further information on the design refinement process can be found in **Chapter 4: Project Description, Volume 2** of the ES (Document

Reference: 6.2.4) and **Chapter 3: Alternatives, Volume 2** of the ES (Document Reference: 6.2.3).

Table 15-7 Formal Consultation feedback – Volume 2, Chapter 15, Seascape, landscape and visual impact assessment

Stakeholder	Theme	How this is addressed in this ES
Adur District Council	<i>While we recognise that larger turbines generate renewable electricity more efficiently and that there must be a trade-off between aesthetic impact and renewable energy production, we do have some concerns about the visual impact of the turbines and we appreciate these concerns being taken into account.</i>	Section 15.7 of the SLVIA chapter sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors, including demonstrating how its appearance provides a ‘good aesthetic’, as far as is possible.
Arun District Council	<i>The Council has significant concerns regarding the scale of the proposals relative to their proximity to the coastline. It is noted that the proposed turbines are substantially larger than the existing Rampion 1 turbines and the visual impacts of the proposals will be enormous. The combination of the size of the turbines and the quantity of them lead ADC to conclude that the proposals are an overdevelopment in this location.</i>	The visual impacts of Rampion 2 WTGs are assessed in this Chapter. Design principles are described in Section 15.7 , which sets out how the design of Rampion 2 provides embedded environmental measures addressing visual effects, in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, it’s spread and quantity of WTGs within it. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain

Stakeholder	Theme	How this is addressed in this ES
Arun District Council	<i>Table 16-11 Viewpoints included in the SLVIA fails to consider or identify that there is a conservation area fronting on to the sea, with a second one close by. This is disappointing as the same table identifies the conservation areas in Bognor Regis and other LPA areas. This issue had to be raised at one of the online meetings, and it would appear that this issues still has not been properly addressed.</i>	flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is a necessary part of the process that is recognised through NPS EN-1 at paragraphs 4.2.5 - 4.2.6. Viewpoint 11 Littlehampton is sited near the pier and Harbour Park to represent the concentration of receptors in this area. The effect of Rampion 2 on the setting of conservation areas is assessed in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference: 6.2.25).
Arun District Council	<i>There is also an Area of character in South Terrace which has not been identified (non-designated heritage asset).</i>	The effect of Rampion 2 on non-designated heritage assets is assessed in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference: 6.2.25).
Brighton & Hove City Council	<i>With regards to Table 16-6, we would query the reference to construction and decommissioning being ‘short term’ in its impact, and the lack of reference to cumulative visual impacts alongside the existing Rampion windfarm. The reference to reversible effects is also questionable, given the turbines are expected to be in situ for 25 years.</i>	Section 15.8 of the SLVIA chapter sets out the methodology for the ES assessment including definitions for short, medium and long term impacts. The methodology, based on guidance (GLVIA3) defines short-term effects

Stakeholder	Theme	How this is addressed in this ES
		<p>as ‘1 to 5 years’. The construction phase of the Project will be completed within that period. Operational effects are assessed as reversible at the end of the operational period upon completion of decommissioning (although long- term). Cumulative effects are assessed in Section 15.12. Rampion 1 windfarm has been considered as part of the baseline.</p>
<p>Brighton & Hove City Council</p>	<p><i>The assessment of possible effects on landscape character set out in Table 16-34 uses the Marine Conservation Area (MCA07), extending from Selsey Bill to Seaford Head, as the baseline against which to assess the impact on landscape character. The assessment states that: “The sensitivity of the MCA to changes associated with the offshore elements of Rampion 2 is considered to [sic] medium-high for the inshore areas of the MCA and medium for the offshore areas in which the windfarm array area is located, due to the reduction in susceptibility with the increased distance offshore and the presence of Rampion 1 Wind Farm whose WTGs are a characteristic feature of the existing seascape.’ The seascape is assessed as having medium value. The assessment identifies that the magnitude of change would be medium to high, and the overall effect on the MCA07 area significant (Major / Moderate). The assessment acknowledges that there are areas of</i></p>	<p>The effect of the Proposed Development in views from urban areas including tourist hotpots is assessed at representative viewpoints, such as Viewpoint 8 Brighton Seafront (Section 15.10), which is assessed as being of high sensitivity (with medium-high value) and more open/tranquil areas at Viewpoint 27 Hollingbury Hill Fort (Section 15.10), which is also assessed as high sensitivity (with high value). Assessment of the Proposed Development on conservation areas is undertaken in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference: 6.2.25).</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>open coast as well, including South Downs National Park which is assessed separately. However, it does not identify areas of greater sensitivity and value within the urban areas such as tourist hotspots, more open/tranquil areas along the seafront, and conservation areas. In this context the effect on the more sensitive townscape areas has been underassessed.</i></p>	
<p>Brighton & Hove City Council</p>	<p><i>The visual impacts are assessed as significant and major from all of the views within B&H (below).</i></p> <p><i>a. Viewpoint 7 Rottingdean (within SDNP): the turbines would occupy 58.5 degrees of the 180 degree view out to sea.</i></p> <p><i>b. Viewpoint 8 Brighton Seafront: the turbines would occupy 71.7 degrees of the 180 degree view out to sea.</i></p> <p><i>c. Viewpoint 27 Hollingbury Golf Course (within SDNP): the turbines would occupy 61.7 degrees of the 180 degree view out to sea. This being the case, we consider the assessment of views from within the urban areas should be reconsidered.</i></p>	<p>The significance of visual effects on views from Brighton & Hove was considered in the project design and there are reductions to the Horizontal Field of View (HFoV) affected, as described in Section 15.7 and as assessed for each viewpoint within Brighton & Hove in Section 15.10.</p>
<p>Brighton & Hove City Council</p>	<p><i>We note that the value of views from settlements along the coast was cited in the Examining Authority's Recommendation Report for Rampion 1 (paragraph 4.335), highlighting the point made by one resident as being "captured eloquently" in referring to the importance of "an uninterrupted sea view to the character and sensation of space when within Brighton". While the views may no longer be entirely uninterrupted due to Rampion 1, the sensation of space along the coast continues to form an</i></p>	<p>The assessment in Section 15.10 confirms that sea views from Brighton are no longer uninterrupted due to the presence of Rampion 1. The conclusions of the SLVIA in Section 15.15 consider how the 'sensation of space' along the coast continues to form an important part of the character of the city.</p>

Stakeholder	Theme	How this is addressed in this ES
Brighton & Hove City Council	<p><i>important part of the character of the city.</i></p> <p><i>The assessment considers Rampion 1 to be part of the baseline, rather than resulting in cumulative effects, an approach we do not agree with. This is also apparent in this conclusion from the Table: “Rampion 2 will increase the influence of the wind farm element viewed in MCA07 that forms the seascape element of views, through an increase in the lateral spread, scale and influence of WTGs extending from Rampion 1, both eastwards and westwards on the sea skyline, contributing to a greater degree of enclosure of the seascape of Sussex Bay.”</i></p>	<p>In accordance with GLVIA3 (Landscape Institute, 2013) (para 7.13), existing offshore wind farms, (including Rampion 1) and those which are under construction are included in the baseline for seascape, landscape and visual effects assessments in Section 15.9 to 15.11. Cumulative effects are assessed in Section 15.12.</p>
Brighton & Hove City Council	<p><i>This notes the increase in scale, extending from Rampion 1, but does not note that it would fully enclose Rampion 1 on all sides. This approach reduces the overall assessment of magnitude of change on the urban areas from which it is seen.</i></p>	<p>The effects arising from the Proposed Development on seascape character have been updated in Table 15-36. The assessment of VP8 Brighton Seafront in Section 15.10 also notes that the Proposed Development will extend WTG development westwards and eastwards on the skyline, increasing the horizontal extent of the array, with effects assessed as medium-high magnitude and significant.</p>
Brighton & Hove City Council	<p><i>Three viewpoints from within the Brighton & Hove boundary have been selected, though two are within the SDNP. This puts a heavy reliance on the remaining viewpoint (viewpoint 8) being representative of the impact on the entire Brighton & Hove urban area. It is therefore crucial that this is</i></p>	<p>The location of Viewpoint 8 Brighton Seafront at one of the closest and most open sections of the Brighton coast with views to the Proposed Development is considered to be</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>representative of a 'worst-case scenario', in accordance with the Rochdale Envelope approach.</i>	representative of the 'worst-case' effects on views from the settlement, with effects assessed as medium-high magnitude and significant. Viewpoint 27 at Hollingbury Hill Fort is also within the City of Brighton and representative of views from elevated areas of the city set further back from the coastal edge, with effects on views are assessed as being of medium magnitude.
Brighton & Hove City Council	<i>The Brighton seafront view (Viewpoint 8) has been taken from the Kings Road between the two piers. This is a comparatively low-lying viewpoint and the seafront here is very developed and has a busy commercial and tourism character. As a result, the impact of the offshore array in this viewpoint has been under-assessed.</i>	The busy commercial / tourist character near to Viewpoint 8 is noted, however the viewpoint is sited at one of the closest sections of the Brighton coast with views to the Proposed Development and is considered to be representative of the 'worst-case' effects on views from the settlement, which are described as occurring from wider Brighton seafront. Effects are assessed as being of medium-high magnitude in Section 15.10 and are not therefore considered to be under-assessed.
Brighton & Hove City Council	<i>In landscape and seascape terms, a more representative location would be from an elevated position towards the eastern end of Marine Parade. The seafront is much more open and tranquil in this area, and uninterrupted</i>	Viewpoint 8 Brighton Seafront is considered to be representative of the worst-case views from Brighton seafront, including from Marine

Stakeholder	Theme	How this is addressed in this ES
	<p><i>sea views are integral to the way this historic area is experienced, so the magnitude of change arising from the offshore array will likely be greater.</i></p>	<p>Parade, which despite having a higher heritage value, is not as busy / popular with people / visitors as the area near to Viewpoint 8. Effects on visual receptors at Brighton seafront are assessed as being of medium-high magnitude and significant, and would not be notably greater from the nearby position towards the eastern end of Marine Parade.</p>
<p>Brighton & Hove City Council</p>	<p><i>It is therefore considered that either an additional or replacement viewpoint from Marine Parade east should be produced and assessed. We would emphasise that to date, the precise location of viewpoint has been unclear.</i></p>	<p>Detailed consultations were undertaken on the viewpoints selected through the statutory and non-statutory consultations, which brought forward many suggestions from stakeholders regarding the inclusion of certain viewpoint locations for assessment. In total 54 viewpoints (Table 15-14) were agreed and included in the SLVIA, which provide a wealth of representative locations from which to understand the likely significant effects of the Rampion 2 project. Viewpoint 8 Brighton Seafront is representative of the worst-case from Brighton seafront and nearby areas. No further viewpoints from Marine Parade are included in ES.</p>

Stakeholder	Theme	How this is addressed in this ES
Brighton & Hove City Council	<p><i>We note that the conclusions drawn in paragraph 16.10.56 are unclear: “The open sea views are informally recognised through the seaward alignment of the urban sea frontages and the popularity of the beaches/seafronts to visitors, however, the views from these settlements are not within a designated landscape nor afforded planning policy protection.” While the urban seafront areas in Brighton & Hove are not within designated landscapes, large parts of the seafront are within heritage designations. Views from the settlements will not be afforded planning policy protection because LPAs do not have jurisdiction over the sea.</i></p>	<p>The assessment of Viewpoint 8 in Section 15.10 identifies that it is located within a conservation area and that parts of visible townscape therefore have heritage planning policy protection, reflected in the medium-high value of views. The concluding paragraph of the assessment has also been updated to reflect the presence of the conservation area.</p>
Brighton & Hove City Council	<p><i>Finally, we are aware of work which has been carried out with regard to the need for buffers between coastal areas and offshore wind farms, which vary depending on the size of the turbines and the sensitivity of the coastal receptors. It is unclear what work has been undertaken in relation to this project, and how the buffer proposed for this scheme has been calculated, given the sensitivity of the coastal area.</i></p>	<p>Buffers for offshore wind farm development are not defined on a project-by-project basis, but through strategic assessment. The OESEA (OESEA, 2020) proposes 34km offshore as a suggested buffer for all scales of wind farm development to avoid significant adverse effects on a combined National Park and Heritage Coast. The OESEA does not suggest no-go areas for development, it is a strategic tool and is not guidance or a roadmap for placing of wind farms, which are allocated by The Crown Estate and it is not in the Applicant's remit to locate sites to avoid impacts. The SDNPA have also</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>recently undertaken a buffer study for the SDNP, which is considered further in Section 15.11 It found that WTGs of this scale would be likely to exceed low magnitude at less than 38.6km from shore and therefore could be significant on highest sensitivity landscapes e.g. SDNPA. For the Brighton & Hove area outside the SDNPA, it found WTGs this size would be likely to exceed medium magnitude less than 27.5km from shore and therefore could be significant within that distance. The study findings were considered as part of the project design. High level ‘buffer’ studies do not ultimately replace the need for site specific assessment, which has been undertaken in this SLVIA Chapter of the ES.</p>
<p>Clymping Parish Council</p>	<p><i>Adverse visual impact, exacerbated by height of the turbines, the area covered and closeness to the shore. This is contrary to current Government Policy re distance of turbines from the shore.</i></p>	<p>There is no Government Policy that defines distance limits for offshore wind farms from shore. Buffers for offshore wind farm development are not defined on a project-by-project basis, but through strategic assessment. The OESEA (OESEA, 2020) proposes that for areas outside designated landscapes, WTGs of this</p>

Stakeholder	Theme	How this is addressed in this ES
East Sussex County Council	<i>ESCC support the proposed Rampion 2 development, but we ask that efforts are made to minimise the visual impact of the wind farm on the coast, when considering the size of the wind turbines as well as their location and layout.</i>	<p>size would be likely to exceed medium magnitude less than 27.5km from shore and therefore could be significant within that distance. The OESEA does not suggest no-go areas for development, it is a strategic tool and is not guidance or a roadmap for placing of wind farms, which are allocated by The Crown Estate and it is not in the Applicant's remit to locate sites to avoid impacts. High level 'buffer' studies do not ultimately replace the need for site specific assessment, which has been undertaken in this SLVIA Chapter of the ES, of which the findings have informed the project design and the embedded environmental measures, as described in Section 15.7.</p>
		<p>The visual impacts of Rampion 2 are assessed in this Chapter. Section 15.7 sets out how the design of Rampion 2 provides embedded environmental measures that address visual effects, in response to stakeholder comments, including reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of WTGs within it. Opportunities to reduce</p>

Stakeholder	Theme	How this is addressed in this ES
East Sussex County Council	<i>When deciding between the smaller 210m high wind turbines or the larger 325m high wind turbines it is important that the visual impacts of the wind farm on the coastline are fully considered. Likewise, the location and layout of turbines should also be selected in a way which minimises the visual impact of the proposals on the coastline.</i>	<p>effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors.</p> <p>The visual impacts of Rampion 2 on the coastline are fully considered in Section 15.10. Section 15.7 sets out how the design of Rampion 2 provides embedded environmental measures that address visual effects, in response to stakeholder comments, including reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of WTGs within it. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario (as described in Section 15.7) is a necessary part of the process that is</p>

Stakeholder	Theme	How this is addressed in this ES
East Sussex County Council	<i>The current assessment indicates that for a large part of the East Sussex coast, from Peacehaven to Beachy Head, the visual impact of the proposals would be ‘Major/Moderate and significant’. This highlights the importance of ensuring that the final design of the wind farm (the size, location and layout of turbines) is selected in a way which minimises the visual impact on the coast. This is considered particularly important in areas of this coastline deemed a significant asset to visitors and residents, as well as benefitting from nationally recognised designations (National Park and Heritage Coast).</i>	<p>recognised through the NPS EN-1 at paragraphs 4.2.5 - 4.2.6.</p> <p>Section 15.7 sets out how Rampion 2 responds to visual impacts on the coast and provides embedded environmental measures that include the location and layout of WTGs, however opportunities to reduce effects through turbine size are limited due to the technical and economic requirements of the Project. The UK Government’s financial mechanism that facilitates offshore wind farms to be built, Contract for Difference (CfD), requires the project to be economically competitive with other proposed OWFs in order to have a chance of successfully achieving funding and this drives the required project area and WTG dimensions as well as other factors.</p>
Isle of Wight Council	<i>The Isle of Wight AONB Partnership have confirmed that they do not object to the proposals, considering the benefits from renewable energy for the country (carbon emission reductions towards a net-zero carbon economy) outweigh any impacts to the Isle of Wight AONB seascape, in this instance.</i>	Stakeholder comments are noted with no action required in the ES.
Isle of Wight Council	<u><i>Impact on the character of the Island’s landscape, seascape and AONB</i></u>	Assessment of the impact of Rampion 2 on the character of the Isle of

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Strategic policy SP5 of the Island Plan Core Strategy supports proposals that protect, conserve and / or enhance the Island’s natural environment and protect the integrity of international, national, and local designations. Policy DM2 requires development proposals to complement the character of the surrounding area, with Policy DM12 emphasising the need to protect the integrity of international, national and local designations relating to landscape and seascape. Policy DM16 specifically requires renewable energy development proposals to be informed by a landscape character assessment and to reflect the capacity and sensitivity of the landscape of the Island.</i></p>	<p>Wight’s landscape, seascape and AONB has been undertaken in the SLVIA (Section 15.10) under the requirements of these policies.</p>
<p>Isle of Wight Council</p>	<p><i>The applicants have provided a detailed Seascape, Landscape and Visual Impact Assessment (SLVIA) at chapter 16 of the PEIR, which relates to the offshore development. The Council agrees with the methodology for the SLVIA and consider it to be in accordance with the recognised best practise guidance contained within Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA 3). In addition, the SLVIA identifies the correct National Character Area for the Island, NCA 127 and refers to the correct local character assessments for the Island.</i></p>	<p>Agreement on the methodology for the SLVIA and relevant national and local baseline character area is welcomed.</p>
<p>Isle of Wight Council</p>	<p><i>The SLVIA has assessed the perception of the proposed development from 3 viewpoints on the Island (viewpoints 24, 34 & 35) as well as the Isle of Wight Coastal Path and various landscape character areas and settlements, based upon the realistic worst-case scenario for the proposed project, which would involve the</i></p>	<p>The realistic maximum design scenario for Rampion 2 would now involve the installation of 65 wind turbines with a blade tip height of 325m, as described in Table 15-25. The design with the greatest number of</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>installation of 75 wind turbines with a blade tip height of 325m and widest rotor diameter of 295m. It should be noted that the design option with the greatest number of turbines (116) would relate to turbines with a height of 210m, so much lower than the realistic worst-case scenario. The SLVIA also assesses the potential for effects on the special qualities of the Isle of Wight AONB and its statutory purpose. There is no landside development proposed for the Isle of Wight.</i></p>	<p>turbines (90) would relate to turbines with a height of 285m. The SLVIA assesses the potential for effects on the special qualities of the Isle of Wight AONB and its statutory purpose in Table 15-42.</p>
<p>Isle of Wight Council</p>	<p><i>The viewpoints used on the Island are taken from the eastern edge of Bembridge (viewpoint 24), which is 29.9km from the Area of Search, Bembridge Down (viewpoint 34), which is 32.4km from the Area of Search and St Boniface Down (viewpoint 35) which is 37km from the Area of Search. Viewpoints 34 and 35 are both within the AONB designation while viewpoint 24 is close to it. Photomontages have been provided to represent the realistic worst-case scenarios or views of the project. While visual representations must always be considered with a degree of caution, it is considered that those provided present a fair and reasonable representation of the project and therefore, are suitable to allow an effective and accurate assessment to be made. The viewpoints are shown within appendix 1 of this report.</i></p>	<p>Viewpoints in the Isle of Wight are taken from the eastern edge of Bembridge (Viewpoint 24), Bembridge Down (Viewpoint 34) and St Boniface Down (Viewpoint 35) and are assessed in Appendix 15.4 Viewpoint Assessment, Volume 4 of the ES (Document Reference 6.4.15.4) with photomontage visualisations provided in Figure 15.48, Figure 15.57 and Figure 15.58, Volume 3 of the ES (Document Reference: 6.2.15). Agreement that the visual representations present a fair and reasonable representation of the project is welcomed.</p>
<p>Isle of Wight Council</p>	<p><i>The information provided for these areas, shows that the proposed project would be visible from the Island, on clear days but at distance. From the three viewpoints and other viewpoints</i></p>	<p>Stakeholder comments are noted and welcomed, with no action required in the ES.</p>

Stakeholder	Theme	How this is addressed in this ES
Isle of Wight Council	<p><i>with similar available views, the western edge of the Area of Search would be visible as a line of turbines on the horizon.</i></p> <p><i>The SLVIA considers two character areas on the Island, these being the Chalk Downs and The Undercliff (Ventnor). The SLVIA notes that the closest of the Chalk Downs are those at Bembridge, Shanklin and Ventnor, from where there would be distant views of the proposed wind turbines (see viewpoints 34 & 35). These areas are highly sensitive to change, as acknowledged by the SLVIA, but it is argued that distance would mitigate the magnitude of change to these areas, with the significance of effect said to be moderate for the closest section of the character area (Bembridge Down) and moderate/minor for the Downs at Ventnor and Shanklin and therefore not significant.</i></p>	<p>Stakeholder comments are noted and welcomed, with no action required in the ES.</p>
Isle of Wight Council	<p><i>Having visited these areas and assessed the photomontages, it is considered that the proposed project would not result in significant effects to these character areas. The chalk downs are iconic landscape areas for the Island and popular locations for Islanders and tourists alike to visit. Much of the chalk downs character area is within the AONB, with open access areas and rights of way allowing significant access. It is correct that these areas and the visual receptors within them are highly sensitive to change, given the AONB designation along with the low level nature of natural screening, which when combined with height, allow scenic views across the Island and the seascape that surrounds it.</i></p>	<p>Agreement of not significant effects to the perceived character of the Chalk Downs and The Undercliff (Ventnor) character areas is welcomed.</p>

Stakeholder	Theme	How this is addressed in this ES
Isle of Wight Council	<i>Nonetheless, from the various rights of way and open access landscape within the chalk downs character area, views are panoramic and thus allow the viewer wide vistas that take in scenic landscapes, wide areas of the sea that surrounds the Island along with an appreciation of more urban locations both with foreground and in some cases, backdrop views. From Bembridge Down there are views of the Solent and the development that surrounds its coastal margins (on Island and off Island) and these combine with landscape and seascape to result in complex vistas.</i>	Stakeholder comments are noted and welcomed, with no action required in the ES.
Isle of Wight Council	<i>From St Boniface Down, views are more readily related to rural areas, with some longer distance views of urban areas to the east and north-east. This viewpoint is a greater distance from the Area of Search for the project. Based on the submitted plans and photomontages it is considered that the proposed project would form a narrow section of panoramic vistas, but a slightly wider section of specific views when looking due east of the Island. These would always be distant views, with the project being visible but not intrusively so, because the turbines would be relatively small-scale elements of views. They would not fundamentally alter the key characteristics of the chalk downs or harm the landscape and visual receptors within them. It is noted that the project would be visible from other locations given the ridge of elevated downland that transects the Island. But these areas would be at greater distance and thus it is reasonable to conclude that impacts would be less than those experienced at Bembridge or St Boniface.</i>	Agreement is welcomed that Rampion 2 will not fundamentally alter the key characteristics of the chalk downs or harm the landscape and visual receptors within them.

Stakeholder	Theme	How this is addressed in this ES
Isle of Wight Council	<i>The Undercliff is an area of lower landscape that aligns the south-east and southern coastline, between the eastern extremity of Shanklin, running west towards Niton. It is likely that there would be some views of the proposed projects from various coastal viewpoints along the Undercliff. The SLVIA avers that effect would be moderate/minor, indirect, long-term and reversible on the perceived character of the Undercliff between Luccombe Bay and Dunnose/ Ventnor; dropping to minor along the southern coastline between Ventnor and St Catherine’s Point; and no effect on the Undercliff between St Catherine’s Point and Chale Bay.</i>	Stakeholder comments are noted and welcomed, with no action required in the ES.
Isle of Wight Council	<i>The Undercliff is flanked by a rugged coastline that is subject to land instability. There are attractive areas of landscape and townscape along the Undercliff, always appreciated in the context of the seascape and wide vistas of the English Channel. It is agreed that the proposed project would be seen at distance from the Undercliff from limited locations, at distance with the turbines seen as small-scale elements of the horizon, seen alongside the coastal landscape. These significant distances would mitigate impacts and therefore the preliminary conclusions of the SLVIA are considered to be correct.</i>	Agreement of not significant effects to the perceived character and views from The Undercliff character area is welcomed.
Isle of Wight Council	<i>Viewpoints 34 and 35 have been assessed above, in combination with the chalk downs character area. The final viewpoint, 24, is taken from the foreshore that forms the eastern edge of Bembridge. This viewpoint is effectively taken from sea level and views here are again, panoramic. From here, the project would be seen</i>	Agreement is welcomed that Rampion 2 would not form an intrusive or overly prominent addition to views from Bembridge (Viewpoint 24) or result in harm to views form this settlement.

Stakeholder	Theme	How this is addressed in this ES
Isle of Wight Council	<p><i>as a relatively wide line of turbines that would breach the horizon. However, the project would be seen in a wider panorama that would include the closer coastlines to the north and north-east and development along them. In addition, the area of English Channel close to Bembridge forms a busy navigational passage where larger seagoing vessels are a regular element of view. As a result, is considered that the proposed development would not form an intrusive or overly prominent addition to views or result in harm.</i></p> <p><i>The SLVIA assesses the impact of the project from sections of the Isle of Wight Coastal Path that traverse the northern and southern coastlines on the eastern half of the Island. These include visual receptors between Cowes and Bembridge and then Bembridge to St Catherine’s Point, which forms the southern extent of the coast from where the project could potentially be visible. The SLVIA also includes assessments for the settlements of Bembridge, St Helens, Shanklin and Sandow. For the visual receptors C, the SLVIA concludes that impacts would range between zero to low, increasing as distance between a receptor and the project decreases. The Council agrees with these conclusions. This is because when seen from viewpoints along the northern coastline, the development would be seen at distance within complex views that would include busy urban areas, the various vessels using the Solent and intervening landscape. The project would not be a dominant feature in any view and therefore nor an intrusive change for receptors in these areas.</i></p>	<p>Agreement is welcomed that Rampion 2 would result in impacts ranging between zero to low in views from the Isle of Wight areas between Cowes and Bembridge, St Helens, Shanklin and Sandow, including the Isle of Wight Coastal Path, and that the project would not be a dominant feature in any view nor form an intrusive change for receptors in these areas.</p>

Stakeholder	Theme	How this is addressed in this ES
Isle of Wight Council	<i>For the areas between Bembridge, to St Catherine’s Point (including the bays around Sandown, Shanklin and Ventnor) the SLVIA concludes that the effect of the project would range between low to zero. In a similar view to the northern coastline, many vistas of the project would be included within wider views, where the line of turbines would be small scale and not intrusive. In the bays surrounding Sandown, Shanklin and Ventnor views would be interrupted by landscape and where the project was visible, it would be in the context of a wider panorama and therefore, not be a dominant element.</i>	Agreement is welcomed that Rampion 2 would appear small scale and not intrusive from these areas, viewed in the context of a wider panorama and not be a dominant element.
Isle of Wight Council	<i>Regarding settlements, the SLVIA concludes that the effect of the project on Bembridge would be negligible. This is because while visible from the shoreline areas of the village (assessed above) when viewed from inland residential areas the development would be screened by built form, landform and vegetation. This conclusion is correct. Areas of the village close to the shoreline would allow views of the project, but as concluded for the viewpoint taken from Bembridge, the project would be seen at distance, in wide views and not appear dominant.</i>	Agreement is welcomed that Rampion 2 would result in negligible effects on inland residential areas of Bembridge and even in views from the shoreline, the project would be seen at distance, in wide views and not appear dominant.
Isle of Wight Council	<i>The SLVIA reasons that from St Helens, the development would not be visible owing to intervening built form and the well wooded nature of the coastline. The Council concurs with this reasoning and therefore agrees with the SLVIA conclusion that the impact of the project on St Helens would be negligible.</i>	Agreement is welcomed that from St Helens, Rampion 2 would not be visible and that the impact on St Helens would be negligible.
Isle of Wight Council	<i>The SLVIA notes that Sandown and Shanklin are urban areas that align the coastline and refers the importance of</i>	The assessment in Section 15.10 provides further assessment of the

Stakeholder	Theme	How this is addressed in this ES
	<p><i>tourism to these settlements and the beaches that draw visitors, reasoning that views of the sea are matters of interest. The SLVIA advises that views of the project from the bay would be from the seafront and that from internal areas of the towns, views would be screened by buildings. This assessment is correct. Very little mention is made of the mitigating factors that have been used to reach a conclusion of not significant effects, for the coastal areas of the towns, as laid out within the SLVIA. It is considered that more reasoning is required, given that easterly views from the beaches and the various hotels, shops, cafes and tourism destinations that align the seafronts of Sandown and Shanklin, would include the proposed turbines. The Council notes that the project would be seen at distance and be unlikely to represent a dominant or intrusive element of wide vistas, however the SLVIA should acknowledge and assess the mitigating factors.</i></p>	<p>mitigating factors that have been used to reach a conclusion of not significant effects for the coastal areas of Sandown and Shanklin on the IoW.</p>
<p>Isle of Wight Council</p>	<p><i>The SLVIA assesses the impact of the proposed project on the Isle of Wight AONB. It should be noted that the Isle of Wight AONB Partnership will provide separate detailed comments that focus specifically on the assessment and likely impact on the designation. Therefore, the Council's comments will not replicate those of the Partnership. However, as noted above the AONB Partnership have provided initial comments in relation to this report and concluded that impacts to the designation would be outweighed by the benefits that the projects would provide in terms of renewable energy and decarbonisation.</i></p>	<p>The impact of Rampion 2 on the special qualities of the Isle of Wight AONB are assessed in Table 15-42. It is noted that the Isle of Wight Council advised that the Isle of Wight AONB Partnership will provide separate detailed comments, however these have not been provided and no detailed comments from the Isle of Wight AONB Partnership have been seen by the Applicant. It is noted that the Isle of Wight Council advise that</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>In paragraph 5.1, the Isle of Wight Council confirm that the Isle of Wight AONB Partnership <i>‘do not object to the proposals, considering the benefits from renewable energy for the country (carbon emission reductions towards a net-zero carbon economy) outweigh any impacts to the Isle of Wight AONB seascape, in this instance’</i>.</p>	<p>the Isle of Wight AONB Partnership do not object to the proposals and that their initial comments conclude that the impacts to the Isle of Wight AONB designation would be outweighed by the benefits that the project would provide, in terms of renewable energy and decarbonisation.</p>
<p>Isle of Wight Council</p>	<p><i>In conclusion, it is noted that the existing Rampion wind turbine development is not visible from the Island. Therefore, it would not merge with the proposed Rampion 2 project to cause combined or greater effects. The Council has scrutinised the submitted information related to the likely landscape, seascape and visual impacts of the project on the Island, taking into account the realistic worst-case scenario of the Area of Search for the proposals. The Council’s assessment is based on the likely impacts of the tallest turbines when in operation, considering this to be the most significant stage of the project, with the construction and decommissioning phases likely to cause lesser effects. It is considered that the methodology and information contained within the SLVIA is in accordance with best practise guidance and that the supporting visualisations and plans allow an accurate assessment to be made.</i></p>	<p>Agreement is welcomed that the methodology and information contained within the SLVIA is in accordance with best practise guidance and that the supporting visualisations and plans allow an accurate assessment to be made.</p>
<p>Isle of Wight Council</p>	<p><i>The Council agrees that the landscape, seascape and visual impacts of the development would not be significant on the various landscapes, urban areas and visual receptors within the eastern half of the</i></p>	<p>Agreement is welcomed with the SLVIA findings that the landscape, seascape and visual impacts of Rampion 2 would not be significant</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Island. The project would be most visible on clear days during daylight hours but from the assessment carried out above, it is apparent that even from the closest viewpoints, where foreground views would include the sea, the proposed turbines would be relatively small objects seen on the horizon within wide views, and not readily eye-catching or intrusive. They would cause some change to the current easterly views of the seascape, but when seen in conjunction with other existing components of such vistas, such as vessels, and the development or landscape on the shoreline, they would not appear harmful or cause significant change.</i></p>	<p>on the various landscapes, urban areas and visual receptors within the eastern half of the Isle of Wight, and that it would not appear harmful or cause significant change.</p>
<p>Isle of Wight Council</p>	<p><i>When seen from inland locations or coastal locations further west, foreground views would begin to include the presence of the landscape and urban areas within the eastern half of the Island which would further mitigate the effect of the project. Therefore, the Council agrees with the conclusions laid out within the SLVIA, subject to some minor clarification in respect of mitigating factors for the towns of Shanklin and Sandown.</i></p>	<p>Agreement with the conclusions laid out within the SLVIA is welcomed. The assessment in Section 15.10 provides further assessment of the mitigating factors that have been used to reach a conclusion of not significant effects for the coastal areas of Sandown and Shanklin on the IoW.</p>
<p>MMO</p>	<p><i>The MMO will continue to review any ongoing matters in relation to Seascape and provide comments where relevant.</i></p>	<p>Stakeholder comments are noted with no action required in the ES.</p>
<p>Natural England</p>	<p><i>A key issue for R2 OWF is not to undo important location and design decisions that were made and secured in the Rampion 1 DCO in order to reduce the visual effects of Rampion 1. There is no evidence that SLVIA issues have driven the design of the</i></p>	<p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors. SLVIA topic specific design principles</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>R2. Aspects of wind farm design that can influence seascape, landscape and visual effects include:</i></p> <ul style="list-style-type: none"> • <i>The number of turbines,</i> • <i>Turbine size / scale (including relative size in comparison to existing wind farms),</i> • <i>Position on the skyline (including in relation to existing wind farms),</i> • <i>Extent of the wind farm across the skyline (the lateral spread); and</i> • <i>Turbine layout, including balance, gaps and evenness as seen from key viewpoints.</i> 	<p>are described, which set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the aim of reducing the magnitude of effects of the Proposed Development, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. Detailed consultations were undertaken on the design of the project during ETG meetings, in which SLVIA matters were a key consideration in driving the design changes made to address comments of stakeholders and provide embedded environmental measures with regard to potential seascape, landscape and visual impacts. The spatial extent of the Rampion 2 array area has been reduced, which reduces the horizontal spread of WTGs visible; increases the distance of Rampion 2 from the most sensitive areas of coastline (reducing the apparent height and visibility of WTGs); and achieves a separation between the Rampion 1 and Rampion 2 arrays in key views, with a better balance in apparent WTG size.</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>Natural England understand from the Applicant’s assessment that there will be significant effects on some of the Special Qualities of the SDNP and CHAONB. However, no mitigation/design measures have been proposed to reduce the significance of this effect. It is Natural England’s view that more can and should be done to minimise the adverse effects on designated landscapes which are identified in the SLVIA. Natural England’s position is that in order to reduce the magnitude of the visual effects, the following principles should be adopted by R2:</i></p> <ul style="list-style-type: none"> • <i>There should be no turbines constructed within Zone 6.</i> • <i>Reducing the combined horizontal extent (lateral spread) of turbines associated with a visually combined Rampion 1 and R2 scheme, or</i> • <i>There should be perceptible separation distance (from all land-based viewpoints) between the existing Rampion 1 OWF and the new R2 array by concentrating development in the western end of the Rampion Extension area. The distance should be sufficient that a clear distinction can be made between the two arrays, in order that they are perceived as separate objects in the seascape when viewed from the shore and from within the SDNP.</i> • <i>Clear lines of sight should be left between the arrays (Rampion 1 and R2), so that open views to the horizon are maintained when viewed from shore and from within the SDNP.</i> 	<p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors. SLVIA topic specific design principles are described, which set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the specific aim of reducing the magnitude and geographic extent of effects of the Proposed Development, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. These design principles have been developed in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> • ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. • ‘Proximity’ - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with

Stakeholder	Theme	How this is addressed in this ES
	<ul style="list-style-type: none"> • <i>The design of the new array should aim to balance the two arrays as far as practicable in terms of apparent turbine size and spacing, taking advantage of the effects of perspective to reduce any apparent difference in size between turbines.</i> • <i>Implement reduced aviation lighting intensity for the Rampion 1 array (from 2000cd to 200cd). The Applicant has already agreed to the dimming of aviation lights to 200cd where visibility conditions permit.</i> • <i>Natural England advise that these measures are adopted to reduce the geographical scale of the significant effects and prevent further degradation of landscape and visual receptors located in the coastal portion of the SDNP and SHC. However, these measures will not prevent the effects on designated landscapes from being significant, rather they will reduce the geographical scale of the effects as the 3rd objective would not mitigate for the significant effects on the IoWAONB and CHAONB. For the former, it may even intensify the significant effects further. Significant effects would still occur on receptors located in the central portion of the SDNP (for instance LCA R3 and at VPs 21, 33 and 50). However, on balance this is the best possible outcome that NE can envisage should R2 be consented. In addition, it is NE's view that such a design would be the most likely to fulfil the</i> 	<p>consequential benefits to other design principles).</p> <ul style="list-style-type: none"> • 'Wind farm separation zones' - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. • 'Separation foreground' - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7.</p>

Stakeholder	Theme	How this is addressed in this ES
<i>requirement for Good Design as set out in EN-1.</i>		
Natural England	<p><i>Introduction</i> <i>Natural England (NE) welcomes this opportunity to comment on the seascape, landscape and visual impact assessments (SLVIA) and related chapters of the Rampion 2 (R2) Preliminary Environmental Information Report (PEIR) as they relate to the offshore aspects of the scheme. In keeping with our previous comments on the potential SLVIA effects likely to arise from the development, we will limit our comments to those effects associated with the prime statutory purpose of:</i></p> <ul style="list-style-type: none"> • <i>South Downs National Park (SDNP) and its seascape setting.</i> • <i>Chichester Harbour AONB (CHAONB) and its seascape setting.</i> • <i>Isle of Wight AONB (IoWAONB) and its seascape setting.</i> • <i>The Sussex Heritage Coast (SHC) is located wholly within the SDNP and the special character of this area defines the coastal portion of the National Park.</i> 	<p>The effects of Rampion 2 on views and perceived special qualities of the SDNP, CHAONB and IoWAONB are assessed in Section 15.9 to 15.12, with the main long-term effects during the operational phase assessed in Section 15.10. Section 15.7 sets out how the design of Rampion 2 shows regard to the statutory purpose of these receptors with the aim of minimising harm to their special qualities.</p>
Natural England	<p><i>For seascape, landscape and visual effects within and outside of these designated landscapes we advise that close attention is paid to the comments and advice provided by the relevant Local Planning Authorities. Particular attention should be paid to the comments of the SDNP Authority. For the CHAONB and IoWAONB, we also recommend that close attention is paid to advice from these AONB Partnerships. Their detailed local</i></p>	<p>Advice provided by the relevant Local Planning Authorities and AONB Partnerships is set out in this Table 15-7, together with how this advice has been addressed in the ES.</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>knowledge of these designated landscapes, their special qualities, management needs and the relationship between land and sea in supporting the area's statutory purpose will provide greater depth and detail than can be provided by Natural England.</i></p> <p><i>NE offers its comments and advice without prejudice. Our comments and advice on the seascape, landscape and visual effects of the offshore and onshore elements of the scheme may change as further evidence and information emerges through the EIA process. We may also receive other relevant information from the local authorities, the SDNP Authority, AONB partnerships and other sources. NE will also be collecting its own evidence to inform our comments and advice and may continue to do so until the end of the examination process. Our comments are based solely on the documents provided by the Applicant (including hardcopies of the photomontages, the provision of which we thank the Applicant for). Site visits to selected viewpoints in the SDNP, CHAONB and IoWAONB were undertaken in July 2019. We plan to undertake further site visits in October 2021.</i></p>	<p>Stakeholder comments are noted with no action required in the ES.</p>
Natural England	<p><i>Overview of Natural England SLVIA Comments</i></p> <p><i>Views out to sea from the coastal portions of the SDNP and certain locations on the chalk ridge which forms the backbone of the South Downs are already influenced by the presence of the Rampion 1 array. Although the mitigation measures contained within the Rampion 1 (Rampion 1) DML (see below for</i></p>	<p>The influence of the existing Rampion 1 offshore wind farm from the coastal portions of the SDNP and locations on the chalk ridge of the SDNP to its north are noted. In accordance with GLVIA3 (Landscape Institute, 2013) (para 7.13) existing offshore</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>details) successfully reduced the visual influence of the turbines in views from the coastal portions of the national park (as defined by the SHC), they did little to lessen the visual effect from inland locations with the SDNP immediately to the north of the array. As a result, the visual influence of the Rampion 1 array is greater at Beacon Hill, Cissbury Ring and Highdown Hill than it is at Beachy Head and the beach at Cuckmere Haven. Noting that the influence of the Rampion 1 array could have been even more pronounced had larger turbines been used, it is nevertheless Natural England’s opinion that the Rampion 1 array has compromised the statutory purpose of the SDNP through the introduction of structures into Sussex Bay. We note that views out to sea from these locations are heavily influenced by the settlements of Brighton, Hove and Worthing, and that the presence of these settlements does have an influence on the nature and quality of views out to sea from the national park.</i></p>	<p>wind farms (Rampion 1) is included in the baseline for seascape, landscape and visual effects assessments in Section 15.9 to 15.11. It is noted that Natural England’s opinion is that Rampion 1 has already compromised the statutory purpose of the SDNP.</p>
<p>Natural England</p>	<p><i>The Overarching National Policy Statement for Energy EN-1 (5.9.19) invites comparisons with other consented offshore wind arrays. In the specific case of R2 this approach has some merits given that comparisons with Rampion 1 are unavoidable and consider that these should be incorporated into the determination of the scheme, taking note of the design principles as stipulated in the Rampion 1 DML. Nevertheless, for the avoidance of doubt Natural England takes the overall position that such comparisons have significant shortcomings and as such do not advocate this approach more widely.</i></p>	<p>In accordance with GLVIA3 (Landscape Institute, 2013) (para 7.13), existing offshore wind farms (Rampion 1) are included in the baseline for seascape, landscape and visual effects assessments in Section 15.9 to 15.11. The SLVIA does not directly compare the impacts of Rampion 1 and Rampion 2, however assessments of Rampion 2 are informed by observations of the</p>

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Natural England	<p><i>If built as defined in the ‘maximum design scenario’, from our initial estimation the maximum apparent height of the R2 turbines will be the largest in the setting of an English designated landscape by a factor of at least 2.5. From Viewpoint 7 - Beacon Hill, Rottingdean the R2 turbines will appear to be over twice the height of the turbines of the Rampion 1 array with an apparent height, expressed as degrees, of 1.304 compared to 0.522 (see below for explanation). From Beachy Head the R2 turbines will appear to be 3 times the height of the Rampion 1 turbines (0.738 compared with 0.267).</i></p>	<p>visibility of Rampion 1 and where relevant the influence of Rampion 1 on views and perceived character is described and informs the predicted seascape, landscape and visual impacts arising from Rampion 2. The Planning Inspectorate’s findings in respect of Rampion 1 set out in Rampion 1 Recommendation Report (The Planning Inspectorate, 2014) are also considered relevant and referred to in the conclusions of the SLVIA in Section 15.15.</p> <p>Quantitative analysis of the apparent height of WTGs has limitations. Natural England note in their advice that comparisons with other offshore wind farms have shortcomings. Judgements on significance should properly be based on the assessment material provided in the ES which have been undertaken in accordance with best practice guidance (GLVIA3). The visual effect of the Proposed Development on the views from Viewpoint 1 Beachy Head and Viewpoint 7 Beacon Hill is assessed in Section 15.10 and shown in the corresponding</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<i>The additional westward lateral spread of R2 is also a substantial increase on the lateral spread of the Rampion 1 array. This will significantly increase the proportion of the seaward horizon occupied by wind turbines when viewed from inland locations within the SDNP. Locations in the SDNP located to the west of viewpoint 19 at Highdown Hill from where uninterrupted views to the far seaward horizon are possible would be ‘closed off’ from those views should the R2 array be built.</i>	photomontages in Figure 15.26 and Figure 15.32, Volume 3 of the ES (Document Reference: 6.3.15). These photomontages are the best way to appreciate the scale (apparent height) of the WTGs. As described in Section 15.7 the project design responds to a set of combined design principles that contribute to providing embedded environmental measures in respect of the apparent height of WTGs in views from the SDNP.
Natural England	<i>In addition, the scheme will introduce turbines into portions of the seascape setting of 2 other designated landscapes (CHAONB and loWAONB) which are currently free of such visual intrusion. The PEIR has recognised that significant adverse effects will occur within the SDNP and CHAONB, and that the some of the special qualities of these landscapes will be adversely affected. Having reviewed</i>	The effects of Rampion 2 on views and perceived special qualities of the loWAONB are assessed in Section 15.10 . This concludes that the views from the loWAONB and the perception of its special qualities will not be significantly affected by the Rampion 2. These

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the available evidence we conclude that the some of the special qualities of the loWAONB will also be significantly affected by the scheme. Consequently, NE advises that the prime statutory purpose of the designations: ‘to conserve and enhance natural beauty’, will be adversely affected in all 3. We conclude therefore that the key policy tests are:</i></p> <ul style="list-style-type: none"> • <i>The acceptability of further harm to the seascape setting of the SDNP and the consequences this has for the already compromised statutory purpose of the designation due to Rampion 1.</i> • <i>The acceptability of harm to the statutory purpose of the CHAONB and loWAONB from</i> • <i>The introduction of wind turbines into the seascape setting of these designations.</i> <p><i>Drawing on the Rampion 1 Design Principles, Natural England has developed a set of principles that we advise should be adopted to reduce the severity of the impacts on the above designated landscapes. These are set out at the end of Section 3.</i></p>	<p>conclusions are supported by the Isle of Wight Council in their s42 consultation response, set out above in this Table. The effects of Rampion 2 on views and perceived special qualities of the CHAONB and SDNP are assessed in Section 15.10. Although there are some significant effects on views and perceived special qualities of these designations, no effects are of such magnitude or significant enough, on their own or cumulatively, to compromise the purposes of designation of the CHAONB or SDNP. These conclusions are set out fully in Section 15.15.</p> <p>Section 15.7 sets out SLVIA topic specific design principles that set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the aim of reducing the magnitude of effects/minimising harm resulting from the Proposed Development on these designated landscapes, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs.</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>Natural England’s advice on Key SLVIA Issues</i></p> <p><i>i) Relationship with Rampion 1.</i></p> <p><i>It is noted that cumulative seascape, landscape and visual effects with other operational, consented and application stage OWF projects were agreed to be scoped out. Rampion 1 is therefore considered as part of the baseline conditions in Section 16.6 and impact assessments in Section 16.10. As noted in Paragraph 16.6.27-28 (and illustrated in the combined ZTV in Figure 16.22), R2 will be viewed from areas where the existing Rampion 1 wind farm is not visible including ‘areas of the Low Weald and High Weald to the north of the South Downs; the edges of the Surrey Hills; and coastal areas of Hampshire and the Solent’ (Paragraph 16.6.28). This statement should be amended to read ‘areas of the Low Weald and High Weald to the north of the South Downs; the edges of the Surrey Hills; and coastal areas of Hampshire including the Chichester Harbour AONB, the Solent and the eastern coastline of the Isle of Wight including portions of the Isle of Wight AONB’.</i></p>	<p>In line with the advice provided by Natural England, paragraph 15.6.28 of the ES has been updated to include reference to coastal areas of Hampshire including parts of the Chichester Harbour AONB and the Solent as areas where Rampion 1 is not currently visible. Field surveys undertaken as part of the SLVIA noted that Rampion 1 could just be seen in views from the eastern coastline of the Isle of Wight in excellent visibility and the ZTV in Figure 15.22, Volume 3 of the ES (Document Reference: 6.3.15) indicates theoretical visibility of Rampion 1 from this eastern coastline of the Isle of Wight.</p>
	<p><i>It is stated in Paragraph 16.6.27 that where Rampion 1 and R2 are visible in combination with each other ‘Rampion 2 will result in visual effects arising from the appearance of Rampion 2 when viewed in-combination with Rampion 1. The apparent height of the larger Rampion 2 turbines (210m to 325m) relative to the smaller operational turbines (140m) is likely to be central to the potential for cumulative visual effects arising from these areas’ NE agrees with this statement. We note that one of the key seascape and visual issues for this</i></p>	<p>As described in Section 15.7 the project design responds to a set of combined design principles that provide embedded environmental measures in respect of the apparent height of WTGs in views from the SDNP and reduce the magnitude of effects/minimise harm resulting from the Proposed Development on the perceived special</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>proposed scheme is the major difference in the size of the turbines between Rampion 1 and R2, which will greatly exacerbate the adverse effects arising from the project on the statutory purpose of the SDNP and the special character of the SHC.</i></p>	<p>qualities of the SDNP. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is a necessary part of the process that is recognised in the NPS EN-1 at paragraphs 4.2.5 - 4.2.6.</p>
<p>Natural England</p>	<p><i>ii) Zone 6, the Rampion Extension Area, Rampion 1 Exclusion Zone and Rampion 1 DML Design Principles. Figure 16.1 in the PEIR illustrates the spatial relationship between Rampion 1, the Rampion 1 Zone 6 and the Rampion Extension Area; the latter two now comprise the R2 Proposed DCO Order Limits We note the area shown as Zone 6 is only a portion of the original Rampion Zone 6 licence area. We understand that part of this area was omitted from the R2 Development Area prior to the PEIR. The area labelled ‘Exclusion Zone’ forms a part of the Rampion 1 Deemed Marine Licence (DML) (Condition 11, Part 2, 11 (1) of Schedule 13 (p.99)) whilst the Rampion 1 ‘Design Principles’ (Condition 11, Part 2, 11 (3a) of Schedule 13 (p.106)) apply to all of</i></p>	<p>As described in full in Section 15.7, the design of the Proposed Development aims to minimise effects on the special qualities of the SDNP, CHAONB and loWAONB through careful design consideration in terms of scale, size and location, and taking account of relevant policy and guidance. The resulting effects of the Proposed Development on the special qualities of these designated landscapes are assessed in Section 15.10 and conclusions drawn in Section 15.15.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Zone 6. For completeness here are the Rampion 1 Design Principles: At Volume 4, Appendix 4.1 (Commitments Register) C-61 the Applicant states: ‘Due regard will be given to design principles held in Rampion 1 Design Plan and design principles to be developed for Rampion 2, with consideration of the seascape, landscape and visual impacts on the South Downs National Park and Sussex Heritage Coast’. And C-66; ‘The Proposed Development will aim to minimise effects on the Special Qualities of the South Downs National Park and High Weald Area of Outstanding Natural Beauty (AONB) through careful design consideration in terms of scale, size and location, and taking account of relevant policy and guidance.’ 2 This High Weald AONB has been scoped out of the PEIR / ES and is no longer relevant consideration to the design of the scheme. However, the CHAONB and loWAONB area relevant considerations to the design of the scheme and should therefore be included in commitment C-66.</i></p>	
<p>Natural England</p>	<p><i>From the information presented in the PEIR NE fails to understand how these commitments by the applicant has been fulfilled. It appears that the design of R2 has not been driven by seascape, landscape, and visual constraints, nor the commitment to ‘minimise effects’ to the prime statutory purpose of 3 designated landscapes or the special character of a Heritage Coast. The Applicant’s own assessment reports significant effects on some of the Special Qualities of the South Downs National Park and CHAONB. No mitigation measures have been proposed to reduce the significance of this effect. If due regard</i></p>	<p>Section 15.7 sets out how the project design responds to a set of combined design principles that contribute to provide embedded environmental measures in respect of the views and special qualities of the SDNP and CHAONB and reduce the magnitude of effects/minimise harm resulting from the Proposed Development on their perceived special qualities, principally</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>is to be paid to the Rampion 1 Design Principles a substantial, rigorous and open-minded consideration of these conditions is required. We request that the Applicant provides a detailed account as to how the Rampion 1 Design Principles have influenced the R2 maximum design scenario as a matter of urgency. We also request clarification on the Applicant's commitment to the design principles as we note their intention to disapply the current DCO. NE advises that more can be done to minimise the adverse effects on designated landscapes which are identified in the SLVIA. Details of these proposals are set out below.</i></p>	<p>through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. These design principles have been developed in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> ● 'Field of view' – reducing the field of view or 'horizontal extent' of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. ● 'Proximity' - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles). ● 'Wind farm separation zones' - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● 'Separation foreground' - avoiding juxtaposition of larger

Stakeholder	Theme	How this is addressed in this ES
		<p>Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible.</p> <p>During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7.</p>
<p>Natural England</p>	<p><i>iii) Advice regarding Turbine Height and Proximity to the Coastline of a Designated Landscape. The last 16 years has witnessed a significant upscaling of the technology used by the offshore wind energy industry. Over this period turbines have increased both in output capacity and size. For coastlines of designated landscapes this upscaling has seen an increase from the 132m high 3.6MW turbines (Sheringham Shoal, Norfolk Coast AONB, closest point 17km) to the 181m high 6.3MW (Gallopier, Suffolk Coast and Heaths AONB; closest point 29.3km). The emerging industry ‘standard’ for the 2020s is 15MW to 20MW turbines potentially reaching heights of 325m as proposed for R2 (325m and 14.2km from the SDNP). When viewed from any given location, the bigger the structure the greater it’s visual prominence. Similarly, the bigger the structure the</i></p>	<p>Natural England’s observations on the upscaling of WTG technology used for offshore wind farms in terms of capacity and size are noted and are part of wider trend towards more efficient turbines with larger rotor diameters in the wind energy sector and is not unique to Rampion 2. This trend is part of the need to make offshore windfarms economically competitive in the energy markets, to meet government targets for renewables, maximise energy gain, increased capacities and efficiencies, and contribute towards</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>greater the distance (and geographic area) from which it can be seen from and the greater the likelihood that individual structures or a collection of them will be prominent within the view. This is especially the case for offshore wind arrays because there is no means to screen them. These basic principles have guided our appraisal of the R2 scheme and the formulating of our comments and advice. We have also used visual comparisons with the Rampion 1 array, which is located in the seascape setting of the SDNP, at a similar distance from the coast to illustrate the likely influence of the upscaling in technology on the seascape setting of the SDNP, CHAONB and IoWAONB</i></p>	<p>meeting climate change targets set out in legislation and Government policy.</p>
<p>Natural England</p>	<p><i>iv) Note about the Apparent Height of Offshore Wind Turbines Understanding the comparative apparent heights of offshore structures is a critical component in the assessment of the scale of effect that they have on the receiving landscape resource and associated visual amenity. The diagram below illustrates this point. Here the smaller structure on the left appears to be same height as the taller structure on the right, which is located a further 11km away. The apparent heights of these differing structures are very nearly the same. A number of parameters need to be incorporated into the measurement of apparent height; the distance to the structure, the height of the structure, the effect of Earth's curvature on the visible heights and the height from which the turbines are viewed. Calculating the apparent heights of offshore structures is however relatively straightforward. Our analysis is based upon the established method</i></p>	<p>Comparisons between the apparent height of the turbines with existing offshore wind turbines, such as Rampion 1, can be useful as a scale reference to assist in the judgement of visual influence. While the comparison of turbine height in Figure 1 of Natural England's response is useful as a diagrammatic illustration, it is not representative of the scale of the turbines when viewed from coastal viewpoints of the study area; nor representative of the true relationship of Rampion 2 with the existing Rampion 1 WTGs, which are often not viewed directly next to each other in the way presented in Figure 1.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>for calculating the visible height of structures offshore. This method is set out in the Scottish Natural Heritage in their 2017 publication ‘Visual Representation of Wind Farms Guidance 2.2’. A diagrammatic representation is shown below at Figure 2 for the simplified case when atmospheric refraction is ignored.</i></p> <p><i>These calculations are also necessary for the creation of the photomontage images as they appear in Chapter 16, Volume 3 Seascape, Landscape and Visual Large Format Images files 1 to 3.</i></p> <p><i>We note SNH’s emphasis on the presence of the Earth’s atmosphere as a critical factor i.e. the influence of the refraction of light in defining the apparent height of structures when seen from a distance. The formula used by NE also incorporates this emphasis on light refraction, using a refraction correction value (0.075) which is universally applied. If effects of light refraction on apparent height are excluded from the formula this value is switched to 0. However, for comparative purposes the important point is that the correction is applied universally. All of the apparent height values provided by NE in our advice have the light refraction value set at 0.075 AOD).</i></p> <p><i>The NE method provides a result in the apparent, or angular (a), height of a turbine as seen by an observer expressed as degrees. Therefore, it is possible to compare the apparent height of a 99m turbine located at 15km away to that of a 190m turbine located at 26km. In this instance (when view from a height of 5m AOD)</i></p>	<p>The apparent scale differences will not, in reality, be viewed in this very direct way, as there is physical separation between WTGs, which means that the scale comparisons will be more subtle than indicated in this image.</p> <p>The scale of the Project turbines is best appreciated at the viewpoints with reference to the photomontages included in the SLVIA (Figures 15.26 to 15.92, Volume 3 of the ES (Document Reference: 6.3.15)). If viewed correctly at the correct printed image size, these provide a close representation of the vertical scale of turbines in actual viewpoints. The wireline visualisations presented in the SLVIA (Figures 15.93 to 15.109, Volume 3 of the ES (Document Reference: 6.3.15)) are the best tool to understand the scale relationship with other offshore WTGs.</p> <p>While the tabular analysis of apparent height may be of some use for considering the ratio of apparent heights of WTGs from viewpoints on the coast to each offshore windfarm, there</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>he values are 0.368 and 0.375 respectively. The 2020 BEIS ‘Review and update of Seascape and Visual Buffer Study for Offshore Wind Farms’ does essentially the same thing. Please see the diagrams the pages located between (p. 140 to 141). See also Figure 1 in this response.</i></p> <p><i>The calculation can also be used to predict the apparent height of (the not yet built) 325m turbines as used in the R2 worst-case scenario. These values can then be compared to the apparent heights of the Rampion 1 array. As the visual effects of the latter are known and can be readily experienced, their visual influence can be used to judge the likely effect of the R2 worst-case scenario turbines when viewed from the same location. This information can also be used to inform the scale of effect judgement and hence the magnitude of change judgement. This is what NE has done.</i></p> <p><i>Using the information provided by the Applicant in Volume 3 Seascape, Landscape and Visual Large Format Images Files 1 to 3, we present information on the comparative height of turbines between Rampion 1 and R2 in Table 1.</i></p>	<p>are limitations in the analysis presented. For example, the analysis in Table 1 of Natural England’s response only considers the apparent height of the closest visible turbine in the array. It does not allow for variations in apparent height that will actually occur between different turbines in the arrays, depending on their distance offshore. Turbines located at greater distance offshore within each windfarm site, will have a lower visible height and less apparent height difference, creating variations and similarities in scale/apparent height between windfarms depending on distance of turbines offshore.</p> <p>There are limitations which raise questions about the applicability of the findings as it cannot be wholly representative of the variations and similarities in apparent height that will actually occur across different parts of the Rampion 1 and 2 arrays from different viewpoints in the study area, which are accounted for in the Applicant’s visual assessment and shown clearly in the visualisations (Figures</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>15.26 to 15.92, Volume 3 of the ES (Document Reference: 6.3.15)).</p> <p>Judgements on significance should properly be based on the assessment material provided in this Chapter and supporting visualisations (Figures 15.26 to 15.92, Volume 3 of the ES (Document Reference: 6.3.15)) which have been undertaken in accordance with best practice guidance (GLVIA3). There is no established guidance which reduces seascape, landscape and visual assessment to a quantitative assessment of values in a table (such as Table 1).</p> <p>It is recognised in GLVIA3 that <i>‘assessing visual effects is not a quantitative process’</i> (para 6.3) and that <i>‘While there is some scope for quantitative measurement of some relatively objective matters... much of the assessment must rely on qualitative judgement about the significance of change’</i> (para 2.23). Variations in the apparent height of turbines between different viewpoints are incorporated in the visual assessment in the SLVIA</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>together with appropriate consideration of other criteria informing magnitude of change and sensitivity to change, to inform judgements on significance of effect. Differences in apparent height of the WTGs, together with other aspects of the appearance of the windfarm site, are shown clearly in the visualisations (Figures 15.26 to 15.92, Volume 3 of the ES (Document Reference: 6.3.15)) in the landscape / seascape context of each viewpoint. The vertical scale of the Project turbines is best appreciated during field evaluation at the viewpoints with reference to the material provided in the ES.</p>
<p>Natural England</p>	<p><i>v) Maximum Development Scenario R2 is described in PEIR Chapter 4 and comprises Wind Turbine Generators (WTG) approximately 13km to 25km offshore, up to three offshore substations, up to four offshore export cables and up to two offshore interconnector export cables. R2 is located immediately to the west, south and east of Rampion 1 (116 turbines, 140m height to blade tip). As set out in Chapter 4, the final choice of WTG and therefore the final capacity of R2 will be subject to a procurement exercise carried out post-consent. Therefore, two different WTG models have been considered:</i></p>	<p>It is noted that there is agreement that the MDS for Rampion 2 is appropriate, given that larger turbines will be more widely visible within the study area and the scale difference with Rampion 1 will be more apparent. The updated MDS for Rampion 2 is described in Section 15.7, which has been reduced to 65 WTGs. The assessment of this MDS ensures that the maximum environmental</p>

Stakeholder	Theme	How this is addressed in this ES
	<ul style="list-style-type: none"> • a ‘smaller WTG type’ comprising up to 116 turbines, with a maximum blade tip height of 210m and a rotor diameter of 172m; and • a ‘larger WTG type’ comprising up to 75 turbines, with a maximum blade tip height of 325m and a rotor diameter of 295m. <p><i>The assessment in the PEIR is based on the ‘Rochdale Envelope’ approach. In the SLVIA a ‘maximum design scenario’ is assessed (the rationale for this provided in Section 16.7). This consists of 75 x 325m blade tip WTGs as shown in Volume 3, Figure 16.1. Visualisations which accompany the SLVIA illustrate this ‘maximum design scenario’. The ‘Rochdale Envelope’ approach (as set out in the Planning Act 2008) is a parameter-based approach to environmental assessment which aims to take account of the need for flexibility in the evolution of detailed design. NE considers this to be an appropriate approach given that larger turbines will be more widely visible within the study area and the scale difference with Rampion 1 will be more apparent, thereby leading to greater effects on the seascape, landscape and visual resource and the prime statutory purpose of 3 designated landscapes. However, one consequence of this is that only the maximum scenario has been assessed; the appearance of the ‘smaller WTG type’ scenario has not been assessed or illustrated.</i></p> <p><i>NE advises that the smaller WTG type model will also result in significant adverse effects on</i></p>	<p>effects are assessed in Sections 15.9 to 15.12 and illustrated in Figures 15.26 to 15.92, Volume 3 of the ES (Document Reference: 6.3.15) for one clear worst-case/MDS. It is noted that it is NE’s opinion that the ‘smaller WTG type’ (shown in Table 15-25) will also result in significant adverse effects on the seascape, landscape and visual resource.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the seascape, landscape and visual resource and the prime statutory purpose of 2 and possibility 3 designated landscapes. Due to the lower maximum blade tip height of the 210m WTG, the geographical extent of adverse effects is likely to be smaller than that for the ‘maximum design scenario’.</i></p>	
<p>Natural England</p>	<p><i>vi) Good Design Policies contained within EN-1 (Overarching National Policy for Energy) set out the importance of a scheme’s appearance (para. 4.5.1 – 4.5.3). These state that the ExA needs to be satisfied that energy infrastructure developments are sustainable, ‘attractive’ and that the Applicant has taken both the functionally and aesthetics of the scheme into account as a part of the design process. Paragraph 4.5.5 goes on to state that: ‘...applicants should be able to demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.’</i></p>	<p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors, including demonstrating how its appearance provides a ‘good aesthetic’, as far as is possible. SLVIA topic specific design principles are described, which set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the aim of reducing the magnitude of effects of the Proposed Development, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these combined</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>The need for good design was an important issue in the examination of the Rampion 1 scheme and a particular focus of the ExA during the Issue Specific Hearings. The result of this attention was the Rampion 1 DML requirement for a Turbine Exclusion Zone and set of Design Principles (as set out above). The purpose of these requirements was to reduce the visual impact of the Rampion 1 array on nationally important landscape receptors located within the SHC portion of the SDNP, and to achieve</i></p>	<p>principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7.</p> <p>Opportunities for ‘Good Design’ of an offshore wind farm are however limited to some extent, by the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario (a necessary part of the process that is recognised through the NPS at paragraphs 4.2.5-4.2.6) also reduces opportunities for good design.</p> <p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors, and the design principles that have been applied specific to the design of Rampion 2, with the aim of reducing the magnitude of effects of the Proposed Development and minimising harm to the</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>an aesthetically coherent alignment of the turbine rows (3. iv) in order that the visual appearance of the array was enhanced as far as possible. To this end these mitigation measures, when viewed from Beachy Head for instance, were successful.</i></p>	<p>special qualities of national landscape designations. During the design process these design principles were applied to define the reduce extent of the Rampion 2 array area such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7.</p>
<p>Natural England</p>	<p><i>As set out above (see: ‘Note about Zone 6, the Rampion Extension Area, Rampion 1 Exclusion Zone and Rampion 1 DML Design Principals’) NE fails to understand from the information provided by the Applicant, how the requirement for Good Design (as set out in EN-1) has been addressed.</i></p> <p><i>As currently configured in the maximum development scenario, the R2 design for 75 turbines with a maximum blade tip height of 325m, as set out in Figure 16.1, appears to entirely disregard the Design Principles and Exclusion Zone of the Rampion 1 DML measures which were specifically included in order that policy requirement for Good Design was fulfilled. As R2 is an extension to the Rampion 1 array it is our view that the mitigation measures contained within the Rampion 1 DML are equally applicable to the design of the R2 scheme.</i></p>	<p>The Exclusion Zone of the Rampion 1 DML is located entirely outside the Rampion 2 array area boundary. Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors, and the design principles that have been applied specific to the design of Rampion 2, with the aim of reducing the magnitude of effects of the Proposed Development and minimising harm to the special qualities of national landscape designations. These design principles were developed in consultation with Natural England, drawing on the Rampion 1 design principles and those specifically recommended by Natural England for Rampion 2 during consultations.</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7.</p>
<p>Natural England</p>	<p><i>In addition, it is clear from the Applicant’s photomontages that the in-combination effect of the Rampion 1 and R2 arrays (the difference in turbine heights and row spacing) will be visually incoherent, rendering the combined Rampion 1/R2 array aesthetically unattractive and noting that the existing Rampion 1 is already a significant element within the seascape setting of the SDNP, Natural England advises that the development of R2 both in Zone 6 and the westerly extension of the existing array has the potential to further adversely affect the seascape setting of the SDNP.</i></p>	<p>Effects on the seascape setting of the SDNP are assessed in Section 15.10. Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors, including demonstrating how its appearance provides a ‘good aesthetic’, as far as is possible. SLVIA topic specific design principles are described, which set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the aim of reducing the magnitude of effects of the Proposed Development on the seascape setting of the SDNP, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. This includes a principle</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>Constructing in both the undeveloped zone 6 area of Rampion 1 and the new extension zone poses several significant impacts to the designated landscapes. It would result in a hybrid (mixed) array where the new, larger turbines are clearly visible alongside and between Rampion 1. It would also enclose the bay by significantly reducing the extent of open views from the shore to horizon and thereby enclosing a greater portion of the visible horizon. The construction of substantially larger turbines (325m to blade tip) also creates a more disjointed and jarring visual effect. Height of turbines is also a significant factor in determining the extent of the visual envelope and therefore the geographical extent of probable significant adverse effects which will result from the construction of such schemes.</i></p> <p><i>Natural England advises that in order to prevent or at least reduce the magnitude for these effects that suitable principles of good design must be presented for consideration. They should seek to reduce any possible detrimental effects of the statutory purposes of the South Downs National Park and deliver a balanced and definable set of objects in the seascape.</i></p>	<p>which seeks to achieve a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays.</p> <p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ and how project design responds to a set of combined design principles that contribute to provide embedded environmental measures in respect of the views and special qualities of designated landscapes and reduce the magnitude of effects/minimise harm resulting from the Proposed Development on their perceived special qualities, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. These design principles have been developed in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> • ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. • ‘Proximity’ – increasing the distance of Rampion 2 from most sensitive

Stakeholder	Theme	How this is addressed in this ES
		<p>areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles).</p> <ul style="list-style-type: none"> ● ‘Wind farm separation zones’ – achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● ‘Separation foreground’ – avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7.</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>vii) Natural England’s Recommended Design Principles</i></p> <p><i>A key issue for R2 OWF is not to undo important location and design decisions that were made and secured in the Rampion 1 DCO in order to reduce the visual effects of Rampion 1. There is no evidence that SLVIA issues have driven the design of the R2. Aspects of wind farm design that can influence seascape, landscape and visual effects include:</i></p> <ul style="list-style-type: none"> • <i>The number of turbines,</i> • <i>Turbine size / scale (including relative size in comparison to existing wind farms),</i> • <i>Position on the skyline (including in relation to existing wind farms),</i> • <i>Extent of the wind farm across the skyline (the lateral spread); and</i> • <i>Turbine layout, including balance, gaps and evenness as seen from key viewpoints.</i> 	<p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape, landscape and visual receptors. SLVIA topic specific design principles are described, which set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the aim of reducing the magnitude of effects of the Proposed Development, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. As described above and in full in Section 15.7, the spatial extent of the Rampion 2 array area has been reduced, which reduces the horizontal spread of WTGs visible; increases the distance of Rampion 2 from the most sensitive areas of coastline (reducing the apparent height and visibility of WTGs); and achieves a separation between the Rampion 1 and Rampion 2 arrays in key views, with a better balance in apparent WTG size.</p>
Natural England	<p><i>Natural England understand from the Applicant’s assessment that there will be significant effects on some of the Special Qualities of the SDNP and</i></p>	<p>Section 15.7 sets out how Rampion 2 responds to ‘good design’ in respect of seascape,</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>CHAONB. However, no mitigation/design measures have been proposed to reduce the significance of this effect. It is Natural England’s view that more can and should be done to minimise the adverse effects on designated landscapes which are identified in the SLVIA. Natural England’s position is that in order to reduce the magnitude of the visual effects, the following principles should be adopted by R2:</i></p> <ul style="list-style-type: none"> <i>• There should be no turbines constructed within Zone 6</i> <i>• Reducing the combined horizontal extent (lateral spread) of turbines associated with a visually combined Rampion 1 and R2 scheme, or</i> <i>• There should be perceptible separation distance (from all land-based viewpoints) between the existing Rampion 1 OWF and the new R2 array by concentrating development in the western end of the Rampion Extension area. The distance should be sufficient that a clear distinction can be made between the two arrays, in order that they are perceived as separate objects in the seascape when viewed from the shore and from within the SDNP.</i> <i>• Clear lines of sight should be left between the arrays (Rampion 1 and R2), so that open views to the horizon are maintained when viewed from shore and from within the SDNP.</i> <i>• The design of the new array should aim to balance the two arrays as far as practicable in terms of apparent turbine size and spacing, taking advantage of the effects of perspective to reduce any apparent difference in size between turbines</i> <i>• Implement reduced aviation lighting intensity for the Rampion 1 array (from 2000cd to 200cd). The Applicant has</i> 	<p>landscape and visual receptors and how project design responds to a set of combined design principles, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. These provide embedded environmental measures in respect of the views and special qualities of designated landscapes and reduce the magnitude of effects/minimise harm resulting from the Proposed Development on their perceived special qualities. These design principles have been developed in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> • ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. • ‘Proximity’ - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential

Stakeholder	Theme	How this is addressed in this ES
	<p><i>already agreed to the dimming of aviation lights to 200cd where visibility conditions permit.</i></p>	<p>benefits to other design principles).</p> <ul style="list-style-type: none"> ● ‘Wind farm separation zones’ - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● ‘Separation foreground’ - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7. As noted in Section 15.7, a reduction in the intensity of aviation lights to no less than 200cd will occur during operation where visibility conditions permit.</p>

Stakeholder	Theme	How this is addressed in this ES
Natural England	<p><i>Natural England advise that these measures are adopted to reduce the geographical scale of the significant effects and prevent further degradation of landscape and visual receptors located in the coastal portion of the SDNP and SHC. However, these measures will not prevent the effects on designated landscapes from being significant, rather they will reduce the geographical scale of the effects as the 3rd objective would not mitigate for the significant effects on the loWAONB and CHAONB. For the former, it may even intensify the significant effects further. Significant effects would still occur on receptors located in the central portion of the SDNP (for instance LCA R3 and at VPs 21, 33 and 50). However, on balance this is the best possible outcome that NE can envisage should R2 be consented. In addition, it is NE’s view that such a design would be the most likely to fulfil the requirement for Good Design as set out in EN-1.</i></p>	<p>Effects on the views from and perceived special qualities of the SDNP, CHAONB and loWAONB are assessed in Section 15.10. Section 15.7 of this SLVIA sets out how Rampion 2 responds to ‘good design’ including the design principles and changes that have been applied to the Project to reduce effects on the CHAONB, loWAONB and SDNP, including from receptors located in the central portion of the SDNP (e.g. LCA R3 and at Viewpoints 21, 33 and 50).</p>
Natural England	<p><i>Detailed comments on the SLVIA</i></p> <ul style="list-style-type: none"> <i>i) Offshore visibility</i> <i>ii) SLVIA Methodology</i> <i>iii) Assessing effects on Designated Landscapes</i> <i>iv) Baseline information including sensitivity</i> <i>v) Seascape</i> <i>vi) Landscape</i> <i>vii) Visual</i> <i>viii) Special Qualities</i> <i>ix) Assessment of Effects – Construction</i> <i>x) Assessment of Effects – Operation</i> 	<p>Further detailed comments on SLVIA are provided by Natural England which can be viewed in full in their s42 Consultation Response. The SLVIA in this Chapter has been updated to take on board specific comments and observations on receptors in these detailed comments and incorporated within the ES chapter section as follows:</p> <ul style="list-style-type: none"> i) Offshore visibility is addressed in Section

Stakeholder	Theme	How this is addressed in this ES
		<p>15.6, through the assessment findings in Section 15.10 and conclusions in Section 15.15.</p> <p>ii) A full SLVIA Methodology is provided in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference 6.4.15.2) and summarised in Section 15.5 and 15.8.</p> <p>iii) Effects (operational) on Designated Landscapes are assessed in Section 15.10.</p> <p>iv) Baseline information including sensitivity is described in Section 15.6 and Section 15.10.</p> <p>v) Seascape effects (operational) are assessed in Section 15.10.</p> <p>vi) Landscape effects (operational) are assessed in Section 15.10.</p> <p>vii) Visual effects (operational) are assessed in Section 15.10.</p> <p>viii) Effects on Special Qualities of designated landscapes (operational) are assessed in (Section 15.10).</p> <p>ix) Assessment of effects during construction are assessed in Section 15.9.</p> <p>x) Assessment of effects during operation are</p>

Stakeholder	Theme	How this is addressed in this ES
assessed in (Section 15.10).		
Natural England	<p><i>Assessment Summary/NE Conclusion SLVIAs (and LVIAs) have a tendency to be complex, highly interconnected and multifaceted documents which reflect the nature of their subject matter. Assessment of effects upon the natural beauty and hence the statutory purpose of designated landscapes only adds to this complexity. NE has reviewed many SLVIAs and LVIAs since the introduction GLVIA3 in 2013 and we now have considerable experience in distilling the aspects of the assessment which pertain to designated landscapes. As SLVIAs/LVIAs address effects in both designated and non-designated landscapes, separating out those elements which apply to designated landscapes alone can, for some schemes, be a complex task. In this instance the PEIR has successfully achieved this task.</i></p>	<p>Agreement that the SLVIA successfully separates out effects that apply to designated landscapes is welcomed. Effects on designated landscapes (during operation) are assessed in Section 15.10 for each of the relevant receptors – SDNP, CHAONB and loWAONB.</p>
Natural England	<p><i>GLVIA 3 provides a pithy reminder of the pitfalls into which with LVIA / SLVIAs can fall (paragraph 3.35 p.41). The 3rd bullet point states ‘losing sight of the most glaringly obvious significant effects because of the complexity of the assessment’ should be avoided. To assist RWE, Natural England offers the following simple clear and accessible explanation of the issue as we understand it. As described in the PEIR the turbines of the R2 maximum design scenario are too big and located too close to the coastline of the SHC portion of the SDNP. Their sheer size and their lateral spread, combined with the marked contrast in height with the</i></p>	<p>The Exclusion Zone of the Rampion 1 DML is located entirely outside the Rampion 2 array area boundary, thereby adhering to the requirement for a Structures Exclusion Zone as set out in the Rampion 1 DML. The proposed Rampion 2 WTGs cannot be entirely excluded from the Rampion Zone 6 area, however the spatial extent of the Rampion 2 array area has been reduced and designed</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>existing Rampion 1 turbines, will be visually incoherent and result in significant cluttering of the seascape setting of the SDNP and dramatically degrade views out to sea from Beachy Head and Birling Gap. For this reason, NE advise that turbines should be excluded from the Rampion Zone 6 area thereby adhering to the Design Principals and requirement for a Turbine Exclusion Zone as set out in the Rampion 1 DML.</i></p>	<p>according to a set of SLVIA specific design principles which limit the extent of Rampion 2 within the Zone 6 area, reduce its field of view (lateral spread), increase its distance offshore (from the SDNP) and provide separation from Rampion 1, as described in full in Section 15.7. The changes applied to the design of Rampion 2 have reduced the magnitude of effects of the Proposed Development and minimise its harm to the special qualities of the SDNP, as explained fully in Section 15.7.</p>
<p>Natural England</p>	<p><i>The extension of the influence of turbines westwards, through development of the Rampion Extension Area will increase the industrialisation of the seascape setting of the SNDP. Their presence in the seascape setting of the SDNP will further degrade the quality of views out to sea which are already influenced by the turbines of the Rampion 1 array and lead to further loss of natural beauty for which this landscape was designated. The westward expansion will also result in significant effects on the seascape setting of the CHAONB (although this will be limited) and, more extensively, the eastern portions of the loWAONB at Bembridge Down and St. Boniface Down resulting in further loss of natural beauty for these designations as well. As a consequence of these significant adverse effects on both the SDNP,</i></p>	<p>It is noted that Natural England’s comments imply that Rampion 1 has already degraded the quality of the seascape setting and views out to sea from the SDNP, which are already influenced by offshore WTGs.</p> <p>The effects of the westward expansion of Rampion 2 on views from and the perceived special qualities of the CHAONB are assessed in Section 15.10. These effects are recognised by Natural England as being limited.</p> <p>The effects of Rampion 2 on views and perceived</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>CHAONB and loWAONB the Applicant judges that some of the special qualities for these designations will be adversely affected in multiple locations throughout areas. NE agrees with this judgement.</i></p>	<p>special qualities of the loWAONB are assessed in Section 15.10. This concludes that the views from the loWAONB and the perception of its special qualities will not be significantly affected by the Rampion 2. These conclusions are supported by the Isle of Wight Council in their s42 consultation response, set out above in this Table 15-7.</p>
<p>Natural England</p>	<p><i>NE concludes therefore that the statutory purpose of all three of these designated landscapes will be adversely affected by the R2 scheme. We consider therefore that the key policy tests are the acceptability of further harm to the statutory purpose of the SDNP and special character of the SHC, and the acceptability of the harm to the statutory purpose of the CHAONB and loWAONB.</i></p>	<p>The effects of Rampion 2 on views and perceived special qualities of the loWAONB are assessed in Section 15.10 and are found to be not significant. The effects of Rampion 2 on views and perceived special qualities of the CHAONB and SDNP are also assessed in Section 15.10. Although there are some significant effects on views and perceived special qualities of these designations, no effects are of such magnitude or significant enough, on their own or cumulatively, to compromise the purposes of designation of the CHAONB or SDNP. These conclusions are set out fully in Section 15.15. It is noted that Natural England’s opinion is that Rampion 1 has already compromised the</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>statutory purpose of the SDNP. Section 15.7 sets out how the design of Rampion 2 shows regard to the statutory purpose of these designations with the aim of minimising harm to their special qualities.</p>
<p>SDNPA</p>	<p><i>The SDNPA has commissioned White Consultants (April 2021) to consider seascape character sensitivity with regard to views and the character of the seascape. The final report, which has previously been shared with RWE is included in Appendix 3. Based on this detailed analysis, 6 seascape character zones (SCZ) were identified, which were then used to identify the sensitivity to offshore windfarm development. Key findings from this assessment were that the SCZ east of the existing Rampion 1 array was highly sensitive and turbines of any height should not be installed in this area (see fig.1). There was medium sensitivity found in the SCZ west of the existing array and therefore further turbines should not exceed 225m in height.</i></p>	<p>The proposed Rampion 2 WTGs cannot be entirely excluded from SCZ01 however, the spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which limit the extent of Rampion 2 within SCZ01, avoiding the area to the east of Rampion 1 in favour of the area to the south of Rampion 1, which is further offshore at greater distance from the Heritage Coast of the SDNP, while also reducing its field of view (lateral spread) and providing separation from Rampion 1, as described in full in Section 15.7. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA	<p><i>White Consultants, on behalf of the SDNPA have completed a review of the SLVIA included in the PEIR. This is included in full at Appendix 2. The report comprises a review of the SLVIA in terms of approach to seascape character, sensitivity and cumulative effects, a comparison of the seascape character assessment in the SLVIA with the SCZ established in the April 2021 report and makes recommendations on how the scheme could be improved and effects mitigated.</i></p>	<p>numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is a necessary part of the process that is recognised through NPS EN-1 at paragraphs 4.2.5 - 4.2.6.</p> <p>The review in Appendix 2 has been considered and where justified, comments are reflected in the updated ES methodology (Section 15.8), baseline (Section 15.7) and assessment and findings (Section 15.10 and 15.12) of this chapter.</p> <p>Recommendations on how the scheme could be improved and effects mitigated have informed the design principles set out in Section 15.7. These design principles have been developed in consultation with stakeholders and the project design response for Rampion 2 provide embedded environmental measures in respect of the views and special qualities of designated landscapes and reduces the magnitude of effects/minimising harm resulting from the Proposed Development on their perceived special qualities.</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA	<p><i>The SDNPA consider the SLVIA has downplayed the impacts of the turbines, in terms of sensitivity, visual effects and significance. As a result of this understatement, it does not sufficiently guide development away from locations which significantly detract from views from the National Park and Heritage Coast to the east, or reduce the size of the turbine proposed. Insufficient regard has been given to the statutory purposes of the Park and the requirement that the applicant must give weight to both its status and setting. This is in part a result of the assessment applying definitions for magnitude that are not based on accepted definitions, nor indeed being in line with those used in the assessment of other windfarm proposals. Although the SLVIA mentions documents which specifically address seascape and offshore wind energy in its references, it does not take on board the more detailed and focused approach and context of these documents.</i></p>	<p>The SLVIA undertaken within the PEIR did not ‘downplay’ the impacts of Rampion 2, in terms of sensitivity, visual effects and significance. On the contrary, the significant seascape and visual effects of Rampion 2 were identified in the PEIR, including those on certain perceived qualities of the SDNP. The design of Rampion 2 (described in Section 15.7) demonstrates due regard to conserving natural beauty, through good design and embedded environmental measures that address adverse impacts to minimise ‘harm’ and avoid ‘compromising’ the purposes of the SDNP. Magnitude of change definitions in the PEIR assessment were appropriate and consistent with accepted definitions (Landscape Institute, 2013) but have been updated with slight revisions made in this ES assessment methodology (Section 15.8) to address comments provided and achieve common ground.</p>
SDNPA	<p><i>The SDNPA do not accept that the proposed worst-case scenario being assessed has taken appropriate consideration of the significant effects and taken steps to avoid these through the application boundary and design. Furthermore, despite suggesting the</i></p>	<p>The maximum design scenario being assessed in the ES has taken appropriate consideration to the seascape, landscape and visual effects of Rampion 2 and</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>application boundary reflects the consented area for Rampion 1, it continues to include a significant part of the Exclusion Zone identified in the Development Consent Order for the original windfarm. We therefore continue to object to the extent of the application boundary, particularly as it extends to the east of the existing array and believe the maximum design scenario should reduce the height of the turbines to 225m.</i></p>	<p>shown due regard to the purposes of the SDNP through the design process. The Rampion 2 array area is now located entirely outside the Rampion 1 structures exclusion zone and has been designed so that it does not extend to the east of the Rampion 1, instead being located entirely to the south and west of the existing array, in order to minimise effects on the Heritage Coast area of the SDNP in particular. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is a necessary part of the process that is recognised through NPS EN-1 at paragraphs 4.2.5 - 4.2.6.</p>
SDNPA	<p><i>Whilst it is appreciated that the April 2021 study arrived too late to be taken into consideration in the PEIR SLVIA, we request that it is referenced in the</i></p>	<p>The SDNP Offshore Wind Farms Buffer Study (SDNPA/White Consultants, April 2021) (herein ‘the SDNP buffer</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>final SLVIA in the Environmental Statement.</i>	<p>study') is referenced in this Chapter of the ES. Specific points in terms of the approach and methodology for the SLVIA, seascape character/zoning, sensitivity and impact magnitude have been considered and where considered justified, reflected in the updated findings presented in the baseline (Section 15.7) and assessments (Section 15.10 and 15.12) of this chapter. There is however, some specific issues with the approach to the SDNP buffer study which are addressed under specific comments in this table below, and a fundamental issue with the overall premise of the study. The SDNP buffer study appears to render Rampion 2 and the seascape of Sussex Bay offshore from the SDNP largely unacceptable and as not having capacity for further development, apart from seascape beyond 40km offshore from the SDNP. This approach does not accord with Government targets to increase offshore windfarm capacity, at a time when Government has brought forward targets to reduce GHG emissions. Draft NPS EN-1 (DESNZ,</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>2023) states that <i>‘Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant new offshore wind infrastructure’</i> and that <i>‘the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy’</i>. The fundamental aim of the SDNP buffer study <i>‘to avoid significant adverse effects on high sensitivity receptors’</i> is potentially flawed, as precedent shows it is not necessary or possible to develop such low impact projects that avoid significant effects, in order to be considered acceptable and consentable in the planning balance, when weighing up all relevant factors e.g. energy targets, government policy etc.</p> <p>The NPS requirement is to have <i>‘due regard’</i> to the statutory purpose of the SDNP, which has been had. The design of Rampion 2 (described in Section 15.7)</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA	<p><i>It is disappointing that the scoping boundary still includes the area east of the existing array and references it being in line with the design principles for Rampion 1, which is not the case given the exclusion zone included as part of the previous DCO. Furthermore, the design principles for Rampion 1 were relevant for turbines far smaller than the current proposals. Despite there having been a reduction in the application boundary following the scoping opinion, no analysis has been presented on how this amendment would impact the Theoretical Field of View. From the earlier baseline tables these all look to increase significantly from all the VP's within the SDNPA and Heritage Coast. The figures presented in the baseline tables are repeated later – so this suggested there is no reduction from the 'amended' scheme. This does not support the claim that this is being offered as an effective mitigation measure.</i></p>	<p>demonstrates due regard to conserving natural beauty, through good design and embedded environmental measures that address adverse impacts, minimise 'harm' and avoid 'compromising' the purposes of the SDNP.</p> <p>The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which limit the extent of Rampion 2, avoiding the area to the east of Rampion 1 in favour of the area to the south of Rampion 1, which is further offshore at greater distance from the Heritage Coast of the SDNP, while also reducing its field of view (lateral spread) and providing separation from Rampion 1, as described in full in Section 15.7. The Exclusion Zone of the Rampion 1 DML is now located entirely outside the Rampion 2 array area boundary. As described in full in Section 15.7, the design of the Proposed Development provides embedded environmental measures that minimise effects on the special qualities of the SDNP through careful design</p>

Stakeholder	Theme	How this is addressed in this ES
		consideration in terms of scale, size and location, and taking account of stakeholder feedback, relevant policy and guidance.
SDNPA	<i>There are several references to the 2011 South Downs Integrated Landscape Character Assessment, although we believe this may be a typo as the descriptions reflect 2020 version. However, the assessment has not picked up on the key sensitivities for each character area and therefore further clarification and consideration is required.</i>	The Landscape Character Assessment presented in the PEIR and Section 15.6 of this ES reflects the 2020 South Downs Landscape Character Assessment (SDNPA, 2020).
SDNPA	<i>Paragraph 16.7.19 refers to the ‘maximum adverse effects being balanced between receptors east and west’. This suggests that the impact to the West, and on the Isle of Wight AONB specifically, needs to be balanced. This suggests an additional design principle is being applied – this wasn’t discussed at the technical working group. Greater weight should be given to the combination of National Park and Heritage Coast designations, as advised in the Offshore Energy Strategic Environmental Assessment: Review and update of Seascape and Visual Buffer Study for Offshore Windfarms (2020) BEIS/Hartley Anderson. The distance of the array from the loW AONB is greater – so this seems a spurious justification for balancing out the quantum of development East to West.</i>	Recommendations on how the Project could be improved and effects mitigated have informed the design principles set out in Section 15.7 . These design principles have been developed in consultation with stakeholders and the project design response for Rampion 2 provides embedded environmental measures in respect of the views and special qualities of the SDNP and reduces the magnitude of effects / minimises harm resulting from the Proposed Development on its perceived special qualities. The qualities and statutory purpose of the SDNP have been given due regard. The impact of Rampion 2 on the perceived character and views from the Isle of

Stakeholder	Theme	How this is addressed in this ES
SDNPA (Appendix 16.2)	<p>2. Review of PEIR SLVIA method <i>2.2 The method is 50 pages which is long. One page addresses cumulative effects- this is very short and therefore does not seem proportionate.</i></p>	<p>Wight has been assessed as not significant (in agreement with the Isle of Wight Council). Embedded design measures for receptors on the Isle of Wight have therefore not been applied. The need to balance significant impacts to the west have been considered in relation to receptors in West Sussex, with the western extent of the array area reduced slightly and a separation zone between Rampion 1 and 2 introduced to allow more distinction between the arrays in views from the west.</p> <p>The description of the methodology for assessing cumulative seascape, landscape and visual has been expanded in Appendix 15.2 SLVIA Methodology, Volume 4 of the ES (Document Reference: 6.4.15.2).</p>
SDNPA (Appendix 16.2)	<p><i>2.3. The method relies heavily on GLVIA 3 which has less than half a page dedicated to seascape character assessment (GLVIA 5.6). Though the PEIR SVIA mentions documents which specifically address seascape and offshore wind energy in its references, it does not appear to take on board the more detailed and focused approach and context of these documents. GLVIA 3 states that methods to assess seascape character are being</i></p>	<p>The SLVIA methodology in Appendix 15.2: SLVIA methodology. Volume 4 of the ES (Document Reference: 6.4.15.2) is considered robust and in line with both GLVIA3 and other seascape and offshore wind energy specific documents referenced in Section 15.17 and has been</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>developed and practitioners should refer to the latest available guidance (GLVIA 5.6). For instance, MMO seascape sensitivity guidance, 2020, states that it is relevant to both SVIAs for specific developments and strategic assessments (MMO, 2020, 1.2). As such it refines and considers in more detail and precision the factors which should be considered in determining the sensitivity of any given area. As Rampion 2 is a large-scale development set within a seascape this is proportionate to use.</i></p>	<p>tested and found to be robust for other NSIP projects and through recent Examinations. Some of the seascape specific documents referred to provide a guide to undertaking seascape character assessment, but are not necessarily guidance for undertaking impact assessments, for which GLVIA3 is the definitive guidance. The MMO seascape sensitivity guidance (MMO, 2019 [2020]), has been considered and criteria for determining sensitivity (value and susceptibility) have been updated in the SLVIA methodology in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.15.2) to better reflect criteria set out in the MMO seascape sensitivity guidance.</p>
<p>SDNPA (Appendix 16.2)</p>	<p><i>2.4. The iterative assessment and design section (1.3) is stated as aiming to design out significant effects. The maximum development scenario assessed clearly does not achieve this. As the SLVIA understates the effects, it does not sufficiently guide development away from locations which significantly detract from views from the National Park and Heritage Coast to the east, or reduce the size of turbine proposed.</i></p>	<p>The design process for Rampion 2 undertaken following PEIR reduces impact magnitude and significance through a reduction in the spatial extent of the Rampion 2 array area and the number of WTGs proposed. As described in full in Section 15.7, the design of the Proposed Development provides embedded environmental measures that minimise</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA (Appendix 16.2)	<p><i>Effects on seascape character (Section 1.5)</i> <i>2.5. Key factors to be considered in sensitivity- value:</i> <i>Various factors mentioned in the assessment in 1.5.11 are mixed together under three headings (designations, quality and experience) which does not aid clarity. This reinforces the need to assess the effect on the seascape zones set out in the SDNPA, 2021 study with a clearer underpinning rationale. For example, the contribution of the seascape to the wider setting of the National Park and Heritage Coast, and to specific relevant special qualities, should be taken into account.</i></p>	<p>effects on the special qualities of the SDNP through careful design consideration in terms of scale, size and location, and taking account of stakeholder feedback, relevant policy and guidance. Precedent shows it is not necessary or possible to develop such low impact projects that avoid significant EIA effects in order to be considered acceptable and consentable in the planning balance. Due regard to the statutory purpose of the SDNP is being had through the project design process, in order to reduce adverse seascape, landscape and visual effects, their magnitude and geographic extent.</p> <p>Key factors considered in assessing the value component of sensitivity are set out in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2) which are based on those established in guidance (Landscape Institute, 2013). Designations, quality and experience are appropriate as the main criteria, are set out further in Table 1-2 of Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>Reference: 6.4.15.2) and cover the factors affecting value described in MMO seascape sensitivity guidance (MMO, 2019) (Annex C). The SDNP buffer study defines seascape zones based on an applied visual buffer extent from the SDNP and partially relates to defined MCAs, however it does not define seascape character areas – this is stated at para 4.16 <i>‘this is not a character assessment’</i> and <i>‘areas are defined as seascape zones to avoid any implication that they are characterised as seascape character areas’</i>. This brings into question whether these seascape zones defined in the SDNP buffer study are an appropriate baseline from which to assess the effects of the Rampion 2. Taking on board SDNPs comments and the SDNP buffer study seascape zones, the approach adopted in the ES assessment of seascape effects presented in Section 15.10 has been to further define a number of seascape character areas (SCAs) that sit within the national level MCAs and the setting of the SDNP, with a more detailed level of</p>

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<p>SDNPA (Appendix 16.2)</p>	<p><i>2.6. Key factors to be considered in sensitivity- susceptibility: Various factors mentioned in the assessment in 1.5.12-1.5.13 are mix of landscape and seascape which leads to unclear criteria in some cases. For example, the nature of the coastal edge and visual characteristics such as the presence of key views and intervisibility are not included. The differentiation between coastal and seascape pattern and foci would also be helpful. As above, this reinforces the need to assess the effect on the seascape zones with a clearer underpinning rationale.</i></p>	<p>assessment undertaken for these SCAs, informed by the findings/sensitivity assessments of the SDNP buffer study. The boundaries of SCAs are however, based on other factors which define such areas e.g. bathymetry and seabed geology as guided by the Seascape Assessment for the South Marine Plan Areas (MMO, 2014) (rather than visual buffers from the SDNP).</p>
		<p>Key factors considered in assessing the susceptibility component of sensitivity are set out in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2) and are considered appropriate, with assessments made clear using evidence and professional judgement. Further seascape specific criteria have been added in order to address comments, including key views and intervisibility; and differentiation between coastal and seascape pattern and foci. As above, taking on board SDNPs comments and the SDNP buffer study seascape zones, the approach adopted in the ES assessment of seascape effects presented in Section</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>15.10 has been to further define a number of SCAs that sit within the national level MCAs and the setting of the SDNP, with a more detailed level of assessment undertaken for these SCAs, informed by the findings/sensitivity assessments of the SDNP buffer study.</p>
<p>SDNPA (Appendix 16.2)</p>	<p><i>2.7. Table 1-3 sets out the seascape/landscape magnitude of change ratings. It is not clear how ‘large scale’ and ‘medium scale’ elements are defined. The intermediate categories are stated as a ‘combination of criteria’ rather than defined intermediate scales and extent of change which would be more helpful.</i></p>	<p>Table 1-3, Appendix 15.2: SLVIA methodology, Volume 4, of the ES (Document Reference: 6.4.15.2) has been updated to clearly define the large scale’ and ‘medium scale’ elements and add full definitions for intermediate categories (medium-high and medium-low).</p>
<p>SDNPA (Appendix 16.2)</p>	<p><i>2.8. The study just assesses the effects on the national Marine Character Areas e.g. Table 16.25 and 16.30. It does not subdivide or refine these spatially. Different parts of MCA 5 are given different levels of sensitivity or magnitude of change, but this is not shown graphically. This is an imprecise approach. Effects on MCAs remain valid as they apply to all receptors in the study area, but they should be refined.</i></p>	<p>The approach adopted in the ES assessment of seascape effects presented in Section 15.10 has been to further define a number of seascape character areas (SCAs) that sit within the national level MCAs and the setting of the SDNP, with a more detailed level of assessment undertaken for these SCAs, informed by the findings/sensitivity assessments of the SDNP buffer study. The boundaries of SCAs are however, based on other factors which define such</p>

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<p>SDNPA (Appendix 16.2)</p>	<p><i>2.9. It is appreciated that the White Consultants, 2021 study was not available to RWE until April 2021. However, it now forms the most detailed and focused study on sensitivity to wind farms with boundaries which reflect the characteristics of the area and the relationship between Rampion 1 and the potential Rampion 2 area with the National Park. As such, the effects of the proposals on zones set out in the SDNPA, 2021 study should be carried out in parallel with the MCA assessment using an improved method based on the comments above. In our view, the sensitivity study zones better reflect the National Policy context of EN-1 and EN-3 in regard to offshore wind turbine development and effect on them should be assessed as part of the tools to avoid or minimise effects on the national designation of the National Park.</i></p>	<p>areas e.g. bathymetry and seabed geology as guided by the Seascape Assessment for the South Marine Plan Areas (MMO, 2014) (rather than visual buffers from the SDNP).</p> <p>The SDNP buffer study defines seascape zones based on an applied visual buffer extent from the SDNP and partially relates to defined MCAs, however it does not define seascape character areas – this is stated at para 4.16 ‘this is not a character assessment’ and ‘areas are defined as seascape zones to avoid any implication that they are characterised as seascape character areas’. This brings into question whether these seascape zones defined in the SDNP buffer study are an appropriate baseline from which to assess the effects of the Rampion 2. Taking on board SDNPs comments and the SDNP buffer study seascape zones, the approach adopted in the ES assessment of seascape effects presented in Section 15.10 has been to further define a number of seascape character areas (SCAs) that sit within the national level</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>MCA and the setting of the SDNP, with a more detailed level of assessment undertaken for these SCAs, informed by the findings/sensitivity assessments of the SDNP buffer study. The boundaries of SCAs are however, based on other factors which define such areas e.g. bathymetry and seabed geology as guided by the Seascape Assessment for the South Marine Plan Areas (MMO, 2014) (rather than visual buffers from the SDNP).</p>
<p>SDNPA (Appendix 16.2)</p>	<p>Visual effects (Section 1.6) 2.10. <i>The visual impact assessment can underpin and contribute to the assessment of impact on seascape character. Therefore it is important that the method and assumptions underpinning this assessment are reasonable. Table 1.5 sets out the definitions for the magnitude of change with examples of that change. It is of concern that there are no clear definitions for medium-high and medium-low magnitudes of change (as for landscape/seascape Appendix 16.2 Table 1-3). Of most concern is the following:</i></p> <p>2.11. <i>The size and scale of medium change is stated as a prominent change to the view, and low change is characterised by a noticeable change. It would be expected that a prominent change to the view would coincide with a medium-high magnitude and a noticeable change would coincide with</i></p>	<p>Table 1-5, Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2) has been updated to clearly add full definitions for intermediate categories (medium-high and medium-low). The magnitude definitions for medium and low are appropriate and consistent with definitions used for numerous assessments of NSIP projects. The example descriptors of visual magnitude refer to dominant (high), prominent (medium) and noticeable (low), however the full definition provided refers to high forming the prevailing influence; medium being readily</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>a medium magnitude of change. The definitions as they stand therefore has a strong potential to underplay visual effects. They do not coincide with accepted definitions used in many SVIAs and included in the SNH University of Newcastle Study (2002) and more recently in the White Consultants OESEA background study (2020) (page 34). Refer to Table 5.2 from Appendix 2 of SDNPA/White Consultants Rampion 2 PEIR Review.</i></p>	<p>apparent; and low being slightly apparent, which negate any potential for under-assessment. Definitions of visual magnitude are set out in full in Table 1-5, Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2) and have been refined slightly with reference to the guidance and OESEA (2020).</p>
<p>SDNPA (Appendix 16.2)</p>	<p><i>2.12 The definitions used in the SLVIA are also not consistent with the definitions used by the same consultant (OPEN) for the recent East Anglia TWO offshore wind farm SLVIA (see extract in Appendix A). Here high magnitude of change is described as the development forming the prevailing influence and introducing substantially uncharacteristic elements into the baseline view, also displaying visual prominence. Medium magnitude of change is described as the project being plainly visible and forming a readily apparent influence introducing elements that are potentially uncharacteristic on the receiving view, resulting in a moderate incremental change. These are reasonable definitions which are broadly in line with guidance unlike the Rampion 2 method, which is therefore likely to understate the level of both visual and seascape effects.</i></p>	<p>The definitions of visual magnitude set out in the Rampion 2 PEIR (RED, 2021) and in full in Table 1-5, Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2) are consistent with the definitions used by OPEN for the East Anglia TWO offshore wind farm SLVIA, which have been tested through the Examination for that project.</p>
<p>SDNPA (Appendix 16.2)</p>	<p>Cumulative effects (Section 1.7) <i>2.13. The method (1.7.1) cites SNH, 2012 as being relevant guidance for assessing cumulative effects alongside GLVIA 3. It defines</i></p>	<p>Cumulative seascape, landscape and visual effects of Rampion 2 with other wind farm projects have been scoped out, as</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>cumulative effects as the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together. In order to fully assess the effects on the National Park our view is that both should be undertaken. Rampion 1 is the only other windfarm nearby and is a known, measurable quantity. Rampion 2 directly abuts it and extends it in easterly and westerly directions and so the assessment is straightforward with a clear rationale. The assessment of both would be meaningful as it would explore the extent of effects of the long term but non-permanent renewable energy developments on the National Park.</i></p>	<p>agreed with the Planning Inspectorate (Table 15-6). In accordance with GLVIA3 (Landscape Institute, 2013) (para 7.13), the existing Rampion 1 offshore wind farm included in the baseline conditions in Section 15.6 and seascape, landscape and visual effects assessments in Section 15.10. The baseline includes the extent to which Rampion 1 have altered character, views and sensitivity to offshore windfarm development. An assessment of the effect of the Proposed Development is undertaken against a baseline that includes Rampion 1 within the main assessment in Section 15.10. This approach is described fully in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2).</p>
<p>SDNPA (Appendix 16.2)</p>	<p><i>2.14. It is accepted that the key development to be considered in the cumulative assessment in addition to Rampion 2 is Rampion 1. The key principle about cumulative impact, and which makes it differ from the main SLVIA, is that the existing development is not considered as part of the baseline character. This means that existing and proposed developments can be considered together as part of the cumulative</i></p>	<p>In accordance with GLVIA3 (Landscape Institute, 2013) (para 7.13), the existing Rampion 1 offshore wind farm included in the baseline conditions in Section 15.6 and seascape, landscape and visual effects assessments in Section 15.10. Rampion 2 is not</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA (Appendix 16.2)	<p><i>impact assessment. The logic of this is reinforced by the fact that the developments are not permanent, though they are long term, and so theoretically the seascape character will revert to one with no wind farms, dependent on changes in technology.</i></p> <p><i>2.15. It would therefore be expected that the following assessments will take place:</i></p> <ul style="list-style-type: none"> <i>• A combined cumulative impact assessment of Rampion 1 and Rampion 2 together at least on seascape character and visual receptors and resultant effects on the purposes and special qualities of the National Park. Others may also require effects on landscape character to be assessed. Evidence will include a combined ZTV and consideration of factors like the aesthetic relationship between the size and spacing of turbines of the two developments.</i> <i>• A cumulative impact assessment of the additional effect of Rampion 2 as a contribution to the combined cumulative impact of both windfarms. Evidence will include a ZTV showing the additional areas intervisible with Rampion 2 over and above Rampion 1. Consideration of factors like the aesthetic relationship and contrast between the size and spacing of turbines of the two developments will also be needed.</i> 	<p>assessed against a ‘wind farm free’ scenario in which Rampion 1 is not present, as this does not accord with relevant assessment guidance (Landscape Institute, 2013/NatureScot, 2021).</p> <p>An assessment of the effect of the Proposed Development is undertaken against a baseline that includes Rampion 1 within the main assessment in Section 15.10. This approach is described fully in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2). Rampion 2 is not assessed against a ‘wind farm free’ scenario in which Rampion 1 is not present, as this does not accord with relevant assessment guidance (Landscape Institute, 2013/NatureScot, 2021).</p>
SDNPA (Appendix 16.2)	<p>Significance (Section 1.8)</p> <p><i>2.16. In Table 1-6 evaluation of seascape, landscape and visual effects, the calibration of where effects may be significant or otherwise, appears to be low. For instance, medium magnitude of change effects on medium–high receptors are stated</i></p>	<p>Moderate levels of effect (indicated in Table 1-6, Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2)) have the potential, subject to the assessor’s</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>only as moderate, which may or may not be significant. The SLVIA approach therefore has the potential to underestimate the level and number of significant effects and should be reconsidered. BEIS (2020) sets out significance in Table 5.3 (see below) where high sensitivity is the equivalent of medium/high as the second highest level (page 35).</i></p> <p><i>2.17. Whilst it is appreciated that ultimately a judgement has to be made on the likely effects and related significance, matrices act as a transparent guide and help underpin judgements.</i></p>	<p>professional judgement, to be considered as significant or not significant, depending on the sensitivity and magnitude of change factors evaluated. Some moderate levels of effect may be considered significant, while others can be justified as not significant. There is a threshold that hinges around professional judgement, which is applied to the relevant assessments and these assessments are explained for the relevant receptors in the Section 15.10 where this occurs.</p>
<p>SDNPA (Appendix 16.2)</p>	<p><i>Effects on special qualities</i> <i>2.18. It is important for the SLVIA to acknowledge that the special qualities of the National Park including the ‘breathtaking views’ were described before Rampion 1 was built, and therefore it does not form part of the accepted characteristics or qualities of the National Park.</i></p>	<p>The special qualities of the SDNP are defined in the SDNP Special Qualities document (undefined publication date), however they are also referred to in the South Downs Local Development Plan, adopted in July 2019 after Rampion 1 became operational. Rampion 1 is an existing feature in the seascape setting of the SDNP and it would not be accurate to say that it does not form part of its baseline characteristics, which would be to deny its presence in the baseline. The site specific surveys and assessment undertaken in the SLVIA for Rampion 2 (Section</p>

Stakeholder	Theme	How this is addressed in this ES
<p>SDNPA (Appendix 16.2)</p>	<p>3. Effects on seascape character <i>3.1. The structure of the impact assessment on seascape character is structured in false divisions which do not allow full expression of the effect on the National Park and associated seascape character. In the section on the National Park only MCA 08 is considered as the ‘associative setting’ (16.15.8). However, the spread of effect is much larger, as demonstrated by the SDNPA, 2021 study. The MCA 07 description notes the relationship with the National Park/Heritage Coast to the east and as such this should be considered in the seascape effects on the National Park. The National Park also has a strong relationship with MCA 13 and would undergo effects from development within this area and should be considered. MCA 07 also has a relationship as demonstrated by the numerous viewpoints from the downs to the north and west. All these MCAs should be considered as part of the SDNP effects section. This also flags up the need to consider the effects of the development on the seascape zones in the SDNPA, 2021 study which are helpful in expressing different levels of sensitivity in relation to the National Park. This information can then feed into the discussion of effects</i></p>	<p>15.6 and 15.10) have confirmed that the special qualities of the SDNP including the ‘breathtaking views’ still occur in the baseline, albeit with the presence of Rampion 1 in the seascape setting of these views.</p> <p>The structure of the assessment of effects on seascape character has been revised to be considered holistically beyond the geographic regions used to structure the rest of the impact assessment in Section 15.10. MCA 08 is considered to form the main ‘associative setting’ of the SDNP, where marine influences are greatest (see Figure 3.4 of the South Downs Local Development Plan (SDNP, July 2019), however it is noted that MCA 07 has a relationship with the SDNP, as assessed in Section 15.10. MCA 13 is also assessed in Section 15.10. The assessment of seascape effects presented in Section 15.10 has been refined to take on board comments on the approach and the SDNP buffer study seascape zones, using an updated method (Appendix 15.2: SLVIA methodology,</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>on the purposes and special qualities of the National Park.</i>	Volume 4 of the ES (Document Reference: 6.4.15.2)) based on the comments provided (see 2.3, 2.5, 2.6, 2.8, 2.9 above).
SDNPA (Appendix 16.2)	<i>3.2. It is important to note, as the SDNPA, 2021 report states, that, in designating the area, the Inspector left the maritime boundary of the National Park open. In our view the SDNPA, 2021 report seascape zone boundaries (especially SCZ01) better reflect this sentiment in considering wind turbine development than the boundaries of MCA 08 (which do not reflect static features on the sea surface or the boundaries of likely visibility of structures). Nevertheless it is recognised MCA 08 is a valid receptor to consider as part of the Marine Plan evidence base.</i>	MCA 08 is a valid seascape receptor and is assessed in Section 15.10 . The assessment of seascape effects presented in Section 15.10 has been refined to take on board comments on the approach and the SDNP buffer study seascape zones, using an updated method (Table 1-5, Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2)) based on the comments provided (see 2.3, 2.5, 2.6, 2.8, 2.9 above).
SDNPA (Appendix 16.2)	<i>3.3. The assessment of effects on the following seascape character zones should be undertaken: SCZ01, SCZ02, SCZ04, SCZ05, SCZ06. 3.4. The consideration of the SLVIA findings and a preliminary assessment of the effects on the seascape zones derived from the SDNPA, 2021 study are set out in the following pages. For reference, the MCAs assessed within the SLVIA and the seascape zones in the SDNPA, 2021 study are copied into this report overleaf. Refer to table setting out SDNPA/White Consultants comments on sensitivity and magnitude of each seascape receptor against PEIR assessment</i>	The assessment of seascape effects presented in Section 15.10 has been refined to take on board comments on the approach and the SDNP buffer study seascape zones, using an updated method (Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2)) based on the comments provided (see 2.3, 2.5, 2.6, 2.8, 2.9 above).

Stakeholder	Theme	How this is addressed in this ES
SDNPA (Appendix 16.2)	<p>4. Recommendations on assessments and advice on scheme improvements</p> <p>Recommendations on assessments</p> <p><i>4.1. We recommend that the definitions, calibration and factors included in the seascape character and visual effects assessments should be amended in line with the above comments.</i></p>	<p>Refinements of certain definitions, calibration and factors included in the seascape character and visual effects assessments has been amended in line with the comments provided where justified and are reflected in the updated sections of the ES chapter in Section 15.6 (Baseline conditions), Section 15.8 (Methodology for ES assessment) and Section 15.10 (Assessment of O&M effects).</p>
SDNPA (Appendix 16.2)	<p><i>4.2. We recommend that a separate assessment on the effects of the proposals on the SDNPA, 2021 seascape zones should be carried out to complement the MCA effects and contribute to the evidence base considering the effects on the SPNP purpose and special qualities.</i></p>	<p>The assessment of seascape effects presented in Section 15.10 has been refined to take on board comments on the approach and the SDNP buffer study seascape zones, using an updated method (Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2)) based on the comments provided (see 2.3, 2.5, 2.6, 2.8, 2.9 above).</p>
SDNPA (Appendix 16.2)	<p>Advice on scheme improvements</p> <p><i>4.3. It is stated that the SVIA is part of an iterative EIA process which aims to design out significant effects including avoidance and design (Appendix 16.2 1.3). Is clear that the worst-case scenario being assessed does not reflect this approach.</i></p>	<p>The design process undertaken following PEIR reduces and minimises impact magnitude and significance through a reduction in the spatial extent of the Rampion 2 array area and number of</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA (Appendix 16.2)	<p><i>4.4 The SDNPA, 2021 study summarises the findings on seascape zones in Section 5 and these are still highly relevant as they considered turbines within the PEIR scoping area. It is acknowledged that the worst-case scenario extent to the east has now been reduced slightly.</i></p> <p><i>4.5. Taking into account the PEIR including its visualisations with this response and the SDNPA, 2021</i></p>	<p>WTGs proposed. As described in full in Section 15.7, the design of the Proposed Development provides embedded environmental measures that minimise effects on the special qualities of the SDNP through careful design consideration in terms of scale, size and location, and taking account of stakeholder feedback, relevant policy and guidance. Precedent shows it is not necessary or possible to develop such low impact projects that avoid significant EIA effects in order to be considered acceptable and consentable in the planning balance. Due regard to the statutory purpose of the SDNP is being had through the project design process, in order to reduce adverse seascape, landscape and visual effects, their magnitude and geographic extent.</p> <p>The proposed Rampion 2 WTGs cannot be entirely excluded from SCZ01 however, the spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which limit the extent of Rampion 2 within SCZ01,</p>

Stakeholder	Theme	How this is addressed in this ES
SDNPA (Appendix 16.2)	Appendix 3 <i>South Downs National Park Offshore Windfarms Buffer Study</i>	<p>avoiding the area to the east of Rampion 1 in favour of the area to the south of Rampion 1, which is further offshore at greater distance from the Heritage Coast of the SDNP, while also reducing its field of view (lateral spread) and providing separation from Rampion 1, as described in full in Section 15.7. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. The need to retain flexibility of WTG numbers, size and location within the Rampion 2 array area through the planning stages and assessment of a Maximum Design Scenario is a necessary part of the process that is recognised through NPS EN-1 at paragraphs 4.2.5 - 4.2.6.</p> <p>The SDNP Offshore Wind Farms Buffer Study (SDNPA/White Consultants, April 2021) (herein ‘the SDNP buffer study’) is referenced in this Chapter. Specific points in terms of the approach and methodology for the</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>SLVIA, seascape character/zoning, sensitivity and impact magnitude have been considered and where considered justified, reflected in the updated findings presented in the baseline (Section 15.7) and assessments (Section 15.10 and 15.12) of this chapter. There is however, some specific issues with the approach to the SDNP buffer study which are addressed under specific comments in this table below, and a fundamental issue with the overall premise of the study. The SDNP buffer study appears to render Rampion 2 and the seascape of Sussex Bay offshore from the SDNP largely unacceptable and as not having capacity for further development, apart from seascape beyond 40km offshore from the SDNP. This approach does not accord with Government targets to increase offshore windfarm capacity, at a time when Government has brought forward targets to reduce GHG emissions and a target from the British Energy Security Strategy for 50GW of offshore wind by 2030. The fundamental aim of the report <i>'to avoid significant</i></p>

Stakeholder	Theme	How this is addressed in this ES
		<p><i>adverse effects on high sensitivity receptors</i>’ is potentially flawed, as precedent shows it is not necessary or possible to develop such low impact projects that avoid significant effects, in order to be considered acceptable and consentable in the planning balance, when weighting up all relevant factors e.g. energy targets, government policy etc.</p> <p>The NPS requirement is to have ‘due regard’ to the statutory purpose of the SDNP, which has been had. The design of Rampion 2 (described in Section 15.7) demonstrates due regard to conserving natural beauty, through good design and embedded environmental measures that address adverse impacts, minimise ‘harm’ and avoid ‘compromising’ the purposes of the SDNP.</p>
<p>The National Trust</p>	<p><i>The National Trust owns and manages extensive land holdings on the South Downs and in the surrounding area. Between Selsey Bill and Beachy Head we care for a number of properties including Highdown Hill, Cissbury Ring, Fulking Escarpment, Shoreham Gap, Southwick Hill, Devil’s Dyke, Wolstonbury Hill, Black Cap, Ditchling Beacon, Frog Firl Farm, Chyngton Farm and Exceat, Crowlink and Birling Gap. In addition, the Trust holds</i></p>	<p>The effects of Rampion 2 on National Trust land holdings on the South Downs and in the surrounding area is assessed in Section 15.10 (O&M effects). Specifically, representative viewpoints have been agreed, sited and assessed at representative viewpoints</p>

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<p><i>covenants over the potential landfill site to the west of Littlehampton at Bailiffscourt Estate and Climping.</i></p> <p><i>These sites are of very significant cultural, landscape, biodiversity and amenity value, many within the South Downs National Park (SDNP) contributing to the special qualities of the SDNP with almost all having sweeping views southwards across the coastal plain and out to sea. The majority of the properties at the eastern end of the SDNP also lie within the Sussex Heritage Coast designation. The setting of these assets is 'boundless' and not an area defined on a map; the core issue is the impact on the significance of the assets in question. Greater significance is given to the Heritage Coast impacts and individual designated assets where the cultural value is more significant.</i></p>	<p>at Highdown Hill, Cissbury Ring, Devil's Dyke, Wolstonbury Hill, Ditchling Beacon and Birling Gap, and photomontages visualisations provided in the ES from these locations.</p> <p>The effects of Rampion 2 on views from National Trust sites within the SDNP and Sussex Heritage Coast with southwards views across the coastal plain and out to sea are assessed in Section 15.10 (O&M effects), as are effects on the special qualities of the SDNP, including its 'breathtaking views'.</p>
The National Trust	<p><i>There is no reference in the LVIA to Historic Seascape Characterisation – see link – which ought to be referenced and may add a useful dimension to the LVIA.</i> http://archaeologydataservice.ac.uk/archives/view/hschast_eh_2011/downloads.cfm</p>	<p>Historic Seascape Characterisation is undertaken as part of Chapter 16 Marine Archaeology, Volume 2 of the ES (Document Reference: 6.2.16).</p>
The National Trust	<p><i>The Trust also owns and manages land on the eastern side of the Isle of Wight at Bembridge Down, Culver Down and Ventnor and Luccombe Downs. There are potential seascape effects indicated from these areas and</i></p>	<p>The effects of Rampion 2 on National Trust land holdings on the eastern side of the Isle of Wight are assessed in Section 15.10 (O&M effects). Specifically,</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>they all lie within the Isle of Wight AONB.</i>	representative viewpoints have been agreed, sited and assessed at representative viewpoints at Bembridge Down and Ventnor Down.
The National Trust	<i>With reference to representations made in regard to the 2012 DCO for the existing (built) Rampion offshore wind farm, that development was assessed as having major impacts on the seascape and landscape with particular reference to the SDNP, and the Sussex Heritage Coast. In response to these comments, and those of Natural England, the DCO for Rampion 1 was altered to include a ‘structures exclusion zone.’ Unfortunately, no maps of the excluded area are available on the Planning Inspectorate website but the following paragraphs are quoted from the Examining Authority’s Report of Findings and Conclusions. See paragraphs quoted in the National Trust s42 consultation submission.</i>	The Exclusion Zone of the Rampion 1 DML is located entirely outside the Rampion 2 array area boundary, thereby adhering to the requirement for a Structures Exclusion Zone as set out in the Rampion 1 DML.
The National Trust	<i>The important elements here are the definition of remote as over 20km, and the structures exclusion zone. These are both benchmarks for the assessment of the likely impacts of the newly proposed extension to the existing Rampion wind farm, which has similar and greater impacts on the same area’s sensitive locations and receptors as the existing wind farm. This is because the proposals extend the area of the windfarm both east and west, with particular issues for the Heritage Coast as well as increasing the height and impact of the turbines on the setting and landscape / seascape, this 20km zone of</i>	The Exclusion Zone of the Rampion 1 DML is located entirely outside the Rampion 2 array area boundary, thereby adhering to the requirement for a Structures Exclusion Zone as set out in the Rampion 1 DML. The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which limit the eastern extent of

Stakeholder	Theme	How this is addressed in this ES
	<i>'remoteness' is affected by and altered by the proposed development.</i>	<p>Rampion 2, avoiding the area to the east of Rampion 1 in favour of the area to the south of Rampion 1, which is further offshore at greater distance from the Heritage Coast of the SDNP, while also reducing its field of view (lateral spread) and providing separation from Rampion 1, as described in full in Section 15.7.</p> <p>The boundary of the Rampion 2 array area is now located 19.7 km from closest point of the Sussex Heritage Coast. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors.</p>
The National Trust	<p><i>In landscape sensitivity terms it has been accepted under Rampion 1 that the whole of the area within the South Downs National Park has a very high sensitivity to change and visual impacts. This in principle assessment of the level of likely impacts has been applied throughout. Impacts on National Trust sites have been re-assessed in light of a greater and potentially more proximate impact and hence a larger zone of remoteness, within the context of its very high sensitivity. Impacts on specific viewpoints are discussed below.</i></p>	<p>The effects of Rampion 2 on the special qualities and views from the SDNP, including the Sussex Heritage Coast area, is assessed in Section 15.10 (O&M effects). Very high levels of sensitivity are not defined in the SLVIA methodology for sensitivity, which is recorded on a scale of high, medium and low. The SDNP is, as a whole, assessed to be of high value, recognised</p>

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<p><i>Birling Gap is a major National Trust attraction drawing 650,000 visitors a year. Situated to the west of Beachy Head within the Sussex Heritage Coast the site holds wide coastal views from the Beachy Head Cliffs westwards toward Seven Sisters and past Seaford Head, including wide and far-reaching panoramas. The existing Rampion wind farm is clearly visible even on an overcast day, and both the closer proximity of the proposed turbines and the increase in height and extent, will significantly increase the impact on this site. This has consequently greater impacts on the cultural value and experience of the Heritage Coast. Areas of the Birling Gap estate held by the National Trust are within 20km of the proposed area, and Birling Gap itself is on the very edge of the proposed area. The greater height and concentration of the turbines will make them more immediate in the seascape with a greater intrusion into people’s experience and enjoyment of this</i></p>	<p>through its designation as a National Park and its inherent sensitivity is high, however there is some variation in the susceptibility of the different landscape character areas and views/visual receptors within the SDNP to the specific nature of changes, since the assessment of susceptibility to change is tailored to the changes associated with the specific nature of the Proposed Development.</p> <p>The effect of Rampion 2 on the view from Birling Gap is assessed in full at Viewpoint 2: Birling Gap in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisation in Figure 15.27, Volume 3 of the ES (Document Reference: 6.3.15). The terms ‘increasing’ and ‘severe’ used by the National Trust are not terms that are typically used in EIA nor the SLVIA methodology set out in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2), which uses</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>undeveloped coast location. The impact in this is considered to be Increasing and Severe.</i>	accepted terminology on a scale of high, medium, low, negligible magnitude and major, moderate, minor, negligible effect as shown in the matrix in Table 15-28.
The National Trust	<i>As this location (Birling Gap) was protected under Rampion 1 by the structures exclusion zone, it is queried why the proposed development would seek to intrude on this already protected area, and re-introduce the impacts considered unacceptable in the Rampion 1 decision. The proposals would actually increase the level of harm and intrusion on the Heritage Coast over and above that ruled out under Rampion 1. No justification for re-introducing and exacerbating this harm has been put forward and the National Trust would seek such an explanation and justification at the Examination Stage.</i>	The Exclusion Zone of the Rampion 1 DML is located entirely outside the Rampion 2 array area boundary, thereby adhering to the requirement for a Structures Exclusion Zone as set out in the Rampion 1 DML. The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) that provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the Heritage Coast area of the SDNP. The eastern extent of Rampion 2 has been reduced, avoiding the area to the east of Rampion 1 in favour of the area to the south of Rampion 1, which is further offshore at greater distance from Birling Gap (28.8km), while also reducing its field of view (lateral spread) and providing separation from

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<p><i>Cuckmere Haven and Seaford Head.</i> <i>The same issues detailed for Birling Gap, apply to the viewpoints at Cuckmere Haven and Seaford Head. The Cuckmere Haven site in National Trust ownership does not have as wide ranging views westwards, but the same increase in impact and experience of the Heritage Coast apply. From Seaford Head the existing turbines are substantially more visible and immediate in the seascape than at Birling Gap, appearing much larger in the view. The proposed turbines are within 19km of the Cuckmere Haven and the proposed increase in turbine height and extent will only increase this impact further. The impact in this location is considered to be Increasing and Moderate-Major.</i></p>	<p>Rampion 1, as described in full in Section 15.7.</p> <p>The effect of Rampion 2 on the view from Cuckmere Haven and Seaford Head are assessed in full at Viewpoint 4: Seaford Head and Viewpoint 28: Cuckmere Haven in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisations in Figure 15.29 and Figure 15.51, Volume 3 of the ES (Document Reference: 6.3.15). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the Heritage Coast area of the SDNP, including Seaford Head and Cuckmere Haven.</p>
The National Trust	<p><i>Ditchling Beacon</i> is situated on the scarp slope of the Downs with extensive panoramic views inland and far reaching views south across the Downs and out to sea and is one of</p>	<p>The effect of Rampion 2 on the view from Ditchling Beacon is assessed in full at Viewpoint 51: Ditchling Beacon in</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the highest points on the South Downs. This is one of a number of “honey pot” sites of national significance within the SDNP. Ditchling Beacon attracts about 250,000 visitors a year and as with the coastal sites it is the view that people come to see. While the main views are looking inland the site does enjoy extensive seaward views, as far east as the Seven Sisters and the turbines are seen in the context of looking across the interior downland landscape. The breadth of the view is significant from the OS Trig viewpoint location and the proposed extension will significantly broaden the extent and impact of the turbines in this view, mainly to the west. The increase in turbine size will bring the views of them forward in the seascape decreasing their remoteness, increasing the impacts on the views from the Beacon. From this location the geometric layout of the turbines becomes a factor, where the rows of the existing turbines line up in fixed arrays creating perspective rows or arrays in the view leading out into the channel. Such a fixed and geometric layout introduces an alien element into the seascape, and any intensification of this effect from the new turbines would create a more severe impact. The turbines are approximately 24km in distant from the Beacon where the additional height and scale of the turbines may make them more immediate and less remote than the previously assessed 20km. The impact in this location is considered to be Increasing and Moderate-Major.</i></p>	<p>Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4) summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisations in Figure 15.64, Volume 3 of the ES (Document Reference: 6.3.15) The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the SDNP, including Ditchling Beacon, which is now located 27.8km from the closest point of the Rampion 2 array area. Design principles that have shaped the Rampion 2 design have been developed and applied in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> • ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral

Stakeholder	Theme	How this is addressed in this ES
		<p>spread of Rampion 1 and Rampion 2.</p> <ul style="list-style-type: none"> ● ‘Proximity’ - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles). ● ‘Wind farm separation zones’ - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● ‘Separation foreground’ - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible.
<p>The National Trust</p>	<p><i>Devils Dyke is situated on the scarp slope of the Downs with extensive panoramic views inland and far reaching views south across the Downs and out to sea, and is one of the highest points on the Downs. The site is very popular as a destination for Brighton residents and hikers along</i></p>	<p>The effect of Rampion 2 on the view from Devil’s Dyke is assessed in full at Viewpoint 17: Devil’s Dyke in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference:</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the South Downs Way and attracts over 800,000 visitors a year. There are extensive views southwards with wide seascape panoramic sight lines, seen in the context of the built form of the Brighton – Hove settlements below. The wide seascape views provide relief and a natural expanse which counters the intrusion of the built form into the more natural downland landscape. The current turbines are clearly visible even in poor visibility and heavy cloud cover. The increase in turbine height and extent will bring the views of them forward in the seascape decreasing their remoteness, increasing the impacts on the views from the Dyke. The turbines are within approximately 19 km distance of the Dyke bringing them within the current zone of remoteness, increasing the impact of them on this cultural landscape feature. As with Ditchling Beacon there is concern regarding the geometric layout of the turbines becoming a factor, where the rows of the existing turbines line up in fixed arrays creating perspective rows or arrays in the view leading out into the channel. Such a fixed and geometric layout introduces an alien element into the seascape, and any intensification of this effect from the new turbines would create a more severe impact. The impact in this location is considered to be Increasing and Moderate-Major.</i></p>	<p>6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisations in Figure 15.42, Volume 3 of the ES (Document Reference: 6.3.15). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the SDNP, including Devil’s Dyke, which is now located 24.4km from the closest point of the Rampion 2 array area. Design principles that have shaped the Rampion 2 design have been developed and applied in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> ● ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. ● ‘Proximity’ - increasing the distance of Rampion

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<i>Cissbury Ring is the largest hill fort in Sussex and the second largest in England is an iconic nationally significant scheduled hill fort – part of its significance is the setting. The site has the most expansive and wide panoramic views of the National Trust viewpoints with particularly fine and long reaching views out to sea giving extensive long range views both east and westwards as far as the Isle of Wight. The current turbines sit squarely in the view, and the proposed</i>	<p>2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles).</p> <ul style="list-style-type: none"> • ‘Wind farm separation zones’ - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. • ‘Separation foreground’ - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>The effect of Rampion 2 on the view from Cissbury Ring is assessed in full at Viewpoint 18: Cissbury Ring in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>increase in height and width of the full installation will create a dominant element in the view. The main views south from Cissbury overlooks a natural gap in development and is largely natural and undeveloped increasing the sense of remoteness and naturalness of the wide seascape views. Additionally the elevation at Cissbury increases the sense and impact of the turbines in the view, drawing them closer and making them more distinct in the view. The enlarged turbines will be very prominent and exaggerated by this elevation. The width of the new array will also dominate the wide vista and significantly detract from the naturalness and remoteness of this very significant site. The turbines are within 19 km of Cissbury Ring bringing them within the current zone of remoteness, increasing the impact of them on this cultural landscape feature and increasing the impact on the Ring substantially. From this location the geometric layout of the turbines becomes a factor, where the rows of the existing turbines line up in fixed arrays creating perspective rows or arrays in the view leading out into the channel. Such a fixed and geometric layout introduces an alien element into the seascape, and any intensification of this effect from the new turbines would create a more severe impact. The impact in this location is considered to be unacceptable, rising to a Significantly Increasing impact and Severely detracting to this site.</i></p>	<p>visualisations in Figure 15.43, Volume 3 of the ES (Document Reference: 6.3.15). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the SDNP, including Cissbury Ring, which is now located 19.5km from the closest point of the Rampion 2 array area. Design principles that have shaped the Rampion 2 design have been developed and applied in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> ● ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. ● ‘Proximity’ - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and

Stakeholder	Theme	How this is addressed in this ES
		<p>increase sense of remoteness (with consequential benefits to other design principles).</p> <ul style="list-style-type: none"> ● ‘Wind farm separation zones’ - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● ‘Separation foreground’ - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>The terms ‘increasing’ and ‘severe’ used by the National Trust are not terms that are typically used in EIA nor the SLVIA methodology set out in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2) which uses accepted terminology on a scale of high, medium, low, negligible magnitude and major, moderate, minor, negligible effect as shown in the matrix in Table 15-28.</p>

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<p><i>Highdown Hill is an erratic outlier of the South Downs overlooking the coastal plain to the south. The site is a hill fort and major open space serving the nearby residential areas of Angmering, Goring and Ferring. It is an open access site partly owned and managed Worthing BC. Like Cissbury, Devil's Dyke and Ditchling this is another hill fort site and the views from all the hill forts along the Downs will be dominated by the wind turbines with the potential to create a cumulative impact on the whole area. The seascape view is seen in the context of the built form of the Goring – Littlehampton settlements and the wide seascape views provide relief and a natural expanse which counters the intrusion of the built form into the more natural downland landscape. The existing turbines are reasonably remote from the viewpoint, but the width of the view will be contracted by the proposed increase in height/extent and number, detracting from the panoramic quality of the views. There is also concern regarding the geometric layout and rows of the existing turbines line up in fixed arrays creating perspective arrays leading out into the channel. This geometric layout introduces an alien element into the seascape, and any intensification of this effect from the new turbines would create a more severe impact. The proposals bring the turbines to within 16.4km of Highdown Hill significantly increasing the intimacy of them within the seascape and breaching the zone of remoteness. The impact in this location is considered to be Increasing and Moderate.</i></p>	<p>The effect of Rampion 2 on the view from Highdown Hill is assessed in full at Viewpoint 19: Highdown Hill in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisations in Figure 15.44, Volume 3 of the ES (Document Reference: 6.3.15). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the SDNP, including Highdown Hill, which is now located 16.7km from the closest point of the Rampion 2 array area. Design principles that have shaped the Rampion 2 design have been developed and applied in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> • 'Field of view' – reducing the field of view or 'horizontal extent' of Rampion 2

Stakeholder	Theme	How this is addressed in this ES
		<p>and the visually combined lateral spread of Rampion 1 and Rampion 2.</p> <ul style="list-style-type: none"> ● 'Proximity' - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles). ● 'Wind farm separation zones' - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● 'Separation foreground' - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible.
The National Trust	<p><i>The National Trust also has extensive landholding on the Isle of Wight and two of the viewpoints selected for the SLVIA are located on Trust land. These are both on the eastern side of the Isle of Wight and the Trust accepts</i></p>	<p>The effect of Rampion 2 on the views from Bembridge Down and Ventnor Down/St Boniface Down is assessed in full at</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>that there will be no visible impact on land within its control on the western side of the Island. The viewpoint at St Boniface Down, Ventnor sits at a high point on the downland which lies behind Ventnor to the south and Luccombe to the east. The viewpoint at Bembridge Down lies on a downland ridge that projects eastwards between the settlements of Bembridge and Sandown/Shanklin. The Trust accepts the assessment made of the residual effect of the Rampion 2 windfarm on these viewpoints as set out in Table 16-41 of the SLVIA.</i></p>	<p>Viewpoint 34: Bembridge Down and Viewpoint 35: St. Boniface Down in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisations in Figure 15.57 and Figure 15.58, Volume 3 of the ES (Document Reference: 6.3.15).</p>
<p>The National Trust</p>	<p><i>A plan showing the 20km buffers around the selected National Trust viewpoint locations is appended showing the extent of the zone of remoteness set at 20km. This clearly illustrates the level of additional impact the extended area of the consent border will have on these viewpoints. Note: that this 20km buffer is set to the standard applied for the existing Rampion 1 turbines and does not account for the greater height and extent of the proposed Rampion 2 extension.</i></p>	<p>The spatial extent of the Rampion 2 array area has been reduced and now avoids the area to the east of Rampion 1, in favour of the area to the south of Rampion 1, which is located further offshore at greater distance from the SDNP and Sussex Heritage Coast. The Rampion 2 array area boundary is now located over 20km from all of the identified National Trust land holdings, with the exception of Cissbury Ring (19.5km) and Highdown Hill (16.7km).</p>
<p>The National Trust</p>	<p><i>It remains our overall conclusion at this stage that the eastern reach (structures exclusion zone) area of search will have major and significant impacts on landscape and seascape, especially on the SDNP and Sussex Heritage Coast, and thus that the balance of the extension should lie to</i></p>	<p>The Exclusion Zone of the Rampion 1 DML is located entirely outside the Rampion 2 array area boundary, thereby adhering to the requirement for a Structures Exclusion</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the west of the existing development. The area proposed within the eastern extension is currently protected by the structure’s exclusion zone under the Rampion 1 Examiners’ Report and the Trust would question what the justification is provided for breaching this provision.</i></p>	<p>Zone as set out in the Rampion 1 DML. The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the Heritage Coast area of the SDNP. The eastern extent of Rampion 2 has been reduced, avoiding the area to the east of Rampion 1 in favour of the area to the south of Rampion 1, which is further offshore at greater distance, while also reducing its field of view (lateral spread) and providing separation from Rampion 1, as described in full in Section 15.7.</p>
<p>The National Trust</p>	<p><i>In addition, the views from Ditchling Beacon and Devils Dyke will be majorly affected by the proposals and have major impacts on the quality of and experience of these cultural and heritage assets in addition to their special qualities within the South Downs National Park.</i></p>	<p>The effect of Rampion 2 on the views from Devil’s Dyke and Ditchling Beacon are assessed in full at Viewpoint 17: Devil’s Dyke and Viewpoint 51: Ditchling Beacon in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4) summarised in Section 15.10 (O&M effects) and</p>

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<i>Most significantly the views from and impacts on Cissbury Ring are considered to be severe and of great significance. This and the whole of the area within the National Park have a very high sensitivity to change and visual impacts.</i>	shown in the photomontage visualisations in Figure 15.42 and Figure 15.51, Volume 3 of the ES (Document Reference: 6.3.15). The effect of Rampion 2 on the view from Cissbury Ring is assessed in full at Viewpoint 18: Cissbury Ring in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4), summarised in Section 15.10 (O&M effects) and shown in the photomontage visualisations in Figure 15.43, Volume 3 of the ES (Document Reference: 6.3.15).
The National Trust	<i>The zone of remoteness established by Rampion 1 is greatly compromised by the current proposals. The additional scale and extent of the proposed turbines increases the impact on the zone of remoteness effectively decreasing their remoteness by bringing the turbines closer into the view. The zone of remoteness buffer should be reassessed to establish what the zone of remoteness for the greater scale turbines should be.</i>	The spatial extent of the Rampion 2 array area has been reduced and now avoids the area to the east of Rampion 1, in favour of the area to the south of Rampion 1, which is located further offshore at greater distance from the SDNP and Sussex Heritage Coast. The Rampion 2 array area boundary is now located over 20km from all of the identified National Trust land holdings, with the exception of Cissbury Ring (19.5km) and Highdown Hill (16.7km).

Stakeholder	Theme	How this is addressed in this ES
The National Trust	<p><i>Whilst we accept that the context of views from the South Downs is often subject to urban influence this does not necessarily mean that the impact of the turbines is lessened as a result. The wind farm can only increase the sense of development and reduce the wilder and more natural outlook from these very sensitive viewpoints. The principle should always be to enhance landscape setting and mitigate harm, not increase harm where it already exists. The Heritage Coast is the exception which serves to highlight its great relative importance and value. The relatively rural nature of the area around Beachy Head and the presence of the South Downs Way mean that the large numbers of people wishing to perceive a ‘wild’ part of the countryside will be impacted by the Rampion 2 proposals and this principle of protected settings for people to enjoy and experience nature, wildness and tranquillity has been brought into focus by the experience of the pandemic and peoples need for wellbeing outdoors.</i></p>	<p>The effects of Rampion 2 on views from National Trust sites within the SDNP and Sussex Heritage Coast with southwards views across the coastal plain and out to sea is assessed in Section 15.10 (O&M effects), as are effects on the special qualities of the SDNP (including its ‘breathtaking views’). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the Heritage Coast area of the SDNP.</p>
West Sussex County Council (WSCC)	<p><i>In summary, although it is considered that Rampion 2 should be supported in principle, there are a number of matters of significant concern that need to be satisfactorily addressed by RED, including: the methodology for the Seascape, Landscape and Visual Impact Assessment (SLVIA), specifically viewpoint locations; the size and layout of the offshore wind turbines (in order to reduce impacts on views out to sea); final selection of the location of the project substation; final selection for the cable route and the micro-siting of the cable route within the cable corridor; further understanding of the impacts of</i></p>	<p>The methodology for the SLVIA is set out in full in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2). Some refinements have been made in line with comments received where justified. Additional viewpoint locations within West Sussex have been agreed in consultation with WSCC and are assessed in Section 15.10 (O&M effects). The spatial extent of the</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>crossings along the cable corridor and reinstatement proposals; the impacts on onshore and offshore ecological receptors and the need for ecological enhancement (including Biodiversity Net Gain); and the socioeconomic benefits to West Sussex and impacts on tourism.</i></p>	<p>Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived seascape qualities and views. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors. Details of the selection and micro-siting of the cable route are provided in the Onshore ES (Chapter 3: Alternatives, Volume 2 of the ES (Document Reference: 6.2.3)). Impacts of crossings along the cable corridor and reinstatement proposals are provided in Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4). Impacts on onshore and offshore ecological receptors are assessed in Chapter 8: Fish and Shellfish Ecology, Chapter 9: Benthic Subtidal and Intertidal Ecology,</p>

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<p><i>RED has identified that the offshore infrastructure associated with Rampion 2 could have potentially significant adverse impacts on the seascape, coastal landscapes, and people who live, work and visit West Sussex. The onshore infrastructure at the substation site also has the potential to negatively impact on a number of environmentally sensitive areas and features and on residential amenity during the lifetime of the project. However, it is acknowledged that a worst-case has been presented by RED and that any adverse impacts need to be balanced against the benefits of the scheme.</i></p>	<p>Chapter 10: Commercial Fisheries, Chapter 11: Marine Mammals and Chapter 12: Offshore and Intertidal Ornithology, Volume 2 of the ES (Document Reference: 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12 respectively). The socioeconomic benefits to West Sussex and impacts on tourism are assessed in Chapter 18: Socioeconomics, Volume 2 of the ES (Document Reference: 6.2.18).</p> <p>The effects of Rampion 2 on the seascape, coastal landscapes, and views experienced by people who live, work and visit West Sussex is assessed in Section 15.10 (O&M effects). The basis for the ES assessment MDS assessed in the SLVIA is described in Section 15.7. The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived seascape qualities and views.</p>

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<p><i>Therefore, although the Rampion 2 Offshore Wind Farm is supported in principle by the County Council, there are number of matters of significant concern that need to be satisfactorily addressed by RED; these include:</i></p> <ul style="list-style-type: none"> <i>• the methodology for the Seascape, Landscape and Visual Impact Assessment (SLVIA), specifically viewpoint locations</i> <i>• the size and layout of the offshore wind turbines, in order to reduce impacts on views out to sea</i> 	<p>The methodology for the SLVIA is set out in full in Appendix 15.2: SLVIA methodology, Volume 4 of the ES (Document Reference: 6.4.15.2). Some refinements have been made in line with comments received where justified. Additional viewpoint locations within West Sussex have been agreed in consultation with WSCC and are assessed in Section 15.10 (O&M effects). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived seascape qualities and views. Opportunities to reduce effects through turbine height reduction are limited due to the technical and economic requirements associated with producing renewable energy as well as other environmental factors.</p>
West Sussex County Council (WSCC)	<p>Offshore</p> <p><i>In general terms, the assessment is detailed and provides useful information to enable the consideration of impacts on SLVIA aspects. A worst-case scenario has rightly been</i></p>	<p>General agreement is noted regarding the assessment detail, method, information and impacts assessed in the PEIR. While noting that</p>

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<p><i>presented (reflecting the current position of the design and understanding of baseline conditions) and the methodology is largely clear, considering the full range of key matters that would be expected. Although it is recognised that matters of professional judgement are involved, in some cases it is considered that these may have been downplayed, specifically with regards to ‘receptors’ (that is, a physical feature or area that would be directly or indirectly affected) along the West Sussex coastline. The County Council notes and agrees with the concluding findings of the assessment, that is, that the proposed development would have some significant seascape, landscape, and visual effects. Therefore, it has concerns about the scale of likely impacts of Rampion 2 in addition to, and in combination with, the currently operating Rampion 1 Offshore Wind Farm.</i></p> <p><i>The assessment largely includes comments made by County Council officers during technical discussions. However, there are several matters, particularly those relating to impacts on ‘visual receptors’ (that is, groups of people who are likely to be affected), that would benefit from further consideration. The documentation suggests in several places that viewpoint locations have all been agreed. Although there has been general consensus on the viewpoints that have been provided,</i></p>	<p>there are some differences in professional judgement of specific receptor assessments, there is agreement on the concluding findings of the PEIR assessment. The updated assessment of effects of Rampion 2 on seascape, coastal landscapes and views experienced by people (receptors) in West Sussex are assessed in Section 15.10 (O&M effects). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude (scale) of effects and minimising harm on the perceived seascape qualities and views.</p> <p>Further dialogue on viewpoint locations in West Sussex was had through ETG meetings and written comments from WSCC (28 April 2021 and 26 July 2021). Comments on additional viewpoint locations, photomontages and night-time views from West Sussex have been addressed with further viewpoint photography</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>officers have consistently asked for additional viewpoints to be considered, in particular at key populated areas along the coastline and within the coastal plain where the assessment clearly show views are likely to be visible. Although RED sent a follow-up method statement after formal consultation, which indicates the outstanding concerns around viewpoints have been understood, dialogue on these matters needs to continue in the coming months.</i></p>	<p>undertaken in summer 2021 and these additional viewpoints from West Sussex included in the ES, as agreed in consultations with WSCC, as follows:</p> <p>40. Climping Beach (Figure 15.59, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>A. East Wittering (Figure 15.73, Volume 3)</p> <p>B1. Chichester Harbour AONB (Chichester Marina) (Figure 15.74, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>B2. Chichester Harbour AONB (Dell Quay) (Figure 15.75, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>C. Eastergate (Proposed A29) (Figure 15.76, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>D. Footbath between A259 and Colworth (Figure 15.77, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>E. Ferring Gap (Figure 15.78, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>F. Lancing Beach (Figure 15.79, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>Night-time views:</p> <p>10. Worthing seafront (Figure 15.35, Volume 3)</p>

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<i>The provided photomontages are useful tools that aid in the assessment of visual effects. They clearly show the significance of impacts likely to be experienced by receptors in West Sussex, in particular, the impacts that would result from the lengthy westerly extension, which would significantly extend the field of view over which impacts on seascape would be experienced.</i>	<p>of the ES (Document Reference: 6.3.15)) 13. Pagham Harbour (Figure 15.38, Volume 3 of the ES (Document Reference: 6.3.15)) 21. Bignor Hill (Figure 15.46, Volume 3 of the ES (Document Reference: 6.3.15)).</p> <p>Photomontages of Rampion 2 are provided in Figures 15-26 to 15-91, Volume 3 of the ES (Document Reference: 6.3.15). The western extent of the Rampion 2 array area has been reduced slightly since PEIR, at the corner of the north-western extent of the array area (nearest Selsey Bill), with a corresponding slight reduction in the lateral spread/HFoV occupied by Rampion 2 WTGs in views from West Sussex. The effects of Rampion 2 on views experienced from West Sussex derives primarily from the scale and western spread of WTGs in the field of view and is assessed from representative viewpoints in Section 15.10 (O&M effects).</p>
West Sussex County Council (WSCC)	<i>Although a worst-case has been presented, consideration should be given to an offshore layout that has an overall potential for lesser impacts. A commitment should be made by RED to a break in the lateral spread of</i>	Section 15.7 sets out how Rampion 2 responds to 'good design' in respect of seascape, landscape and visual receptors. SLVIA topic

Stakeholder	Theme	How this is addressed in this ES
	<p><i>turbines to reduce the proliferation of visual impacts upon the horizon should be made. Although the PEIR states that there cannot be “perceptible separation distances between Rampion 1 and Rampion 2”, the County Council would query why this is the case.</i></p>	<p>specific design principles are described, which set out how the design of Rampion 2 has been shaped by potential seascape, landscape and visual effects, with the aim of reducing the magnitude and geographic extent of effects of the Proposed Development, principally through a reduction in the spatial extent of the Rampion 2 array area and reduction in the number of WTGs. The project design responds to combined principles developed in consultation with stakeholders, as explained fully in Section 15.7 and includes a windfarm separation zone between Rampion 1 and 2 to provide a break in the lateral spread of WTGs on the horizon.</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>Therefore, the County Council wishes RED to consider developing the SLVIA methodology to include more detailed assessment of effects upon the receptors of West Sussex. Also, RED should continue to work with stakeholders to further develop commitments to the layout of turbines to reduce the significant visual impacts as presented in the assessment. Key areas for consideration are:</i></p> <ul style="list-style-type: none"> <i>• to agree and identify the remaining viewpoints not considered as part of the PEIR</i> <i>• to review the quality and number of photomontages, to provide clarity</i> 	<p>The SLVIA include a detailed assessment of effects upon the receptors of West Sussex within Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4) - Viewpoint Assessment, Appendix 15.5: Assessment of aviation and navigation lighting visual effects, Volume 4 of the ES (Document Reference: 6.4.15.5) - Assessment of aviation and navigation</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>on potential views from identified points</i></p> <ul style="list-style-type: none"> ● <i>to give greater consideration to night-time views from highly populated coastal areas, where sensitive visual receptors are located and many of which benefit from a dark horizon in seaward views</i> ● <i>the scope of the Built Heritage Assessment</i> ● <i>commitment to a clear separation of Rampion 1 and Rampion 2 to minimise the horizontal extent of the offshore wind turbines east to west along the horizon/seascape in order to reduce the potential curtaining effect</i> ● <i>consideration of using the full north-south extent of the search area to also reduce the lateral spread; and</i> ● <i>a more detailed understanding and discussion of the balance between the potential locations of turbines in the western extension area (which would clearly be more detrimental to receptors along the West Sussex coastline) and that of Zone 6 (the unused area of the original Rampion 1 zone).</i> 	<p>lighting visual effects and Section 15.10 (O&M effects). The project design responds to combined principles developed in consultation with stakeholders, as explained fully in Section 15.7. Key areas:</p> <ul style="list-style-type: none"> ● Additional viewpoints from West Sussex are included in the ES, as agreed in consultations with WSCC and listed above. ● Additional photomontages from these viewpoints are included in the ES. ● Additional night-time views are included from urban areas of West Sussex at Worthing seafront (Figure 15.35 Volume 3 of the ES (Document Reference: 6.3.15)) and Pagham Harbour (Figure 15.38 Volume 3 of the ES (Document Reference: 6.3.15)). ● The project design responds to combined principles developed in consultation with stakeholders, as explained fully in Section 15.7 and includes a wind farm

Stakeholder	Theme	How this is addressed in this ES
		<p>separation zone between Rampion 1 and 2 to provide a break in the lateral spread of WTGs on the horizon; and reduce the lateral spread of the Rampion 2 array area.</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>With regards identification of viewpoints, WSCC have engaged with RED over the series of ETGs. As stated in Table 16-11, further viewpoints were discussed with RED that haven't made it into the PEIR but will be assessed as part of the ES. WSCC wishes to reiterate the last set of comments made to RED in a memo dated 10 May 2021. This memo was focussed upon the viewpoints in the West Sussex coastal plain, and those along the coastal strip. We have reiterated these points again, as the table only notes the additional of VP A and VP B for the ES. It is noted that RED have consulted with WSCC on further viewpoints to be included, during the formal consultation period. WSCC have included those comments made to RED in a memo in May 2021 below for completeness however.</i></p>	<p>Further dialogue on viewpoint locations in West Sussex was had through ETG meetings and written comments from WSCC (28 April 2021 and 26 July 2021). Comments on additional viewpoint locations, photomontages and night-time views from West Sussex have been addressed with further viewpoint photography undertaken in summer 2021 and these additional viewpoints from West Sussex included in the ES, as agreed in consultations with WSCC, as set out below.</p>
<p>West Sussex County Council (WSCC)</p>	<p>Comments from WSCC memo dated 10 May 2021 <i>VPs A-D – WSCC welcomes the identification of these VPs based upon feedback given in the first SLVIA ETG. As stated in the follow up ETG, WSCC would like to see VP A included, potentially microsited to the car park (there are car parks at West Wittering and Bracklesham Bay) where there are likely to be a concentration of visitors. The inclusion of VP B would</i></p>	<p>Further dialogue on viewpoint locations in West Sussex was had through ETG meetings and written comments from WSCC (28 April 2021 and 26 July 2021). Comments on additional viewpoint locations, photomontages and night-time views from West Sussex have been</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>allow the views experienced from the eastern side of Chichester Harbour AONB to be presented, at a point where the maximum number of turbines would be visible. WSCC understands REDL will be further consulting with Chichester Harbour AONB on any additional VPs required. The microsited location should be representative of views from Dell Quay and Chichester Harbour to the west and Chichester Golf club etc to the east where more visitors/tourists might be expected. VP C - WSCC suggests removal of the currently proposed VP C, which being directly between VP 13 and VP B probably wouldn't add much to the assessment and propose a new location to the south of Eastergate (where there is a large area of turbine visibility, the presence of Arun's Strategic housing allocation and the new alignment of the A29 - A29 realignment scheme - West Sussex County Council). It would also better cover off the apparent remaining large areas of maximum turbine visibility inland to the east of VPs A-D). VP D – the location of this VP seems sensible, located on the A259 between Chichester and Bognor, which would represent views experienced by receptors travelling along the coastal plain here.</i></p> <p><i>Elsewhere along the West Sussex Coast – Having reviewed the updated ZTV, WSCC wishes to highlight both the Ferring Gap/Goring and Lancing Beach areas. The ZTV shows in both locations, the maximum visibility of turbines in very well used coastal areas. This is highlighted by the presence of cafés, beach huts, promenade and green space with no possibility of intervening screening and mitigation.</i></p>	<p>addressed with further viewpoint photography undertaken in summer 2021 and these additional viewpoints from West Sussex included in the ES, as agreed in consultations with WSCC, as follows:</p> <p>40. Climping Beach (Figure 15.59, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>A. East Wittering (Figure 15.73, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>B1. Chichester Harbour AONB (Chichester Marina) (Figure 15.74, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>B2. Chichester Harbour AONB (Dell Quay) (Figure 15.75, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>C. Eastergate (Proposed A29) (Figure 15.76, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>D. Footbath between A259 and Colworth (Figure 15.77, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>E. Ferring Gap (Figure 15.78, Volume 3 of the ES (Document Reference: 6.3.15))</p> <p>F. Lancing Beach (Figure 15.79, Volume 3 of the ES (Document Reference: 6.3.15))</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>Night-time views: 10. Worthing seafront (Figure 15.35, Volume 3 of the ES (Document Reference: 6.3.15)) 13. Pagham Harbour (Figure 15.38, Volume 3 of the ES (Document Reference: 6.3.15)) 21. Bignor Hill (Figure 15.46, Volume 3 of the ES (Document Reference: 6.3.15)).</p>
West Sussex County Council (WSCC)	<p><i>Table 16.22. WSCC agrees with the presentation of the WTG maximum assessment assumptions, but maintains strong concerns over the likely significant environment effects associated with the size and layout of these WTGs.</i></p>	<p>The updated assessment of effects of Rampion 2 on seascape, coastal landscapes and views experienced by people (receptors) in West Sussex are assessed in Section 15.10 (O&M effects). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude (scale) of effects and minimising harm on the perceived seascape qualities and views.</p>
West Sussex County Council (WSCC)	<p><i>Figure 3.2. It is noted that the offshore PEIR boundary has been refined through project design evolution, reducing the eastern extent, and a very small corner of the north western extent (nearest Selsey Bill). Presumably beneficial for those</i></p>	<p>The western extent of the Rampion 2 array area has been reduced slightly since PEIR, at the corner of the north-western extent of the array area (nearest Selsey Bill), with a corresponding slight</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>receptors to the west, albeit of marginal significance.</i>	reduction in the lateral spread/HFoV occupied by Rampion 2 WTGs in views from West Sussex. The effects of Rampion 2 on views experienced from West Sussex derives primarily from the scale and western spread of WTGs in the field of view and is assessed from representative viewpoints in Section 15.10 (O&M effects).
West Sussex County Council (WSCC)	<i>16.3.4 [paragraph of PEIR] Why are key items raised by WSCC not included here? Comments were made ahead of a more detailed response at the Scoping Stage. WSCC expects all comments made during consultation to be included in the ES.</i>	All comments provided by WSCC made during the consultation are included in the ES either in this Chapter or within the full list of comments received during the Statutory Consultation period in the Consultation Report (Document Reference: 5.1).
West Sussex County Council (WSCC)	<i>Table 16-5 Landscape receptors – Settlement. Only main towns have been identified here. Other settlements, such as Pagham, Climping/Atherington, Rustington, and Ferring, should be included.</i>	Representative viewpoints and accompanying assessments from Pagham, Climping and Ferring Gap are provided in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference: 6.4.15.4) and summarised in Section 15.10 (O&M effects).
West Sussex Council	<i>16.4.13 [paragraph of PEIR] List of receptors kept under review – that is welcomed. It will be important that the list is comprehensive, as it seems very high level in Table 16-5.</i>	Table 15-8 within this Chapter has been updated to define the relevant receptors requiring assessment.

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<i>16.6.23 [paragraph of PEIR] Is the 'limited visibility in the low-lying landform of the West Sussex Coastal Plain' (i.e., more inland areas between Selsey and Littlehampton) backed up by the ZTV? Photomontages should be provided to demonstrate this.</i>	Further assessment of the limited visibility of Rampion 2 from the low-lying landform of the West Sussex Coastal Plain is provided in Section 15.10 (O&M effects) and is supported by Figure 15.15, Volume 3 of the ES (Document Reference: 6.3.15) Blade Tip ZTV with Surface Feature Screening and additional viewpoints within this area at B1/B2. Chichester Harbour (Figure 15.74 and Figure 15.75, Volume 3 of the ES (Document Reference: 6.3.15); C. Eastergate (Proposed A29) (Figure 15.76, Volume 3 of the ES (Document Reference: 6.3.15)); and D. Footbath between A259 and Colworth (Figure 15.77, Volume 3 of the ES (Document Reference: 6.3.15)).
West Sussex County Council (WSCC)	<i>16.6.29 [paragraph of PEIR] Beach huts, cafes, and other open green spaces on the coast host recreational activities also.</i>	These receptors are noted and have been added to the receptors described for representative viewpoints on the West Sussex coast.
West Sussex County Council (WSCC)	<i>16.6.30 [paragraph of PEIR] Noted this section is intended to be an overview but WSCC raises the following:</i> <ul style="list-style-type: none"> • <i>Principal coastal settlements - what defines this?</i> • <i>Main road route - also A29 quite possibly a Main Road route (Principal</i> 	Further definition of the principal coastal settlements is provided in Section 15.6 . An additional representative viewpoint has been provided from a position

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Highway route – both terms are used). In future the proposed re-alignment of the A29 here (through a strategic housing site) will have bridge potentially providing elevated southward views;</i></p> <ul style="list-style-type: none"> <i>• Tourist and Visitor Locations – missing some key other beaches (Wittering’s for which some (albeit limited) views are confirmed likely), and other coastal recreation areas as referred to above.</i> 	<p>near the proposed re-alignment of the A29 (Viewpoint C. Eastergate Proposed A29) (Figure 15.75, Volume 3 of the ES (Document Reference: 6.3.15)) and East Wittering (Viewpoint A) (Figure 15.72, Volume 3 of the ES (Document Reference: 6.3.15)).</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>16.6.44 [paragraph of PEIR]‘Agreement on VPs has been reached’ - this is not entirely accurate. WSCC still wanted to see some issues resolved (see comments below), but notes additional consultation held with RED during formal consultation which is further discussing key VPs to be included.</i></p> <p><i>Table 16-11 and 16.16.3. This table seems to include two additional VPs as discussed which are welcomed, however, not the corresponding plan to see the micro-sited locations and is missing VP C (recommend near Eastergate) and D (A259 which is highlighted as a Main Road Route) which were requested by WSCC in the ETG correspondence.</i></p> <p><i>What consideration has been given to additional beach and recreational areas as previously highlighted? Why no VP for Climping Beach which also has many of the characteristics, recreational, public access etc?</i></p>	<p>Further dialogue on viewpoint locations in West Sussex was had through ETG meetings and written comments from WSCC (28 April 2021 and 26 July 2021). Comments on additional viewpoint locations, photomontages and night-time views from West Sussex have been addressed with further viewpoint photography undertaken in summer 2021 and these additional viewpoints from West Sussex included in the ES, as agreed in consultations with WSCC, as set out in the additional viewpoints listed above.</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>Table 16-14. Rampion 2 will likely be highly visible from the keep of Arundel Castle and should be appropriately considered, including cumulative</i></p>	<p>The visual effect of Rampion 2 on visitors to Arundel Castle is assessed in full at Viewpoint 33 - Arundel</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>impacts from other proposed developments.</i>	Castle in Appendix 15.4: Viewpoint assessment, Volume 4 (Document Reference: 6.4.15.4) summarised in Section 15.10 and shown in Figure 15.56, Volume 3 of the ES (Document Reference: 6.3.15).
West Sussex County Council (WSCC)	<i>16.7.9 [paragraph of PEIR] Why can't there be perceptible separation distances between Rampion 1 and the proposed project? Further clarity is required on this.</i>	The project design responds to combined principles developed in consultation with stakeholders, as explained fully in Section 15.7 and includes a wind farm separation zone between Rampion 1 and 2 to provide a break in the lateral spread of WTGs on the horizon.
West Sussex County Council (WSCC)	<i>16.7.25 [paragraph of PEIR] Night-time photomontages need to take account of impacts at night for other key visual receptors.</i>	Additional night-time views are included from urban areas of West Sussex at Worthing seafront (Figure 15.35, Volume 3 of the ES (Document Reference: 6.3.15)) and Pagham Harbour (Figure 15.38, Volume 3 of the ES (Document Reference: 6.3.15)).
West Sussex County Council (WSCC)	<i>16.7.26 [paragraph of PEIR] Is any lighting for Offshore Substations proposed and has this been considered? Further detail is expected in the ES.</i>	Assumptions regarding the lighting of the offshore substations are described in Section 15.7 and shown in the night-time photomontages in Figure 15.35 and Figure 15.38, Volume 3 of the ES (Document Reference: 6.3.15).

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<i>S16.7.33 [section reference of PEIR] Suggests ETG discussions are set out in full in Appendix 16.1, but this only includes comments made by WSCC at the Scoping stage and no later. WSCC expects this to be included within the ES.</i>	All comments provided by WSCC made during the consultation are included in the ES either in this table of the SLVIA or within the full list of comments received during the Statutory Consultation period in the Consultation Report .
West Sussex County Council (WSCC)	<i>Table 16-30 and Table 16-31. Magnitude of change identified for areas to west of Selsey Bill will need to be verified by proposed additional VP in this location. Generally, given the strong coastal association of these character areas, it could be argued that sensitivity and magnitude of change is somewhat downplayed. Table 16-3 - clarity is required why only seemingly selected LCAs in the West Sussex Coastal Plain are described here?</i>	The effects of Rampion 2 on the perceived seascape character and landscape character of receptors within West Sussex are summarised in Table 15-33 and Table 15-34 of this Chapter where there is potential for significant effects to arise and assessed in detail in Appendix 15.4: Viewpoint Assessment, Volume 4 of the ES (Document Reference 6.4.15.4). Seascape and landscape character receptors are also considered in the simple assessment in Appendix 15.3: Simple assessment, Volume 4 of the ES (Document Reference 6.4.15.3) which identifies receptors where there is potential for significant effects to arise.
West Sussex County Council (WSCC)	<i>Table 16-32. Useful summary but requires detailed cross referencing with Appendix 16.4. Again, sensitivity and magnitude of change are arguable, open to interpretation and</i>	The visual effects of Rampion 2 on the views from representative viewpoints within West Sussex are assessed in detail in Appendix 15.4:

Stakeholder	Theme	How this is addressed in this ES
	<i>may be underplayed in some circumstances.</i>	<p>Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4) and summarised in Table 15-34 of Section 15.10 (O&M effects). Definitions of sensitivity and magnitude of change are defined in the SLVIA methodology, summarised in Section 15.8 and set out in full in Appendix 15.1: SLVIA consultation responses, Volume 4 of the ES (Document Reference 6.4.15.1).</p>
<p>West Sussex County Council (WSCC)</p>	<p>16.10.38 – 16.10.51 [paragraphs of PEIR]. <i>Visual receptors presented in a different format (not tabulated). Consistency of approach across receptors would be easier to follow. Again, impacts potentially downplayed particularly given the recreational use of beachfront areas and associated visitor attractions along the coast.</i></p>	<p>Visual receptors are described in full in Section 15.10 (O&M effects) whereas the visual effects of Rampion 2 on representative viewpoints are assessed in detail in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4) and summarised in Table 15-34 of Section 15.10 (O&M effects).</p>
<p>West Sussex County Council (WSCC)</p>	<p>16.12.4 [paragraph of PEIR] WSCC/011/21 (live application) - <i>Consider the LVIA presented here and the potential for large building and twin 85m stacks to act cumulatively with visual impacts.</i></p>	<p>Application WSCC/011/21 has been reviewed and it is noted that this application has been withdrawn for the Ford Energy From Waste plant at Ford Circular Technology Park. The potential for cumulative impacts of Rampion 2 with this project is not</p>

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council (WSCC)	<i>16.16.5 [paragraph of PEIR] Night-time views should be provided for visual receptors, particularly residents facing seawards.</i>	<p>assessed any further in this ES.</p> <p>Additional night-time views are included from urban areas of West Sussex at Worthing seafront (Figure 15.35, Volume 3 of the ES (Document Reference: 6.3.15)) and Pagham Harbour (Figure 15.38, Volume 3 of the ES (Document Reference: 6.3.15)).</p>
West Sussex County Council (WSCC)	<i>Table 16-44. WSCC should be mentioned here too.</i>	<p>Further consultation and engagement with WSCC has been undertaken post PEIR, with ETG meetings held and attended by WSCC (4 November 2021, 2 March 2022, 14 April 2022 and 17 June 2022). Consultations focused on finalising and agreeing the viewpoints to be presented in the ES, the potential impacts arising on receptors in West Sussex and the design principles that would be embedded into the project design.</p>
West Sussex County Council (WSCC)	<i>Appendix 16.5. Document is heavily focused on the SDNP and dark skies. As stated above this assessment should also consider night-time views from highly populated coastal areas, where sensitive visual receptors are located and many of which benefit from a dark horizon in seaward views. Figure 16.25 lighting ZTV shows how evident lighting will be to a high volume of receptors on the coastline.</i>	<p>Additional night-time views are included from urban areas of West Sussex at Worthing seafront (Figure 15.35, Volume 3 of the ES (Document Reference: 6.3.15)) and Pagham Harbour (Figure 15.38, Volume 3 of the ES (Document Reference:</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>See 2.5.3 guidance which give equal importance to settlements and Dark skies as receptors to be considered and illustrations to be provided. Table 3-1 makes no reference to WSCC comments made on this in ETGs.</i></p>	<p>6.3.15)) and assessed in Appendix 15.5, Volume 4 and Section 15.10.</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>Chapter 16 Dark skies. WSCC did comment in the follow up ETG that there should be representative VPs outside of the designation. It is understood the night-time assessment will focus particularly on this area, which is less influenced by night-time lighting and where the appreciation of dark skies could be most affected by additional WTG lighting. There is however the potential for receptors outside of the designation to experience night- time effects, especially those where light pollution is lower, and this should be covered off in the assessment. WSCC suggests there should be representative VPs for outside of the designation, as it is recognised there are many beachfront/coastal properties, and ecologically important sites that currently look out to a dark horizon, which will be affected by the presence of the operational turbines. WSCC requests a VP at Pagham Harbour and another at a more populated coastal settlement, such as Bognor or Worthing. WSCC also suggests consulting Chichester Harbour AONB on this matter also. WSCC notes that subsequent consultation during formal consultation has been undertaken to provide further clarity on these night-time VPs.</i></p>	<p>Additional night-time views are included from urban areas of West Sussex at Worthing seafront (Figure 15.35, Volume 3 of the ES (Document Reference: 6.3.15)) and Pagham Harbour (Figure 15.38, Volume 3 of the ES (Document Reference: 6.3.15)) and assessed in Appendix 15.5: Assessment of aviation and navigation lighting visual effects, Volume 4 of the ES (Document Reference 6.4.15.5) and Section 15.10. There is no visibility of the Rampion 2 from viewpoints at Viewpoint B1 Chichester Marina (Figure 15.74, Volume 3 of the ES (Document Reference: 6.3.15)) or Viewpoint B2 Dell Quay (Figure 15.75, Volume 3 of the ES (Document Reference: 6.3.15)).</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>Chapter 16 Photo-montages. The provided photomontages are useful tools that aid in the assessment of visual effects. These clearly show the</i></p>	<p>The updated assessment of effects of Rampion 2 on seascape, coastal landscapes and views</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>significance of impacts likely to be experienced by receptors in West Sussex, particularly in terms of impacts that will result from the lengthy westerly extension that will significantly extend the field of view over which impacts on seascape will be experienced. WSCC again raises strong concerns over the potential impacts here. Comments on specific photomontages are given below.</i></p>	<p>experienced by people (receptors) in West Sussex are assessed in Section 15.10 (O&M effects). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude (scale) of effects and minimising harm on the perceived seascape qualities and views. It is noted that the effects experienced from West Sussex derive primarily from the scale and western spread of WTGs in the field of view, which is assessed from representative viewpoints in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4) and summarised in Section 15.10 (O&M effects). Photomontages are available in Figures 15.26 – 15.79, Volume 3 of the ES (Document Reference: 6.3.15).</p>
<p>West Sussex County Council (WSCC)</p>	<p>Chapter 16 Specific VPs</p> <ul style="list-style-type: none"> 16.21b (ZTVs with visual receptors) Westergate, Slindon etc. all in blue (even with 10m 	<p>Comments on each viewpoint have been addressed as follows:</p> <ul style="list-style-type: none"> Figure 16.21b – Representative viewpoint added at

Stakeholder	Theme	How this is addressed in this ES
	<p><i>screening) and no representative VPs.</i></p> <ul style="list-style-type: none"> • <i>16.21 would have been useful to use 10m as a base, so more representative of receptors.</i> • <i>16.34a – VP 9 Shoreham – This is set back and doesn't represent Shoreham Fort and Shoreham beachfront.</i> • <i>16.35a – VP10 Worthing – offshore substation locations will need thought and careful consideration, very prominent from this viewpoint.</i> • <i>16.36a – VP 11 Littlehampton, this shows a very large change from the current seascape views.</i> • <i>16.43a -VP18 Cissbury Ring – Very prominent across a wide angle. Colouring (very white) seems to downplay impacts of westerly extent of turbines.</i> • <i>16.45a – VP20 Springhead Hill – No photomontage included which makes it harder to assess potential impact.</i> • <i>16.46e- VP21 Bignor Hill - Westerly turbines seem hazy in this photomontage.</i> • <i>16.49 – VP26 Low Weald A29 near Ashington – No photomontage included, which makes assessment of impact difficult.</i> • <i>16.52 – VP29 Kingly Vale – No photomontage which makes assessment of impact difficult.</i> • <i>16.54 -VP33 Arundel –Unlike other photomontages turbines not made hazy in the view. LVIA from</i> 	<p>Viewpoint 41 Slindon Folly (Figure 15.60, Volume 3, of the ES (Document Reference: 6.3.15) of the ES (Document Reference: 6.3.15)) and Viewpoint C Eastergate (Figure 15.76, Volume 3 of the ES (Document Reference: 6.3.15) of the ES (Document Reference: 6.3.15)).</p> <ul style="list-style-type: none"> • Figure 16.21 – More detailed OS Terrain 5 DTM has been used in Figure 15.14b, Volume 3 of the ES (Document Reference: 6.3.15) of the ES (Document Reference: 6.3.15) (A1 scale). • Figure 16.34a – VP 9 Shoreham. Noted and updated description in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4). • Figure 16.35a – VP10 Worthing. Noted. Offshore substations shown in Figure 15.35, Volume 3 of the ES (Document Reference: 6.3.15) of the ES (Document Reference: 6.3.15). • Figure 16.36a – VP11 Littlehampton. Noted and effects assessed in Appendix 15.4: Viewpoint

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Ford Energy from Waste and A27 Arundel Bypass (when available) should be taken into account here.</i></p> <ul style="list-style-type: none"> • 16.59 – VP50 The Trundle – <i>Slightly hazy to the west, to be considered for new photography.</i> • 16.61 – VP52 Chanctonbury Ring – <i>WSCC would request new photography, as this was taken at dusk.</i> • 16.62 – VP55 Beeding Hill – <i>No photomontage undertaken, which would help assess impacts.</i> • 16.64 – VP61 Nr Lancing College – <i>No photomontage undertaken here; it is considered the baseline photography is unhelpful as large earthworks (temporary construction works) dominates the view.</i> 	<p>assessment, Volume 4 of the ES (Document Reference 6.4.15.4).</p> <ul style="list-style-type: none"> • 16.43a -VP18 Cissbury Ring. Noted and effects assessed in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4). • 16.45a – VP20 Springhead Hill. Baseline view and wireline visualisation provided in Figure 15.45, Volume 3 of the ES (Document Reference: 6.3.15) of the ES (Document Reference: 6.3.15) are sufficient to consider impacts. • Figure 16.46e - VP21 Bignor Hill. Noted, however photography in visualisation is considered sufficiently clear and is presented in the ES photomontage in Figure 15.46, Volume 3 of the ES (Document Reference: 6.3.15) of the ES (Document Reference: 6.3.15). • Figure 16.49 – VP26 Low Weald A29. Baseline view and wireline visualisation provided in Figure 15.49, Volume 3, of the ES (Document Reference: 6.3.15) are

Stakeholder	Theme	How this is addressed in this ES
		<p>sufficient to consider impacts.</p> <ul style="list-style-type: none"> ● Figure 16.52 – VP29 Kingley Vale. Baseline view and wireline visualisation provided in Figure 15.52, Volume 3 of the ES (Document Reference: 6.3.15) are sufficient to consider impacts. ● Figure 16.54 - VP33 Arundel. New photography was undertaken at Arundel Castle and is presented in Figure 15.56, Volume 3 of the ES (Document Reference: 6.3.15). ● 16.59 – VP50 The Trundle Noted, however photography in visualisation is considered sufficiently clear and is presented in the ES photomontage in Figure 15.63, Volume 3 of the ES (Document Reference: 6.3.15). ● Figure 16.61 – VP52 Chanctonbury Ring. New photography was undertaken at Chanctonbury Ring and is presented in Figure 15.65, Volume 3 of the ES (Document Reference: 6.3.15). ● Figure 16.62 – VP55 Beeding Hill. New photography was

Stakeholder	Theme	How this is addressed in this ES
		<p>undertaken at Beeding Hill and is presented in Figure 15.68, Volume 3 of the ES (Document Reference: 6.3.15).</p> <ul style="list-style-type: none"> Figure 16.64 – VP61 Nr Lancing College. Noted, baseline view and wireline only presented in Figure 15.71, Volume 3 of the ES (Document Reference: 6.3.15) as no view of Rampion 2.
<p>West Sussex County Council (WSCC)</p>	<p><i>Chapter 16 Mitigation WSCC expects RED to work with stakeholders to further develop commitments to the scale and layout of turbines to reduce the significant visual impacts as presented in the assessment. Some areas for consideration are given below:</i></p> <ul style="list-style-type: none"> <i>Commitment to a clear separation of Rampion 1 and Rampion 2, to minimise the horizontal extent of the offshore wind turbines east to west along the horizon/seascape to reduce the potential curtaining effect;</i> <i>Consideration of using the full North- South extent of the search area to also reduce the lateral spread; and</i> <i>Although not deemed an overall worst-case for assessment purposes, the greater number of turbines positioned in the western extension area versus that of Zone 6, will clearly be more detrimental to receptors along the West Sussex coastline. Therefore, a more detailed understanding and discussion of the balance between the potential</i> 	<p>The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7) which provide embedded environmental measures by reducing the magnitude of effects and minimising harm on the perceived qualities and views of the SDNP and from West Sussex. Design principles that have shaped the Rampion 2 design have been developed and applied in consultation with stakeholders and include:</p> <ul style="list-style-type: none"> ‘Field of view’ – reducing the field of view or ‘horizontal extent’ of Rampion 2 and the visually combined lateral

Stakeholder	Theme	How this is addressed in this ES
	<p><i>locations of turbines in the extension area and that of Zone 6 should be held.</i></p>	<p>spread of Rampion 1 and Rampion 2.</p> <ul style="list-style-type: none"> ● ‘Proximity’ - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles). ● ‘Wind farm separation zones’ - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. ● ‘Separation foreground’ - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>During the design process these design principles were applied to reduce the spatial extent of the Rampion 2 array area and the number of WTGs proposed, such that the project design responds to these</p>

Stakeholder	Theme	How this is addressed in this ES
		combined principles and reduces the magnitude and geographic extent of effects, as explained fully in Section 15.7 .
West Sussex County Council (WSCC)	<i>Figures 16.14 – 16.15. WSCC requests a separate ZTV to be produced with heritage assets and viewpoints overlaid.</i>	A separate ZTV of Rampion 2 with heritage assets is presented in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference 6.2.25).

Table 16-7 Formal Consultation feedback – Volume 2, Chapter 16 , Marine archaeology

Stakeholder	Theme	How this is addressed in this ES
Historic England	The worst-case scenario (design envelope) for impacts to known or presently unknown elements of the marine historic environment should be based on the use of foundations utilising suction buckets.	The maximum design scenario has been updated since the PEIR submission and is detailed in Section 16.7 .
Historic England	We do not concur with the approach adopted for assessment of change in respect to perceptions of Historic Seascape Character. A revaluation of HSC is to be delivered within any ES subsequently produced.	A detailed HSC assessment using guidance recommended (see Section 16.2), has been included in Appendix 16.1: Marine archaeological technical report, Volume 4 of the ES (Document Reference: 6.4.16.1). The results are summarised in Section 16.6 .
Historic England	The draft Marine Outline Written Scheme of Archaeological Investigation requires amendment.	Outline Marine Written Scheme of Investigation (Document Reference: 7.13) has been updated.
Historic England	It is our advice, and our position, that impacts to marine archaeology should be scoped into construction activities phase of this proposed project. /.../ until it is demonstrated these	All potential impacts on marine heritage receptors have been scoped in as summarised in Section 16.4 and detailed in Sections 16.9 to 16.15 .

	<p>embedded mitigation measures can be adequately secured through the DCO and DMLs, full consideration should be given to all potential impacts.</p>	
Historic England	<p>Impacts from interconnector cables, omega joints and cable protection should be considered</p>	<p>The maximum design scenario has been updated since PEIR submission and is detailed in Section 16.7. All considered impacts are further detailed in Sections 16.9 to 16.15.</p>
Historic England	<p>Data quality (geophysical data) should be clarified and a figure showing the spatial coverage should be included.</p>	<p>Data quality is summarised in Section 16.6 and detailed in Appendix 16.1: Marine archaeological technical report, Volume 4 of the ES (Document Reference: 6.4.16.1). Spatial cover of geophysical data has been included on Figure 16.1, Volume 3 of the ES, (Document Reference: 6.3.16).</p>
Historic England	<p>Further consideration of the size and shape of AEZs for all medium and high potential receptors is required in any ES subsequently produced to ensure they are robust mitigation on a case-by-case basis the placement of anchor lines and other activities in the water column must also avoid these AEZs.</p>	<p>All AEZs have been produced on a case-by-case basis, as illustrated in Annex E of Appendix 16.1: Marine archaeological technical report, Volume 4 of the ES (Document Reference: 6.4.16.1). As per commitment C60 (Table 16-16), all intrusive activities will be routed and microsited to avoid any identified marine heritage receptors unless other mitigation approaches are agreed with Historic England.</p>
Historic England	<p>The date and character of the deposits preserved within the palaeochannels is established in order to determine their archaeological and palaeoenvironmental potential and significance and test the geophysical results. We therefore look forward to discussing with you how this information should be most effectively obtained, for example, by securing dedicated geotechnical core material from agreed locations</p>	<p>No geotechnical campaign is planned until after consent is granted. A way forward has been discussed during a targeted ETG meeting with Historic England, the MMO and RED. Outline Marine Written Scheme of Investigation (Document Reference: 7.13) outlines commitments and future plans for geoarchaeological campaigns.</p>

	expressly for geoarchaeological analysis.	
Historic England	We recommend that any further survey works planned are presented within the Outline Marine WSI as a table to ensure clear and consistent logging of survey works and to set an indicative programme of further works.	Preliminary survey campaigns and investigations are outlined within Outline Marine Written Scheme of Investigation (Document Reference: 7.13).
Historic England	Cumulative assessment, HE cannot, at this stage, concur with the conclusion of “not significant”. Until we have sufficient baseline characterisation we cannot comment further as to the cumulative impact which may arise.	Section 16.12 , Assessment of cumulative effects, has been updated.
Historic England	We cannot, at this stage, concur with the statement made in paragraph 17.15.5 regarding potential for direct spatial impact on marine heritage receptors during construction and/or decommissioning of the proposed development. It remains the case that assigning a significance of “negligible” is predicated on delivery of what appear to be general “commitments”.	Section 16.14 , Assessment of Inter-related effects, has been updated.
Historic England	Further consideration is required with regards to securing commitments C-58, C-59, C60 and C-97. In particular, C-59 which should be reworded to reflect more proactive measures.	The embedded environmental measures, as detailed in Table 16-16 , have been updated to address the stakeholder comments. The embedded environmental measures are reflected in the DCO (Requirement 13 (1), (2)).
Historic England	A total number of AEZs across the project area should be included in Section 5 , the main marine archaeology chapter and the WSI in any ES subsequently produced.	The total number of AEZs within the Assessment Boundary has been included in Appendix 16.1: Marine archaeological technical report, Volume 4 of the ES (Document Reference: 6.4.16.1), Outline Marine Written Scheme of Investigation

		(Document Reference: 7.13) and Section 16.6.
Historic England	We wish to highlight that if it is the intention of the Applicant to include permission within the DCO for O&M activities, that provisions for mitigation measures for such activities is included within the Outline Marine WSI.	Section 1.1 in Outline Marine Written Scheme of Investigation (Document Reference: 7.13) has been updated.
Historic England	Further detail should be included within Section 8 with regards to the production of method statement before and reports after works (including further survey works) and their submission to the archaeological curators for review. Timeframes and further detail regarding the submission of reports and archives to both OASIS and potentially a museum for material remains should also be included. Further detail with regards to method for recording is required in Section 9.6 , and reference to the required training needs to be included within the PAD (Annex A).	Sections 8 and 9 in Outline Marine Written Scheme of Investigation (Document Reference: 7.13) have been updated.
Historic England	We understand within Part 2, Condition 13 (pre-construction plans and documentation) of both Schedule 11 and 12, there are provisions for a WSI (Condition 13 (2)) and provisions for information relating to archaeological mitigation to be included within other appropriate pre-commencement documents. In principle, Condition 13(2) of both schedules seems to include appropriate provision and timeframes for delivery. However, Condition 13(2)(g)	Condition 13 will be updated to avoid duplication.

and Condition 13(2)(h) within Schedule 11 and Condition 13(2)(h) and Condition 13(2)(i) within Schedule 12 appear to have duplicate purposes. It is recommended that Condition 13(2)(g) and Condition 13(2)(h) of Schedules 11 and 12 respectively should be retained to cover matters relating to a PAD.

<p>MMO</p>	<p>The MMO understands that there are ongoing discussions between RED and Historic England in terms of the commitments register and how mitigation is captured within the draft DCO. The MMO would like to be included in these discussions. The MMO notes the commitments register is likely to be a certified document and believes that this should be referenced within the DMLs as part of a condition to ensure there is enforceability to follow the commitments within this document. The MMO welcomes further discussions with RED and Historic England to agree the condition wording. The MMO requests the MMO is included in any discussions that could impact the DML wording.</p>	<p>MMO has been informed when commitments have been re-worded and have been invited to all discussions on the subject. The commitment register has been updated and is now referred to as the Commitments Register (Document Reference: 7.22).</p>
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Table 17-7 Statutory Consultation feedback, Volume 2, Chapter 17, Socio- economics

Stakeholder	Theme	How this is addressed in this ES and DCO Application
<p>First Statutory Consultation exercise (PEIR) (14 July to 16 September 2021)</p>		

Stakeholder	Theme	How this is addressed in this ES and DCO Application
Arun District Council	<p>Arun District Council recognises that the views to the sea are one of the prime attractions for residents and visitors to the district. They state that the potential impact on economy and tourism is unknown and believe more information and assessment is required. Arun District Council would like to understand what the impact of such large proposals has been on the economy of other coastal towns as a result of similar proposals.</p>	<p>The ES assessment provides a comprehensive and detailed review of the available evidence on the impact of offshore wind farms on tourism. Although this identified some gaps in the literature, the weight of available evidence suggests there will be no significant adverse effects on tourism in the study area. Within Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES: (Document Reference 6.4.17.3) the ES assessment supplements the assessment in the PEIR with an update to the evidence base as well as an additional assessment on more sensitive visitor destinations along the coast.</p> <p>The ES assessment also considers the interrelationships with tourism and seascape and landscape views by cross referring to the findings of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference: 6.2.15).</p>
Arun District Council	<p>The council noted that the economic benefits during the construction period are forecast to be exceptionally low within West Sussex as a whole and that the economic benefits of the proposals appear to be very limited. The Council wishes to secure training programmes for locals as part of the construction and maintenance of a wind farm. It would also wish to secure much greater economic benefits and mitigation through</p>	<p>RED have submitted an Outline Skills and Employment Strategy as part of the DCO application. The purpose of the Outline Skills and Employment Strategy document is to provide an outline strategy that can be developed further with the relevant key consultees into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the Sussex region by RED. In addition a Supply Chain Plan will be produced as part of the CfD</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	things such as development funds and tourism funds.	process. Any additional development and tourism funding would sit outside of the assessment and the Supply Chain Plan is not considered as embedded mitigation and therefore not included in the commitments stated in Table 17-19 .
Brighton and Hove Council	Brighton and Hove Council stated that the assessment of impacts on tourism needs to consider the cumulative impact of Rampion 2 alongside the existing windfarm, notably to incorporate larger wind turbines over an extended area.	Rampion 1 is considered part of the baseline environment presented in Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES (Document Reference 6.4.17.3) as this is already constructed and operational. Activities associated with Rampion 1 are therefore not included within cumulative effects assessment (CEA) offshore as Rampion 1 is already operational and included as part of the socio-economic baseline.
Brighton and Hove Council	The council stated that the socio-economic chapter does not consider the potential positive and negative impacts of the project on education. This should be included, and educational benefits and/or mitigation identified. The project has a stated four year build, and a thirty year lifespan, so we would expect that educational benefits to the local community (such as apprenticeships or otherwise working with local educational establishments) are built in from an early stage, especially given the lead time between consent potentially being	RED have submitted an Outline Skills and Employment Strategy as part of the DCO application. The purpose of the Outline Skills and Employment Strategy document is to provide an outline strategy that can be developed further with the relevant key consultees into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the Sussex region by RED. In addition, a Supply Chain Plan will be produced as part of the CfD process.

Stakeholder	Theme	How this is addressed in this ES and DCO Application
Brighton and Hove Council	<p>granted, and work on the ground beginning. "</p> <p>The council states that the data sources used to inform the socio-economic assessment should also include surveys of local people and visitors, specifically in relation to the existing and proposed windfarm, particularly noting the lack of research that exists regarding the impact of windfarms on tourism.</p>	<p>Recent attitudinal/perceptions surveys have been used alongside other studies to assess the relationship between offshore wind farm development and tourism as is presented in Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES: (Document Reference 6.4.17.3). There is not a lack of research, but a lack of ex-post evidence (studies undertaken after a wind farm has been developed which assess the impact this has had on visitor volume and value). These types of studies are more robust than ex-ante studies (undertaken before a wind farm has developed) which are based on how visitors say their behaviour would change as a result of the offshore wind farm. There are significant weaknesses in ex-ante survey methods as the responses are subject to bias, depending on people’s feelings about wind farms. Because of these weaknesses and the large existing ex-ante evidence base available, it is considered that an additional ex-ante visitor survey is not required. This would be subject to the same risk of bias and would not add value to the assessment. As such, no such additional surveys have been undertaken to inform the ES.</p>
Brighton and Hove Council	<p>While the council support reference to research assessing the impact of windfarms, surveys of locals,</p>	<p>As above, there is already a substantial evidence base showing offshore wind farms have a limited impact on tourism, a</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>visitors, tourism operators of all scales and other relevant stakeholders should have been undertaken to feed into conclusions about the impact of the existing and proposed scheme on the tourism economy of Brighton and Hove, but also the wider Sussex coast.</p>	<p>number of which draw upon visitor surveys. The evidence base is presented in Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES (Document Reference 6.4.17.3). It is considered unlikely that further surveys would provide additional evidence that would justify the considerable costs involved.</p>
<p>Brighton and Hove Council</p>	<p>The same applies to offshore recreational activity – it is unclear why surveys could not be undertaken, particularly given the various recreation groups that exist in the area.</p>	<p>Surveying recreational users would be a complex and resource intensive exercise given the wide range of different users. It is highly unlikely that surveys would provide additional insight that justifies the costs involved. However, there is merit in engaging with recreational groups where there are concerns over negative effects. This additional engagement was undertaken for the ES and was used to inform the update to the Chapter 7: Other marine users, Volume 2 of the ES (Document Reference: 6.2.7).</p>
<p>Brighton and Hove Council</p>	<p>"The impact of the scheme on this sector therefore needs to be robustly assessed, and mitigation identified – such as educational programmes/facilities for residents, visitors, and schools; training of local people in the renewable industry; and creating better linkages between the wind farm and the local community and economy. Economic and social mitigation measures need to be identified and timelines set out, to clarify how Rampion will ensure that</p>	<p>As the assessment presented in Section 17.9, Section 17.10 and Section 17.11 does not anticipate significant negative impacts on the tourism economy in general, it is not anticipated that there is the need for specific mitigation.</p> <p>RED have submitted an Outline Skills and Employment Strategy as part of the DCO application. The purpose of the Outline Skills and Employment Strategy document is to provide an outline strategy that can be developed further with the relevant key</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>the local economy and community benefits from the project. Rather than noting that the supply chain largely misses Sussex and that local skills are absent, Rampion should be examining how to change this, maximising local procurement and local employment, particularly through an early focus on education. "</p>	<p>consultees into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the Sussex region by RED. In addition, a Supply Chain Plan will be produced as part of the CfD process.</p>
<p>Mid Sussex District Council</p>	<p>The principle social effect of the proposals relates to the closure/permanent diversion of Footpath 1T that runs across part of the Wineham Lane North site which has been identified as a moderate/major residual effect. It is apparent that this footpath, which runs for a length of approximately 380 metres from Wineham Lane to the northern boundary of the Wineham Lane North substation site, may need to be permanently diverted. Clearly however the impact is dependent on whether or not this site is selected as the substation location.</p>	<p>There will be no direct impact on footpath 1T as a result of the selection of Oakendene as the substation location.</p>
<p>Clymping Parish Council</p>	<p>The potential impact on coastal tourism given the size of the turbines.</p>	<p>The size of turbines is a common area of concern for a number of consultees. The assessment presented in Section 17.9, Section 17.10 and Section 17.11 considers the maximum design scenario in which the maximum sized turbines are used. The evidence base presented in Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES (Document Reference 6.4.17.3) shows</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
Lyminster & Crossbush Parish Council	The council believes there is likely to be a significant detrimental effect on tourism in the area, with potential job losses.	<p>offshore wind farms have a limited impact on tourism.</p> <p>The baseline assessment highlights assets that are located 500m from the onshore cable corridor in Section 17.6. Within Section 17.9, Section 17.10 and Section 17.11 the ES assesses the tourism impacts in more detail for those tourism areas which are believed to be potentially more sensitive or at risk of negative impacts.</p>
Middleton-on-Sea Parish Council	The council stated that it is difficult to quantify the level of reduction in tourism that Rampion 2 could bring to the parish, but it will have a negative effect on shops, pubs and other establishments. This is especially likely if, as expected, both Bognor Regis and Littlehampton show a much more significant degree of reduction in tourism which will cause a number of businesses to close. The Parish Council therefore OBJECT to Rampion 2 on the basis that this will be detrimental to the parish and larger towns.	<p>Section 17.9, Section 17.10 and Section 17.11 of the ES assesses the potential effects on tourism in more detail than the PEIR assessment to look at particular areas where the tourism economy is more sensitive or vulnerable to negative impacts. These areas are presented in Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES (Document Reference 6.4.17.3). In addition, the assessment has supplemented the review of empirical evidence and the use of specific additional research looking at the ex-post relationship between offshore wind farm development and tourism economy performance.</p>
West Sussex County Council	West Sussex County Council expects the ES to take account of the Economy Reset Plan 2020-2024 and would expect further consideration of visitor economy data that is available, beyond that for Brighton and Hove. The council highlighted that a new report on the Sussex wide tourism data will	The reset plan is incorporated into Section 17.2 and Appendix 17.3: Socio-economics technical baseline, Volume 4 of the ES (Document Reference 6.4.17.3) presents the Sussex wide visitor volume and value data. This evidence is taken account of in the assessment.

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>be published soon. Elements of the data are out of date and do not reflect the significant impact the pandemic has had on jobs and employment. The council would like to see further acknowledgement of this. Similarly, there are currently labour supply pressures in construction, which may or may not settle by the proposed construction dates. Reference to a plan to help overcome this should be discussed further with the council. A key issue is the low economic impact for the County through the construction phase. Further assurance work is being progressed to seek to have some impact on this is needed, as per the commitment at the scoping stage. Again, further meetings with the council will be required to development these commitments.</p>	<p>RED have submitted an Outline Skills and Employment Strategy as part of the DCO application. The purpose of the Outline Skills and Employment Strategy document is to provide an outline strategy that can be developed further with the relevant key consultees into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the Sussex region by RED. In addition, a Supply Chain Plan will be produced as part of the CfD process.</p> <p>RED to also consider the wider issue of limited economic impact locally given the current uncertainty concerning the selection of a construction port.</p>
<p>West Sussex County Council</p>	<p>“It is estimated that around 40% of the Proposed Development’s £2.87 billion (in 2019-pricing) construction cost, or the equivalent of £1.14 billion (in 2019-pricing) will be retained by businesses in the Proposed Development’s supply chain nationally. At the Sussex-level, the overall level of supply chain expenditure retained by local businesses is anticipated to be minimal (around 1.0% of total construction costs), adding up to £30.1 million (in 2019-pricing).” Whilst supply chain issues are recognised, during the scoping stage it was stated</p>	<p>Appendix 17.2: Socio-economics cost and sourcing report, Volume 4 of the ES (Document Reference 6.4.17.2) considers the level of expenditure that could be captured in the national and Sussex supply chain. There may be opportunities to achieve higher retained local spend in practice; however, within the ES it is appropriate to be conservative in the assumptions and modelling of local economic impact. The assessment is based on the use of a realistic worst case scenario to capture the realistic worst case for both negative and positive effects.</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>scenarios considering the use of local ports and project expenditure captured by local businesses would be developed. Information on this work and what it intends to achieve will be expected, with a view towards the percentage figure for Sussex increasing from the current low base. WSCC would expect further discussions on this post formal consultation.</p>	
<p>West Sussex County Council</p>	<p>It is disappointing that `despite the efforts on the existing Rampion 1 project there is not yet an established supply chain cluster in Sussex`. Is there a plan to seek to address this further through the proposed project?</p>	<p>RED have submitted an Outline Skills and Employment Strategy as part of the DCO application. The purpose of the Outline Skills and Employment Strategy document is to provide an outline strategy that can be developed further with the relevant key consultees into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the Sussex region by RED. In addition, a Supply Chain Plan will be produced as part of the CfD process.</p>
<p>West Sussex County Council</p>	<p>The council welcomes the PEIR recognising the aims and aspirations of the council through maintaining multi use routes to a good standard and developing opportunities to improve access to rural areas and the South Downs national Park.</p>	<p>These aims and aspirations are also recognised throughout the ES.</p>
<p>West Sussex County Council</p>	<p>Reference to 136 PROW being affected by proposal but only 77 referenced in OPRoWS. Clarity is required on this.</p>	<p>136 was the number of PROw falling within the nominal 500m ZOI of the originally proposed cable corridor. 77 was the number of paths actually crossed by this corridor, access routes or set-</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
West Sussex County Council	The Downs Link is a shared-used path accessible to pedestrians, horse-riders and cyclists and uses a Public Bridleway. It is not a cycle route, and reference to this should be corrected.	down areas. The numbers resulting from the final corridor route selection are 154 paths wholly or partially within the ZOI and 55 actually crossed. This is clarified in this chapter.
Horsham District Council	While not a registered common and therefore not Access Land, there is one other block of public green space that falls within the onshore cable corridor. This is the Washington Recreation Ground and Allotments (TQ122132) which has one football pitch, one cricket pitch and parking for 12 vehicles. The land lies directly on the cable route and but will be crossed using HDD. Two abutting parcels of land are also recognised as public green space, these are Jockey’s Meadow and The Triangle, shown in [sic] The Council notes the sensitivity impacts to these receptors is noted as Low and Medium with negligible and minor significance. The Council further notes a number of embedded environmental measures have been identified and committed at reducing (and mitigating) the impact of construction activity on these receptors. The Council would	Washington Parish Council has been asked to provide information about potentially affected groups but has not provided any.

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>expect commitments at Environmental Statement stage to demonstrate the applicant has engaged with those communities affected on the effects to reduce disruption to these recreation assets.</p>	
<p>South Downs National Park Authority</p>	<p>Use of the Strava Global Heatmap is therefore acceptable, but the findings should be caveated as Strava is known to be used mainly by cyclists and would not capture a large portion of ramblers or local walkers/dog walkers that may be using both the heavily trafficked routes such as the SDW and also some of the paths that appear to have very low usage.</p>	<p>It is acknowledged that Strava data does need to be used with care. However, it is only being used as a relative measure of traffic volumes, rather than for absolute numbers, to give an understanding of which are the more heavily trafficked paths. The Strava data can be selected to broadly differentiate between cyclists and pedestrian users.</p>
<p>Second Statutory Consultation exercise (PEIR SIR: October to November 2022 and third Statutory Consultation exercise (PEIR FSIR: February – March 2023)</p>		
<p>East Sussex County Council</p>	<p>East Sussex County Council recognise the economic benefits that Rampion 2 would bring and support the proposed Rampion 2 development. As the proposed onshore cable route options are all located in West Sussex, quite some distance from the boundary with East Sussex, the impacts of these proposals on East Sussex would be negligible.</p>	<p>This point is noted.</p>
<p>Mid Sussex District Council</p>	<p>The economic benefits of the proposal are supported given the potential for expenditure on the construction of Rampion 2 and the likelihood of Sussex based companies being involved in the supply chain. It is encouraging to note that you</p>	<p>RED have submitted an Outline Skills and Employment Strategy as part of the DCO application. The purpose of the Outline Skills and Employment Strategy document is to provide an outline strategy that can be developed further with the relevant key</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>are committing to work with local partners and will seek to maximise the ability of local people to access employment opportunities associated with the construction and operation of Rampion 2. It is expected that such a commitment would be secured through a legal agreement.</p>	<p>consultees into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the Sussex region by RED. In addition, a Supply Chain Plan will be produced as part of the CfD process.</p>
Horsham District Council	<p>LACR-01c introduces additional socio-economic receptors including users of Public Rights of Ways including footpaths, bridleways and restricted byways. LACR-01c will lead to moderate/major adverse effect (Significant) on user of restricted byway 2092. For the users of all the other Public Rights Of Way impacted by LACR-01c, even accounting for the implementation of embedded environmental measures (Appendix F) this will lead to additional significant residual effects. The Council accepts AA-26 in p notes, the access follows the sa public rights of way.</p>	<p>The impact of the final route on PRow has been comprehensively reviewed for the ES; all routes crossed by the onshore cable corridor or within the ZOI of the Proposed Development have been considered.</p>
SDNPA	<p>Little consideration appears to have been given in respect of the impact on recreational activities and the importance of these in respect of the second Purpose of the National Park (as well as Special Quality 5). The proposals would result in the temporary closure of key routes at Upper Barpham, Angmering Park and Michelgrove (amongst others). This represents a gap in the</p>	<p>It has been noted in the ES that a number of routes within the South Downs National Park will be subject to temporary closure and other potential impacts upon their recreational users. These potential impacts have been considered and assessed on a path by path basis, along with assessments of areas of access land, commons and other publicly accessible open space.</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>assessment through loss of the recreational experience.</p> <p>In future, we would suggest that Public Rights of Way are highlighted clearly as tourist routes within the SDNP.</p>	<p>Particular weight has been given to promoted routes such as the South Downs Way and the Monarch’s Way.</p>
<p>AECOM – Norfolk Estate Farms</p>	<p>LACR-01c</p> <p>Similarly, it is also acknowledged that LACR-01c impacts additional socio-economic receptors (users of Public Rights of Way (PRoWs) including footpaths and bridleways), however, through the implementation of mitigation measures the majority would not result in any additional significant effects. The exception, as noted in the PEIR SIR, are users of the Restricted Byway 2092 which results in an additional potential moderate / major adverse effect (significant) on users.</p> <p>Whilst the addition of the moderate / major adverse significant effect on Restricted Byway 2092 is noted, it is worth making it clear that the all the other options presented, including the original route presented within the original PEIR concluded that there would be a number of significant residual effects for PRoW users, which include moderate residual effects on PRoW users of 829, 197, 2697 and 2298 and moderate / major residual effects on PRoW users of 36Bo and 1T. It is therefore pertinent to note that the new</p>	<p>The respondent notes that we have identified different paths as being potentially impacted by different routes and appears to ask for a comparative assessment. However, for the ES, there is only one route under consideration and therefore it would be inappropriate to make comparisons against routes that are no longer under consideration.</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>significant effect identified for the Restricted Byway 2092 is not in isolation and should not be a reason for not selecting this route as an option to take forward given that the Developer is confident that these impacts do stack against the progression of the OCR given no further mitigation or alternatives have been identified to avoid or reduce these impacts in the PEIR SIR.</p> <p>It is also worth highlighting that the information presented in the PEIR SIR does not appear to clearly compare the non-significant effects to users of PRowS between the different alternative route options against the OCR presented in the original PEIR for specific sections. The only way of comparing this is through referring to the original PEIR which lists the effects for PRow / sensitive receptors for the whole route. It is therefore difficult to develop a clear comparison on the impact to receptors that are presenting not-significant effects between the section of the original route and the particular section of one of the options.</p>	
<p>West Sussex CC</p>	<p>1. A significant number of PRowS will be impacted along the onshore cable route, whichever route is taken forward from those proposed through this consultation. WSCC request this is kept to a minimum</p>	<p>The responses made by WSCC have been used to inform the Socio-economics chapter of the ES. However, the specific comments fall under the remit of Chapter 23, Transport and have not been addressed directly in the Socio-economics chapter.</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>through the design evolution process when refining to a single cable route option. Reference is made in the consultation materials to a Public Rights of Way Management Plan (PRoWMP) but no detail on which meaningful commentary can be made at this stage.</p>	
	<p>2. Various references are made throughout the PEIR SIR of interruption to users as a consequence of construction traffic management, including temporary and permanent access to the cable route. In some instances, alternative routes put users on roads. This may be acceptable in the short term but for those longer-term closures/diversions, it is expected that more user-friendly options are provided, where possible. It is understood this will not always be possible, but this needs to be seriously considered particularly in cases of roadway diversions with no footway. Alternative diversions should be considered, even if requiring the creation of new temporary routes. Concern is also raised</p>	

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>that a number of accesses seemingly propose a shared use with PRow users.</p> <p>3. Consideration of the phasing of these closures also needs to be undertaken in consultation with WSCC, for example, Bridleways 2208 and 2174/1. It seems that these offer an alternative to one another if closed, so consideration of the timing of these works is needed to not close both routes at same time, and therefore minimising negative impact on users.</p> <p>The principles of how these routes will be managed and the required mitigation to interrupt public access as little as possible will require detailed engagement with WSCC ahead of the DCO submission.</p>	

Table 18-6 Formal Consultation feedback, Volume 2, Chapter 18, Landscape and Visual Impact – Access requested, First Statutory Consultation exercise (July – September 2021)

Stakeholder	Theme	How this is addressed in this ES
<p>Multiple stakeholders including (but not restricted to) Adur District Council, Horsham District Council and West</p>	<p>Concerns regarding the temporary impact of the cabling installation including construction compounds, on protected landscapes and communities</p>	<p>The construction effects of the onshore cable corridor on designated landscapes and visual effects on communities have been assessed in detail in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3) and Appendix 18.4: Visual assessment,</p>

Stakeholder	Theme	How this is addressed in this ES
<p>Sussex County Council.</p>		<p>Volume 4 of the ES (Document Reference: 6.4.18.4), and summarised in Section 18.11 to 18.13.</p>
<p>Multiple stakeholders including (but not restricted to) Natural England and West Sussex County Council.</p>	<p>Careful consideration must be given to the need for any temporary or permanent lighting, which should be sensitively designed and managed.</p>	<p>Where required, construction lighting will be limited to directional task lighting positioned to minimise glare and nuisance to residents and recreational receptors as noted in Section 18.7.</p> <p>The effects of lighting have been assessed in Sections 18.9 to 18.10, Appendix 18.2: Viewpoint analysis, Volume 4 of the ES (Document Reference: 6.4.18.2) and Appendix 18.4: Visual assessment, Volume 4 of the ES (Document Reference: 6.4.18.4).</p>
<p>Multiple stakeholders including (but not restricted to) West Sussex County Council, Horsham District Council, Natural England and South Downs National Park Authority (SDNPA).</p>	<p>The temporary construction will result in vegetation loss, this should be avoided</p>	<p>Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>An Outline Landscape and Ecological Management Plan (LEMP) (Document Reference: 7.10) has been developed to ensure the reinstatement of landscape features and habitats.</p>
<p>Multiple stakeholders including (but not restricted to) SDNPA, WSCC and Natural England.</p>	<p>Advised to include an arboricultural report to support the findings of the landscape and visual impact assessment.</p>	<p>Arboriculture Surveys and Vegetation Retention Plans form part of the additional survey information required to better inform the LVIA and assessment of SDNP and SLQs.</p> <p>The arboricultural impact assessment is presented in Appendix 22.16</p>

Stakeholder	Theme	How this is addressed in this ES
<p>Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.</p>	<p>The assessment should consider visual impact to the wider surrounds, landform and visual character. The special landscape qualities of the SDNP should be assessed.</p>	<p>Arboricultural Impact Assessment, Volume 4 of the ES (Document Reference: 6.4.22.16)</p> <p>The effects of the onshore elements of the Proposed Development on the special landscape qualities of the SDNP have been summarised in Sections 18.11 – 18.13 of the Chapter, and assessed in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3). The visual assessment been assessed in detail in Appendix 18.4: Visual assessment, Volume 4 of the ES (Document Reference: 6.4.18.4)</p>
<p>Multiple stakeholders including (but not restricted to) Natural England and SDNPA.</p>	<p>No reference is made to the criteria for demonstrating exceptional circumstances justifying major development in the SDNP, including considerations of alternative locations.</p>	<p>The final onshore cable route was selected after assessment and consultation on several onshore cable route options.</p> <p>Further justification on development within the SDNP can be found within Section 3.3 of Chapter 3: Alternatives, Volume 3 of the ES (Document Reference: 6.2.3).</p>
<p>Multiple stakeholders including (but not restricted to) WSCC, Natural England and Horsham District Council.</p>	<p>Of particular concern are significant effects relating to the loss of trees and woodland. Stakeholders highlight the existing boundary vegetation along Bob Lane is crucial for screening both substations.</p>	<p>Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>An Outline LEMP (Document Reference: 7.10) has been developed to ensure the reinstatement of landscape features and habitats.</p>

Stakeholder	Theme	How this is addressed in this ES
		The existing boundary vegetation along Bob Lane has been retained.
<p>Multiple stakeholders including (but not restricted to) Arun District Council and WSCC.</p>	<p>The effect of the Proposed Development interface with planned and known upcoming development on the landscape and visual impacts.</p>	<p>Cumulative effects of the onshore elements of the Proposed Development have been assessed in Section 18.14.</p>
<p>Multiple stakeholders including (but not restricted to) Arun District Council, Horsham District Council, Natural England and SDNPA.</p>	<p>The Landscape Design Plan is required to clearly set out how the design planning will ensure the protection of landscape character, mitigation and the architectural strategy.</p>	<p>A Landscape Design Plan and Strategy for the onshore substation has been developed and presented as part of the Outline LEMP (Document Reference: 7.10) which includes all the elements requested by Natural England.</p>
<p>Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.</p>	<p>Due to the sensitivity of SDNP and concerns of the feasibility of reinstatement works an assessment after three and five years should be undertaken.</p>	<p>The assessment has included effects at Year 1, Year 5 and Year 10, in agreement with stakeholders during consultation.</p> <p>An Outline LEMP (Document Reference: 7.10) has been developed to ensure all new planting is established within five years of the construction phase, and appropriate maintenance and management is carried out up to 10 years.</p>
<p>Multiple stakeholders including (but not restricted to) Natural England and SDNPA.</p>	<p>Question whether the Study Area (2km either side of the temporary construction corridor) is sufficient in open downland.</p>	<p>Methodology setting out the rationale for the extent of the LVIA study area is reported in Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the ES (Document Reference: 6.4.18.1)</p>

Stakeholder	Theme	How this is addressed in this ES
<p>Multiple stakeholders including (but not restricted to) SDNPA and Natural England.</p>	<p>The consideration of topography as a highly sensitive landscape feature.</p>	<p>Topography is a characteristic of landscape character. Effects on landscape character are assessed in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3).</p>
<p>Multiple stakeholders including (but not restricted to) SDNPA, Natural England and WSCC.</p>	<p>Further information is required to understand the methodology and viability of trenchless crossing techniques (such as HDD). With particular regards scarp slopes within the SDNP.</p>	<p>Trenchless crossings are a measure to reduce, as far as practical, the landscape and visual effects of the onshore cable corridor. This type of crossing has been used for much of the scarp slopes within the SDNP.</p> <p>Risk management measures with respect to trenchless crossing techniques are outlined in the Outline CoCP (Document Reference: 7.2) and Outline Construction Method Statement (Document Reference: 7.23)).</p> <p>Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4) notes that the DCO does not consent open trenching methods in areas where HDD is being proposed (should HDD fail additional consent would be required to deliver an alternative solution).</p>
<p>Multiple stakeholders including (but not restricted to) SDNPA and WSCC.</p>	<p>The assessment should consider intervisibility between onshore and offshore elements of the Proposed Development.</p>	<p>The intervisibility between the offshore and onshore elements of the Proposed Development has been included throughout the assessment in this Chapter.</p>
<p>Multiple stakeholders including (but not restricted to) WSCC and SDNPA.</p>	<p>The assessment of impacts on visual receptors should be broadened to include individual properties,</p>	<p>Settlements within the 2km study area and individual residential properties (within a study area of 1km) are assessed in Appendix 18.4: Visual assessment, Volume 4 of the ES (Document Reference:</p>

Stakeholder	Theme	How this is addressed in this ES
	community facilities and schools.	6.4.18.4) and Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the ES (Document Reference: 6.4.18.5) respectively. Community facilities and schools are assessed separately in Chapter 17: Socio-economics, Volume 2 of the ES (Document Reference: 6.2.17).
Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.	Specific viewpoints should be refined and reconsidered where necessary.	Viewpoint locations have been revised and assessed as a result of route design evolution and feedback from statutory and targeted consultations in Oct/Nov 2022, Feb/Mar 2023 and April/May 2023. The viewpoint locations are illustrated in Figure 18.4a-e, Volume 3 of the ES (Document Reference: 6.3.18) and a viewpoint directory has been reported in Appendix 18.6: Viewpoint table, Volume 4 of the ES (Document Reference: 6.4.18.6).
Multiple stakeholders including (but not restricted to) Arun District Council, Horsham District Council, Mid Sussex District Council, Natural England, SDNPA and WSCC.	Details underpinning the principles of the design of the operational onshore substation should be provided as part of the ES.	A Landscape Design Plan and Strategy for the onshore substation has been developed and presented as part of the Outline LEMP (Document Reference: 7.10).
Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.	The Applicant should review the effectiveness of the Rampion 1 reinstatement techniques and demonstrate how lessons learned have been considered.	An Outline Code of Construction Practice (Document Reference: 7.2) and Outline LEMP (Document Reference: 7.10) have been developed to ensure the reinstatement and monitoring of landscape features and habitats. Further engagement has been undertaken with SDNPA and WSCC

Stakeholder	Theme	How this is addressed in this ES
		to review lessons learned from Rampion 1 on 27 April 2023.
Multiple stakeholders including (but not restricted to) WSCC and SDNPA.	Individual visual impacts on residential properties in proximity to the onshore substation sites should be assessed.	A Residential Visual Amenity Assessment has been included in Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the ES (Document Reference: 6.4.18.5).

Table 18-7 Formal Consultation feedback, Volume 2, Chapter 18, Landscape and Visual Impact – Access requested, Second Statutory Consultation exercise (October – November 2022)

Stakeholder	Theme	How this is addressed this ES
Multiple stakeholders including (but not restricted to) Natural England and SDNPA.	Concerns that the assessment of the impact of the Proposed Development on the special qualities of the SDNP underestimates the landscape effects which is compounded by a lack of baseline analysis.	The effects of the onshore cable corridor on the special landscape qualities of the SDNP have been summarised in Section 18.11 to 18.13 , and assessed in detail in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3) which includes a detail analysis of the baseline conditions reported in Section 18.6 .
Multiple stakeholders including (but not restricted to) Natural England and SDNPA.	The loss of tree belts and hedgerow trees as a result of the temporary cable corridor will diminish the integrity of	Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of

field boundaries, altering the landscape character of the SDNP.

Construction Practice (Document Reference: 7.2).

An **Outline LEMP** (Document Reference: 7.10) has been developed to ensure the reinstatement of landscape features and habitats.

Effects on landscape character within the SDNP are assessed in **Appendix 18.3: Landscape assessment, Volume 4** of the ES (Document Reference: 6.4.18.3).

Multiple stakeholders including (but not restricted to) Natural England and SDNPA.

Even where trenchless crossing techniques are used the SDNP would be impacted by construction activities.

The construction effects of the onshore cable corridor on the special landscape qualities of the SDNP have been summarised in **Sections 18.11 - 18.13** and assessed in **Appendix 18.3: Landscape assessment, Volume 4** of the ES (Document Reference: 6.4.18.3). These effects are temporary and would last up to approximately 3.5 years.

Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.

An Arboricultural Impact Assessment should provide clear criteria used to select trenchless crossing locations.

An AIA is provided in **Appendix 22.16: Arboricultural Impact Assessment, Volume 4** of the ES (Document Reference: 6.4.22.16) which provides criteria used to select trenchless crossing locations, and this information supports the findings of the LVIA.

This information should be incorporated to support the LVIA.

Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES (Document Reference: 6.2.22) and indicated in **Figures 7.2.1- 7.2.3** of the **Outline Code of Construction Practice** (Document Reference: 7.2).

Multiple stakeholders including (but not restricted to) Horsham District Council and WSCC.

The nature of the alternative routes proposed may result in cumulative effects with offshore

No alternative routes are proposed in the ES. Cumulative effects are summarised and assessed in **Section 18.13**.

	elements of the Proposed Development.	
Multiple stakeholders including (but not restricted to) Natural England and SDNPA.	Concerns that LVIA overstates the benefits of C-115 and clarity is required as to the extent of this mitigation measure. Concerns particularly relate to the success of hedgerow notching and re-planting particularly on chalk soils.	An Outline LEMP of the ES (Document Reference: 7.10) has been developed to ensure the reinstatement of landscape features and habitats. The maintenance period for the scheme extends up to 10 years. Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).
Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.	A number of comments were received on the selection and refinement of viewpoints associated with the alternatives and modifications presented for consultation in the PEIR SIR (RED, 2022).	Viewpoint locations have been revised as a result of route design evolution and feedback from statutory and targeted consultations in Oct/Nov 2022, Feb/Mar 2023 and April/May 2023. The viewpoint locations are illustrated in Figure 18.4a-e, Volume 3 of the ES (Document Reference: 6.3.18) and a viewpoint directory has been reported in Appendix 18.6: Viewpoint table, Volume 4 of the ES (Document Reference: 6.4.18.6).
Multiple stakeholders including (but not restricted to) Natural England, SDNPA and WSCC.	Stakeholders advised that the Applicant review the effectiveness of the reinstatement of the Rampion 1 cable corridor.	An Outline Code of Construction Practice (Document Reference 7.2) and Outline LEMP (Document Reference 7.10) have been developed to ensure the reinstatement and monitoring of landscape features and habitats. The maintenance period for the scheme extends up to 10 years.

Further engagement has been undertaken with SDNPA and WSCC to review lessons learned from Rampion 1 on 27 April 2023.

Table 18-8 Formal Consultation feedback, Volume 2, Chapter 18, Landscape and Visual Impact – Access requested, Third Statutory Consultation exercise (February – March 2023)

Stakeholder	Theme	How this is addressed in this ES
Multiple stakeholders including (but not restricted to) SDNPA and Natural England.	The assessment of effects on Special Landscape Qualities within SDNP should not moderate harm through a quantitative judgement on geographical extent and should instead assess whether SLQs will be harmed.	The effects of the onshore cable corridor on the special landscape qualities of the SDNP have been summarised in Sections 18.11 - 18.13 and assessed in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3).
Multiple stakeholders including (but not restricted to) SDNPA and Natural England.	The cultural heritage of the landscape is an integral part of landscape character, therefore should be assessed in reference to the landscape character.	Historic Landscape Character has been acknowledged in the assessment of landscape character in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3) and this Chapter. Effects on Cultural Heritage and Historic Landscapes are assessed in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference: 6.2.25).
Multiple stakeholders including (but not restricted to) SDNPA and Natural England.	A concise baseline commentary on the special qualities of the SDNP to be crossed by the temporary construction corridor during the construction period.	The effects of the onshore cable corridor on the special landscape qualities of the SDNP have been summarised in Sections 18.11 – 18.13 , and assessed in Appendix 18.3: Landscape assessment, Volume 4 of the ES (Document Reference: 6.4.18.3) which includes a baseline analysis of the special landscape qualities.
Multiple stakeholders	The landscape and visual effects of	The landscape and visual effects of temporary fencing during construction

Stakeholder	Theme	How this is addressed in this ES
<p>including (but not restricted to) SDNPA and Natural England.</p>	<p>temporary fencing during construction should be assessed for the proposed locations for fencing within SDNP.</p> <p>The presence of fencing is not assessed in the A3: Arun to Adur Open Downs landscape character assessment where it has the potential to change this open downland landscape character.</p> <p>Any proposed permanent fencing during the operation and maintenance phase should also be assessed.</p>	<p>is assessed as part of construction effects in the assessment including A3: Arun to Adur Open Downs.</p> <p>Permanent fencing is also assessed as part of the operation and maintenance phase.</p>
<p>Multiple stakeholders including (but not restricted to) SDNPA, WSCC and Natural England.</p>	<p>A preliminary Arboricultural Impact Assessment remains to be presented as evidence for the choice of open cut over trenchless crossings.</p>	<p>Arboriculture Surveys and Vegetation Retention Plans form part of the additional survey information that has informed the findings of the LVIA.</p> <p>An AIA is provided in Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the ES (Document Reference: 6.4.22.16).</p>
<p>Multiple stakeholders including (but not restricted to) SDNPA, WSCC and Natural England.</p>	<p>A lack of available evidence on the feasibility of C-115 and the ‘high’ success rates for reinstatement of hedgerows and trees. Failure of C-115 would result in significant severance of field boundaries harming the landscape character.</p>	<p>An Outline LEMP (Document Reference: 7.10) has been developed to ensure the reinstatement of landscape features and habitats. The maintenance period for the scheme extends up to 10 years.</p> <p>Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the</p>

Stakeholder	Theme	How this is addressed in this ES
<p>Multiple stakeholders including (but not restricted to) SDNPA and Natural England.</p>	<p>Further evidence is required on the viability of trenchless crossing (including HDD), particularly on steep slopes and chalk scarp. In event of HDD failure substantial areas of Ancient Woodland would be at threat of loss.</p>	<p>Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>Trenchless crossings are a valuable form of mitigation, capable of reducing residual landscape and visual effects, as far as practical, and are included in the LVIA.</p> <p>Risk management measures with respect to trenchless crossing techniques are outlined in the Outline CoCP (Document Reference: 7.2) and Outline Construction Method Statement (Document Reference: 7.23)).</p> <p>Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4) notes that the DCO does not consent open trenching methods in areas where HDD is being proposed (should HDD fail additional consent would be required to deliver an alternative solution).</p>
	<p>Additional viewpoints and refinements to existing viewpoints are proposed by stakeholders. Stakeholders advise that further micro-siting would be beneficial due to the panoramic nature of several views.</p>	<p>Viewpoint locations have been revised as a result of route design evolution and feedback from statutory and targeted consultations in Oct/Nov 2022, Feb/Mar 2023 and April/May 2023. The viewpoint locations for the final onshore cable route are illustrated in Figure 18.4a-e, Volume 3 of the ES (Document Reference: 6.3.18) and a viewpoint directory has been reported in Appendix 18.6: Viewpoint Directory, Volume 4 of the ES (Document Reference: 6.4.18.6).</p>

Table 18-9 Formal Consultation feedback, Volume 2, Chapter 18, Landscape and Visual Impact – Access requested, Fourth Statutory Consultation exercise (April – May 2023)

Stakeholder	Theme	How this is addressed in this ES
<p>Multiple stakeholders including (but not restricted to) Horsham District Council and WSCC.</p>	<p>Noted that the Bolney substation extension crosses up to four field/land use boundaries and is in close proximity to existing field boundaries which include hedgerows, trees and woodland. Embedded environmental measures will be applied to reduced loss of vegetation and habitat.</p>	<p>Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>A Landscape Design Plan and Strategy for the onshore substation has been developed and presented as part of the Outline LEMP (Document Reference: 7.10).</p>
<p>Multiple stakeholders including (but not restricted to) Horsham District Council.</p>	<p>Views of the Bolney substation extension works are likely to be visible from public footpath 34Bo. Enhancement planting to the existing vegetation should be secured to mitigate this. Views are also likely from Bob Lane, planting to connect the existing tree belt to the westerly woodland block should be secured.</p>	<p>Visual effects from 34Bo public footpath and Bob Lane have been included in the assessment. Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>An Outline LEMP (Document Reference: 7.10) has been developed to ensure the reinstatement of landscape features and habitats. The maintenance period for the scheme extends to 10 years.</p>
<p>Multiple stakeholders including (but not restricted to)</p>	<p>The Bolney substation extension proposals have the potential to increase impacts on</p>	<p>Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are</p>

Stakeholder	Theme	How this is addressed in this ES
<p>Horsham District Council and WSCC.</p>	<p>arboricultural receptors.</p>	<p>documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>A Landscape Design Plan and Strategy for the onshore substation has been developed and presented as part of the Outline LEMP (Document Reference: 7.10).</p>
<p>Multiple stakeholders including (but not restricted to) Horsham District Council and WSCC.</p>	<p>The Bolney substation extension proposal would likely result in further woodland and hedgerow disconnections to those experienced as a result of the creation of Bolney substation and extensions relating to Rampion 1.</p>	<p>Landscape features or elements (principally hedgerows / trees woodland) that may be lost or retained during construction are documented in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) and indicated in Figures 7.2.1- 7.2.3 of the Outline Code of Construction Practice (Document Reference: 7.2).</p> <p>A Landscape Design Plan and Strategy for the onshore substation has been developed and presented as part of the Outline LEMP (Document Reference: 7.10).</p>
<p>Multiple stakeholders including (but not restricted to) Horsham District Council and WSCC.</p>	<p>Landscaping plans required to mitigate, screen and enhance should incorporate existing surrounding woodland and hedgerow features.</p>	<p>A Landscape Design Plan and Strategy for the onshore substation has been developed and presented as part of the Outline LEMP (Document Reference: 7.10).</p>

Table 19-8 Formal Consultation feedback, Volume 2, Chapter 19, Air Quality, First statutory consultation exercise (July – September 2021)

Stakeholder	Theme	How this is addressed in this ES
ADC	Consideration of charging points for electric vehicles.	To be considered in detailed design.
	Ensure the traffic model uses the peak construction year in regard to vehicle movements.	The construction traffic modelling undertaken as part of this ES has used the peak construction traffic years as presented in Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23).
	Baseline data should not reflect traffic activity levels throughout the COVID-19 pandemic. A representative period of traffic data should be used, for example 2019 data.	The impacts of the COVID-19 pandemic on the data used for assessment have been considered as part of the baseline data gathering as presented in Section 19.5 . The traffic modelling has used 2019 as baseline year for the model verification to ensure a robust assessment.
	Consideration of monitoring data and air quality baseline concentrations in Arun.	According to ADC latest Air Quality Annual Status Report (ADC, 2022) current monitoring indicates that there is good air quality within the district and no exceedances of the AQOs have been identified (Section 19.6). The air quality assessment has considered effects from construction traffic on road links that exceed the criteria detailed in the IAQM Guidance (IAQM and EPUK, 2017) on land-use planning and development control: Planning for air quality 2017 v1.2. Traffic increases associated with the Proposed Development within Arun do not exceed the IAQM and EPUK (2017) criteria and therefore potential effects from

Stakeholder	Theme	How this is addressed in this ES
		<p>construction traffic at in Arun have been screened out. Traffic data are presented in Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23). Regardless, according to ADC latest Air Quality Annual Status Report (ADC, 2022) current monitoring indicates that there is good air quality within the district and no exceedances of the AQOs have been identified (Section 19.6).</p>
	<p>Lack of receptors considered within Arun in the construction traffic model.</p>	<p>Construction traffic modelling has focused in areas where anticipated additional traffic is above the IAQM and EPUK (2017) criteria. Only one road link (B2135, South of Ashurst) falls within the criteria and has been assessed (see Section 19.9).</p>
	<p>Consideration of mitigation for locations with moderate adverse impacts.</p>	<p>Moderate adverse impacts have been predicted in areas where the total pollutant concentrations are comfortably below the relevant objective. Given the temporary nature of the impacts and the concentrations at these locations, no additional mitigation is proposed (see Section 19.9).</p>
	<p>Source of dust mitigation measures.</p>	<p>Dust mitigation measures have been taken from the IAQM (2016) <i>Guidance on the Assessment of Dust from Demolition and Construction</i> (see Table 19-).</p>
<p>Highways England South East</p>	<p>Construction traffic model should be updated to consider the new baseline.</p>	<p>Construction traffic modelling has been updated accordingly (see Section 19.6).</p>

Stakeholder	Theme	How this is addressed in this ES
HDC	Provision of receptor location in excel.	Noted. Receptor location provided in a suitable format (see Appendix 19.1: Full results of construction road traffic modelling, Volume 4 of the ES (Document Reference: 6.4.19.1) and Appendix 19.2: Full results of construction plant modelling, Volume 4 of the ES (Document Reference: 6.4.19.2)). A full list of final receptors and their grid location was also provided in Microsoft Excel format, during the June 2023 ETG.
	Provision of an Air Quality Mitigation Plan.	The request for an Air Quality Mitigation Plan was discussed in the ETG (see Table 19-). Considering the nature and timescales of the Proposed Development an Air Mitigation Plan is not required.
	Feasibility of enforcement Heavy Goods Vehicle (HGV) routing to avoid the Cowfold AQMA.	The justification of the HGV routes forms part of the Outline Construction Traffic Management Plan (Outline CTMP) (Document Reference: 7.6) supporting the DCO Application and is a requirement of the DCO. Enforcement of the Outline CTMP (Document Reference: 7.6) is secured through commitment C-158 (see Commitment Register (Document Reference: 7.22)). In addition, Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23) presents the methodology and calculation of construction traffic, confirming that no traffic will be routed through the Cowfold AQMA.

Stakeholder	Theme	How this is addressed in this ES
	<p>Confirm the emission standards of the construction traffic vehicles and Non-Road Mobile Machinery (NRMM) used for cable installation along the A272.</p>	<p>Onshore elements of the Proposed Development will be to a EURO standard V class or better wherever possible as outlined in the Outline CTMP (Document Reference: 7.6)</p>
	<p>Clarification of the duration of the installation activities taking place along the A272 between the A23 and A24.</p>	<p>There are two construction compounds bordering the A272 between the A23 and A24 to support the construction of the substation and the onshore cable corridor, anticipated to take 4 years.</p>
	<p>Air quality dispersion model receptor locations.</p>	<p>Air quality dispersion model receptor locations are presented in Appendix 19.1: Full results of construction road traffic modelling, Volume 4 of the ES (Document Reference: 6.4.19.1) and Appendix 19.2: Full results of construction plant modelling, Volume 4 of the ES (Document Reference: 6.4.19.2).</p> <p>Figure 19.2, Volume 3 of the ES (Document Reference: 6.3.19) also presents the location of the receptors considered for the traffic model.</p>
MSDC	<p>Charging points for electric vehicles</p>	<p>To be considered in detailed design.</p>
Natural England	<p>Transport Assessment to ensure the peak construction year is assessed.</p>	<p>Assessment has considered the peak construction year (see Section 19.9).</p>
	<p>Access road management adjacent to Amberley Mount to Sullington Hill SSSI.</p>	<p>Further information included in the Outline CTMP (Document Reference: 7.6) on the management of the access road adjacent to SSSI.</p>

Stakeholder	Theme	How this is addressed in this ES
	Confirmation that dust impacts are unlikely on the Climping Beach SSSI.	The ES chapter assesses Climping Beach SSSI for completeness due to its location adjacent to the proposed DCO Order Limits in the vicinity of landfall. Dust impacts are considered negligible (Sections 19.8 and 19.9).
	Consideration of dust impacts on Sullington Hill SSSI.	Consideration of potential dust impacts on Amberley Mount to Sullington Hill SSSI is included in the ES (Sections 19.8 and 19.9).
WSCC	Update to the CEA table	Table 19- has been updated to reflect all current projects that have the potential to result in cumulative effects with the Proposed Development.
	Consideration of the mitigation measure ' <i>to hold regular liaison meetings with other high risk construction sites within 500m of the temporary construction site boundary, should be considered for other construction activities where risks are identified</i> '. (Section 19.12.9)	Acknowledged. The environmental measures considered, included the measure referenced in the comment, have been informed from the risk identified during the construction dust assessment.

Table 19-9 Formal Consultation feedback, Volume 2, Chapter 19, Air Quality, Second statutory consultation exercise (October – November 2022)

Stakeholder	Theme	How this is addressed in this ES
Storrington & Sullington Parish Council	Concerns on traffic routing along the Storrington AQMA and a request that traffic measures, such as Automatic Number Plate Recognition (ANPR) cameras. along any prescribed HGV route that	A review of construction traffic flows has confirmed that there will be no significant traffic travelling through the Storrington High Street AQMA. AADT along the AQMA are below

includes the A24 and Long Furlong, are considered.

the IAQM and EPUK (2017) screening criteria for road links in AQMAs (see **Section 19.9**). Therefore, potential impacts are negligible. The routing of construction traffic will be managed by the **Outline CTMP** (Document Reference: 7.6).

Formal Consultation feedback, Volume 2, Chapter 19, Air Quality, Third Statutory Consultation exercise – February 2023 to March 2023 and Fourth Statutory Consultation exercise – April to May 2023

Third Statutory Consultation exercise – February 2023 to March 2023

The third Statutory Consultation exercise was undertaken from 24 February 2023 to 27 March 2023. This was a targeted consultation which focused on a further single onshore cable route alternative being considered following feedback from consultation and further engineering and environmental works. As part of this third Statutory Consultation exercise, RED sought feedback on the potential changes to the onshore cable route proposals to inform the onshore design taken forward to DCO Application. No further comments were received regarding air quality.

Fourth Statutory Consultation exercise – April to May 2023

The fourth Statutory Consultation exercise was undertaken from 28 April 2023 to 30 May 2023. This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the Rampion 2 onshore cable route into the national grid electricity infrastructure. As part of this fourth Statutory Consultation exercise, RED sought feedback on the proposed substation extension works to inform the onshore design and mitigation taken forward to the DCO Application. No further comments were received regarding air quality.

Table 20-4 Formal Consultation feedback, Volume 2, Chapter 20, Soils and agriculture – Access requested, First statutory consultation exercise (July - September 2021)

Stakeholder	Theme	How this is addressed in this ES and DCO Application
Mid Sussex District Council	Mid-Sussex District Council states that “ <i>whilst</i>	The baseline information presented in Section 20.6 records that the

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p><i>the permanent loss of any agricultural land is regrettable, this will be restricted to the onshore substation on Grade 3 land so will not result in a reason to resist the proposals.”</i></p>	<p>onshore substation footprint at Oakendene has been surveyed to confirm its ALC grade and has been found to be mainly Subgrade 3b (77 percent) and some Subgrade 3a (19 percent) and a small amount of Grade 2 (4 percent) was also identified. This means that 77 percent is not considered best and most versatile land, and 23 percent does meet the criteria of best and most versatile land. Landscaping and drainage associated with the Oakendene substation will also result in the loss of some agricultural land, however the natural in situ soils will largely be retained, and as detailed in paragraph 20.6.34 the ALC grade of this area is mainly Subgrade 3b.</p> <p>The existing National Grid Bolney substation extension works will utilise existing accesses and an existing compound, limiting temporary land take. The area of permanent development is limited to 0.63ha of land east of the existing National Grid Bolney substation, some of which has been used previously as a construction compound. As described in Section 20.6, this land has not been surveyed to date and is shown as provisional ALC Grade 3, however, the Predictive BMV Land Assessment map (Natural England, 2010) shows the land as having a low likelihood of BMV land (≤20 percent area BMV).</p>
	<p>Mid-Sussex District Council notes that the application for development consent will</p>	<p>The measures to be taken during handling/excavation, storage and reinstatement of soils are detailed in the Outline SMP (Document</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	include “ <i>a comprehensive reinstatement plan where the underground cables will be placed, as part of the DCO application. This is welcomed.</i> ”	Reference 7.4). The Outline SMP (Document Reference 7.4) has been informed by site-specific soil survey information obtained in 2021 during the soil and ALC survey. The results of the survey are detailed in the baseline information in Section 20.6 . The Outline SMP (Document Reference 7.4) is included as part of the Outline CoCP (Document Reference 7.2). Once all of the proposed DCO Order Limits area has been surveyed, the soil and ALC data obtained will be used to update the Outline SMP (Document Reference 7.4) to a Final SMP before construction begins.
Natural England	Natural England states that the methodology used in relation to the onshore cable trenches should include soil management practices sufficient to allow habitat recovery.	<p>The measures to be taken during handling/excavation, storage and reinstatement of soils are detailed in the Outline SMP (Document Reference 7.4). The Outline SMP (Document Reference 7.4) is informed by site-specific soil survey information obtained in the 2021 Soil and ALC Survey. The results of the survey are detailed in the baseline information in Section 20.6. The Outline SMP (Document Reference 7.4) is included as part of the Outline CoCP (Document Reference 7.2). The soil survey and the Outline SMP (Document Reference 7.4) have been completed by qualified soil specialists.</p> <p>A Vegetation Retention Plan is included within Appendix B of the Outline CoCP, (Document Reference 7.2) as detailed in Chapter 22: Terrestrial ecology and nature conservation,</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
		<p>Volume 2 of the ES (Document Reference: 6.2.22). This will interact with the Outline SMP (Document Reference 7.4). For example, in relation to the seeding of excavated and stockpiled or restored soils, or decision not to seed soils, the decision will be based on the most appropriate measures, defined by an ecologist, to promote habitat recovery following reinstatement.</p>
	<p>Concern that in areas where it is intended that trenchless crossing (Horizontal Directional Drilling (HDD)) will be used to avoid sensitive receptors that this may not be feasible due to ground conditions, resulting in trenching be used.</p>	<p>Ground investigation will be completed pre-construction specifically to confirm the ground conditions at required trenchless crossing locations. Based on the available desk based information, no significant constraints to the feasibility of trenchless crossing beneath sensitive areas within the onshore part of the proposed DCO Order Limits have been identified.</p>
	<p>Concern over the potential for trenching through the South Downs National Park (SDNP) to result in long term ‘scarring’ to the landscape. Based on knowledge of the difficulties of the soil reinstatement work in this area, Natural England expect to see this aspect thoroughly considered by the ES stage.</p>	<p>Soils in the proposed DCO Order Limits within the SDNP have not been surveyed to date. Parts of the SDNP were historically used for military training as the South Downs Training Area (SDTA) and as a result there are moderate to high unexploded ordnance (UXO) hazard zones within the SDNP which are coincident with the proposed DCO Order Limits.</p> <p>The required actions to mitigate the UXO risk sufficiently in these areas to enable Soil and ALC Survey, and other pre-construction surveys, to proceed will involve a combination of non-intrusive survey and intrusive survey to identify whether avoidance, investigation or removal/ clearance</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
		<p>of anomalies is needed before other surveys/other works can progress. Once sufficient UXO clearance is completed, the Soil and ALC Survey will be completed for all areas within the proposed DCO Order Limits and the Outline SMP (Document Reference 7.4) will be updated to include any new measures or amend existing measures to protect soils within the SDNP. This will be completed during pre-construction.</p> <p>Given the likely presence of shallow silty soils over chalk within the SDNP / former SDTA, and this soil's distinctive vegetation cover of herb-rich downland, the Outline SMP (Document Reference 7.4) includes specific measures for these soils. These include suitable seeding of soil stockpiles, to be confirmed by an ecologist, and measures to protect excavated chalk to assist with returning the soil drainage conditions to baseline following reinstatement. The requirement for these measures to be updated in the Final SMP, once Soil and ALC Survey is completed, is an embedded measure in Table 20-17.</p>
	<p>Natural England agree with the proposed Study Area for the soils and agriculture assessment (including the ALC and soil survey, which will include all temporary land-take areas).</p>	<p>Partial Soil and ALC survey (of areas within the proposed DCO Order Limits that are not affected by moderate or higher UXO risk) has been completed to date. Where survey data is not yet available, the assessment has used available desk-based information on soil types and likely ALC grades. As above, commitment C-183 in Table 20-17 ensures that sufficient information</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>Concern that the temporal scope of the soils and agriculture assessment within the PEIR is limited to the construction phase.</p>	<p>will be obtained pre-construction in order for the Final SMP to include suitable measures for the handling/excavation, storage and reinstatement of soils for all areas of temporary (and permanent) land take. The full survey information will be used to inform the Final SMP.</p> <p>Loss of or damage to soil resources during operation and maintenance and decommissioning phases has been scoped out of this ES chapter (as agreed by the Planning Inspectorate (Planning Inspectorate, 2020)) in the Scoping Opinion as soil resources will be protected by the site-specific Outline SMP (Document Reference 7.4) produced using information gathered in the baseline surveys conducted in 2021 (Section 20.6).</p> <p>Any disruption to soils or agricultural land due to operation and maintenance activities are likely to be minimal and short term, with no net loss of agricultural land. The use of joint bays (with access chambers) minimises the requirement to excavate lengths of cable in the event of a fault, as these can be pulled from one joint bay to another.</p> <p>In relation to decommissioning, it is anticipated that the onshore electrical cables will be left in-situ with ends cut, sealed and buried as outlined in Section 4.8 of Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4) to minimise</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>Comment that the table in the assessment methodology in the soils and agriculture assessment in the PEIR does not clarify that agricultural land / soils that are not classed as best and most versatile are also a potential receptor.</p>	<p>environmental effects associated with removal.</p> <p>Table 20-18 now includes descriptions for all ALC grades. ALC grades are assigned a sensitivity in Table 20-18 with the most versatile agricultural land, grades 1 and 2, being the most sensitive. At each stage of its development, the design of Rampion 2 has taken into account information on soils including ALC grades, particularly where these confirm or indicate the presence of best and most versatile agricultural land. The presence of other sensitive soil resources, such as those within statutory designated nature conservation areas and Ancient Woodland has also been considered, and Ancient Woodland is now avoided by the Proposed Development.</p>
	<p>Natural England largely agree with the scoped-out aspects of the assessment (soil loss and land loss during operation, maintenance and</p>	<p>The Outline SMP (Document Reference 7.4) includes soil handling measures for all identified and anticipated soil types and ALC grades within the proposed DCO Order Limits. Where several different soil / agricultural land receptors are present, the assessment of effects on soils and agricultural land (Section 20.9) uses a conservative average sensitivity for the soil receptors to assess the significance of the temporary and permanent effects.</p> <p>Where possible, excavated soils will be reused within the proposed DCO Order Limits and handled in accordance with the Outline SMP (Document Reference 7.4), to minimise the quantity of waste soil</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>decommissioning). It is acknowledged that loss of soil resource and agricultural land due to decommissioning activities has been scoped out of the assessment, however, it is also stated that decommissioning is anticipated to be restricted to the removal and reinstatement of the onshore substation site. However, no consideration has been made to how the substation site would be reinstated. It is currently implied that any surplus soil resource as a result of construction activities would be taken off site (C-31 and C-69).</p>	<p>generated. During construction the reuse of soil will be in accordance with a Materials Management Plan (C-7 and C-69, Table 20-17). The potential for soils to be retained and reused within the substation (e.g., for landscaping purposes) will be explored. Where soil cannot be replaced in its original location, testing of topsoil and subsoil to the applicable British Standards will be completed at the earliest opportunity to inform the potential reuse of these soils elsewhere within the proposed DCO Order Limits or at an offsite receptor site in compliance with the Definition of Waste: Code of Practice (C-256, Table 20-17). Details of how decommissioning will be implemented are provided in Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4).</p>
	<p>Natural England notes that the assessment will be based on the ALC and soil survey data for the temporary and permanent land take areas, and comments that the site-specific information should be utilised to contribute to route options/route refinement, and substation footprint/site design to help minimise BMV loss.</p>	<p>At each stage of its development, the design of Rampion 2 has taken into account information on soils including ALC grades, particularly where these confirm or indicate the likely presence of BMV agricultural land. This information has been considered in the design to minimise the potential impact to soil resources and agricultural land through embedded environmental measures presented in Table 20-17. Based on the soil and ALC survey information the onshore part of the proposed DCO Order Limits is expected to largely avoid the highest quality agricultural land, with most land surveyed to date being Subgrade 3b (not BMV). However, the assessment acknowledges that there is</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
		<p>localised Grade 2 land and Subgrade 3a within the proposed DCO Order Limits, and the potential for BMV land in areas not surveyed to date, and where applicable based on the baseline information in Section 20.6, a conservative average of Subgrade 3a has been applied.</p>
	<p>Natural England welcomes the preparation of an Outline Soil Management Plan (OSMP), the avoidance of soil becoming waste and notes that a specialist land drainage consultancy should be engaged to undertake the preparation of preliminary pre- and postconstruction agricultural land drainage plan.</p> <p>The OSMP should include the type and volume of each soil type to be stripped; the nutrient status of the soil units to inform the potential suitability for biodiversity enhancement (where soils cannot be reinstated where excavated); and where required, the location of soil storage and restoration, derived from the soil survey.</p> <p>For areas of temporary development, the ALC grade determined from soil survey should be used to inform the restoration criteria, with temporarily</p>	<p>The Outline SMP (Document Reference 7.4) is included in the Outline CoCP (Document Reference 7.2). The soil survey and the Outline SMP (Document Reference 7.4) have been completed by qualified soil specialists. This includes soil types however it does not include soil volumes. All soil types and measures for their handling and storage will be confirmed in the Final SMP. During pre-construction, soil volumes will be confirmed in the MMP (and Soil Resource Plan - which will be integrated with, and may form a sub-section of, the MMP), which will interact with the Final SMP.</p> <p>Soil survey within the SDNP has been limited to date by unexploded ordnance constraints within the former South Downs Training Area (SDTA) and in other areas due to land access constraints. Whilst this means that the Outline SMP (Document Reference 7.4) currently does not provide specific soil measures for soils within the SDNP and some other areas where survey has not been possible to date, a commitment is included in Table 20-17 to ensure that sufficient information will be obtained pre-construction in order</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
	<p>disturbed BMV land returned to the same quality as far as practicable to minimise loss.</p> <p>The ALC and soil survey should inform soil re- use opportunities when direct replacement is not possible. (i.e., the permanent land take areas). and all soils should be suitable for the planned end use.</p> <p>It is expected that soil data collected as part of the ALC surveys will be re-used to develop Soil Resources Plans. This soil data should be supplemented, where necessary, to provide coverage for all soils including those in non-agricultural use. The Soil Resource Plan should show the areas and type of topsoil and subsoil to be stripped, haul routes, the methods to be used, and the location, type and management of each soil stockpile.</p>	<p>for the soils for the Outline SMP (Document Reference 7.4) to be updated to include suitable measures for the handling / excavation, storage and reinstatement of soils within the SDNP. Survey will be undertaken using the same density and approach as detailed in Table 20-12.</p> <p>Embedded environmental measure C-28 in Table 20-17 includes a specialist drainage contractor / consultant being engaged prior to construction to develop the pre- and post-construction drainage plan on agricultural land.</p>
	<p>Natural England noted inconsistent terminology used for the potential impacts across Tables 21-8; 21-14 and section 21.9.</p>	<p>The terminology on impacts is now consistent in Table 20-9, Table 20-16 and the assessment in Section 20.9. Table 20-9 has been rationalised to remove duplication in the identified potential effects.</p>
	<p>Natural England note that the Cumulative Effects Assessment (CEA) has</p>	<p>Cumulative effects have been considered for agricultural land and soils in Section 20.10.</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
South Downs National Park Authority	<p>been scoped out for agricultural land and soils, however, the potential cumulative permanent agricultural land take (including BMV) should be considered.</p> <p>Concern over effects on forest soils and woodland/trees due to construction of the cables.</p>	<p>The Proposed Development outlined in Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4) has avoided Ancient Woodland and ensured that all veteran trees will remain in-situ. Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22) outlines the embedded environmental measures to protect veteran trees and woodlands. All soils will be handled in accordance with a site-specific Outline SMP (Document Reference 7.4) based on soil information obtained from a soil and ALC survey.</p>
West Sussex County Council	<p>Concern over the construction methodology and timescales the working corridor may be left open, including haul routes, and soil left stockpiled, in relation to potential adverse effects on soil function.</p>	<p>Rampion 2 will implement the use of machinery with low ground pressure during topsoil stripping to minimise soil compaction where the soil conditions indicate that compaction is possible (C 12). Handling of soils will be in accordance with the Outline SMP (Document Reference 7.4) and soil storage time will be kept to the practicable minimum to prevent the soil deteriorating in quality, appropriate seeding of stockpiles will be undertaken to minimise the potential for soil erosion and nutrient loss and to maintain biological activity (see embedded environmental measures C-133</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
		<p>and C-183 Table 20-17). Topsoil stripped from different fields will be stored separately. Soils will be handled and stored in accordance with a site specific Soil Management Plan (SMP). The Outline SMP (Document Reference 7.4) for Rampion 2 has been produced by a qualified soil specialist based on information obtained from a soil and ALC survey. The final SMP will be developed by the Construction Contractor pre-construction (see commitment C-183 Table 20-17).</p>
	<p>West Sussex County Council notes there is the potential for adverse impacts to farming practices through the temporary loss of land availability, restricted access and disruption caused by temporary working areas and construction traffic, as well as to the soil resource itself. It is acknowledged in the PEIR that the financial effects on productive farmland have not been assessed, but the Council expects this to be fully assessed within the ES, and the methodology of which to be consulted upon with stakeholders.</p>	<p>The assessment of effects of Rampion 2 on farming including financial effects is included in Section 20.9.</p>
	<p>Concern over the potential for soil heating during operation of the cables.</p>	<p>The design of the cables selected for Rampion 2 is such that soil heating due to operation of the cables will be very limited (the cables will warm slightly, by no more than 1°C). Further</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
		assessment of the effects of soil heating during the operational phase is therefore scoped out (see Table 20-10).
	West Sussex County Council wishes to see the minimisation of impacts whether short, medium, or long term upon the agricultural resource within the County, as per National Policy Statement for Energy (EN-1) (DECC, 2011), minimisation of impact to Best and Most Versatile agricultural land, and the permanent loss of agricultural land at the onshore substation minimised through the design phase.	<p>At each stage of its development, the design of Rampion 2 has taken into account information on soils including ALC grades, particularly where these confirm or indicate the likely presence of BMV agricultural land. This information has been considered in the design to minimise the potential impact to soil resources and agricultural land through the embedded environmental measures presented in Table 20-17.</p> <p>Rampion 2 will implement the use of machinery with low ground pressure during topsoil stripping to minimise soil compaction where the soil conditions indicate that compaction is possible (C 12). Handling of soils will be in accordance with the Outline SMP (Document Reference 7.4) and soil storage time will be kept to the practicable minimum to prevent the soil deteriorating in quality (see embedded environmental measures C-133 and C-183, see Table 20-17). Topsoil stripped from different fields will be stored separately. Soils will be handled and stored in accordance with a site specific SMP. The Outline SMP (Document Reference 7.4) for Rampion 2 has been produced by a qualified soil specialist based on information obtained from a soil and ALC survey. The appointed Construction Contractor will ensure that the final SMP will be completed by a suitably qualified</p>

Stakeholder	Theme	How this is addressed in this ES and DCO Application
		and experienced soil scientist or experience soil specialist pre-construction.

Table 20-5 Formal Consultation feedback, Volume 2, Chapter 20, Soils and agriculture – Access requested, Second Statutory Consultation Exercise (October – November 2022)

Stakeholder	Theme	How this is addressed in this ES
Natural England	Natural England recommended that the impact assessment is based upon detailed soil and ALC surveys to determine precise areas of each ALC grade, split into permanent and temporary land take.	The assessment considers the permanent and temporary land take effects of Rampion 2, and, where available, uses soil and ALC survey data. Gaps in survey data and the actions taken to address this to provide a conservative assessment are detailed in paragraph 20.5.3 .
	It is advised that both topsoil (typically top 25cm) and subsoil (typically remaining soil to 1.2m) require reinstatement.	The treatment of excavated topsoil and subsoil is detailed in the Outline SMP (Document Reference 7.4). Material management planning will be used to ensure that where possible, if soils cannot be returned to their original location (e.g., if replaced by below ground infrastructure / necessary engineered fill materials), that topsoils and subsoils are reused elsewhere within the proposed DCO Order Limits, or tested and stored appropriately so that they can be made available to receptor sites through compliance with the Definition of Waste Code of Practice (DoWCoP) (C-256, Table 20-17).
	Soil handling and storage measures – such as topsoil segregation from subsoil, suitable machinery for soil	The Outline SMP (Document Reference 7.4) contains measures for soil handling including segregation of topsoil and subsoil,

Stakeholder	Theme	How this is addressed in this ES
	<p>handling, assessment of whether soils are suitably dry for handling (compliance with the Institute of Quarrying’s Good Practice for Handling soils in Mineral Workings [Institute of Quarrying, 2021]) and Natural England advises on the timing of soil handling that this should normally being avoided during November to March inclusive.</p>	<p>use of the Institute of Quarrying (2021) guidance to confirm soils are suitably dry for handling, use of suitable machinery for soil handling. It is also acknowledged in the Outline SMP (Document Reference 7.4) that soil handling between November to March inclusive is not recommended.</p>
	<p>Natural England advises that the SMP should be a key document feeding into the Materials Management Plan (MMP).</p>	<p>The use of an MMP post consent and the interaction of the SMP with the MMP is incorporated in embedded measure C-69 in Table 20-17.</p>
<p>Poling Parish Council</p>	<p>Soil and agricultural land quality: In relation to LACR-01a, Poling Parish Council is concerned about possible negative effects on soil condition and agricultural land quality, and drainage (including potential for increased surface water flooding), due to excavation during the construction phase of Rampion 2.</p>	<p>The measures to protect soil structure and soil health during soil handling and storage are detailed in the Outline SMP (Document Reference 7.4).</p> <p>Embedded environmental measure C-28 in Table 20-17 (C-28) includes measures to prevent the existing land drainage regime being compromised as a result of the construction phase.</p>
<p>Norfolk Estate Farms Limited</p>	<p>The response notes in relation to soil and agriculture, that the PEIR SIR assesses that for both LACR-01a and LACR-01c there would be no change to the overall assessment outcomes and conclusions provided in Chapter 21: Soils and agriculture of the PEIR, and that without the results from the agricultural land classification (ALC) surveys, confirmation, and direct comparison of the impacts on</p>	<p>The selected onshore cable route through the SDNP is within the area of moderate or high UXO risk and has, therefore, not yet had soil and ALC survey. This will be completed during pre-construction and included as part of commitment C-183 in Table 20-17. The available survey data which informs the assessment is presented in Section 20.6.</p> <p>Soil stockpiles will be present for the shortest practicable timeframe through materials management planning (Table 20-17, C-133).</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>specific ALC grades cannot be assessed.</p> <p>In relation to the disturbance to land during cable construction, the risk of loss of seed-mix from topsoil due to prolonged storage is raised, in addition to dust generated during construction potentially impacting on surrounding areas of vegetation.</p> <p>The response also summarises comments reported to be made by local farmers involved in the Rampion 1 project. Issues raised include mixing of excavated topsoil and subsoil, topsoil stockpiles being uncovered for long periods and subject to rain erosion, failed re-planting of hedgerows (where trenchless crossings were not used) and lasting damage to land quality due to poor reinstatement of soils.</p>	<p>The development of Vegetation Retention Plans in Appendix B of the Outline CoCP (Document Reference 7.2) is an embedded measure (C-220) detailed in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference: 6.2.22). This will accompany the Outline CoCP (Document Reference 7.2) and will interact with the Outline SMP (Document Reference 7.4) e.g., in relation to the seeding of excavated and stockpiled or restored soils, or decision not to seed soils, based on the most appropriate measures, defined by an ecologist, to promote habitat recovery following reinstatement.</p> <p>Soil handling measures, including the separate handling and storage of topsoil and subsoil are detailed in the Outline SMP (Document Reference: 7.4). Table 20-17 includes commitments to reduce the likelihood of soil erosion (including C-11, C-12, C-13, C-19 and C-132).</p>
<p>West Sussex County Council (WSCC)</p>	<p>The response includes comments on reinstatement of land and refers to the experience of Rampion 1, including planting failures following reinstatement. A comprehensive, fully resourced and implemented maintenance plan is described by WSCC as essential, with regular, timely inspections (at an agreed frequency) to ensure planting succeeds at an early stage in the plan.</p>	<p>The Outline SMP (Document Reference: 7.4) includes monitoring and aftercare requirements.</p> <p>Details of the soil profile where surveys have been completed are included in Appendix 20.1: Detailed Agricultural Land Classification Report, Volume 4 of the ES (Document Reference: 6.4.20.1).</p> <p>Table 20-17 includes commitments in relation to storage</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>It is noted that the soil type /profile has not been described in 2.4.5.4 of the PEIR SIR. WSCC comments that <i>“If the ground has been used for agricultural use and is of a clay soil (unlikely but possible), then decompaction measures may be required to break any clay pans within the soils.”</i></p> <p>Storage of soil in the floodplain at TC-16 is noted to require careful consideration.</p> <p>In relation to commitment C-13, and soil compaction, the Council states that new temporary ground protection must be capable of supporting any traffic entering or using the site without being distorted or causing compaction of underlying soil (as per BS 5837:2012, section 6.2.3).</p>	<p>of soils in floodplains (C-131 and C-132).</p> <p>In relation to embedded measure C-13 (Table 20-17), the selection of measures to lower the risk of ground compaction will be undertaken by a suitably trained / experienced person.</p>
<p>Mid Sussex District Council</p>	<p>Restoration of agricultural land following open trenching is welcomed, also the use of trenchless crossing, and the avoidance of Ancient Woodland.</p>	<p>Noted. The design of the cable installation ensures that Ancient Woodland at Michelgrove Park and Calcot Wood will be crossed using a trenchless technique such as HDD. Embedded environmental measure C-216 ensures that there will be no construction vehicular access or ground works within Ancient Woodlands. All ground works will be restricted to areas in excess of 25m from the edge of Ancient Woodland (C-216).</p>
<p>Sussex Wildlife Trust (SWT)</p>	<p>SWT strongly supports the avoidance of the Site of Special Scientific Interest (SSSI) at Climping Beach by</p>	<p>Noted. The design of the cable installation ensures that Ancient Woodland at Michelgrove Park and Calcot Wood will be crossed</p>

Stakeholder	Theme	How this is addressed in this ES
	trenchless crossing, and supports the use of trenchless crossings at the Warningcamp Hill to New Down Local Wildlife Site and ancient woodland. It objects to any loss of Ancient Woodland, and also seeks clarification on whether any ancient woodland soil will be lost. In relation to Ancient Woodland soils, SWT notes commitment made by Rampion 2 that with the use of trenchless crossings there will be no need during future cable maintenance to dig up Ancient Woodland soils.	using a trenchless technique such as HDD. Embedded environmental measure C-216 ensures that there will be no construction vehicular access or ground works within Ancient Woodlands. All ground works will be restricted to areas in excess of 25m from the edge of Ancient Woodland (C-216). The Warningcamp Hill to New Down Local Wildlife Site is avoided by the proposed DCO Order Limits, no soil disturbance will therefore take place within it.
Environment Agency	No specific comments on soils or agriculture, however, reference to works in flood risk areas and at the coast is noted.	Table 20-17 includes embedded measures in relation to storage of soils in floodplains (C-131 and C-132).

Table 20-6 Formal Consultation feedback, Volume 2, Chapter 20, Soils and agriculture – Access requested, Third Statutory Consultation exercise (February – March 2023)

Stakeholder	Theme	How this is addressed in this ES
Natural England	Natural England states that its detailed advice is provided in relation to Longer Alternative Cable Route (LACR) 01-d only, and in relation to all other route options, the previous advice provided in response to the PEIR (September 2021) and PEIR SIR (November 2022) is still relevant.	For soils and agriculture, Natural England’s comments in Table 20-4 are applicable, details of how they are addressed in the ES are provide in Table 20-4 .
Natural England	Natural England noted a “ <i>paucity of survey data presented for many of the environmental assessments of</i>	The selected onshore cable route through the SDNP is within the area of moderate or high UXO risk and has, therefore, not yet had soil

Stakeholder	Theme	How this is addressed in this ES
	<i>the route options being considered”, and states “that it is not possible for Natural England to provide fully informed advice on the options being presented to us, due to the significant omission of survey data and detailed environmental assessments across this consultation.”</i>	and ALC survey. This will be completed during pre-construction and included as part of commitment C-183 in Table 20-17 . The available survey data which informs the assessment is presented in Section 20.6 .

Table 20-7 Formal Consultation feedback, Volume 2, Chapter 20, Soils and agriculture – Access requested, Fourth Statutory Consultation exercise (April – May 2023)

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council	<i>“The temporary construction compound will be located on an area of existing hardstanding, and the current access to the substation will be utilised.” “Considering the implementation of embedded environmental mitigation measures, WSCC agrees that the extension of the Bolney Substation, as proposed, would not result in any additional receptors or likely significant environmental effects beyond those already assessed.”</i>	Noted. The assessment in Section 20.9 for soils and agricultural land considers the prior use of some of the land at Bolney substation, and considers effects on soils and agricultural land where these are still present within the Proposed Development footprint, as detailed in Table 20-15 .

Table 21-7 Formal Consultation feedback, Volume 2, Chapter 21, Noise and vibration, First statutory Consultation exercise (July-September 2021)

Stakeholder	Theme	How this is addressed in this ES
Arun District Council (ADC)	<i>ADC recommended “close liaison with Arun Planning Department to inform the careful selection of any survey position based around existing and</i>	Consultation regarding the noise survey has been undertaken with ADC (see paragraph 21.3.15). A review of proposed monitoring sites has been

Stakeholder	Theme	How this is addressed in this ES
	<p><i>proposed sites for noise sensitive development within and around the 5 years Rampion 2 development framework”.</i></p>	<p>conducted to ensure all future receptors are appropriately protected.</p>
	<p><i>“Typing error SOAEL +10dB?”</i> [MRE: Reference to Paragraph 22.8.25]</p>	<p>A typing error was identified with regard to noise level increases above the SOAEL. The correct level increase considered within the ES chapter is +1 dB, not +10 dB. No further consultation required. More clarification is provided in Section 21.9.</p>
	<p><i>“The degree and extent to which residential sensitive receptors (within 20m, or 10m) may be exposed to unsatisfactory levels of noise needing careful evaluation, particularly in consideration of any evening or night-time working, or where evening/night-time working is continuous with day-time working and where noise screening has been evaluated as impractical for the works.”</i></p>	<p>BS 5228 (BSI, 2014a) provides a criteria for the assessment of noise over a period of time. There will be temporary periods of time where noise will be high outside residences. The effects on residences from temporary high noise levels will be minimised using best practice measures and an agreement to reevaluate noise once a contractor has been commissioned for the work (embedded environmental measure C-263). Embedded environmental measures (see Table 21-20) have been reviewed, updated and included within the Outline CoCP (Document Reference: 7.2).</p>
	<p><i>“Selected roads/lanes may be unsuitable for HGV¹ traffic, not only from the point of view of noise exposure to gardens and habitable rooms but given that houses/gardens may exit directly onto currently quiet roads, with no provision for pavements and pedestrian safety”.</i></p>	<p>An assessment of effects from construction traffic noise is presented in Section 21.9. However, the traffic noise assessment has not identified significant effects. Haul routes which can affect residences farther from the road (or on quiet façades facing away from roads) or on roads with low traffic flows</p>

¹ Heavy Goods Vehicle (HGV)

Stakeholder	Theme	How this is addressed in this ES
		have been assessed differently using absolute level criteria.
	<i>“Night-time noise exposure to be considered” [for Crossbush and Warningcamp] “depending on the decided route of cable laying and required access to project sites by vehicles, including HGVs.”</i>	Night-time noise exposure is considered for those receptors where trenchless crossings could occur for 24 hours a day. Otherwise, the onshore cable corridor works would be undertaken during standard working times only. Any out of hours work beyond HDD sites will be covered by a Section 61 of the <i>Control of Pollution Act 1974</i> agreement backed by an appropriate level of assessment. The S61 requirement is secured via the Outline CoCP (Document Reference: 7.2).
	Requirement of <i>“map demonstrating the route of the proposed works in relation to the location of stated sensitive receptors was provided in this section.”</i>	Figure 21.2, Volume 3 of the ES (Document Reference: 6.3.21) show the locations of noise sensitive receptors in relation to the Proposed Development.
	Requirement to <i>“provide the current levels of noise experienced on relevant roads and for example, the Lyminster By-Pass may be complete before construction begins.”</i>	The current noise levels are provided for the relevant roads in Section 21.6 . The future noise from the Lyminster By-pass has not been included in the assessment to provide a conservative (i.e. quieter) baseline.
	<i>“Document refers to many work items as ‘temporary’; This may be for a period of months or even years and is unlikely to be viewed as acceptable by noise sensitive receptors”</i>	The time period involved could increase the effect to one of significance based on BS 5228 (BSI, 2014a) methods. For instance, trenchless crossing (HDD) noise is considered not significant because of temporary duration based on a qualitative refinement to the assessment result. Further consultation with ADC has been undertaken with

Stakeholder	Theme	How this is addressed in this ES
	<p><i>“Concerns of construction effects (i.e. piling noise/vibration)”;</i></p>	<p>respect to the use of BS 5228 (BSI, 2014a) temporal criteria.</p> <p>A review of the potential effects from vibration has been considered and included Section 21.9.</p>
<p>Chichester District Council (CDC)</p>	<p>Chichester District Council’s Environmental Protection Team would request to be <i>“included in the dissemination of survey findings in relation to any assessments of noise and vibration.”</i></p>	<p>Survey findings are included within Section 21.6.</p>
<p>Highways England South East</p>	<p><i>“Chapter 22 Noise and Vibration considers the temporary noise effects from construction road traffic noise, which finds the effects on various receptors including those along the A27 would be minor adverse, and not considered significant. Any subsequent update of traffic modelling e.g. as a result of the proposed updated baseline will need to inform an updated noise assessment. The assessment does not appear to consider Noise Important Areas, of which there are several along the A27 in the vicinity of the scheme. These should be considered in the ES.”</i></p> <p><i>“The applicant must ensure that Noise Important Areas along the A27 are considered as part of the noise assessment to ensure these areas are not significantly affected by the proposed scheme.”</i></p>	<p>Noise Important Areas have been identified into the assessment in Section 21.9 where these are affected by construction traffic noise.</p>
<p>Horsham District Council</p>	<p><i>“Noise monitoring locations to sensitive receptors be identified</i></p>	<p>Consultation regarding the noise survey has been undertaken with HDC (Section 21.3).</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>and environmental measures embedded accordingly.”</i>	Embedded environmental measures are presented in Table 21-20 .
Mid Sussex District Council (MSDC)	<i>“No significant effects have been identified in the PEIR but issues associated with excessive noise will be a sensitive issue for local residents.”</i>	Whilst the assessment of noise in accordance with BS 5228 (BSI, 2014a) does not necessarily cover the sensitivity of a group to construction, the embedded environmental measures (see Table 21-20) have been reviewed to ensure that noise disturbance is minimised and managed proactively.
	<i>“The Council recognises that the noise impacts for operation and maintenance of the onshore substation will not be submitted until further location and design details are known and we recognise and welcome that those details which have been submitted follow an accepted methodology and are in general accordance with the Planning Noise Advice Document: Sussex.”</i>	Planning Noise Advice Document: Sussex (WSCC et al., 2021) has been reviewed and is incorporated accordingly into the assessment in Section 21.9 .
	<i>“[...] the Council has the following comments/queries on the proposed methodology: •Any new baseline noise data should be undertaken post any Covid-19 lockdown effects. The approach to including or excluding existing substation noise should be fully justified. •A Low Frequency Noise methodology for operational substation noise is yet to be agreed and the Council would welcome the opportunity to comment on any final methodology</i>	Baseline data has been gathered sufficiently post the COVID-19 pandemic lockdown such that traffic was considered to be representative of normal conditions. The existing substations (Rampion 1 substation and existing National Grid Bolney substation) have been included as part of the existing baseline for construction assessments (Section 21.6). For the operational assessment of onshore substation noise, the

Stakeholder	Theme	How this is addressed in this ES
	<p>•<i>The specified SOAEL external noise level for night-time noise from construction given in Table 22-16 of the Wood report is listed as 55dB LAeq 1hr. Even allowing for the full 15dB attenuation for a partially open window, this would equate to 40dB LAeq inside a bedroom; 10dB above the WHO derived figure usually used. Therefore, more detail regarding this level and how it can be mitigated and circumstances when this would be permitted.</i></p> <p><i>Mid Sussex wishes to be consulted upon these details as soon as they are available once the substation location is finalised.”</i></p>	<p>existing substations (Rampion 1 substation and existing National Grid Bolney substation) are sufficiently distant at 1 – 1.5 km from the receptors identified that the noise from these sites would not form a notable contribution to the ambient noise environment.</p> <p>Consideration of low frequency is part of the assessment methodology agreed with MSDC (see paragraph 21.3.18).</p> <p>The use of WHO criteria for the SOAEL relates to noise exposure over a longer-term rather than short-term construction effects. The SOAEL established for night-time is well established in major infrastructure projects. This approach to SOAEL was agreed with MSDC following receipt of this feedback.</p>
	<p>Consideration of local residents with context of the construction of Rampion 1 where the effects of traffic and noise were a common complaint. The Council requests reassurance <i>“that construction activity and associated noise will be adequately managed so as to not be detrimental to local residents and that any agreed working hours would be properly adhered to”</i> through the DCO.</p>	<p>The Outline Code of Conduct Practice (Document Reference: 7.2) and Outline Construction Traffic Management Plan (Document Reference: 7.6) provide a framework of working hours, access routes and restricted routes which have been submitted as part of the DCO Application and form a requirement of the DCO.</p>
	<p>The Council has referenced <i>“a difference between the hours of construction and operation between that proposed by you</i></p>	<p>MSDC’s standard hours have been reviewed and the assessment methodology has</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>and the Council’s standard hours.”</i>	been updated accordingly in Section 21.8 .
SDNPA	The SDNPA with regards to tranquillity, and Seascape, Landscape and Visual Impact, as within the Landscape and Visual chapters.	Tranquillity is considered further within Chapter 18: Landscape and visual impact, Volume 2 of the ES (Document Reference: 6.2.18), Appendix 18.3: Landscape Assessment, Volume 4 of the ES (Document Reference: 6.4.18.3) and Appendix 18.4: Visual Assessment, Volume 4 of the ES (Document Reference: 6.4.18.4). However, the impacts of noise on the SDNP have also been considered within this chapter.
WSSC	West Sussex Council “ <i>With regards the advance notification required for works undertaken outside of stated working hours</i> ”. Request that “ <i>any likely 24 hour or continuous construction activities (e.g. SGT deliveries and oil filling, concrete pours etc)</i> ”, and the proportion of such works are included in the ES, and “ <i>notification should be given to an agreed list of stakeholders</i> ”.	The assessment considers construction activities likely to require 24 hour working (e.g. trenchless crossings) in Section 21.9 . The Outline Code of Construction Practice (Document Reference: 7.2) specifies advanced notice requirements to be given to the relevant local authorities with respect to extended working hours.
	Request that “ <i>The approach to the identification of Noise Sensitive Receptors (beyond those listed in Table 22-6) and monitoring locations for baseline surveys</i> ” are agreed with all relevant stakeholders, including WSSC post formal consultation.	Identification of receptors discussed with stakeholders alongside the noise monitoring approach (Section 21.3).
	WSSC request of further description of the “ <i>establishment of the baseline sound levels</i> ”, and the impacts shown by	The existing substations (Rampion 1 substation and existing National Grid Bolney substation) are included as part

Stakeholder	Theme	How this is addressed in this ES
	Rampion 1. Request of further discussion of the methodology and scope for this, and reference to the operational noise reporting from Rampion 1.	of the existing baseline for construction assessments, but are sufficiently distant from receptors identified for the purposes of assessing operational substation noise that they would not contribute to the noise environment at those locations.
	WSCC requests to ensure lessons learnt from the Rampion 1 process are implemented, and <i>“to ensure that modelling for construction noise was/will be accurate”</i> .	Construction noise monitoring has been reviewed to discern if this was useable for verification purposes in the noise predictions.
	WSCC request to see an <i>“outline presented in the ES of any likely 24 hour or continuous construction activities (e.g. SGT deliveries and oil filling, concrete pours etc), and notification should be given to an agreed list of stakeholders. The ES also requires taking account of a proportion of continuous works.”</i>	Commitment has been discussed with WSCC and is considered within the ES Chapter regarding potential out of hours works.
	WSCC request to see the impacts of over-running work schedules <i>“captured in assessments undertaken for the Proposed Development, and durations for certain activities should be reflected to take account for this.”</i>	This can be considered in terms of temporal criteria within the BS 5228 (BSI, 2014a) assessment, which could make a difference in terms of significance within the assessment (for instance if the difference was between an aspect of works being for under a month and over a month). Assumptions in relation to overruns are included in the working time in which the noise assessment is based.
	WSCC requests to see, <i>“as part of the site selection process, consideration of the orientation of the substation in relation to the nearby PRowS and sensitive</i>	Public Rights of Way (PRowS) would have been considered without the presence of residences, however, in the case of the substation options, there

Stakeholder	Theme	How this is addressed in this ES
	<i>receptors, with the louder noise emitting plant sited away from these receptors.”</i>	were nearby residences in each direction and therefore the nearby residences are the determining factor in terms of assessment and mitigation.
	Request for RED to “ <i>confirm how the construction/operation of the enabling works at the Bolney National Grid Substation have been taken into account</i> ” in the assessment.	The construction of the enabling works at the existing National Grid Bolney substation (Bolney extension) have been considered in Section 21.9 . An assumption has been made that there will be no audible noise outside of the site boundary from the operation of the Bolney extension.
	<i>“Assessments undertaken as part of the EIA are required to reflect the construction locations where there will likely be a more prolonged impact [...] e.g. construction compounds, HDDs, landfall, substation, areas where access is only via haul route along the cable corridor.”</i>	The temporal character of construction works has been noted within the assessment and considered when assessing significance in Section 21.9 .
	WSCC request to further discuss the locations for baseline monitoring in relation to the cable route, noting the PEIR states “ <i>It is not initially proposed to undertaken a sound monitoring survey to inform the assessment of the construction of the onshore cable, or construction of the offshore WTGs, as the extents of the study area are such that the noise environment at receptors will vary widely</i> ”. WSCC request clarification if baseline monitoring will be undertaken in proximity to HDD crossing points, accesses and construction compounds, along	Baseline monitoring has been undertaken both at identified trenchless crossing sites (where relevant in terms of assessment results and likely baseline) and temporary construction access locations. All baseline monitoring is presented in Section 21.6 .

Stakeholder	Theme	How this is addressed in this ES
	with any other more sensitive locations required.	
	Reference to be made to the Oakendene Industrial Estate when referring to noise sources around the substation search areas.	Reference to Oakendene Industrial Estate has been made in Appendix 21.1: Baseline monitoring report, Volume 4 of the ES (Document Reference: 6.4.21.1)
	Clarification on onshore substation piling activities considered.	Onshore piling activities have been assessed for the onshore substation (Section 21.9).
	WSCC require consultation over the detailed survey methods for all baseline monitoring locations along with other local authorities.	WSCC have been consulted with regards to the survey method and locations (Section 21.3).
	Based upon the characterisation of the receiving environment and the outcomes of the noise and vibration assessment, WSCC requests environmental measures required along the route at particularly noisy locations, as well as that required for the substation area are considered.	The embedded environmental measures have been reviewed as part of the iterative design process and during the preparation of this ES Chapter (see Table 21-20).

Table 21-8 Formal Consultation feedback, Volume 2, Chapter 21, Noise and vibration, Second statutory Consultation exercise (October - November 2022)

Stakeholder	Theme	How this is addressed in the ES
Arun District Council	Increase in HDD could extend far beyond stated timescales and this overall impact of the process must be taken into account	The duration of trenchless crossing is included within the assessment (Table 21-29), using a worst case scenario of drilling throughout the period of the trenchless crossing works (despite there being long periods of preparation ancillary activities where drilling will not be taking place). Embedded environmental measure (C-263) includes

		for potential extensions to works to be covered by Section 61 process.
Arun District Council	Provide details of offshore works and how they would affect Climping Beach and environs and mitigation requirements	An assessment of piling noise has been undertaken for offshore works in Section 21.9 . Otherwise associated offshore works not be considered to result in adverse effects onshore.
	Temporary nature of construction compounds to be clarified.	Timescales of different construction aspects have been clarified in Section 21.9 .
Arun District Council	Operational access route through existing quiet housing at Benjamin Gray Drive, Wick, Littlehampton, would not appear to be ideal.	The operational traffic for operation and maintenance would be sufficiently low to make any impact on the residences of Benjamin Gray Drive negligible.
Arun District Council	Provide detail of the proposed method of piling and how these will affect sensitive receptors and any necessary proposed method of mitigation.	No piling is planned for within Arun DC. An assessment of offshore piling noise effects is presented in Section 21.9 .

Table 21-9 Formal Consultation feedback, Volume 2, Chapter 21, Noise and vibration, Third statutory Consultation exercise (February to March 2023)

Stakeholder	Theme	How this is addressed in the ES
Arun District Council (ADC)	Provide detail of how works to support offshore development (including transport, possible operation of the temporary construction compound, etc.) is likely to affect Noise Sensitive Receptors at Climping Beach and environs and mitigation measures to be applied.	Effects to noise sensitive receptors at or near to Climping Beach are considered where relevant to the assessment in Section 21.9 .

Stakeholder	Theme	How this is addressed in the ES
	<p>Documented reference to so called 'Temporary Construction Compounds,' would benefit from clarification that these units will remain in-situ for the whole of the building period, with potential for concomitant site and traffic noise, including from access roads, to adversely affect nearby Noise Sensitive Receptors over a number of years.</p>	<p>Clarity has been added as to the estimated length of time temporary construction compounds and accesses will be in use. Traffic assessments are based on a construction traffic flow level for affected roads which is higher than the worst-case traffic week (Section 21.9).</p>
	<p>The provision of an operational access route through existing quiet housing at Benjamin Gray Drive, Wick, Littlehampton, would not appear to be ideal. (Targeted Onshore Work Plan 2/23)</p>	<p>Operational and maintenance traffic will be minimal (indistinguishable with existing residential vehicular movements) and lower than the threshold numbers needed to be able to assess a change in traffic noise.</p>
	<p>Paragraph C-152 in outline Code of Construction Practice (CoCP). Onshore Piling Activities – Climping Beach and other possible locations. Please note that it will be necessary to provide written detail of the proposed method of piling; how predicted noise and vibration levels have been calculated and how these will affect (nearby) sensitive receptors and any necessary proposed method of mitigation, to Arun Planning Department/Arun Environmental Health Department for assessment /agreement.</p>	<p>Piling is only included within the construction of the substation, which is considered a worst case approach, as piling may not be required at that location. No piling is considered necessary at the landfall or other HDD sites.</p>
<p>Washington Parish Council (WPC)</p>	<p>We are concerned that noise from the continuous drilling installation across the recreation ground will have a detrimental impact on local residents and the operation of the village hall. So far we have not been provided with any information regarding the amount</p>	<p>The noise from drilling has been predicted and assessed for local residents and village hall and recreation ground, with the estimated duration of such impacts. The assessment process does not specifically</p>

Stakeholder	Theme	How this is addressed in the ES
	<p>or duration of noise that they will experience. Whilst this is temporary it is still extremely important that acceptable limits are identified and agreed, and that appropriate and necessary measures are taken to ensure that these are complied with. Rampion should offer to compensate for any direct loss arising from noise interfering with the operation of the Memorial Hall or the recreation ground and consider making ex gratia payments to residents who are unavoidably disturbed where this is justified.</p>	<p>have limits to noise (although the Unacceptable Observable Effect Level could be considered as such as mitigation should be applied such that this level is not exceeded). However, there are thresholds for different magnitudes of impact relating to different significant effect levels. Appropriate mitigation measures (such as screening, lower noise methods) have been identified to minimise impacts of noise. No significant effects have been identified at the locations within Washington parish Council.</p>

Formal Consultation feedback, Volume 2, Chapter 21, Noise and vibration, Fourth Statutory Consultation exercise – April to May 2023

Fourth Statutory Consultation exercise – April to May 2023

The fourth Statutory Consultation exercise was undertaken from 28 April 2023 to 30 May 2023. This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the Rampion 2 onshore cable route into the national grid electricity infrastructure. As part of this fourth Statutory Consultation exercise, RED sought feedback on the proposed substation extension works to inform the onshore design taken forward to the DCO Application.

The only response received related to noise and vibration from Rampion 2’s fourth Statutory Consultation exercise was from Horsham District Council (HDC) who agreed with the noise and vibration assessment conclusions with respect to the existing National Grid Bolney extension works. A full list of all comments received during the fourth Statutory Consultation exercise in 2023 and the responses to those comments is provided in the [Consultation Report](#) (Document Reference: 5.1)).

Table 22-5 Formal Consultation feedback, Volume 2, Chapter 22, Terrestrial ecology and nature conservation, First statutory consultation (July – September 2021)

Stakeholder	Theme	How this is addressed in this ES
Multiple stakeholders including (but not restricted to) Natural England, WSCC, SDNPA and SWT	Baseline habitat survey information was incomplete and no survey data on the type, distribution or number of legally protected or notable species was presented. Lack of a complete dataset restricted commentary to a high-level only.	Detailed survey information that was not available at the time of first statutory consultation is summarised in Section 22.9 , with further detail provided in Appendices 22.2: Terrestrial ecology desk study to 22.17: Bat tree ground level visual assessment survey report, Volume 4 of the ES (Document References: 6.4.22.2 to 6.4.22.17).
Multiple stakeholders including (but not restricted to) Natural England, WSCC, SDNPA and SWT	The Proposed Development should deliver a BNG, measured with Natural England’s Biodiversity Metric and delivered in line with the system currently being devised for the upcoming mandatory system. The BNG should be delivered within the area affected by the development.	The Proposed Development will deliver a BNG with regard to terrestrial habitats, measured with the Biodiversity Metric 4.0 (Natural England and Other Parties, 2023). Further detail is provided in Section 22.7 and in the Biodiversity Gain Information at Appendix 22.15: Biodiversity Net Gain information, Volume 4 of the ES (Document Reference: 6.4.22.15).
Multiple stakeholders including (but not restricted to) Natural England, WSCC, SDNPA, SWT and SOS	The design of the Proposed Development should first seek to avoid, and then minimise, mitigate and finally compensate for effects on conservation notable habitats, flora and fauna.	The design of the Proposed Development has evolved to avoid, as far as possible, effects on designated sites, HPI and habitats used frequently by SPI. Within the proposed DCO Order Limits this can be seen in the Vegetation retention plans within the Outline CoCP (Application Document Reference: 7.2). Embedded environmental measures are described in Section 22.7 , with further detail in the Outline CoCP (Document Reference: 7.2) and the Outline LEMP (Document Reference: 7.10).

<p>Multiple stakeholders including (but not restricted to) Natural England, South Downs National Park Authority, West Sussex County Council and the Sussex Wildlife Trust</p>	<p>Assessment of hedgerow / woodland severance has not been conducted. The assessment of the functionality of these habitats is required.</p>	<p>An assessment of the effects of fragmentation of hedgerows (and other habitats) is provided in Section 22.9, the proposed mitigation developed since the publication of the original PEIR (RED, 2021) is provided in Section 22.7.</p>
<p>Multiple stakeholders including (but not restricted to) Natural England and SDNPA and WSCC</p>	<p>Impacts on designated sites crossed by trenchless techniques should not be scoped out until the feasibility of the construction method has been established. Further, details on any associated surface works should be described.</p>	<p>The proposed trenchless crossings of Climping Beach SSSI, Littlehampton Golf Course and Atherington Beach LWS, Sullington Hill LWS and all ancient woodland sites have been visited by a ‘no dig’ specialist to determine feasibility and the activity within these designated sites confirmed. See Section 22.6 for details.</p>
<p>Multiple stakeholders including (but not restricted to) Natural England and SDNPA, WSCC and SWT</p>	<p>Details on the timing of restoration and description of the maintenance, management and monitoring are required to provide reassurance that lessons have been learned from habitat establishment issues associated with the delivery of Rampion 1.</p>	<p>Details on habitat restoration, establishment and monitoring are provided in the Outline CoCP (Document Reference: 7.2) and Outline LEMP (Document Reference: 7.10).</p>
<p>Multiple stakeholders including (but not restricted to) Forestry Commission, WSCC, MSDC and SWT</p>	<p>A stand-off of ground works to Ancient Woodland and veteran trees should be implemented to ensure indirect effects on these habitats are avoided.</p>	<p>No Ancient Woodland or veteran trees will be lost to the Proposed Development and buffer zones will be implemented for both ground works and trenchless crossings (see Section 22.7).</p>
<p>Multiple stakeholders including (but not restricted to) SWT and SOS</p>	<p>The potential for effects on migratory birds moving through the onshore construction area should be considered.</p>	<p>Migratory birds are considered in Section 22.9.</p>
<p>Natural England</p>	<p><i>“Natural England note that all impacts to Amberley Mount to Sullington Hill SSSI have been scoped out.</i></p>	<p>The need for assessment has been negated through the design evolution as there is no longer a temporary construction access track adjacent to Amberley Mount</p>

	<i>As two access tracks run directly adjacent to the SSSI, Natural England have concerns that the SSSI may be impacted by dust deposition.”</i>	Sullington Hill SSSI. See Section 22.6 .
Natural England	<i>“The definition of Priority Habitats (HPI) and protected species have been incorrectly assessed. The level of importance has been assessed on geographical terms which Natural England disagree with. These habitats are of national importance.”</i>	The approach to assessment laid out in the original PEIR (RED, 2021) is in keeping with the Scoping Report (RED, 2020), CIEEM Guidelines for EclA (CIEEM, 2018) and a wide range of other Environmental Statements (accompanying DCO applications and Town & Country Planning Act 1990 (TCPA) applications) that have been consented. However, to ensure clarity the terms used have been altered in Section 22.6 from “Importance – legislation and policy” and “Importance – project level” to “Importance” (reflecting legislation and policy status) and “Scale” (reflecting the geographical basis for the assessment of each ecological feature).

Table 22-6 Formal Consultation feedback, Volume 2, Chapter 22, Terrestrial ecology and nature conservation, Second Statutory Consultation (October – November 2022)

Stakeholder	Theme	How this is addressed in this ES
Multiple stakeholders including (but not restricted to) Natural England, WSCC and SDNPA	Baseline survey information has not been provided in its entirety for consideration by stakeholders. Lack of a complete dataset restricted commentary to a high-level only.	Detailed survey information was gathered across time with availability varying at different points during the consultation process. Baseline reports were provided to the ETG in advance of application. The baseline is summarised in Section 22.9 , with further detail provided in Appendices 22.2: Terrestrial ecology desk study to 22.17: Bat tree ground level visual assessment survey report, Volume 4 of the ES (Document References: 6.4.22.2 to 6.4.22.17).
Multiple stakeholders including	Impacts on designated sites crossed by trenchless	The proposed trenchless crossings of Climping Beach SSSI, Littlehampton Golf Course and Atherington Beach LWS,

Stakeholder	Theme	How this is addressed in this ES
(but not restricted to) Natural England and SDNPA and WSCC	techniques should not be scoped out until the feasibility of the construction method has been established. Further, details on any associated surface works should be described.	Sullington Hill LWS and all ancient woodland sites have been visited by a ‘no dig’ specialist to determine feasibility and the activity within these designated sites confirmed. Further, it has been confirmed that works between the launch and retrieval sites will require walking access only, with a commitment made to ensure wheeled and tracked vehicles are excluded (other than in an emergency). See Section 22.6 for details. Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference: 6.2.4) notes that the DCO does not consent open trenching methods in areas where HDD is being proposed (should HDD fail additional consent would be required to deliver an alternative solution).
Multiple stakeholders including (but not restricted to) Natural England and SDNPA, WSCC and SOS	The updated approach to hedgerow crossings aimed at minimising habitat loss was welcomed, but its applicability in all situations was questioned.	The approach to hedgerow crossings has been updated to reflect comments and is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2). Further, the assessment of hedgerows in Section 22.8 does not rely on the approach to restoration described, rather it uses the realistic worst-case scenario of all gaps being reinstated through the planting of whips.
Multiple stakeholders including (but not restricted to) Natural England and SDNPA, WSCC and Forestry Commission	Ancient woodland and veteran trees were highlighted as sensitive features, with emphasis on the need to avoid, unless the benefits of the development in that location clearly outweigh the loss.	No ancient woodland or veteran trees would be lost to development through design. The approach to avoidance and mitigation of effects are described in Section 22.7 and the Outline CoCP (Document Reference: 7.2).
Multiple stakeholders including (but not	The importance of the Peppering project was highlighted with avoidance or	The design avoids the long-established area of the Peppering Project, but the boundary does interact in a single, highly restricted location to an area where

Stakeholder	Theme	How this is addressed in this ES
restricted to) Natural England and SDNPA, WSCC and SOS	comprehensive mitigation recommended to safeguard important bird populations	expansion may occur in the future (may interact at a single hedgerow which is not yet in existence). The approach to avoidance and mitigation of effects are described in Section 22.7 and the Outline CoCP (Document Reference: 7.2). The Peppering Project is addressed directly in Section 22.9 .
Multiple stakeholders including (but not restricted to) Natural England and SDNPA, WSCC and SOS	The importance of the curlew release project focused on two National Grid References TQ 083115 and TQ 052111 was highlighted with avoidance or comprehensive mitigation recommended to safeguard any breeding population that becomes established.	The cable route is more than 500m of the release sites. The approach to mitigation of effects is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2). The Curlew Release Project is addressed directly in Section 22.9 .
WSCC	The presence of water vole is noted on the Black Ditch	The cable route crosses and runs parallel to the Black Ditch and some of its tributaries. The approach to mitigation of effects is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2).
WSCC	The area around Michelgrove Park is wide and includes an Ancient & Semi Natural Woodland known as Beech Copse. Exclusion of this woodland from the boundary is desirable.	Optionality for trenchless crossing is maintained in this area due to the potential presence of karst features. Geotechnical survey during the detailed design phase will result in a single option being identified. There is no surface work proposed within Beech Copse and based on layout it is unlikely that cables would be drilled underneath it. Existing hardcore access tracks that run along its boundary (currently used for forestry operations) could however be utilised dependent on detailed design. Protection for ancient woodland is described in Section 22.7 and

Stakeholder	Theme	How this is addressed in this ES
		the Outline CoCP (Document Reference: 7.2).
WSCC	WSCC raise concerns around the crossing of a woodland belt linking areas of ancient woodland north of Kitpease Copse.	The onshore cable route crosses the woodland belt. The approach to mitigation of effects is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2).

Table 22-7 Formal Consultation feedback, Volume 2, Chapter 22, Terrestrial ecology and nature conservation, Third Statutory Consultation (February – March 2023)

Stakeholder	Theme	How this is addressed in this ES
Multiple stakeholders including (but not restricted to) Natural England, WSCC and SDNPA	Baseline survey information has not been provided in its entirety for consideration by stakeholders. Lack of a complete dataset restricted commentary to a high-level only.	Detailed survey information was gathered across time with availability varying at different points during the consultation process. Individual survey reports were shared prior to application with members of the ETG. The baseline is summarised in Section 22.9 , with further detail provided in Appendices 22.2: Terrestrial ecology desk study to 22.17: Bat tree ground level assessment survey report, Volume 4 of the ES (Document References: 6.4.22.2 to 6.4.22.17).
Multiple stakeholders including (but not restricted to) Natural England and SDNPA and WSCC	The updated approach to hedgerow crossings aimed at minimising habitat loss was welcomed, but its applicability in all situations was questioned.	The approach to hedgerow crossings has been updated to reflect comments and is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2). Further, the assessment of hedgerows in Section 22.8 does not rely on the approach to restoration described, rather it uses the realistic worst-case scenario of all gaps being reinstated through the planting of whips.
Norfolk Estate	The importance of the Peppering project was highlighted with acknowledgement of	The design avoids the long-established area of the Peppering Project, but the boundary does interact in a single, highly restricted location to an area where

Stakeholder	Theme	How this is addressed in this ES
	avoidance but highlighting potential indirect effects.	expansion may occur in the future (may interact at a single hedgerow which is not yet in existence). The approach to mitigation of indirect effects is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2).
Multiple stakeholders including (but not restricted to) Natural England Norfolk Estate, and RSPB	The importance of the curlew release project focused on Harrow Hill was highlighted with avoidance or comprehensive mitigation recommended to safeguard any breeding population that becomes established.	The onshore cable route is more than 500m from Harrow Hill. The approach to mitigation of effects is described in Section 22.7 and the Outline CoCP (Document Reference: 7.2). The Curlew Release Project is addressed directly in Section 22.9 .

Table 22-8 Formal Consultation feedback, Volume 2, Chapter 22, Terrestrial ecology and nature conservation, Fourth Statutory Consultation exercise (April – May 2023)

Stakeholder	Theme	How this is addressed in this ES
WSCC and SWT	The need to ensure that existing woodland, trees and hedgerows are retained where possible, with fragmentation of habitat minimised and strengthening connectivity considered in landscaping plans	Losses of woodland and hedgerows are quantified and assessed in Section 22.9 . The vegetation retention plan within the Outline CoCP (Document Reference: 7.2) provides a visualisation of losses in and around National Grid’s Bolney substation. An indicative landscape plan of the area is provided in the Outline LEMP (Document Reference: 7.10).
WSCC and SWT	Potential effects on legally protected and notable species are highlighted specifically with regards great crested newts, hazel dormice, reptiles and badger	Effects on all of the legally protected species are assessed within Section 22.9 , with technical appendices providing relevant baseline information.

Stakeholder	Theme	How this is addressed in this ES
SWT	Water neutrality issues should be addressed	Water neutrality issues are addressed within Chapter 26: Water environment, Volume 2 of the ES (Document Reference: 6.2.26).

Table 23-4 Formal Consultation feedback, Volume 2, Chapter 23, Transport, First Statutory Consultation exercise (July – September 2021)

Stakeholder	Theme	How this is addressed in this ES
Multiple stakeholders including (but not restricted to) Arun District Council, Clymping Parish Council, West Sussex County Council	During the construction phase of highways, careful consideration needs to be given to the impact on various aspects such as the number and location of construction compounds and the routing of construction traffic. These factors are crucial in determining the overall impact and effectiveness of the construction process.	Decisions around traffic routes are addressed in the Outline CTMP (Application Document Reference: 7.6), decisions around compound locations are addressed in the Chapter 4: The Proposed Development, Volume 2 of the ES (Document Reference 6.2.4)
East Sussex County Council	7. The County Council has finished the second phase of the Newhaven Port Access Road, funded by the Department for Transport (DfT) and the council's own capital program. This road project enhances connectivity to the East Quay area of the Port, including the Rampion site, by providing final links from the Access Road to the Port land. It improves access from the strategic road network (A26 and A27) into the designated area, benefiting transport in the region.	The residual road transport impacts around the vicinity of the chosen designated port are considered in this ES Chapter from paragraph 23.4.26 to 23.4.34

<p>East Sussex County Council</p>	<p>Most components and materials for Rampion 2 would be shipped directly from European manufacturing bases to the offshore construction area, bypassing the need to land in the UK. Additionally, materials from different locations within the UK would be shipped from various ports rather than a single designated port. The majority of transport would occur via sea, thereby avoiding any potential impacts on highways.</p>	<p>The residual road transport impacts around the vicinity of the chosen designated port are considered in this ES Chapter</p>
<p>National Highways (formally Highways England)</p>	<p>8. The primary effects of traffic generation on the Strategic Road Network will occur in on the A23, A27, and the A26 between Newhaven and the A27.</p> <p>9.</p>	<p>The impact of Rampion 2 on the SRN is provided in Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES (Document Reference: 6.4.23.2)</p>
<p>National Highways (formally Highways England), Royal Mail Group, The Environment Agency, Washington Parish Council</p>	<p>Awareness of the significant local major development proposal A27 Arundel bypass which Highways England is planning to construct between 2024 and 2030. The underground cable circuits pass beneath the A27 and are in proximity to the proposed A27 Arundel Bypass scheme. Need to ensure that any cabling route is compatible with/ does not fetter the ability of NH to deliver any consented scheme. Impacts of both need to be considered.</p>	<p>Comments on the A27 Arundel Bypass scheme provided in the Outline CTMP (Document Reference: 7.6).</p>

**National Highways
(formally Highways
England), Mid Sussex
District Council**

10. A Transport Assessment, an updated Construction Traffic Management Plan, and an Outline Travel Plan have been requested for Rampion 2. These documents are intended to evaluate whether the environmental and transport impacts of the project can be adequately mitigated, ensuring minimal negative effects on the surrounding area. They also provide a comprehensive understanding of how the proposed development will impact the strategic road network (SRN). The assessment of these plans will determine whether the project can proceed without significant detriment to the area or ascertain the extent of its impacts on the SRN.

An **Outline CTMP** (Document Reference: 7.6), **Appendix 23.2: Traffic Generation Technical Note, Volume 4** of the ES (Document Reference: 6.4.23.2) and an **Outline CWTP** (Document Reference: 7.6) have been submitted alongside the DCO Application.

**National Highways
(formally Highways
England)**

The baseline modelling assessments for the project rely on historical traffic data. It is recommended in the detailed transport assessment review section that the baseline data be updated using revised traffic surveys starting from September 2021. This update is necessary due to the relaxation of COVID-19 restrictions, which may have an impact on traffic patterns and volumes.

Methodology for baseline data gathering is discussed in **Section 23.5**

**National Highways
(formally Highways
England)**

Confirmation is needed that the construction work associated with the proposed development will minimise additional trips during the network weekday morning peak from 08:00 to 09:00 and the network evening peak from 17:00 to 18:00. The specific number of trips expected during these peak hours needs to be provided as part of the confirmation process. NH emphasises the importance of minimising construction-related traffic during these peak periods to avoid disruptions to the network.

The **Outline CTMP** (Document Reference: 7.6) provides information about the breakdown of trips.

**National Highways
(formally Highways
England), West Sussex
County Council**

It is stated that a full traffic data set for 2021 will be surveyed in September 2021, following the lifting of COVID-19 restrictions in the UK. This updated baseline data will be used for the Environmental Statement (ES) chapter and other supporting documents. It is requested that the applicant arranges for updated traffic surveys to be conducted from September 2021 onwards. The surveys should take place on a neutral weekday outside of school holiday periods, provided there are no changes to COVID-related requirements.

Further engagement has taken place with NH with regards to the validity of pre-COVID-19 data and the need to undertake refreshed surveys.

**National Highways
(formally Highways
England), West Sussex
County Council**

The PEIR does not provide evidence to determine if the peak weeks occur between week 53 and 136.

Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the ES (Document

A request is made for further information and acknowledges the need for additional data to determine the specific timing of peak weeks and highlights the importance of addressing this information gap to ensure a comprehensive understanding of the project's impacts.

Reference: 6.4.23.2) provides details of how the peak week has been calculated and when it is forecast to occur.

National Highways (formally Highways England)

Stakeholders want to be consulted once the final arrangement of the construction works, methods and the construction phases is determined, given the implications for vehicle movements and number of staff required.

Further engagement has taken place with a range of stakeholders.

National Highways (formally Highways England)

The applicant is required to confirm whether construction personnel are included in the overall trip generation. If they are not included, they should be incorporated into the calculations. Trip generation should be provided in much more detail such and divided into hourly time periods throughout the entire construction period, with a specific focus on the peak hours of the highway network. The applicant must provide a clear explanation of how the presence of plant equipment and personnel translates into traffic generation figures. This clarification is necessary to accurately assess the

Construction personnel are included within the overall trip generation found in **Appendix 23.2: Traffic Generation Technical Note, Volume 4** of the ES (Document Reference: 6.4.23.2).

impact of construction activities on the transport network.

National Highways (formally Highways England)

The applicant is required to confirm whether workers will make any internal trips within the proposed DCO Order Limits throughout the day. If such trips are expected, the trip generation should be updated accordingly.

Construction personnel are expected to make movements within the assessment boundary during the working day, and these movements have been included as part of the **Appendix 23.2: Traffic Generation Technical Note, Volume 4** of the ES (Document Reference: 6.4.23.2).

National Highways (formally Highways England)

The PEIR and Appendix 24.4 do not assess the expectation of 2000+ two-way movements for crew support vessels from onshore ports to offshore infrastructure. This omission is concerning as it indicates an underestimation of the number of additional trips on the strategic road network (SRN) resulting from this activity. The specific timeframe for these 2000+ movements is not clarified, whether it is per day, per week, per year, or over the entire construction period.

The 2000+ two-way movements is spread over the period of construction.

National Highways (formally Highways England)

In Chapter 24, a daily vehicle figure is provided per 'Highway Link.' This daily figure does not provide information about the timing of these trips. NH raises concerns about the distribution of trips throughout the day. They seek clarity on whether the trips will be evenly spread

The **Outline CTMP** (Document Reference: 7.6) provides information on the a booking system (included in the DMS) will be used so that construction deliveries to the construction sites are spread across the working day (where feasible). This will

	<p>out or if there will be specific peak hours associated with Rampion 2. More detail is required to understand the proposed timing of these trips. They express particular concern if a significant number of trips are planned during the morning and evening peak hours on the highway network.</p>	<p>minimise the impact of construction HGV traffic during the peak periods.</p>
<p>National Highways (formally Highways England)</p>	<p>Traffic flow diagrams are provided for the Wineham Lane substation, but they only cover the local highway network and display daily trips. Highway Links 26 and 27 have logical routes to the strategic road network (SRN). Therefore, the applicant should expand the traffic flow diagrams to include the SRN, along with the morning (AM) and evening (PM) network peaks, the identified construction traffic peaks for Rampion 2 (AM and PM), and the average interpeak period.</p>	<p>Traffic flow diagrams can be found in Figure 23.19, Volume 3 of the ES (Document Reference: 6.3.23)</p>
<p>National Highways (formally Highways England)</p>	<p>It is observed that the temporary construction compounds are not accessed directly from the strategic road network (SRN). However, it is anticipated that vehicles destined for the temporary construction compounds would utilise the SRN to reach their respective locations. The Climping Landfall Site (Site 1) is likely to be accessed via</p>	

	<p>the A27, while the Oakendene Industrial Estate (Site 3) would be accessed through the A23. The Construction Traffic Management Plan (CTMP) refers to seven different construction compounds. Therefore, the applicant is requested to provide clarification regarding the exact number of temporary construction compounds.</p>	
<p>National Highways (formally Highways England)</p>	<p>The applicant should submit all temporary construction management plans and temporary traffic management measures to the stakeholder for review and comment.</p>	<p>These are being submitted as appendices to the application (Outline CTMP (Document Reference: 7.6)).</p>
<p>Lyminster & Crossbush Parish Council, SDNPA</p>	<p>There are significant objections to the proposed routes B and C through Crossbush village. Both would cause great disruption due to heavy machine traffic along single track country roads, close to local residents.</p>	<p>The proposed cable route no longer passes close to Crossbush, and traffic associated with the Proposed Development would also not need to pass through the village.</p>
<p>Royal Mail Group</p>	<p>Royal Mail requests that the CTMP includes specific requirements that during the construction phase Royal Mail is notified by Rampion Extension Development Limited or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and the CTMP includes a mechanism to inform major road users (including Royal Mail) about works affecting</p>	<p>Noted – no specific actions in ES</p>

the local highways network (with particular regard to Royal Mail’s distribution facilities near the DCO application boundary as identified above).

SDNPA

The PEIR seems to downplay the effects of transport, including within the National Park, and as a result, the proposed mitigation measures are deemed insufficient. There is a suggestion that greater efforts could be made to promote sustainable transport during the construction phase.

Sustainable transport has been considered in the **Outline Operational Travel Plan (OTP)** (Document Reference: 7.5) and **Outline CWTP** (Document Reference: 7.7).

Washington Parish Council

There are significant concerns regarding the proposed construction compounds in the village and the excessive disruption it would cause to residents, including a primary school and campsite. The Council deems any location within the parish or nearby as entirely inappropriate due to existing traffic pressures on the local A283 and A24, including Washington Roundabout and the surrounding country road network.

The **Outline CTMP** (Document Reference: 7.6) contains details regarding the proposed routes which construction vehicles will take. Decisions around compound locations are addressed in the **Chapter 4: The Proposed Development, Volume 2** (Document Reference 6.2.4)

West Sussex County Council

Eight out of the 13 settlements in the study area, including Climping, Littlehampton, Crossbush, Warningcamp, Wepham, Wiston, Partridge Green, and Shermanbury, would experience significant temporary visual effects. Additionally, the views from

Impacts on PRow have been discussed in the **Outline PRowMP** (Document Reference: 7.8).

five long-distance recreational routes, such as the Downs Link located approximately 500m south of Partridge Green, would be significantly affected during the construction phase. Recreational users of approximately 76 local Public Rights of Way (PRoWs) would also be significantly affected, both directly and indirectly. It is necessary to ensure suitable accommodation for all PRoWs during construction and minimize adverse impacts after the works are completed.

West Sussex County Council

Compound 2 (Washington) lacks peak week movements associated with it. This compound raises concerns due to the increased presence of slow-moving HGVs on the A24 at a junction without a merge, as well as poor forward visibility for vehicles turning from the A283 onto The Hollow. Further discussions are necessary with WSCC regarding potential locations and the impacts associated with siting a compound in this area.

The **Outline CTMP** (Document Reference: 7.6) provides data for all compounds.

West Sussex County Council

Clarity is required on the access points presented, if possible, the number should be reduced, especially where multiple accesses are proposed onto the same road.

Accesses have been reduced at the ES stage and discussed along with visibility splays in the **Outline CTMP** (Document Reference: 7.6).

West Sussex County Council

The visibility requirements for access locations will be determined based on speed surveys, although there are a few locations (such as Access 13 and 20a) where achieving adequate visibility may be challenging. It is important to determine if feasibility checks have been conducted for the access locations and what alternatives are in place if some accesses do not meet the necessary visibility guidelines or have negative implications in both visual and ecological terms.

Visibility splays have been reviewed for all accesses along the route.

West Sussex County Council

Consideration needs to be given to where the use of certain roads is required, and aren't suitable. Some roads lack any merge lane, will significantly increase slow moving HGV movements onto a high-speed road, will disrupt the only access to businesses for staff, deliveries, and emergencies, or not be accessible during adverse weather conditions.

The **Outline CTMP** (Document Reference: 7.6) sets out the principles of which routes have been selected for use by HGVs.

Table 23-5 Formal Consultation feedback, Volume 2, Chapter 23, Transport, Second Statutory Consultation exercise (October – November 2022)

Stakeholder	Theme	How this is addressed in this ES
<p>Horsham District Council, Shermanbury Parish Council, Storrington & Sullington PC</p>	<p>Additional traffic using roads is a concern to local communities.</p>	<p>Local access routes have been developed based on considerations including areas prone to congestion and are available in the Outline CTMP (Document Reference: 7.6).</p>
<p>Horsham District Council, Washington Parish Council</p>	<p>The visual impact of the proposed routes would be significant, and out of context with the surrounding countryside. Open views are attractive and having a permanent access in this location is likely to have a negative effect on the special qualities of the SDNP.</p>	<p>Noted – no specific actions in ES</p>
<p>Horsham District Council, Washington Parish Council</p>	<p>Query the need for accesses in such close proximity.</p>	<p>Accesses have been reduced at the ES stage and discussed in the Outline CTMP (Document Reference: 7.6).</p>
<p>Network Rail Infrastructure Ltd</p>	<p>The scheme introduces an alternative access AA-03, which uses the Pring level User-Worked Level Crossing. Network Rail, additional information regarding the frequency and types of vehicles that would utilise the level crossing is needed in order to assess the proposal and determine if any measures are required to mitigate potential risks associated with it.</p>	<p>AA-03 (as presented in the PEIR SIR (RED, 2022)) has been discounted as an access following design refinements and not included within the proposed DCO Order Limits. Trenchless crossing will mean no impact on the rail network at either level crossing on the Network Rail network.</p>

Stakeholder	Theme	How this is addressed in this ES
Network Rail Infrastructure Ltd	Network Rail has standard protective provisions which it expects to be included in the DCO. These will need to be amended to incorporate appropriate cross-references to the DCO provisions. Network Rail would like to ensure that that submitted form of DCO includes an agreed form of protective provisions.	This is noted.
Poling Parish Council	Risks of the proposed access to the A27 between houses and the proximity of shallow septic tanks, connections etc. and also to some redundant fuel storage tanks in the area that will need further investigation.	This access has been removed from the scheme. A list of accesses can be found in the Outline CTMP (Document Reference: 7.6).
Poling Parish Council, Shermanbury Parish Council, Shermanbury Parish Council, Twineham Parish Council	Consideration needs to be given to where the use of certain roads is required, and aren't suitable. Only access roads in to villages mustn't be blocked off and fragile road surfaces must be considered.	Local access routes have been developed based on considerations including areas prone to congestion and are available in the Outline CTMP (Document Reference: 7.6). Poling Lane in particular is now crossed by trenchless crossing methods and will not need to be closed.
Poling Parish Council	The new A27 Arundel Bypass works at Crossbush could be much greater than previously envisaged as new roundabouts and a second A27 bridge crossing are being consulted upon so this may increase the amount of trenchless work on the existing proposed blue route. This reinforces a choice of route that would	Comments on the A27 Arundel Bypass scheme provided in the Outline CTMP (Document Reference: 7.6).

Stakeholder	Theme	How this is addressed in this ES
	follow the contours around the edge of the valley to connect back up with the existing route at Wepham.	
Shermanbury Parish Council, West Sussex County Council	Disruption footpaths, and bridleways; this must be minimised. The detail is light on the impacts to PRowWs and some alternative routes put users on roads.	Impacts and PRowW diversions have been addressed in the Outline PRowWMP (Document Reference: 7.8).
Shermanbury Parish Council, Twineham Parish Council, West Sussex County Council	Traffic management systems should not be used at the Bolney National Grid site. The road is straight, and a simple give way system is adequate. Other traffic management systems should be adjusted to only be in place during working hours.	Site specific mitigation has been considered in the Outline CTMP (Document Reference: 7.6).
Storrington & Sullington PC	Provision should be made for a layby located away from the site on the A23/A272 for HGVs to park up prior to gaining access to the site as this may go some way to reducing the number of movements per hour.	This feedback is noted.
Storrington & Sullington PC, Twineham Parish Council	Measures should be put in place to prevent HGVs travelling through villages and to enforcement of lorry routes.	Local access routes have been developed based on considerations including areas prone to congestion and are available in the Outline CTMP (Document Reference: 7.6).
Washington Parish Council	West Sussex County Council (WSCC) describes the A283 as “a very busy high speed rural road, which does not have a	Along the route overall, accesses have been reduced at the ES stage and discussed in the Outline CTMP (Document Reference:

Stakeholder	Theme	How this is addressed in this ES
	<p>good accident record” (WSCC Report to Executive Member ‘Proposed extension to Rampion Offshore Windfarm; Approval of Consultation Response’ September 2021). As a consequence, WSCC asked Rampion to reduce the number of access point from the A283, not to increase the number as proposed.</p>	<p>7.6). In the vicinity of Washington it is still necessary to provide accesses.</p>
<p>Washington Parish Council</p>	<p>Construction compounds must be easily served by major routes, including the A283 and A24. However, the proximity of Washington village to these roads and the fact that our residents inevitably rely upon them for every day access gives rise to the possibility of conflict between construction traffic and local traffic.</p>	<p>Local access routes have been developed based on considerations including areas prone to congestion and are available in the Outline CTMP (Application Document Reference: 7.6).</p>
<p>Washington Parish Council</p>	<p>The Rock Common Quarry is not suitable for a construction compound with issues relating to existing traffic flows and sightlines. The possibility exists that further HGV traffic will be generated by activities at this site and this has not yet been taken into account in the evaluation of its operational suitability.</p>	<p>Rock Common Quarry is no longer proposed to be a temporary construction compound</p>
<p>West Sussex County Council</p>	<p>A significant number of PRoWs will be impacted along the onshore cable route, whichever route is</p>	<p>Impacts and PRoW diversions have been addressed in the Outline PRoWMP (Document Reference: 7.8).</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>taken forward from those proposed through this consultation. This should be kept to a minimum through the design evolution process when refining to a single cable route option.</p>	
<p>West Sussex County Council</p>	<p>The LACR-01 cable route proposes a crossing with the Lyminster Bypass, construction on which has recently commenced. It is noted that the alignment of the bypass is not shown on any drawings submitted or therefore considered against the related new access points.</p>	<p>The cable route has been designed with a trenchless crossing of the Lyminster Bypass, however, the drawings show the road network in its present state.</p>
<p>West Sussex County Council</p>	<p>Confirmation is required on the number and location of new accesses.</p>	<p>Accesses have been reduced and clarified at the ES stage and discussed in the Outline CTMP (Document Reference: 7.6).</p>
<p>West Sussex County Council</p>	<p>There are a number of accesses indicated in the table where a visibility splay is not required (e.g. AA-22, 23, 24, 26). Whilst these accesses may be existing, the proposals will intensify the use. Some of these accesses are also onto high-speed roads and have potentially substandard visibility for emerging vehicles at present. An appropriate review of the appropriateness of these accesses to accommodate the intended use should be undertaken.</p>	<p>Visibility splays have been reviewed prior to DCO submission based on maximum road design speed and are available in the Outline CTMP (Document Reference: 7.6).</p>

Stakeholder	Theme	How this is addressed in this ES
West Sussex County Council	WSSCC will require detailed consultation on the draft PRow Strategy prior to submission of the DCO to understand and make comment on the proposals to impact PRow, once a refined cable route has been chosen.	WSSCC have been consulted on PRow in advance of DCO submission, this is included in the Outline PRowMWP (Document Reference: 7.8).

Table 23-6 Formal Consultation feedback, Volume 2, Chapter 23, Transport, Third Statutory Consultation exercise (February – March 2023)

Stakeholder	Theme	How this is addressed in this ES
Clapham Parish Council, WSSCC	The routing of the cable may have temporary impacts for traffic, Long Furlong is already heavily congested at peak travel times and it is difficult to envisage how this aspect can be successfully managed to avoid potential gridlock during the work.	Local access routes have been developed based on considerations including areas prone to congestion and are available in the Outline CTMP (Document Reference: 7.6)
Horsham District Council, WSSCC	The cable corridor passes through a number of Public Right of Ways.	An Outline PRowMWP (Document Reference: 7.8) has been written up outlining the effected routes, closures and diversions.

Table 23-7 Formal Consultation feedback, Volume 2, Chapter 23, Transport, Fourth Statutory Consultation exercise (April – May 2023)

Stakeholder	Theme	How this is addressed in this ES
Horsham District Council	No new transport receptors have been identified as a result of the Bolney substation extension works,	Information on traffic has been provided in Appendix 23.2: Traffic Generation

Stakeholder	Theme	How this is addressed in this ES
	however it will result in a change to construction traffic generation. Construction traffic trip generation data should be further updated in detail in the ES, and that updated traffic flows associated with the proposed Bolney substation extension will be assessed as part of the ES.	Technical Note, Volume 4 of the ES (Document Reference: 6.4.23.2)

Table 24-5 Formal Consultation feedback, Volume 2, Chapter 24, Ground conditions – Access requested, First Statutory Consultation exercise (July – September 2021)

Stakeholder	Theme	How this is addressed in this ES
Arun District Council	Contamination discovered during construction activities for Rampion 2 should be appropriately quantified and managed.	The assessment presented in the desk study supporting this chapter (Appendix 24.1: Phase 1 geo-environmental desk study, Volume 4 of the ES (Document Reference: 6.4.24.1)) identifies where there is the potential for contamination to be present. The embedded environmental measures set out in Table 24-14 in Section 24.7 include measures for dealing with contamination in line with the Environment Agency’s guidance LCRM (2020) and dealing with the presence of unexpected contamination during the construction phase.
Environment Agency	In relation to excavation in Brook Barn Farm historical landfill, the Environment Agency agrees that as route only passes through a small section, the pollution risk is reduced and manageable. However, noted a	Assessment of effects presented in Sections 24.9 to Section 24.14 with this conclusion. The embedded environmental measures set out in Table 24-14 in Section 24.7 include measures for dealing

Stakeholder	Theme	How this is addressed in this ES
	detailed assessment of risk will still be required at detailed design stage.	with contamination in line with the Environment Agency's guidance LCRM (2020). Detailed risk assessment will form part of a Contractors safe working practices developed by the Contractor prior to commencement of the construction phase.
West Sussex Council	Rock Common Quarry noted to be within the Soft Sand Resource and where impacts on Heavy Goods Vehicle (HGV) movements and minerals sterilisation should be considered.	Consideration of effects on minerals safeguarding and on minerals sites is presented in Sections 24.9 to 24.14 and includes Rock Common Quarry as a specific site. Consideration of the impact of Rampion 2 on traffic is assessed in Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23).

Table 24-6 Formal Consultation feedback, Volume 2, Chapter 24, Ground conditions – Access requested, Second Statutory Consultation exercise (October – November 2022)

Stakeholder	Theme	How this is addressed in this ES
Natural England	Rampion 2 should aim to avoid interaction with landfill areas to minimise the impacts on the water environment.	<p>Commitment to avoiding sensitive sites (including landfills and areas of potential contamination) where practical included in the embedded environmental measures set out in Table 24-14 in Section 24.7. Through the design evolution process, the onshore elements of the Proposed Development only interact directly with potential sources of contamination at one location, a historical landfill at Brook Barn Farm.</p> <p>The assessment of effects presented in Sections 24.9 to Section 24.14 considers the impact of this interaction noting that the Environment Agency has indicated in their statutory consultation response (Table 24-5) that they consider the risks from this interaction</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>to be low. The embedded environmental measures set out in Table 24-14 in Section 24.7 include measures for dealing with contamination in line with the Environment Agency’s guidance LCRM. Detailed risk assessment will form part of a Contractors safe working practices developed by the Contractor prior to commencement of the construction phase.</p>
<p>Environment Agency</p>	<p>The Environment Agency welcomed confirmation that drilling fluids used during trenchless crossings, including Horizontal Directional Drilling (HDD), will not contain groundwater hazardous substances.</p> <p>Construction works should not compromise the containment features of landfills.</p> <p>Any works where furniture manufacture was a previous use, Per-and polyfluoroalkyl substances (PFAS) contamination may be present.</p>	<p>Commitment to the nature of drilling fluids included in the embedded environmental measures set out in Table 24-14 in Section 24.7.</p> <p>The onshore elements of the Proposed Development only interact with landfill areas at one location, a historical landfill at Brook Barn Farm which given its age is not believed to have any containment features present. The assessment of effects presented in Sections 24.9 to Section 24.14 considers the impact of this interaction noting that the Environment Agency have indicated in their statutory consultation response (Table 24-5) that they consider the risks from this interaction to be low. The embedded environmental measures set out in Table 24-14 in Section 24.7 include measures for dealing with contamination in line with the Environment Agency’s guidance LCRM. Detailed risk assessment will form part of a Contractors safe working practices developed by the Contractor prior to commencement of the construction phase.</p> <p>The onshore elements of the Proposed Development do not directly interact with any sites where furniture manufacturing was or is a use. The embedded environmental measures set out in Table 24-14 in Section 24.7 include measures for dealing with contamination including compliance with environmental and groundwater discharge permits where water containing contaminants may require disposal.</p>

Table 24-7 Formal Consultation feedback, Volume 2, Chapter 24, Ground conditions – Access requested, Third Statutory Consultation exercise (February – March 2023)

Stakeholder	Theme	How this is addressed in this ES
Environment Agency	Land contamination assessments should be undertaken as there may be potential sources of contamination, such as industrial sites, within the proposed areas being consulted.	The assessment presented in the desk study supporting this chapter (Appendix 24.1: Phase 1 geo-environmental desk study, Volume 4 of the ES (Document Reference: 6.4.24.1)) identifies where there is the potential for contamination sources to be present. The assessment has been carried out in line with the Environment Agency’s guidance for the assessment of land affected by contamination, LCRM, and covers the whole of the proposed DCO Order Limits including those areas consulted on as part of the third Statutory Consultation.

Formal Consultation feedback, Volume 2, Chapter 24, Ground conditions – Access requested, Fourth Statutory Consultation exercise – April to May 2023

Fourth Statutory Consultation exercise – April to May 2023

The fourth Statutory Consultation exercise was undertaken from 28 April 2023 to 30 May 2023. This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the Rampion 2 onshore cable route into the national grid electricity infrastructure. As part of this fourth Statutory Consultation exercise, RED sought feedback on the proposed substation extension works to inform the onshore design taken forward to the DCO Application.

There were no key themes emerging from statutory consultation exercise in April 2023 specifically relating to ground conditions.

Further detail about the results of the statutory consultation exercise can be found in the **Consultation Report** (Document Reference: 5.1).

Table 25-6 Formal Consultation feedback, Volume 2, Chapter 25, Historic Environment, First statutory consultation exercise (July-September 2021)

Stakeholder	Theme	How this is addressed in this ES
<p>Arun District Council</p>	<p>Second World War coastal defence structures</p> <p><i>“The Climping Coastal defence features from the Second World War, whilst identified as being of archaeological interest, are also non-designated heritage structures. Would expect some care to be taken so as to ensure that their significance is not harmed as part of the Horizontal Directional Drill (HDD) technique that will be used at the landfall location.”</i></p>	<p>Effects on the Second World War Climping coastal defence structures are assessed based on design information available at ES and presented in Sections 25.9 to 25.11.</p>
	<p>Areas of Character</p> <p>The Arun LPAA have identified both buildings and areas of character which are non-designated heritage assets.</p>	<p>Assessment of effects on Locally Listed Buildings or Structures of Character and Areas of Character, as identified by Arun District Council, is presented in Sections 25.9 to 25.11.</p>
	<p>Setting of heritage assets and indirect effects</p> <p><i>“Table 26-31 ‘Offshore substation and wind turbine generators – Potential effects arising through change to setting of heritage assets during the operation and maintenance phase - Paragraph 26.4.17 of the PIER states that the</i></p>	<p>Appendix 25.7: Settings assessment scoping report, Volume 4 (Document Reference: 6.4.25.7) details the approach for scoping in heritage assets for the assessment of indirect effects (including those selected along the Arun coast), which is presented in Sections 25.9 to 25.11.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>identification of heritage assets to be included within the settings assessment is based on stage 1 of GPA 3. This followed a two-stage process which included identifying those assets where the coastal setting, including views out to sea, contributes in a notable and substantial way to the heritage significance of an asset. It is therefore not clear why some assets have been included in this table (and table 26-12) and others haven't.</i></p> <p><i>[...]</i></p> <p><i>This table needs to be updated to reflect all of the assets along the Arun coast."</i></p> <p><i>"The WTG will be clearly visible from the seafronts of both of the coastal towns. For instance, in Littlehampton, the report states that Seafront views, including those from the sea-front promenade will be defined by open, direct views of the offshore elements (Viewpoint 11), where they will be a prominent element in good visibility of the offshore field of view. This will result in a high magnitude of change and significant (major) effect on views experienced by</i></p>	<p>Littlehampton Seafront and Littlehampton River Road in Littlehampton Conservation Areas have been taken forward for assessment.</p> <p>The scope of LVIA assessment is presented in Chapter 18: Landscape and visual, Volume 2 (Document Reference: 6.2.18), which considers a wide range of landscape and visual effects and has been completed in accordance with relevant guidance for that topic. The historic environment assessment presented in this chapter (Sections 25.9 to 25.11) considers the effect on heritage significance of relevant heritage assets.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>residents and users of Littlehampton seafront. However, the failure to include the Littlehampton conservation areas in the heritage assessment (table 26-31) means that this impact has not been fully assessed on the heritage assets.”</i></p> <p><i>“The landscape study identifies that the Bognor Regis Seafront Promenade (which includes the conservation area) has a medium-high sensitivity to change, a medium high magnitude of change, resulting in the significance of residual effect being significant (major/moderate). However, the heritage report then identifies that the impact on the conservation area would be minor (in terms of the significance of the effect. Is this correct?”</i></p>	
	<p>Consultation</p> <p><i>“It is not clear what form this will take. It is suggested that smaller meetings taken place with individual or neighbouring authorities.”</i></p>	<p>Details and outcomes of consultation and engagement is provided in Section 25.3.</p>
<p>Brighton & Hove Council</p>	<p>Assessment of heritage assets</p> <p><i>“Table 26-31 should include assessment of the impact on the grade II*</i></p>	<p>Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) details the approach for</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>listed Madeira Terrace in Brighton, in view of its historic function, design and interest as a raised seafront promenade.”</i></p> <p><i>“Some of the conservation areas – notably, Kemp Town, East Cliff, Regency Square and Brunswick Town - have a very deliberate, designed relationship with the sea and seafront, whilst others have a more historic relationship (e.g., Old Town) or a less formal relationship. The contribution that the setting of open sea and seafront makes to their significance therefore varies accordingly.”</i></p> <p><i>“Rottingdean is very different again in character and appearance to the urban conservation areas and has a distinct visual and historic relationship with the sea.”</i></p> <p><i>“The assessment of the impact on the Kemp Town Enclosures registered park and garden has not properly considered that this park/garden was deliberately designed to enable sea views and access to the beach (which where it adjoins the gardens was originally private). The magnitude</i></p>	<p>scoping in heritage assets for the assessment of indirect effects, which is presented in Sections 25.9 to 25.11.</p> <p>The grade II* listed Madeira Terrace in Brighton has been taken forward for assessment.</p> <p>The assessment of effects (including effects on the Kemp Town Enclosures registered park and garden) is presented in Sections 25.9 to 25.11.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>of change and significance of effect have consequently been underassessed, given how visible the array turbines would be from this point with the increased height.”</i></p>	
<p>Historic England</p>	<p>Significance and setting of heritage assets</p> <p><i>“In summary, the setting assessment should be reported in greater detail, in order to provide sufficient information to judge the validity of its conclusions. Further consideration should be given to the nature of heritage assets’ relationship with long views and the way in which temporary changes are assessed and reported.”</i></p> <p><i>“The completion of this assessment is particularly necessary where the PEIR boundary falls within the settings of grade I and II* listed buildings.”</i></p> <p><i>“The Historic Environment Figures provided show the grade I listed St Mary’s, Climping (Figure 25.3a,) the grade I listed St Mary Magdalene, Lyminster (Figure 25.3a,) the grade I listed All Saints, Buncton (Figure 25.3d) and the grade II*</i></p>	<p>Full details of the setting assessment are presented in Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) and Sections 25.9 to 25.11.</p> <p>Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) details the approach to identifying the heritage assets for inclusion in the assessment of indirect effects, which has been completed in accordance with Historic England guidance (as listed in Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) and Table 25-4).</p> <p>Chapter 4: The Proposed Development, Volume 2 (Application Document Reference: 6.2.4) provides detail of the design of the Proposed Development.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>listed Bailiffscourt Hotel and associated buildings, Climping (Figure 25.2b) all in close proximity to the red line PEIR assessment boundary. There is no discussion of what the impact on these heritage assets is likely to be and no visual assessment in either Chapters 16 or 19 (Landscape and Visual (Onshore)). Further written information in relation to the works proposed in these locations and their likely impacts on the identified heritage assets, including their settings should be provided in any ES subsequently produced.”</i></p>	
	<p><i>“Furthermore, figures 26.3a and 26.3b shows the PEIR assessment boundary in three Conservation Areas within Arun, these are Burpham and Wepham, Warningcamp and Lyminster. Further written information in relation to the nature of works proposed within and adjacent to these Conservation Areas and their likely impact should be provided.”</i></p>	
	<p><i>“The PEIR does not report how the Applicant identified which assets were to subject to detailed setting assessment, in</i></p>	

Stakeholder	Theme	How this is addressed in this ES
	<p><i>accordance with Step 1 of Historic England’s guidance (Historic England Good Practice in Planning be also Note 3). This step requires that the Applicant identifies all assets whose experience is capable of being affected by a proposed development. In order to demonstrate compliance with the guidance, the final ES should describe the criteria by which Step 1 was determined and, for each asset within the study area that was scoped out at Step 1, provide reasons why each did not fulfil the criteria for full assessment.”</i></p>	
	<p>Archaeological remains</p> <p><i>“We require a more fine-grained predictive model of the potential for buried archaeological remains and for this to be clearly depicted in figures;”</i></p> <p><i>“We add that in consideration of the inshore location of this proposed development that it is possible that if a site of archaeological interest is encountered which proves to be significant that designation is possible through either Protection of Wrecks Act 1973 or Ancient Monuments and</i></p>	<p>The design of the Proposed Development has been an iterative process that has sought to avoid, or minimise, impacts on archaeological remains, wherever possible. Embedded environmental measures (Table 25-23) are presented in Section 25.7. The approach to identifying heritage assets that may be subject to effects is set out in Section 25.4 and Section 25.5.</p> <p>The onshore historic environment baseline is summarised in Section 25.6. A detailed desk study is provided in</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Archaeological Areas 1979.”</i></p> <p><i>“The proposed development area may contain nationally important non--designated archaeological remains, which are equivalent to scheduled monument in significance. Any as yet unidentified or not fully understood remains, including nationally important remains, could be subject to adverse impacts up to and including significant effects and/or substantial harm. However, insufficient assessment has been carried out to understand the significance of buried archaeological remains with sufficient confidence to inform a planning decision.”</i></p> <p><i>“Tables setting out potential and significance [...] do not appear to consider the full range of Palaeolithic and prehistoric asset types that might survive within the scheme footprint or ascribe to them an appropriate level of potential and significance.”</i></p> <p><i>“Anticipated assets will not only be isolated flints. re In situ flint scatters and other mains associated</i></p>	<p>Appendix 25.2: Onshore historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2), the geoarchaeological and palaeoenvironmental assessment report in Appendix 25.3: Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 (Application Document Reference: 6.4.25.3), and survey reports provided in Appendices 25.4: Onshore geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4) and 25.7: Archaeological trial trenching at Brook Barn Farm, Volume 4 (Application Document Reference: 6.4.25.7). All of which have informed the assessment of potential and significance of archaeological, geoarchaeological and palaeoenvironmental remains.</p> <p>Following engagement with WSCC, advanced targeted archaeological trial trenching has been undertaken to better understand the potential and significance of archaeological remains (see Appendix 25.6: Archaeological trial trenching at Brook Barn</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>with buried land surfaces are likely and might (for the Palaeolithic and Mesolithic periods) be deeply buried within raised beach, head, river terrace and alluvial sequences. These natural Quaternary deposits have archaeological as well as palaeoenvironmental potential, yet the tables appear to separate the deposits from their associated archaeology. Similarly, important geoarchaeological and palaeoenvironmental evidence is likely to be found in other contexts than those listed.”</i></p>	<p>Farm, Volume 4 (Application Document Reference: 6.4.25.6)) which may have been impacted by Rampion 2.</p> <p>An Outline Onshore WSI (Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. The Outline Onshore WSI (Document Reference: 7.9) is submitted with the DCO Application.</p>
	<p>Scope of archaeological field surveys</p> <p><i>“It is the preferred option that archaeological field assessment(s) take place prior to final cable route optioneering and, for example, onshore substation siting. This is to ensure that the design process can fulfil the requirement to minimise harm to the historic environment and preserve any nationally important remains in situ.”</i></p>	<p>Additional survey work has been undertaken to better understand potential for archaeological remains, comprising geophysical survey and targeted trial trenching (see Appendices 25.4: Onshore geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4) and 25.6: Settings scoping appraisal, Volume 4 (Application Document Reference: 6.4.25.6)). Methodology for baseline data gather presented in Section 25.5.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>Mitigation</p> <p><i>“Where the view from military assets would be harmfully interrupted by the scheme, the applicant should consider, as mitigation, provision of interpretation materials that emphasise the sense that they were the last bastions against an imminent threat from across the uninterrupted waters. Any such interpretation materials might also usefully reflect on the changing ways in which the seascape has been used, from defence and transport to sustainability, and how people’s conceptualisation of the open space of the sea has altered as a result.”</i></p>	<p>The assessment of effects on heritage assets through change to setting is presented in Sections 25.9 to 25.11, Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference 6.4.25.7) details the approach to identifying the heritage assets for inclusion in the assessment.</p> <p>Embedded environmental measure C-261 provides for an appropriate and proportional programme of public outreach (Table 25-23).</p>
	<p>Geoarchaeological assessment</p> <p><i>“...we recommended a staged approach, modelling the potential of the proposed development area. The first stage should be to create a preliminary deposit model using geology and topography mapping, historic/existing boreholes, archaeological records that record the deposit sequence, information from geotechnical work carried out for the scheme</i></p>	<p>The methodology for baseline data gathering and assessment are presented in Sections 25.5 and 25.8, which follows the approach recommended by Historic England. An onshore desk-based geoarchaeological and palaeoenvironmental assessment report was prepared (Appendix 25.3: Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 (Application</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>(monitored by a geoarchaeologist), LiDAR data and aerial photographs (historic and modern). The model should demonstrate the expected characteristics, potential and depth of deposits with archaeological interest along the route. This model should then be tested and refined through magnetometer survey, test pits and boreholes, and an appropriate amount of evaluation trenching. The results of the deposit model should be presented as a transect and/or ‘heat map’ showing areas of differing archaeological potential and character.”</i></p>	<p>Document Reference: 6.4.25.3)). Where available, results of field surveys have been incorporated into the baseline and assessment.</p>
	<p>Consultation</p> <p><i>“We would expect to be consulted regarding the scope of further works, including an opportunity to comment on any WSIs for fieldwork. For reasons given above, we expect that as much as possible, all necessary fieldwork will be carried out pre-submission. However, if any fieldwork cannot be carried out until after submission, outline WSIs for that work should be supplied as supporting information with the application.”</i></p>	<p>Further stakeholder engagement in response to this request is detailed in Section 25.3. An Outline Onshore WSI (Application Document Reference: 7.9) for further work has been prepared separately to the ES.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>“Although non-designated archaeology lies outside the remit of our Inspectors, our Science Advisor should be consulted along with the archaeological advisors for West Sussex County Council and South Downs National Park Authority about the scope of proposed surveys and trial trenching.”</i></p>	
	<p>Assessment of effects</p> <p><i>“The final ES should report unmitigated and residual effects for every individual asset.”</i></p>	<p>The methodology for assessment is provided in Section 25.8.</p> <p>The assessment of effects is detailed in Sections 25.9 to 25.11.</p> <p>A summary of residual effects is provided in Table 25-30.</p>
<p>Horsham District Council (HDC)</p>	<p>Potential significant effects</p> <p><i>“Where it is identified potential significant effects may arise to settings of heritage assets, those assets are subject to a more detailed assessment in the identification of potential effects, to include Listed Building Grade I Buncton Chapel of All Saints (List entry no. 1354113); archaeological heritage assets within the vicinity of Sullington Hill including the scheduled group of</i></p>	<p>Detailed assessment of effects, including effects on the heritage assets listed by HDC, is presented in Sections 25.9 to 25.11.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>four Bronze Age bowl barrows at the Chantry Post (List entry no. 1015713); and Oakendene Manor and its landscaped parkland (Grade II listed, List entry no. 1027074)”</i></p>	
<p>MSDC</p>	<p><i>“Setting of heritage assets and assessment of effects</i></p> <p><i>Although I would not disagree about the list of the assets affected, there appears to be no full consideration of the nature of the special interest of any of the assets, the contribution that setting, and in particular the proposed development site, makes to that interest, or the impact that the development will have on that setting.</i></p> <p><i>I would therefore recommend that a properly detailed assessment is carried out in line with the Historic England Good Practice Advice in Planning Note 3 ‘The Setting of Heritage Assets’.</i></p> <p><i>[...]it is my opinion that the impact through setting on the affected heritage assets is likely to be more severe in some cases than the relatively low levels of harm identified in most cases. The site</i></p>	<p>Full details of the setting assessment are presented in Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) and Sections 25.9 to 25.11.</p> <p>Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) details the approach for scoping in heritage assets for the assessment of indirect effects.</p> <p>Further consultation in response to this request is detailed in Section 25.3.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>currently has an open and rural character which would be fundamentally altered by the proposed development. To the extent to which the site contributes positively to the settings of each of the assets identified, the proposal is therefore likely to detract from the contribution which setting makes to each asset's special interest[...]</i></p> <p><i>The Mid Sussex Conservation Officer will of course be pleased to work with and help RWE to find a resolution to these matters well in advance of the submission of the DCO application."</i></p>	
<p>South Downs National Park Authority (SDNPA)</p>	<p><i>"Built heritage</i></p> <p><i>In respect of non-designated heritage assets [...] We consider built heritage should also be included and further detail provided of how this will be identified."</i></p>	<p>Built heritage assets are identified as non-designated heritage receptors (see Section 25.4).</p>
	<p><i>"Mitigation and archives</i></p> <p><i>C79 of the Commitment Register - Paleo-environmental mitigation must be designed and led by a recognised specialist contractor with a strong, proven understanding and familiarity with the South</i></p>	<p>An Outline Onshore WSI (Application Document Reference: 7.9) has been prepared separately to the ES and submitted with the DCO Application, which sets out the requirement for specialist input to the design of appropriate mitigation</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Downs paleo-archaeological landscape and geology (inc. Sussex raised beaches).</i></p> <p><i>Investment should be made in the WSCC HER to adequately record and disseminate paleoenvironmental data, which may require a degree of upgrade to their current HER software. Would urge that early conversations are held with the WSCC HER Officer and County Archaeologist as to any upgrades, enhancements or additions that could be made to the HER in order to make paleo-environmental data recordable and publicly accessible on the County HER.</i></p> <p><i>Appropriate curation/deposition of the site archive - The impact of an infrastructure project of this size and scale on the relevant archaeological archive repositories (which will include The Novium, Brighton Museums etc.) is likely to be significant. Early conversation needed with the relevant archaeological archive repositories to confirm whether they have capacity to collect and if not, what measures might be taken to potentially put</i></p>	<p>strategies, and that archaeological contractors undertaking the work should be suitably experienced and qualified. The WSI also sets out the requirements for further archaeological investigation work in response to impacts of Rampion 2.</p> <p>Embedded environmental measure C-79 includes provision archaeological recording and dissemination, and for appropriate curation/deposition of the site archive (see Table 25-23).</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>them in a position to collect. This might be investment in collecting infrastructure such as shelving or racking to store anticipated large amounts of material from such a major project; alternatively, it may be an agreement to cover costs at DeepStore for a specified period from deposition. However, assuming that there will be space to archive archaeological material is a mistake, and the mitigation / enhancement package could include investment in publicly funded / not for profit collecting repositories, which will also enable fulfilment of this stated measure.”</i></p>	
	<p><i>“Consultation [...] please also include SDNPA Conservation Officer.”</i></p>	<p>Request acknowledged. Details of further consultation with SDNPA, where relevant, is provided in Section 25.3</p>
<p>West Sussex County Council (WSCC)</p>	<p><i>“Direct impacts on archaeological receptors The proposal for Rampion 2 has the potential to have a significant impact on archaeological assets across West Sussex which will need to be appropriately assessed within the ES for the DCO submission. The burying of the onshore cable route will result in a significant</i></p>	<p>The design of the Proposed Development has been an iterative process that has sought to avoid direct impacts on designated heritage assets and limited the potential for indirect effects, wherever possible. Embedded environmental measures (Table 25-23) are presented in Section 25.7.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>impact on below ground archaeological deposits. Effects on below ground archaeological deposits will be permanent with archaeological deposits within the cable corridor requiring preservation by record (open area excavation). There needs to be early assessment of these deposits.</i></p>	<p>Assessment of archaeological potential and significance supported by baseline presented in Appendix 25.2: Onshore historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2) and summarised in Section 25.6.</p>
	<p><i>Recommendations made at the early stages of consultation have been taken on board with the route with least known impact now being the preferred option.</i></p>	<p>Further consultation in response to comments regarding scope of archaeological surveys is detailed in Section 25.3. An Outline Onshore WSI (Application Document Reference: 7.9) for further work has been prepared separately to the ES.</p>
	<p><i>In reference to PEIR C-4 The presence of important archaeological deposits needs to be established at the design stage so that their preservation by directional drilling can be included. This is likely to require considerable trenched evaluation to understand the extent and importance of the below ground deposits present.</i></p>	
	<p><i>In reference to PEIR C-9 There needs to be an understanding of the below ground archaeological deposits so the impact is understood.</i></p>	
	<p><i>In reference to PEIR C-29 For the majority of the sub</i></p>	

Stakeholder	Theme	How this is addressed in this ES
	<p><i>surface deposits apart from the buried beeches these excavations will still impact the archaeological deposits.</i></p> <p><i>In reference to PEIR C-79 WSCC would recommend a programme of trial trenching in advance of DCO application to determine the level of mitigation required and define the heritage impact of the project on below ground deposits.</i></p> <p><i>The direct impact of both the underground cabling and the substation will result in the destruction of archaeological deposits within the 36 kilometres by 50m corridor as well as the substation area and is identified as being an impact of high magnitude and cannot be mitigated. It is therefore important that RED undertake appropriate assessment of the whole route to inform the ES.</i></p> <p><i>The completion of an appropriate evaluation would provide the detailed information to allow a full assessment of the impact of the development corridor for the ES.</i></p> <p><i>It is recommended that once this baseline assessment has been produced, further</i></p>	

Stakeholder	Theme	How this is addressed in this ES
	<p><i>meetings for heritage considerations are conducted to ensure that the scoping of heritage assets and evaluation techniques are agreed prior to further drafting of the ES.</i></p> <p><i>Trial trenching is identified within the additional work proposed. However, there is little clarity on how this will be achieved or its extent. This should be undertaken to clarify the impact on the known buried heritage assets along the route and assess the blank areas for previously unrecorded archaeological deposits and assess their extent and significance.</i></p> <p><i>There should be a programme of evaluation based on the results of the geo—archaeological desk-based work to ground truth the assessment and define the level of work that will be needed in advance of the onshore cable route being constructed. This would include elements such as dry valleys being test pitted or trenched to assess their importance.</i></p> <p><i>The use of HDD installation beneath Climping Beach is supported as this will minimise the impact on</i></p>	

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the archaeological deposits in this area.”</i></p> <p><i>“Other PEIR Commitments (not referred to under specific theme)</i></p> <p><i>In reference to PEIR C-1 [...] will help preserve the setting of heritage however, it will have a significant impact on below ground deposits.</i></p> <p><i>In reference to PEIR C-61 – set out what these were. Including the mitigation methods for the substation. Ensure that the option analysis takes into account the embedded mitigation provided for Rampion 1. For instance, for any screening provided previously to limit impacts to HAs in the Bolney Road / Kent Street area may be affected. In reference to PEIR C-115 The reduction of the working width in woodlands could be used also to limit impact on archaeological sites.”</i></p>	<p>C-61 relates to the offshore development from the perspective of SLVIA (see Table 25-23).</p> <p>Embedded environmental measure C-225 provides for narrowing of the onshore cable corridor to minimise direct impacts to archaeological remains.</p>
	<p><i>“Historic hedgerows</i></p> <p><i>The loss of historic hedgerows could potentially be avoided by the use of drilling beneath these important landscape features. Although replanting can</i></p>	<p>The design of the Proposed Development has been an iterative process that has sought to avoid and minimise impacts on heritage assets, wherever possible. Embedded environmental measures</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>eventually restore these historic hedgerows this takes many years whereas drilling preserves the features in situ thus reducing the impact on the historic landscape.”</i></p>	<p>including C-115, C-196 and C-220 (Table 25-23) are presented in Section 25.7.</p> <p>Historic environment considerations outlined in this ES chapter have informed the relevant strategy within the Outline Landscape and Ecology Management Plan (LEMP) (Document Reference: 7.10), which are submitted with the DCO Application and Vegetation Retention Plans are included with the Outline Code of Construction Practice (CoCP) (Document Reference: 7.2).</p>
	<p><i>“Significance of heritage assets</i></p> <p><i>It is unclear why a scheduled barrow cemetery is regarded as high significance whilst a non-designated barrow cemetery is regarded as medium. This should be assessed in advance of the ES to see if the barrow cemeteries should be considered to be of similar importance. Similarly, within KP13-15 the presence of material associated with a scheduled monument may potentially be of a similar significance to the Scheduled Area following assessment, so this</i></p>	<p>The methodology for assessing significance of heritage assets is presented in Section 25.8.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>should be regarded as low to high within this assessment.”</i></p> <p><i>“Oakendene Manor</i></p> <p><i>The proposed substation site close to Oakendene Manor would have a significant impact on the surviving historic parkland. However, more detailed assessment needs to be undertaken to understand both site options.”</i></p>	<p>A historic landscape assessment of the historic parkland a Oakendene was undertaken in line with WSCC information consultation response, which is presented in Appendix 25.5: Oakendene parkland: historic landscape assessment, Volume 4 of the ES (Document Reference: 6.4.25.5). This exercise has informed the design process and the assessment of effects in Sections 25.9 to 25.11</p>
	<p><i>“Outreach</i></p> <p><i>The PEIR contains no information on any proposal for outreach or long-term opportunities for the promotion and management of the heritage resource which will be impacted by this scheme.”</i></p>	<p>Opportunities for outreach are included in the Outline Onshore WSI (Application Document Reference: 7.9) for further work has been prepared separately to the ES.</p>
	<p><i>“Archives</i></p> <p><i>The undergrounding of the cable will result in significant archaeological archive and finds assemblage. The local plan policies include recommendations that whenever practicable, opportunities should be taken for the enhancement and</i></p>	<p>Arrangements for archiving are included in the Outline Onshore WSI (Application Document Reference: 7.9) for further work has been prepared separately to the ES.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>interpretation of archaeological remains. This project along with Rampion 1 will provide a major resource of information on the geo-archaeological and Palaeo-environmental data for West Sussex and it would be beneficial to discuss the potential of this material with the WSCC HER to maximise its potential.”</i></p>	
	<p><i>“Scoping of assets and assessment of indirect effects</i></p> <p><i>[...] there is no methodology provided for the 2km buffer for the onshore substation. PINS had stated (ID 5.8.3, 5.8.4 The Planning Inspectorate, (2020). Scoping Opinion: Proposed Rampion 2 Offshore Wind Farm) that it should not be an arbitrary figure. WSCC raises concerns that the search buffer has not been fully considered.</i></p> <p><i>The Landscape and Visual Impact Assessment (LVIA) Zone of Theoretical Visibility (ZTV) and viewpoints (Chapter 19; Figure 19.3, Volume 3) does not clearly show that a 2km buffer for each substation option is appropriate. The</i></p>	<p>The methodology for the spatial scope of the assessment was presented in Section 26.4 of the PEIR (RED, 2021) and within the second ETG (see Section 25.3). This methodology is also provided in Section 25.4, and in Appendix 25.6: Archaeological trial trenching at Brook Barn Farm, Volume 4 (Application Document Reference: 6.4.25.6), which sets out the setting scoping appraisal.</p> <p>Targeted scoping was undertaken, informed by ZTV, viewpoints and site visits. From this exercise a 2km study area was chosen. Appendix 26.6: Archaeological trial trenching at Brook Barn Farm, Volume 4 (Application Document Reference: 6.4.26.6) details the approach to the selection of heritage</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>ZTV should be overlaid with the designations map (SMs, LBs, CAs, NDHAs), this should then be used for targeted scoping rather than the arbitrary 2km.</i></p> <p><i>Methodology for scoping should include heritage assets identified and assessed as part of Rampion 1. Particularly as harm identified to those may be increased.</i></p> <p><i>Understanding any historical associations/historical development of sites should also be included within the principles and selection. This is particularly important for Oakendene Manor.</i></p> <p><i>Concern regarding the limited number of surveys. WSCC requests confirmation is given that further walkovers will take place, including reviewing the offshore impacts to heritage assets onshore.</i></p> <p><i>It would be expected that these Conservation Areas would be assessed.</i></p> <p><i>Scoped assets are not reflective of the SLVIA ZTV (Chapter 16; Figures 16.14 – 16.15, Volume 3) or the assets noted in the heritage interest column of Table 16-11 Viewpoints</i></p>	<p>assets in line with Historic England (2017a) Good Practice Advice 3. This was made available to consultees for comment ahead of the ES.</p> <p>Figures showing designated heritage assets overlaid onto the LVIA and SLVIA ZTVs are provided in Figure 25.6 (Application Document Reference: 6.3.25) and 25.8, Volume 4 (Application Document Reference: 6.4.25.8).</p> <p>The locally listed buildings data are only available as written lists. Their locations have been cross-checked to inform the baseline and assessment presented in Sections 25.6 and 25.9 to 25.11. However, they have not been represented spatially within the ES.</p> <p>Additional walkovers were undertaken, including visits to off-site heritage assets to inform the assessment presented in Sections 25.9 to 25.11. Details of site visits presented in Section 25.5.</p> <p>The baseline for assets assessed for indirect effects is presented in Section 25.6 and Appendix 25.8: Onshore</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>included in Volume 2, Chapter 16 Seascape, landscape and visual.</i></p> <p><i>ZTV map with locally listed buildings overlaid should be provided to demonstrate that these assets can be scoped out.”</i></p>	<p>heritage asset baseline information, Volume 4 (Application Document Reference: 6.4.25.8).</p>
	<p><i>“There is considerable concern the offshore element will result in harm to a high number of heritage assets. [...] There should be consideration of the visual impact that this may have for heritage assets on the coast, and the potential for visual impact, and any cumulative impacts with the turbines.”</i></p>	<p>Effects on onshore heritage assets arising from offshore and onshore development has been undertaken in Section 25.9 to 25.11, Appendix 25.6: Archaeological trial trenching at Brook Barn Farm, Volume 4 (Application Document Reference: 6.4.25.6) sets out the setting scoping appraisal.</p>

Table 25-7 Formal Consultation feedback, Volume 2, Chapter 25, Historic Environment, Second statutory consultation exercise (October – November 2022)

Stakeholder	Theme	How this is addressed in this ES
Historic England	<p>Comparison of onshore cable route options</p> <p><i>“...there is not sufficient baseline information to identify which option would be least harmful to archaeological remains.</i></p> <p><i>This is because:</i></p> <ul style="list-style-type: none"> <i>- the PEIR SIR Appendix K (Historic Environment) clearly outlines that there is a high potential for archaeological remains to be present across each of</i> 	<p>The design of the Proposed Development has been an iterative process that has sought to avoid, or minimise, historic environment impacts, wherever possible. Embedded environmental measures (Table 25-23) are presented in Section 25.7.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>the Longer Alternative Cable Routes assessed. This is comparable to the potential of the existing PEIR route; and</i></p> <p><i>- there is no field evaluation work to support the desk-based assessment for the proposed amendments. Therefore, the actual presence, extent and condition of the potential archaeological remains are currently unknown.</i></p> <p>...</p> <p><i>Further field evaluation would be required for the proposed modifications in order to confidently advance route selection. In its absence it is not possible to rule out the presence of archaeological features of high significance within the LACRs (or the proposed modified and alternative routes) with any degree of confidence.”</i></p> <p><i>“A number of ACR [Alternative Cable Routes] have been proposed in order to avoid areas of the original route where archaeological remains have been identified by geophysical survey.</i></p> <p><i>In principle, Historic England support re-routing the cables to avoid impacts on heritage assets. However, because the ACR locations have not been subject to the same field assessments, we cannot be certain of the presence, extent and condition of archaeological remains within the ACRs themselves. Therefore, we cannot accurately assess if the proposed modifications would then be less, more, or equally as harmful.</i></p> <p><i>Route alterations should not be fixed until field investigations have been</i></p>	<p>The design process was informed by available historic environment information as detailed in the PEIR (RED, 2021), PEIR SIR (RED, 2022) and PEIR FSIR (RED, 2023), together with geophysical survey results, where available.</p> <p>The approach to identifying heritage assets that may be subject to effects is set out in Sections 25.4 and 25.5</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>conducted for both original and alternative route options.”</i></p> <p>Impact to archaeological and geoarchaeological remains:</p> <p><i>“...we consider the following points to be relevant at this stage:</i></p> <p><i>1) Overall new land take</i></p> <p><i>Based on the results of the desk-based assessment, there is a broadly similar high potential for archaeological remains to be present throughout the study area.</i></p> <p><i>The proposed amendments, particularly the two LACR, would increase the new land take of the proposal. It is therefore more likely that non-designated archaeological remains would be encountered during the works, some of which may be of national significance.</i></p> <p><i>Although not a direct correlation, generally speaking the higher level of ground impact could equate to a higher level of harm to archaeological remains. This does not include areas where re-routing has been proposed which is informed by field assessment techniques such as geophysical survey, geoarchaeological survey and trial trenching.”</i></p> <p><i>“We recognise the logistical difficulties associated with accessing land for undertaking field assessment. However, the desk-based information as it stands does not provide sufficient granularity in the data to fully weigh the potential harm and benefits of the proposed route options. This is a concern because of the high potential for geoarchaeological deposits and archaeological remains to be present which may be of national significance.</i></p>	<p>The design of the Proposed Development has been an iterative process that has sought to avoid, or minimise, impacts on archaeological remains, wherever possible. Embedded environmental measures (Table 25-23) are presented in Section 25.7. The approach to identifying heritage assets that may be subject to effects is set out in Sections 25.4 and 25.5.</p> <p>An Outline Onshore WSI (Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. The Outline Onshore WSI (Document Reference: 7.9) is submitted with the DCO Application.</p> <p>The onshore desk-based geoarchaeological and palaeoenvironmental assessment report (Appendix 25.3: Onshore desk-based geoarchaeological and</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>The geophysical survey of the existing route design has shown the benefits of undertaking field evaluation at an early stage as it has allowed for alternative routes to be proposed which would avoid sensitive locations. Geophysical survey, further geoarchaeological assessment and trial trenching should be undertaken for proposed alternative routes in order to establish a design which minimises harm and de-risks the project moving forward.</i></p> <p><i>If extensive evaluation work is not possible, it must be set out within the Environmental Statement how the project would mitigate for retention in situ of unexpected archaeological remains of national significance.”</i></p> <p><i>“...the geoarchaeological desk-based assessment and the deposit model it presents should be updated to include the area of the proposed new routes. Further to our comments on the geoarchaeological assessment (Chris Pater, 23rd September 2022) the updates should include Holocene alluvial and colluvial deposits, as well as the potential for waterlogged remains. There may not be many historic boreholes from the area of the proposed route alterations therefore, information from any geotechnical work being done for the scheme should also be included (and this work monitored by a geoarchaeologist).</i></p> <p><i>The preliminary deposit model (as well as aerial photos and Lidar) should identify areas where archaeology could lie at shallow depth and magnetometer survey would be useful.</i></p>	<p>palaeoenvironment assessment report, Volume 4 of the ES (Document Reference: 6.4.25.3)) has been updated in line with the proposed DCO Order Limits and Historic England comments received 23 September 2022.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>The deposit model would also highlight areas where archaeology could lie at depth within the natural deposit sequence and test pits and/or boreholes would be needed to understand archaeological potential. Based on the above results a less extensive and more targeted programme of evaluation trenching could be designed for any remaining route options”</i></p>	
	<p>Accesses and scheduled monuments</p> <p><i>“Any deviation from existing trackways should be avoided within or adjacent to scheduled monuments and any other areas of archaeological sensitivity which may be identified. If this is not possible, the potential for harm would need to be more accurately assessed. At a minimum, additional survey work would likely be required to demonstrate that these works would not result in harm to the archaeological remains and to inform micro-siting of any widening works.</i></p> <p><i>Therefore we consider commitment C-13 on its own to be insufficient to mitigate the potential impacts on scheduled monuments and other areas of similar archaeological sensitivity.”</i></p>	<p>The design of the Proposed Development has been an iterative process that has sought to avoid, or minimise, impacts on archaeological remains, wherever possible. Embedded environmental measures (Table 25-23) are presented in Section 25.7. The approach to identifying heritage assets that may be subject to effects is set out in Sections 25.4 and 25.5.</p> <p>Access A-27, which lies adjacent to a scheduled monument (1015880), has subsequently been changed from a construction and operational access to an operational access only, requiring no upgrade works to the existing trackway.</p> <p>Access AA-22/23, as defined in the PEIR SIR (RED 2022) and which crossed a scheduled monument, has been</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>removed from the Proposed Development.</p> <p>Embedded environmental measure C-13, as described in the consultation documents, has subsequently been removed.</p>
	<p>Setting</p> <p><i>“The onshore elements of the Proposed Development have the potential to change the setting of numerous designated heritage assets, which may impact their heritage significance.</i></p> <p><i>The summary table in Appendix K3 is useful. However due to the lack of baseline assessment for designated heritage assets, the likely changes to significance which may arise from the various proposals, and thus which route option may be least harmful, cannot be fully assessed.”</i></p>	<p>Full details of the setting assessment are presented in Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7) and Sections 25.9 to 25.11. Baseline information on the assets which have been assessed is provided in Section 25.6.</p>
<p>Horsham District Council</p>	<p>Historic environment baseline and effects relating to LACR-01c:</p> <p><i>“Within LACR-01c, there are features relating to a relic field system, comprising archaeological remains dating to the prehistoric, Roman and medieval periods, further indicating the potential for unknown remains of potentially high heritage significance at this location.</i></p> <p><i>It is noted LACR-01c introduces new designated heritage assets not previously identified within the baseline. There is potential for a very low to low magnitude of change to receptors of</i></p>	<p>The Proposed Development does not include the whole of LACR-01c, as presented in the PEIR SIR (RED, 2022). The Historic Environment baseline for the onshore part of the proposed DCO Order Limits (which includes part of the accesses and a short section of the onshore cable corridor at the west end of LACR-01c) is provided in Section 25.6 and Appendix 25.2: Onshore</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>high heritage significance, resulting in minor to moderate adverse effects. Minor adverse effects will be Not Significant and moderate adverse effects could potentially be Significant.”</i></p>	<p>historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2). The assessment of effects is presented in Sections 25.9 to 25.11.</p>
	<p>Historic environment baseline and effects relating to ACR-06:</p> <p><i>“It is noted the magnitude of impact by of 3 heritage assets will change. This change is largely resulting from the close proximity of these assets to ACR-06, which is considered likely to increase the perceptibility of construction activities affecting the setting of these designated heritage assets: Horsebridge House; Blakes Farmhouse (1353943); and Bergen-op-Zoom Cottage. However, taking into consideration the following points and implementation of embedded environmental measures, the assessment of residual effects on these designated heritage assets will be not significant.”</i></p>	<p>The Proposed Development includes land within ACR-06, as presented in the PEIR SIR (RED 2022).</p> <p>The assets referred to by Horsham District Council are scoped into the assessment in Sections 25.9 to 25.11.</p>
<p>West Sussex County Council</p>	<p>Historic environment baseline and effects relating to LACRs:</p> <p>LACR-01a</p> <p><i>“LACR-01a and associated accesses passes in close proximity to a number of designated assets...This includes a potential Major Adverse effect (Significant in EIA terms) identified for GII listed The Old Cottage 1027714) during construction phase.”</i></p> <p><i>“LACR-01a has the potential to intersect with heritage assets of national significance, and to result in</i></p>	<p>The Proposed Development includes a refined version of LACR-01a to that presented in the PEIR SIR (RED, 2022).</p> <p>The assessment of effects on heritage assets is presented in Sections 25.9 to 25.11.</p> <p>The Proposed Development does not include LACR-01b, as presented in the PEIR SIR (RED, 2022).</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>significant adverse effects to the historic environment.”</i></p>	
	<p>“LACR-01a has the potential to intersect with heritage assets of national significance, and to result in significant adverse effects to the historic environment.”</p>	<p>Access AA-22/23, as presented in the PEIR SIR (RED, 2022) and which crossed a scheduled monument, has been removed from the Proposed Development.</p>
	<p>LACR-01b</p>	
	<p><i>“An Archaeological Notification Area (ANA) intersects with the route, relating to multi-period archaeological activity on Harrow Hill. This indicates a potential for archaeological features of potentially high heritage significance to be present within LACR-01b.”</i></p>	<p>The Proposed Development assessed in the ES does not include the whole of LACR-01c, as presented in the PEIR SIR (RED 2022). The historic environment baseline for the onshore part of the proposed DCO Order Limits (which includes part of the accesses and a short section of onshore cable corridor at the west end of LACR-01c) is provided in Section 25.6 and Appendix 25.2: Onshore historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2).</p>
	<p><i>“Access AA-22/23 is cause for concern as it crosses a Scheduled Monument (List Entry 1017446: Itford Hill style settlement and an Anglo-Saxon barrow field at New Barn Down). As above, the proposed creation of laybys/passing places is cause for concern; these would inevitably be within the Scheduled Monument and therefore there is the potential for significant effects to the historic environment.”</i></p>	
	<p>LACR-01c</p>	
	<p><i>“LACR-01c has the potential to intersect with heritage assets of national significance, and to result in significant adverse effects to the historic environment.”</i></p>	<p>The Proposed Development does not include LACR-02, as presented in the PEIR SIR (RED, 2022), nor does it include the section of PEIR Assessment Boundary presented in the original PEIR (RED, 2021) which crossed Warningcamp Hill intersecting with the geophysical anomalies indication archaeological</p>
	<p>LACR-02</p>	
	<p><i>“This route runs south of Warningcamp Hill, and as a result would avoid the cable route intersecting with the complex of geophysical anomalies</i></p>	

Stakeholder	Theme	How this is addressed in this ES
	<p><i>which lie within the PEIR assessment boundary on Warningcamp Hill. These have been identified as probable archaeological features likely relating to the two ANAs that cover this area identified, of potentially medium to high significance. This change is welcomed, as this would avoid harm to archaeological heritage assets of potentially high significance. However, LACR-02 runs through another of which may contain features of equal or higher significance to the PEIR boundary.”</i></p> <p><i>“LACR-02 intersects with areas of woodland characterised in the HLC as Ancient Semi-natural and Replanted Ancient Semi-Natural and also includes three areas identified for compensation woodland planting areas.”</i></p>	<p>remains of possible medium to high heritage significance.</p>
	<p>Historic environment baseline and effects relating to Alternative Cable Routes ACR-01</p> <p><i>“ACR-01 (located approximately 270m to the north-west of Littlehampton, starting adjacent to the original PEIR Assessment Boundary south of the railway) - This alternative route is suggested in order to avoid anomalies identified on the geophysical survey as being of potentially high significance. The consideration of alternative route options in order to minimise harm to these heritage assets is welcomed. However, it must be highlighted that the route should not be altered/fixe on the basis of avoiding heritage assets, until the new proposed area has been subject to, at a bare minimum, geophysical survey, in order to avoid a repeat of the same issue down the line.”</i></p>	<p>The Proposed Development does not include ACR-01, as presented in the PEIR SIR (RED, 2022).</p> <p>Geophysical survey of ACR-01 was not possible in advance of onshore cable route selection due to land access restrictions.</p> <p>Advanced archaeological trial trenching was undertaken at Brook Barn Farm to target the geophysical anomalies of interest. Results are provided in Appendix 25.6: Archaeological trial trenching at Brook Barn Farm, Volume 4 (Application Document</p>

Stakeholder Theme	How this is addressed in this ES
<p>Historic environment baseline and effects relating to accesses</p> <p><i>“Concern is raised over the potential for significant effects to designated heritage assets and associated belowground archaeology arising from a number of the new proposed accesses. Whilst in many cases these proposed accesses will be along an existing farm or estate track, the proposed creation of laybys/passing places may result in harm to scheduled monuments and/or associated heritage assets.”</i></p> <p><i>“AA-31 passes directly adjacent to two scheduled monuments (, Deserted medieval settlement at Upper Barpham Farm (1015882) and Cross dyke on Barpham Hill (1015715)) and two grade II listed buildings at Upper Barpham Farm (1353838 and 1232897). LACR-02 is located in close proximity to GII listed 1222537.”</i></p>	<p>Reference: 6.4.25.6) and incorporated into the baseline and assessment presented in Section 25.6.</p> <p>The design of the Proposed Development has been an iterative process that has sought to avoid, or minimise, impacts on archaeological remains, wherever possible. Embedded environmental measures (Table 25-23) are presented in Section 25.7. The approach to identifying heritage assets that may be subject to effects is set out in Sections 25.4 and 25.5.</p> <p>Since the publication of the PEIR FSIR (RED, 2023a), access A-27, which lies adjacent to a scheduled monument (1015880), has subsequently been changed from a temporary construction and operational access to an operational access only, requiring no upgrade works to the existing trackway.</p> <p>Access AA-22/23 and AA-31, as presented in the PEIR SIR (RED, 2022) and which crossed a scheduled monument, have been removed from the design of the Proposed Development.</p>

Stakeholder	Theme	How this is addressed in this ES
		<p>Embedded environmental measure C-225 provides for narrowing of the onshore cable corridor to minimise direct impacts to archaeological remains (Table 25-23).</p>
	<p>Assessment methodology</p> <p><i>“There are also concerns over the inclusion of embedded mitigation in calculations of magnitude of effect on receptors in the absence of further surveys/assessment to confirm suitability of the proposed measures and to inform assessments.”</i></p> <p><i>“The Appendix K targeted assessment for LACR-01 and LACR-02 is welcomed and the LACRs are identified as most likely to result in a greater cumulative magnitude of effect on the historic environment due to their length. Overall, this document constitutes a proportionate, robust and well-structured assessment of the additional historic environment effects which may arise from the two LACRs.”</i></p> <p><i>“...the assertion that C-79 measures (implementation of an approved programme of archaeological mitigation) will be sufficient to limit the magnitude and overall effect on archaeological assets to low to medium adverse, i.e. Not Significant in EIA terms, is not evidenced. Especially as the significance of any such features present within the various route options is not yet known.”</i></p>	<p>The methodology for baseline data gathering and assessment are presented in Sections 25.5 and 25.8.</p> <p>Additional survey work has been undertaken to better understand potential for archaeological remains, comprising geophysical survey and targeted archaeological trial trenching (see Appendices 25.4: Onshore geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4) and 25.5: Oakendene parkland: historic landscape assessment, Volume 4 (Application Document Reference: 6.4.25.2)). Where there are limitations in the availability of survey data and other baseline information to support the assessment of potential and significance of archaeological remains, a reasonable worst-case has been assumed in the assessment.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>Setting</p> <p><i>“WSCC would like to see a preliminary targeted baseline settings assessment of those designated heritage assets scoped in for further assessment as the potential for substantial harm to the</i></p>	<p>Embedded environmental measures (Table 25-24) are presented in Section 25.7, which have been adopted to reduce the potential for effects on historic environment receptors. In line with these embedded environmental measures, an Outline Onshore WSI (Application Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders is submitted with the DCO Application. The Outline Onshore WSI (Application Document Reference: 7.9) refers to the need for “site-specific WSIs” to set out proposals for evaluation and mitigation stages for each area of the onshore part of the proposed DCO Order Limits, which are to be agreed to relevant stakeholders.</p> <p>Baseline information for historic environment assets scoped into the assessment of effects resulting from change to setting is presented in Appendix 25.4: Onshore</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>significance of some of these assets cannot currently be ruled out.”</i></p> <p><i>“...the impacts of construction traffic upon nearby designated assets, both physical and arising from change within settings, will need to be robustly assessed.”</i></p> <p><i>“The scoping table included within Appendix K ensures that the shortlist of heritage assets scoped in for further assessment is clear and consistent, and the change from PEIR stage is clear. The comment on likely magnitude of change and significance of effect is useful. However, the opportunity has been missed to make the scoping process fully transparent, as initial stages are missing. The process by which Stage 1 of the GPA3 methodology has been carried out is currently unclear. Was this scoping exercise carried out purely on the basis of the LVIA ZTV, or were results of walkover surveys incorporated into the process?”</i></p>	<p>geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4). The assessment is presented in Sections 25.9 to 25.12, which takes into consideration effects relating to construction traffic.</p> <p>Accidental damage is not assessed within this Chapter as it is not a planned activity. Measures to avoid accidental damage are intrinsic to the measures provided in the Outline CoCP (Application Document Reference: 7.2).</p> <p>Targeted scoping was undertaken, informed by ZTV, viewpoints and site visits. Full details of the setting assessment are presented in Sections 25.9 to 25.11 and Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7). Baseline information on the assets which have been assessed is provided in Section 25.6.</p>
	<p>Impacts to archaeological and geoarchaeological remains, and field surveys</p> <p><i>“In the absence of geophysical survey results at a minimum, it is not possible</i></p>	<p>Survey work has been undertaken to better understand potential for archaeological remains, comprising geophysical survey and targeted</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>to exclude the presence of archaeological features of high significance within the LACRs with any degree of confidence. The need for additional survey work does not just apply to the two LACRS; given the scale of many of the ACRs and MCRs, there is also the need for additional survey work for these route options.”</i></p>	<p>archaeological trial trenching (see Appendices 25.4: Onshore geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4) and 25.5: Oakendene parkland: historic landscape assessment, Volume 4 (Application Document Reference: 6.4.25.5)). Survey results, where available, together with all other historic environment evidence as described in Section 25.5, have fed into the design of the Proposed Development and the assessment of archaeological potential and significance.</p>
	<p><i>“...trenched evaluation is required to understand the extent and significance of below ground archaeological features present. The lack of intrusive investigations to date within the PEIR boundary is highly concerning... Archaeological potential and significance must be assessed through trial trench evaluation prior to fixing any proposed route changes.”</i></p>	<p>The onshore desk-based geoarchaeological and palaeoenvironmental assessment report (Appendix 25.3: Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 (Application Document Reference: 6.4.25.3)) has been updated in line with the proposed DCO Order Limits.</p>
	<p><i>“The lack of additional detailed geoarchaeological assessment work for the PEIR SIR is also cause for concern, given the potential for significant geoarchaeological and palaeoenvironmental deposits, especially on the coastal plain/Zone 1.”</i></p>	<p>Assessment of effects on archaeological remains is assessment in Sections 25.9 to 25.12.</p>
	<p><i>“The removal/loss of any such high significance features, as well as the cumulative effect of other archaeological features of lesser (low to medium significance), is likely to result in a significant adverse effect on the historic environment.”</i></p>	

Stakeholder	Theme	How this is addressed in this ES
	<p>Viewpoints</p> <p><i>“Historic environment receptors should be actively incorporated from the start when selecting additional viewpoints for the LACRs and route options. WSCC should be consulted on viewpoint locations to ensure heritage assets likely to be sensitive receptors for the new routes are adequately represented within viewpoints.”</i></p>	<p>LVIA engagement has been undertaken to determine relevant viewpoints.</p>

Table 25-8 Formal Consultation feedback, Volume 2, Chapter 25, Historic Environment, Third statutory consultation exercise (February – March 2023)

Stakeholder	Theme	How this is addressed in this ES
Historic England	<p>Archaeological potential and significance</p> <p><i>“...there is not sufficient baseline information to fully understand the significance of any heritage assets which might be present within the route corridor for LACR-01d.”</i></p> <p><i>“...the proposed LACR-01d corridor is a significant archaeological landscape for the prehistoric period. Based on our current understanding of the historic environment, we think that the amendment cannot currently be justified over the previous options.”</i></p> <p><i>“The rich archaeology likely to be present within the LACR-01d area is attested by the high incidence of scheduled sites adjacent to the proposed route. It lies between two Neolithic flint mines and adjacent to Bronze</i></p>	<p>The Proposed Development includes an onshore cable route corridor along LACR-01d, as presented in the PEIR FSIR (RED, 2023).</p> <p>The methodology for the assessment of archaeological potential and significance is described in Section 25.6, paragraph 25.6.37 and Section 25.7.</p> <p>The historic environment baseline presented in Section 25.6 and Appendix 25.2: Onshore historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2) includes details on available archaeological and geoarchaeological evidence pertaining to the onshore cable route corridor which traverses along LACR-01d, which identifies</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>Age settlements and mortuary sites as well as an Anglo Saxon burial ground.”</i></p> <p><i>“Most of LACR-01d lies within ‘red alert’ Archaeological Notification Areas (ANA), based to a large extent on proximity to nearby scheduled sites. There is a high potential for archaeological remains contemporary with, and of likely equivalent significance to, those of the scheduled sites to be present within these ANA.”</i></p> <p><i>“Without field investigation, based on the information currently available, it should be assumed that the risk of encountering highly significant archaeology is very likely. ”</i></p> <p><i>“...the route follows / crosses several dry valleys, infilled with potentially deep colluvial deposits that might conceal archaeological remains and ecological evidence associated with the significant and nationally important prehistoric activity known from the area.”</i></p> <p><i>“The Boundaries of scheduled sites rarely mark the exact limits of the area of interest. Therefore, it is likely that non-scheduled remains associated with and probably of equivalent national importance to those within the scheduled areas exist in areas crossed by LACR-01d.”</i></p> <p><i>“The area crossed by LACR-01d has significance as an archaeological landscape. Table</i></p>	<p>archaeological potential and significance as described by Historic England (as listed in Table 25-4).</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>G1-1 suggests that some of the archaeological remains in the area are contemporary. It is also likely that as-yet unknown and non-designated archaeology contemporary with the scheduled sites exists beyond the boundaries of the scheduled remains. These remains are likely to relate to Neolithic flint mining; Bronze Age settlement and burial activity; Iron Age and Romano-British settlement and associated activity; as well as Saxon burial sites and medieval settlement. Therefore, any archaeological remains surviving in this area have considerable group value and the majority of the area crossed by LACR-01d (that within the SDNPA Archaeological Notification Areas) should be considered in an equivalent way to a scheduled site.”</i></p>	
	<p>Assessment</p> <p><i>“In the absence of detailed baseline data (such as significance, distribution and extent of features) at this stage in the assessment process a high magnitude of effect should be assumed for known and potential buried archaeological features present within the route corridor.”</i></p> <p><i>“...we disagree with the conclusion that implementing embedded environmental measures would effectively limit the magnitude and overall effect on archaeological assets to an</i></p>	<p>Geophysical survey has been undertaken to better understand potential for archaeological remains (see Appendix 25.5: Oakendene parkland: historic landscape assessment, Volume 4 (Application Document Reference: 6.4.25.5)). Survey results, where available, together with all other historic environment evidence as described in Section 25.5, have been considered in the design of the Proposed Development and the assessment of archaeological potential and significance.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>‘acceptable level’ of low to medium adverse, which would be not significant in EIA terms.”</i></p>	<p>Where there are limitations in the availability of survey data and other baseline information to support the assessment of potential and significance of archaeological remains, a reasonable worst-case is assumed in the assessment.</p> <p>The implementation of embedded environmental measures has been considered in the assessment of historic environment effects in Section 25.9.</p>
	<p>Evaluation</p> <p><i>“...any proposed development impacts in this area would require the most detailed and meticulous levels of evaluation and mitigation (prior to and following DCO submission) to make sure that archaeologically important evidence is not lost.”</i></p> <p><i>“...standard evaluation techniques across the LACR-01d area might not be adequate and evaluation surveys will therefore need to include other types of geophysics, borehole surveys, fieldwalking, ploughsoil gridding, sampling and sieving for finds recovery, and deep, shored excavation test pits and trenches. without the baseline evidence these surveys would provide, we cannot be confident that embedded measures C6 (avoidance) or C79 (recording, dissemination and archiving) will</i></p>	<p>An Outline Onshore WSI (Application Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. This includes the application of non-standard evaluation techniques within the part of the proposed DCO Order Limits which falls within LACR-01d.</p> <p>The Outline Onshore WSI (Application Document Reference: 7.9) is submitted with the DCO Application.</p> <p>A site-specific WSI will be required for appropriate and proportional archaeological evaluation works to be</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>be appropriate to mitigate archaeological impacts.”</i></p>	<p>undertaken, which will be agreed in advance with relevant stakeholders.</p> <p>In the absence of baseline evidence from recommended evaluation techniques, a worst-case scenario has been considered in the assessment of historic environment effects presented in Sections 25.9 to 25.12, specifically for the part of the proposed DCO Order Limits which falls within LACR-01d.</p>
	<p>Mitigation</p> <p><i>“It is also not possible to assess if mitigation through design could be effective.”</i></p> <p><i>“Given the nature of the archaeological remains we know to be present within the vicinity of this route option, and in the absence of detailed baseline survey data for LACR-01d, it is not possible to state that ‘avoidance of areas of sensitivity’ will be feasible.”</i></p> <p><i>“...C-79 (recording, dissemination and archiving) is likely to require full excavation of the development footprint. This would need to be of the highest standard, given the potentially national importance of the archaeological evidence. Therefore, archaeological mitigation is likely to be expensive and to require a significant amount of time</i></p>	<p>Embedded environmental measures (Table 25-24) are presented in Section 25.7, which have been adopted to reduce the potential for historic environment effects. In line with these embedded environmental measures, an Outline Onshore WSI (Application Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. The Outline Onshore WSI (Application Document Reference: 7.9) is submitted with the DCO Application. The Outline Onshore WSI (Application Document Reference: 7.9) refers to the need for “site-specific WSIs” to set out proposals for evaluation and</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>allocated within the construction programme.”</i></p>	<p>mitigation stages for each area of the onshore part of the proposed DCO Order Limits, which are to be agreed to relevant stakeholders to ensure suitability and effectiveness.</p>
SDNPA	<p>Archaeological potential and significance</p> <p><i>“The proposed route along LACR-01d may be slightly shorter in length (compared to LACR-01c), but given this high significance, presents the possibility of a prolonged construction timetable to ensure the appropriate due diligence to archaeology that sits so closely to Scheduled Monuments. Further to this, further detailed investigation is likely to be required before final route selection i.e. before construction work commences.”</i></p> <p><i>“Blackpatch and Harrow Hills sit on high points either side of the valley containing the proposed route corridor. Given both sites are of a prehistoric industrial nature, it is probable that the valley contains significant potential for settlement evidence from the early prehistoric (and therefore may represent some of the earliest evidence for Neolithic settlement in Britain). The landforms themselves suggest significant sediment build ups within the dry valley between both sites, with potential evidence for Neolithic and other periods lying deep in the valley profiles. This means</i></p>	<p>The Proposed Development includes an onshore cable route along LACR-01d, as presented in the PEIR FSIR (RED, 2023).</p> <p>The methodology for the assessment of archaeological potential and significance is described in Section 25.6, paragraph 25.6.39 and Section 25.7.</p> <p>The historic environment baseline presented in Section 25.6 and Appendix 25.2: Onshore historic environment desk study, Volume 2 (Application Document Reference: 6.4.25.2) includes details on available archaeological and geoarchaeological evidence pertaining to the onshore cable route which traverses along LACR-01d.</p>

Stakeholder	Theme	How this is addressed in this ES
WSSC	<p><i>that geophysical data is unlikely to provide a sufficiently detailed evidence base on which to base decisions relating to route options.”</i></p>	
	<p><i>“It would appear highly unlikely that the route could be achieved without substantial permanent destruction of the historic environment.”</i></p>	
	<p>SDNPA provided historic environment baseline information from Neolithic to Roman periods (courtesy of the Sussex Archaeological Society).</p>	
<p>Archaeological potential and significance</p>	<p><i>“...the level of baseline assessment undertaken is insufficient to fully understand the significance of any heritage assets that might be present within the route corridor for LACR-01d. Therefore, the effect on the historic environment cannot be accurately assessed nor statements relating to the feasibility of mitigation by design substantiated.”</i></p>	<p>The methodology for the assessment of archaeological potential and significance is described in Section 25.6, paragraph 25.6.39 and Section 25.7.</p>
<p><i>“...WSSC raises serious concerns about the risk of harm to nationally significant archaeology, which would constitute a major adverse effect (significant in Environmental Impact Assessment (EIA) terms) on the historic environment.”</i></p>	<p>The onshore historic environment baseline is summarised in Section 25.6. A detailed desk study is provided in Appendix 25.2: Onshore historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2), the geoarchaeological and palaeoenvironmental assessment report in Appendix 25.3: Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 (Application Document Reference: 6.4.25.3), and survey report provided in</p>	

Stakeholder Theme	How this is addressed in this ES
	<p>Appendix 25.4: Onshore geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4) All of which have informed the assessment of potential and significance of archaeological, geoarchaeological and palaeoenvironmental remains presented in Sections 25.9 to 25.12.</p> <p>The potential for nationally significant archaeological remains has been identified within part of the proposed DCO Order Limits which include an onshore cable route along LACR-01d.</p>
<p>Evaluation</p> <p><i>“In order to attempt to advance understanding of the significance of the archaeology potentially present within LACR-01d, an extensive suite of specialist field surveys would, at a minimum, be required.”</i></p> <p><i>“Standard evaluation techniques, for example, geophysical survey followed by trial trench evaluation, are likely to be fairly effective at picking up many of the more commonly encountered feature types that the PEIR FSIR has identified as being potentially present within LACR-01d.”</i></p> <p><i>“However, certain feature types would not be detectable by means of standard evaluation techniques.”</i></p>	<p>An Outline Onshore WSI (Application Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. This includes the application of non-standard evaluation techniques within the part of the proposed DCO Order Limits which falls within LACR-01d.</p> <p>The Outline Onshore WSI (Application Document Reference: 7.9) is submitted with the DCO Application.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>“Depending upon the exact route chosen, constraints posed by the topography of LACR-01d mean that standard fieldwork methods may be impractical and more time-consuming and costly than usual.”</i></p>	<p>A site-specific WSI will be required for appropriate and proportional archaeological evaluation works to be undertaken, which will be agreed in advance with relevant stakeholders.</p>
	<p><i>“Evaluation of LACR-01d must include provision for the presence of deeply stratified colluvial deposits and the associated potential for earlier archaeological features and deposits. Borehole and/or auger survey might also be required.”</i></p>	
	<p><i>“The above factors would make it highly challenging to successfully evaluate the archaeological potential of LACR-01d and may mean that even following evaluation, there is a chance that LACR-01d would not be archaeologically de-risked to a high degree of confidence.”</i></p>	
	<p><i>“This would require considerable additional survey work to be undertaken prior to the route being fixed for DCO. This should include:</i></p> <ul style="list-style-type: none"> <i>• Further baseline assessment work on significance;</i> <i>• Geophysical survey;</i> <i>• Trial trench evaluation;</i> <i>• Specialist assessment of paleoenvironmental potential and, if appropriate, targeted environmental sampling of dry valley;</i> <i>• Test pit evaluation; and</i> 	

Stakeholder	Theme	How this is addressed in this ES
	<ul style="list-style-type: none"> <i>Proposed mitigation strategy for accurately evaluating and assessing significance for the nationally significant prehistoric landscape that LACR01d crosses, factoring in the unique constraints posed by topography and likely feature types.</i> <p><i>Surveys should include coverage of the entire LACR-01d corridor to ensure that the baseline evidence can support cable route changes if required.”</i></p>	
	<p>Mitigation</p> <p><i>“In the event that archaeology of high significance associated with the known prehistoric industrial landscape is identified, full and comprehensive mitigation to the highest standard would be required. It is worth noting that, based on previous investigations of such features, researching any prehistoric mine would be problematic and time-consuming and likely to result in the recovery of extremely large volumes of archaeological finds. It has been suggested that a single mineshaft can produce upwards of 150,000 artefacts (Baczkowski 2020).”</i></p>	<p>Embedded environmental measure C-79 provides for archaeological mitigation which will entail an agreed programme of archaeological recording, as well as appropriate curation/deposition of the site archive.</p> <p>An Outline Onshore WSI (Application Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. The WSI also details the requirement for the design and implementation of mitigation strategies to be undertaken by suitable qualified and experience archaeologist and specialists.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p>Setting</p> <p><i>“Identified effects on designated heritage assets arising via a change in setting, are a cause for concern, despite being temporary in duration.”</i></p> <p><i>“Further settings assessment work is required to refine assessments of significance of the affected assets and of the impacts of the proposals upon that significance.”</i></p>	<p>Baseline information for assets scoped into the assessment of effects resulting from change to setting is presented in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 (Application Document Reference: 6.4.25.8). The assessment is presented in Sections 25.9 to 25.12.</p>
	<p>Assessment of effects</p> <p><i>“WSCC do not concur with the summary of direct effects on heritage assets for LACR-01d and associated AAs (para. 2.2.84). In particular, the assessment that a low to medium magnitude of change is most likely. In the absence of detailed baseline data at this stage in the assessment process (such as significance, distribution and extent of features), a high magnitude of effect should be assumed for known and potential buried archaeological features present within the route corridor.”</i></p> <p><i>“Substantial harm to heritage assets of national significance cannot be ruled out for LACR-01d on the basis of the available evidence.”</i></p> <p><i>“WSCC do not support the assertion that this harm can be mitigated to an acceptable degree via standard industry mitigation practises, and</i></p>	<p>Geophysical survey has been undertaken to better understand potential for archaeological remains (see Appendix 25.4: Onshore geophysical survey report, Volume 4 (Application Document Reference: 6.4.25.4)). Survey results, where available, together with all other historic environment evidence as described in Section 25.5, have been considered in the design of the Proposed Development and the assessment of archaeological potential and significance.</p> <p>Where there are limitations in the availability of survey data and other baseline information to support the assessment of potential and significance of archaeological remains, a reasonable worst-case has been assumed in the assessment.</p> <p>The implementation of embedded environmental</p>

Stakeholder	Theme	How this is addressed in this ES
	<i>certainly not by reliance on design or route micro-siting.”</i>	<p>measures is considered in the assessment of historic environment effects.</p> <p>An Outline Onshore WSI (Application Document Reference: 7.9) setting out the requirements for further archaeological investigation work in response to impacts of Rampion 2 has been prepared separately to the ES, informed by the results of surveys and ongoing consultation with relevant stakeholders. This includes the application of non-standard evaluation techniques within the part of the proposed DCO Order Limits which falls within LACR-01d.</p> <p>The Outline Onshore WSI (Application Document Reference: 7.9) is submitted with the DCO Application.</p> <p>A site-specific WSI will be required for appropriate and proportional archaeological evaluation works to be undertaken, which will be agreed in advance with relevant stakeholders.</p>

Table 25-9 Formal Consultation feedback, Volume 2, Chapter 25, Historic Environment, Forth statutory consultation exercise (April – May 2023)

Stakeholder	Theme	How this is addressed in this ES
Historic England	Effects through change to setting	Based on the limited potential for impacts to designated heritage assets through

Stakeholder	Theme	How this is addressed in this ES
	<p><i>“Historic England consider that both the AIS or GIS options proposed have limited potential to impact upon designated heritage assets and their settings.</i></p> <p><i>This is largely due to the general lack of designated heritage assets within proximity of the proposed extension and new infrastructure. The exception to this being Twineham Court Farmhouse (Grade II, 1025579), which is situated approximately 270m to the east.</i></p> <p><i>It has been assessed in the PEIR (RED, 2021) that minor adverse effects to the Twineham Court Farmhouse may result from audible and visual changes during construction and operation within its setting. The potential impact appears to be similar for both the AIS and GIS options. Historic England agree that this assessment of potential effects is proportionate.”</i></p> <p><i>“Historic England has no objection to the proposed extension to and new infrastructure at Bolney substation on heritage grounds.</i></p> <p><i>Based on the information provides, we agree with your assessment that there are minimal differences between the AIS/GIS options with regards to the historic environment.”</i></p>	<p>change to setting, a 1km buffer was used to identify heritage assets which may be scoped into the assessment of effects (as detailed in Appendix 25.7: Settings assessment scoping report, Volume 4 (Application Document Reference: 6.4.25.7)). Only Twineham Court (NHLE 1025579) has been scoped into the assessment of effects due to the existing National Grid Bolney substation extension (Sections 25.9 and 25.10).</p>
WSCC	<p>Impacts to archaeological remains</p> <p><i>“There is an identified potential for harm to as-yet unidentified archaeological features located</i></p>	<p>The assessment of potential and significance archaeological remains which may be impacted by the existing National Grid Bolney</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>within the footprint of the substation extension (both for AIS and GIS). However, WSCC agrees that the impacts would be no greater than those already assessed at PEIR. The geophysical survey report indicates that no anomalies of archaeological origin were identified within the footprint of the substation extension. WSCC notes that the results of the geophysics have yet to be ‘ground-truthed’ by trial trench evaluation in this area, so the accuracy of the geophysics results cannot yet be confirmed. In the event that significant archaeological features are identified within the footprint of the substation extension, the larger footprint of the AIS design option might potentially result in a greater degree of harm. The location of the construction compound on an area of existing hardstanding is welcomed as this will significantly reduce impacts to buried archaeological features and reduce the requirement for investigation and/or mitigation.”</i></p>	<p>substation extension is considered within Section 25.6 and Appendix 25.2: Onshore historic environment desk study, Volume 4 (Application Document Reference: 6.4.25.2). Effects on archaeological remains are assessed in Section 25.9.</p>
	<p>Effects through change to setting</p> <p><i>“The PEIR assessed that there would be no likely significant effects to nearby designated heritage assets associated with construction or operation of the project substation and enabling works at Bolney Substation. Nearby Grade II listed Twineham Court Farmhouse (1025579) was assessed at PEIR as being subject to a possible minor adverse effect (not significant) during both construction and operation phases. WSCC concurs that the consulted design</i></p>	<p>The baseline for heritage assets scoped in to the assessment of effects arising from change to setting is provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 2 (Application Document Reference: 6.4.25.8).</p> <p>The assessment of effects is presented in Sections 25.9 and 25.10.</p>

Stakeholder	Theme	How this is addressed in this ES
	<p><i>and construction parameters associated with both AIS and GIS options are unlikely to materially alter these predicted effects. However, WSCC notes that the exact effects of proposals upon heritage assets arising from changes within settings cannot be fully assessed at this stage, in the absence of detailed baseline settings assessments of significance (including contribution made by setting) for the scoped-in heritage assets.”</i></p>	

Table 26-7 Formal Consultation feedback, Volume 2, Chapter 26, Water Environment, First statutory consultation exercise (July – September 2021)

Theme / Comment	How this is addressed in this ES and DCO Application
<p>ADC “Due to the recent release of the peak river flow allowances incorporating climate change from the 2018 projections, it is advised that 40% should be used in the FRA modelling, especially due to the landfall location being within Flood Zone 3a and the significant inland incursion affected.”</p>	<p>Climate change allowances are discussed in detail in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2). The Flood Risk Screening Assessment carried out a comprehensive review of the (2016) Environment Agency guidance on climate change allowances and this was provided alongside the first statutory consultation exercise in 2021. This covered peak fluvial flows, peak rainfall intensity, sea level rise etc. In a recent stakeholder meeting the flood officer from ADC noted that he had no issues with the findings of that FRA (Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2)) provided alongside the original PEIR (RED, 2021).</p> <p>The updated FRA in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2)</p>

now considers the latest 2022 fluvial climate change guidance. This states that the Higher Central allowance for Essential Infrastructure in flood zones and the new recommended allowances have been applied. In the FRA, Table 5-9 considers these peak flow climate change allowances for the South East River Basin District, together with the relevant flood zone development vulnerability combination which applies. Table 5-10 also provides current NPPF (MHCLG, 2021) guidance as a frame of reference.

Environment Agency

Chapter 26 General Comment: *“Given that the route and substation are not located in any highly sensitive location with respect to groundwater, we agree that the measures and approaches as outlined are sufficient.”*

Agreement noted. No further action necessary.

Chapter 26 PWS: *“While we do not have any fundamental issues with the conclusions of the risk assessment, we have concern about non-licenced potable supplies being classed as low resource value. Though they may only represent a minor abstraction, they can be the sole drinking water supply for individuals, in locations discreet from public water supply. Capacity for monitoring these to ensure that they are not impacted is also likely to be limited. As such they can be vulnerable for impaction. As such ensuring that they are protected is a high priority. Their resource value should reflect this.”*

The value of the PWS receptor has been updated. Medium value has been given to PWSs in **Table 26-21** and in the assessments in **Section 26.9** to **26.11** to better reflect their importance as suggested.

Chapter 26 PWS: *“C-137 All proposed infrastructure and construction activities will be sited outside of the inner SPZs (SPZ1) for the Southern Water Warning camp and Burpham borehole water supplies. Construction activities will also be steered as far as practicable outside of their respective SPZ2s, and there will be no drilling activities or storage of hazardous materials including chemicals, oils and fuels within any SPZ.”*

Noted. Due to further evolution of the onshore elements of the Proposed Development between the provision of PEIR and the ES, the proposed temporary construction corridor crosses SPZ2 of the Angmering and Patching Southern Water public water supplies. The only activities within SPZ1 for Warningcamp are for a light construction and operational access track (A-25). The use of existing farm tracks, entrances and 4 x 4 vehicles will ensure that there will be no ground disturbance within the

Warningcamp SPZ1. As discussed with Southern Water (at the 6 April 2023 meeting), the proposals for construction and operational access along Michelgrove Lane in Patching SPZ1 will require minor localised road upgrades at several locations. A range of embedded environmental measures have been provided as part of a detailed Hydrogeological Risk Assessment in **Appendix 26.4: Hydrogeological Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.26.4) (and in **Section 26.7** of this chapter, see **Table 26-20**), as recommended by Southern Water.

“We welcome confirmation that no infrastructure and construction activities will take place inside the SPZ1 for the named (public water supply) sources. We would welcome the confirmation regarding limiting higher risk activities inside the SPZ2. Please also note that there are default 50m SPZ1 around private water supplies used for potable purposes. A default 250m SPZ2 would also generally be implemented around these sources.”

As detailed in C-137 in **Section 26.7**, there will be no groundworks within Warningcamp SPZ1 as light temporary construction access will utilise existing farm tracks near Hill Barn. The minor road upgrades along Michelgrove Lane within Patching SPZ1 will be carried out in accordance with specific embedded environmental measures (C-250, and C251 in **Table 26-20**) to minimise any potential risks posed towards groundwater. There are also no activities within any default SPZ1 for PWSs. Activities in SPZ2 have also been limited along sections of the onshore cable corridor. C-137 provides a statement confirming what activities will be outside of the SPZs, which is projected onto **Figure 26.6, Volume 3** of the ES (Document Reference: 6.3.26) and taken into account in the baseline. Text is provided in the detailed baseline report (**Appendix 26.1: Detailed water environment baseline information, Volume 4** of the ES (Document Reference: 6.4.26.1)) and summarised in the main body of the baseline in **Section 26.6** of this chapter. A survey carried out by ADC on 22 June 2022 and 2 June 2023, has also helped improve the precision of source coordinates for several PWSs in closer proximity to the proposed DCO Order Limits.

WFD Assessment:

“With regard onshore freshwater ecology, we have the following comments to make. Whilst the cable route has looked to limit the number of watercourse crossings, and the proposals for main rivers are for directional drilling below watercourses, there is still likely to be a high level of disturbance to smaller watercourses in both the Arun and Adur catchment.”

“Whilst the WFD status for many of these is “Moderate” or “Poor” and Rampion activities are unlikely to cause direct deterioration in status there is still the possibility of impacts to fish populations during the construction phase.”

“Mention is made of potential impacts from mobilised sediments and pollutants with regard impact to fish and other aquatic species but no acknowledgement of the potential for physical impact caused by damming and de-watering of sections of watercourse and disturbance from temporary or permanent vehicle crossings. We would expect to see as many cable crossings to be below the bed of river wherever possible to reduce this. Permits will be required for each site given the variability of habitats and species present.”

More information has been presented in **Appendix 26.3: Water Framework Directive compliance assessment, Volume 4** of the ES (Document Reference: 6.4.26.3), **Section 26.7** and **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES (Document Reference: 6.2.22) regarding the suite of embedded environmental measures (see **Table 26-20**) to minimise the temporary sediment disturbance relating to open cut cabling crossings and culverted watercourse crossings.

A collaborative approach has been carried out with the terrestrial ecology team to identify those smaller watercourses which require additional mitigation along the onshore cable corridor. A watercourse crossing assessment has been carried out as part of **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES (Document Reference: 6.2.22) to identify potential fisheries along the onshore cable route. One watercourse crossing was identified as offering good coarse fishery habitat near Buncton adjacent to Water Lane. This was previously marked as an open cut trenched crossing in the original PEIR (RED, 2022) however this has been altered to a trenchless crossing to minimise effects from channel disturbance at this location.

Several other smaller crossings were identified as modified Chalk streams by the SDNPA and an embedded environmental measure (C-229) in **Table 26-20** has been put in place for clear span bridges to minimise impacts at these locations.

A suite of other embedded environmental measures have considered unintrusive ways to cross upstream of the spawning grounds (for example, at the Water Lane river) and

limiting the period of disturbance during critical periods of spawning. This is captured within **Section 26.7** of this chapter (see **Table 26-20**).

There may be a requirement to restrict timings of works in particular locations with regard both spawning timings for coarse fish and salmonids.

As noted in **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES (Document Reference: 6.2.22), only one crossing was identified as having favourable conditions for fish spawning (near Buncton). This will be crossed by an unintrusive trenchless crossing methodology. Within the survey, fish were identified as unlikely to be resident along the other reaches of smaller watercourses along the onshore cable corridor.

Embedded environmental measure C64 will ensure isolation works are kept to as short a duration as possible, and screening will take place to prevent fish being drawn into the pump. Embedded environmental measure C-117 ensures that works will be programmed in early summer and autumn. Embedded environmental measures are outlined in **Table 26-20** within **Section 26.7**.

WFD Assessment: “De-watering activity will require suitable screening of all pumps and the ability to rescue and recover any fish encountered. Any potential loss of habitat during the construction phase will require compensation in line with Government Net Gain Targets and there are a number of proposed or ongoing Environmental Projects in both the Arun & Adur Valleys for which mitigation for Rampion 2 could be directed toward.”

Embedded environmental measure C64 will ensure that isolation works would be kept to as short a duration as possible, and screening will take place to prevent fish being drawn into the pump, as described in **Table 26-20**, within **Section 26.7** of this chapter. Information on any temporary habitat loss and biodiversity net gain are addressed within **Chapter 22 Terrestrial Ecology and Nature Conservation, Volume 2** of the ES (Document Reference: 6.2.22) and **Appendix 22.15 Biodiversity Net Gain information, Volume 4** of the ES (Document Reference: 6.4.22.15) accordingly.

Flood Risk. FRAPS: “Following the review of the PEIR we welcome the fact that the environmental permitting requirements have been identified in accordance with the Environmental Permitting (England and Wales) Regulations 2016.”

Noted, no further action required.

Environmental Permitting: *The Applicant will require an Environmental Permit for Flood Risk Activities for the construction phase of the work (a 'FRAP'). Further guidance can be found on the gov.uk website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits#exemptions>. We advise that you consult us early to avoid delays to construction. We generally take two months to determine each application, but for a large scale Nationally Significant Infrastructure Project such as this, with multiple main river crossings and associated works, it may take longer to determine the applications.*

Noted. This chapter acknowledges the need for these permits in **Section 26.7** as does the Flood Risk Assessment in **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.26.2). Engagement will continue during the post-DCO consent, detailed design stage for the preparation of Environmental Permit and FRAP applications. RED will commence that process in advance of construction works.

Environmental Permitting: “Any temporary work associated with permanent installation such as temporary bridge crossings, dewatering and working compounds in the flood plain are also likely to require an Environmental Permit for Flood Risk Activities. Temporary work should therefore be considered in the ES and / or standalone FRA to determine whether there will be a likely significant effect.”

Noted. This chapter (**Section 26.7**) and **Appendix 26.2: Flood Risk Assessment, Volume 2** of the ES (Document Reference: 6.4.26.2) acknowledge the need for these permits. Engagement will continue into the detailed design stages as part of the preparation of the Environmental Permit and FRAP applications. Both documents also consider all temporary construction activities that have potential for impact on the water environment including flood risk. Following implementation of embedded environmental measures set out in **Section 26.7** (see **Table 26-20**) it has been concluded that there will not be 'significant' effects.

Environmental Permitting: “We will require further information regarding any temporary flood risk activities as part of any permit application. We therefore recommend that you engage with us regarding any temporary works design early in the process to ensure

Noted. This chapter (**Section 26.7**) and **Appendix 26.2: Flood Risk Assessment, Volume 2** of the ES (Document Reference: 6.4.26.2) acknowledge the need for these permits. Engagement will continue post-detailed design stages as part of the preparation

that a permit can be granted for the temporary works. Flood Risk Activity Permits are potentially capable of being disapproved in relation to Nationally Significant Infrastructure Projects under section 150 of the Planning Act 2008. However, this would be subject to obtaining our prior consent and application of agreed protective provisions.”

of the Environmental Permit and FRAP applications.

Environmental Permitting: “The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: on or within 8 metres of a main river (16 metres if tidal) / on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) / on or within 16 metres of a sea defence / involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert / in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it’s a tidal main river) and you don’t already have planning permission.”

Noted. These permitting requirements are captured within an embedded environmental measure (C-17) set out in **Table 26-20** within **Section 26.7** and **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.26.2).

WFD Assessment: “We have reviewed the Water Framework Directive (WFD) assessment documentation supplied in the relevant technical appendix (vol 4 Chapter 26) in relation to the WFD water quality remit for TRaC waters.”

Agreement noted. No further action required.

WFD Assessment: “We are pleased to note that we agree with the screening and scoping interpretations provided, and note that as regards chemical water quality further information will be provided within an impact assessment when chemical samples have been analysed. This is encouraging and gives us confidence that WFD water quality for the TRaC waters is being covered well.”

Noted. Results from sediment sampling within the marine environment have been incorporated as part of the WFD assessment in **Appendix 26.3: Water Framework Directive compliance assessment, Volume 4** of the ES (Document Reference: 6.4.26.3).

WFD Assessment: “We would like to take the opportunity to point out that summary water body classifications were last issued formally in the 2015 RBMP, (quoted in this document) and that whilst they remain officially the classification due to not having yet

The latest interim classifications (2019) have been used to inform the WFD assessment in **Appendix 26.3: Water Framework Directive compliance assessment, Volume 4** of the ES (Document Reference: 6.4.26.3). It has also been noted in that assessment that

being formally updated we should point out that ALL TRaC waterbodies are now failing for chemistry. This information is published and in the public domain, in as much as the latest (referred to as the “2019”) classification monitoring results are available online via Open Data, but it would not be obvious, without detailed scrutiny of the individual results and deep knowledge of the classification process, that all water bodies fail.”

WFD Assessment:

“The applicant may wish to consult Environment Agency directly for summary chemistry classifications for the 2019 classification ahead of conducting the chemical water quality impact assessments they intend to provide for us anyway.

The impact assessments should use available information on pre-existing chemical baselines in the waterbodies where impact assessment are carried out, and the 2019 classification exercise may provide more up to date baselines.”

WFD Assessment:

“The significance of the change is chemical status to “fail” for the applicant, is that if the water body is already failing in relation to priority or priority hazardous substances (for example) then no activity they could undertake is likely not to result in a situation where the waterbody still continues to fail.”

“In such a scenario, WFD compliance for water quality cannot be argued as activity in a water body which passes, and the activity doesn’t cause a change from PASS to FAIL, since the baseline will be failing, so the activity is not going to cause an improvement to a PASS. Therefore, the applicants WFD defence argument must be somewhat more subtle; that the activity will not cause a WFD deterioration of any water quality element(s). The applicant must therefore

all Transitional and Coastal (TraC) water bodies are currently failing to achieve good chemical status. The assessment has taken this into account (in terms of potential to 'fail worse').

Latest water quality data available from the Environment Agency's Catchment Data Explorer have been used to inform the assessment, based on the latest interim classifications (2019) in [Appendix 26.3: Water Framework Directive compliance assessment, Volume 4](#) of the ES (Document Reference: 6.4.26.3).

Noted. [Appendix 26.3: Water Framework Directive compliance assessment, Volume 4](#) of the ES (Document Reference: 6.4.26.3) outlines that all TraC waterbodies are currently failing to achieve good chemical status and therefore any disturbance of sediments will effectively result in a 'fail worse' situation.

The WFD Assessment in [Appendix 26.3: Water Framework Directive compliance assessment, Volume 4](#) of the ES (Document Reference: 6.4.26.3) concludes that the Proposed Development will not result in a 'fail worse' scenario for any WFD water body.

provide the rationale for the water body not “failing worse.”

We can provide some further guidance on how we would interpret the “fail worse” threshold, to assist the applicant in making their impact assessment arguments.”

WFD Assessment: “We positively welcome engagement on this prior to the issue of the WFD impact assessment which will consider concentrations in water resulting from disturbance of sediment which may contain either CEFAS list chemicals or Environmental Quality Standards Directive (EQSD) list chemicals they do not need to be discharged from the activity directly- they should still be considered if they are present in sediment being disturbed.

We note the applicant appeared to “scope out EQSD chemicals” arguing they were not going to be used- but we would advise that sediment chemical testing needs to include priority and hazardous substances (EQSD list substances) and that disturbance of waterbody sediments where they do contain these chemicals would need to be scoped in to impact assessments, even if then at the impact assessment stage it can be argued that the concentration changes are temporary, short term and will not contribute to a “fail worse” classification scenario for any failing chemical elements due to the changes being “insignificant” in amplitude.

We are of course aware that in large water bodies the amplitude is probably going to be low as there probably will be high dilution, so we are looking for the applicant to qualify that by reasoned argument to make their case for WFD compliance transparent to the public.”

Landfall design: “For the proposed Landfall works at Climping, the

The WFD assessment in [Appendix 26.3: Water Framework Directive compliance assessment, Volume 4](#) of the ES (Document Reference: 6.4.26.3) and its Annex B considers priority hazardous substances for a number of activities associated with the onshore cable corridor. In Annex B, it is acknowledged that there is potential for pollutants and sediments from various temporary construction activities, and these were scoped in for further assessment in Annex C. As such these chemicals also receive due consideration in relation to the onshore water environment.

Noted. The Environment Agency has been consulted on positioning of the

positioning of any above ground apparatus and haul road / construction compound would need to be chosen with extreme care. This is primarily due to situation regarding coastal erosion in close vicinity to the planned works. We would request that we are consulted regularly regarding this aspect and location as part of the wider works, including any final decisions.”

landfall with regards to coastal erosion, and this is addressed within **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.26.2) and considered further within **Chapter 6: Coastal processes, Volume 2** of the ES (Document Reference: 6.2.6). In **Section 26.7** an embedded environmental measure (C-247) has also been put forward for post-DCO ground investigation to inform the detailed design of the Transition Joint Bay (TJB) apparatus to further protect it against future coastal erosion and tidal flooding.

MSDC

“No significant effects have been identified in the PEIR but the Water Environment submissions and Flood Risk Assessment that will be compiled when the substation location is finalised to then form part of the DCO application will need to be fully assessed (by) Mid Sussex.”

Noted, no further action required. The onshore substation location is now outside of the jurisdiction of MSDC. Therefore, MSDC has deferred to HDC in relation to matters pertaining to onshore substation drainage, as noted in **Section 26.3**.

SDNPA

“As per our comment above in Terrestrial Ecology section, there is no mention of dew ponds on the Norfolk estate and other downland sites. Chalk springs may not be designated but are a very important unpolluted habitat and should be given higher status. Please ensure both are identified and protected.”

In **Appendix 26.1: Detailed water environment baseline information, Volume 4** of the ES (Document Reference: 6.4.26.1), the baseline section includes relevant dew ponds and Chalk springs that were not included in the original PEIR (RED, 2022). SDNPA provided a map which identifies several Chalk streams which are crossed by the onshore cable corridor. Embedded environmental measures (C126 and C229) set out in **Table 26-20** aim to minimise effects on these features including the combined use of open span haul road bridges, trenchless crossing techniques and seasonal working. These were presented and agreed with SDNPA and the Environment Agency at the ETG meeting in November 2022.

Given that ponds and Chalk springs are undesignated the sensitivity criteria places them as 'low' value or sensitivity within the four tier spectrum of receptors

(in **Table 26-21**). However, the assessment is structured so that permanent detectable impacts on these springs would be flagged up as being significant. Embedded environmental measures C-76, C-77, C140, C-141, C-144 and C-229 ensure there would be no significant effects on these receptors within assessments in **Section 26.9** to **26.11**.

“In terms of specific mitigation measures, if concrete is to be used as a base in watercourses then there should be a methodology for reinstatement of the natural bed after construction.”

In terms of onshore cable crossing methodologies, embedded environmental measure C-122 ensures that the cables will pass beneath the bed of the watercourse with sufficient depth resulting in no potential for exposure due to scour (**Section 26.7**, see **Table 26-20**). **Chapter 4: The Proposed Development, Volume 2** of the ES (Document Reference: 6.2.4) indicates that trenches will be backfilled with originally excavated material or cement bound sand (CBS) up to the protective tiles / tape then backfilled above that with excavated material >1m above cables.

In terms of cable route watercourse crossings, pre-fabricated concrete duct protection blocks will be buried well below the base of watercourses (at a depth of approximately 1m below the watercourse). This will enable in-channel works to be carried out more efficiently and minimise the level of direct disturbance. The onshore cable and associated concrete duct blocks will be left in-situ once the Proposed Development has been decommissioned. Embedded environmental measures are outlined in **Section 26.7** (see **Table 26-20**) of this chapter. This includes embedded environmental measures C-19, and C-229 which ensure that channels are to be reinstated in as short as practicable a timescale by carefully reinstating material that had been stripped and stored during construction.

WSCC

2.44 “There are a number of environmental sensitivities within the landfall area that have required due consideration; these include West Beach Local Nature Reserve (LNR), Climping Beach Site of Special Scientific Interest (SSSI), Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS), the location in Flood Zone 3, and the presence of Environment Agency flood defences. RED have stated that, to reduce construction impacts, a trenchless solution is proposed to install ducts that would house the cables under Climping Beach. Although this approach is welcomed, there could still be indirect impacts on these sites that have not been assessed as part of the PEIR and that should be more transparently assessed in the ES.”

The FRA in **Appendix 26.2: Flood Risk Assessment, Volume 4** of the ES (Document Reference: 6.4.26.2) has further summarised the coastal change vulnerability assessment which is presented in detail within **Chapter 6: Coastal processes, Volume 2** of the ES (Document Reference: 6.2.6). These assessments have considered indirect effects along the coastal frontage and considered the resilience of the development and effects on shoreline processes. Further engagement has also taken place with the Environment Agency on the topic of flood risk management as described in **Section 26.3** of this chapter.

Appendix D on the Crossing Schedule: “Based on the current mapping provided several water crossings have been missed i.e., Figure 4.2.1g ‘Main Crossing on onshore cable corridor,’ between TRX-19 and TRX-20. Also Figure 4.2.1h, to the east of RDX-13. Clearly not all water crossings will be picked up from the OS mapping, but it would be expected that all will be picked up during subsequent site walk overs. WSCC expects this to be fully detailed in the ES.”

Additional watercourse crossings have been incorporated into the crossing schedule in **Appendix 4.1: Crossing schedule, Volume 4** of the ES (Document Reference: 6.4.4.1). As noted during a stakeholder meeting further walkovers would be carried out by an Ecological Clerks of Works (ECoW) and the appointed Contractor following the grant of development consent, to identify ditches prior to any construction works.

(In relation to paragraph 27.9.7) “This section suggests ‘two parallel separate trenches’ will be excavated and backfilled to install the cable circuit, yet the worst case scenario is ‘up to four’. Clarification is needed on what assumptions have been used in the assessment.”

The text in the assessment of potential effects for the Construction phase of the Proposed Development (in **Section 26.9**) has now been updated to acknowledge that there could be up to four separate trenches excavated and backfilled to install cable circuits. This represents a worst-case scenario in terms of potential for ground disturbance and associated effects on water quality and hydromorphology.

(With regards to paragraph 27.9.12) “Has piling been considered and assessed as a worst case?”

Piling has been considered as a worst case for groundwater receptors in the onshore substation assessment **Sections 26.9 to 26.11**. This has been made clearer in the maximum design scenario section of **Section 26.7**.

**Table 26-8 Formal Consultation feedback, Volume 2, Chapter 26,
Water Environment, Second statutory consultation exercise
(October – November 2022)**

Theme / Comment	How this is addressed in this ES and DCO Application
Environment Agency	
<p>Flood Risk: “We support the general approach made to updates to the Flood Risk Screening Assessment. We support the inclusion of a coastal change vulnerability assessment and the approach to fluvial floodplain considerations.”</p>	<p>This general comment is welcomed regarding the agreement on the approach taken on flood risk assessment and the inclusion of the coastal change vulnerability assessment. The FRA in Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2) has further summarised the coastal change vulnerability assessment which is presented in detail within Chapter 6: Coastal processes, Volume 2 of the ES (Document Reference: 6.2.6).</p>
<p>“Works near flood defences FRAP: any works within 16 metres from the landward toe of the sea defences would potentially need a FRAP under the Environment Permitting Regulations 2016. Similarly, if the works are within the Arun Internal Drainage District, for any works in under or over a watercourse a formal Flood Defence consent under the 1991 Land Drainage Act and/or byelaws would need to be forthcoming.”</p>	<p>Noted. Further engagement with the Environment Agency will be facilitated with respect to the proposed approach to permitting following the DCO Application submission.</p>
<p>Groundworks in SPZ1: “In relation to modifications to the potential route at LACR-01 and LACR-02 and MR-04, we welcome the confirmation that no ground disturbance / groundworks will take place within the SPZ1. The only activities in SPZ1 will be use of access track and “stringing out” of HDD crossings only.”</p>	<p>Noted. It can be confirmed that there will be no groundworks in SPZ1 associated with the onshore cable construction corridor as part of the Proposed Development in the DCO Application. With respect to the minor upgrade works for access tracks associated with the Michelgrove Lane temporary construction and operational access route (A-26) within Patching SPZ1 two embedded environmental measures have been put forward in</p>

Theme / Comment	How this is addressed in this ES and DCO Application
<p><i>“We would also support a watching brief for solution features, pre - construction Ground Investigation to identify sensitive areas and ground conditions and avoidance of features (swelling clays, transition zones, preferential pathways for breakouts).”</i></p>	<p>Section 26.7 (C-250 and C-251) in order to ensure that there will be no potential effects associated with these proposals.</p> <p>Noted. An environmental measure (C-246) has been embedded in Section 26.7 to ensure that the ‘watching brief’ is carried out post DCO Application and prior to construction to identify sensitive areas and ground conditions within a key target area between Hammerpot and the Buckmans.</p>
<p>Poling Parish Council</p>	
<p>Surface Water Drainage: <i>“The surface water drainage contained within the fabric of Poling Street is fragile and failing with a number of sections already fractured and pipes blocked. Detailed closed circuit television surveys are available to prove this. We are currently working with the County Council as the Highways Authority on remedial measures so bearing in mind that these pipes cover almost the entire length of the Street, we would be seeking some actions from them to ensure that a detailed precondition survey was undertaken and agreement given by yourselves to make good any damage.”</i></p>	<p>There is one proposed open cut trenched temporary crossing of Poling Street associated with the cable route.</p> <p>Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2) and Section 26.7 includes the provision of embedded environmental measures to ensure that there will be no damage to drainage. Embedded environmental measure C-28 addresses such circumstances for open cut temporary crossings along the onshore cable route.</p>
<p>Surface Water Flooding: <i>“the village has, in the last few decades, been prone to some severe surface water flooding and many residents are concerned that works could make this worse so we would be looking for some guarantees that this will not be the case.”</i></p>	<p>Appendix 26.2: Flood Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.2) concludes that there will be no adverse effects on flood risk receptors along the onshore cable route (including the villages of Hammerpot and Poling). Embedded environmental measures (C-27, C-73, C-74, C-75 and C-134), presented in Section 26.7 are included in Table 26-20.</p>

Theme / Comment	How this is addressed in this ES and DCO Application
<p>Drainage: <i>“the whole landscape in and around the village is criss-crossed with streams, ditches and main river each of these are interlinked and blockages cannot, because of the slack gradient, be tolerated. Similarly ensuring that the spoil and haul roads do not cause problems with overland flows we would be seeking that anyway in the coastal plain that you are working such that these open watercourses are maintained in good order in and around your works.”</i></p>	<p>A wide range of environmental measures have been embedded into the Proposed Development to minimise the potential for changes in watercourse conveyance from blockages or the mobilisation of silt laden runoff entering the watercourses. Environmental measures include C-28, C-73, C-130, C-133, C-135 and C-176 (see Section 26.7). This chapter concludes that, following implementation of these embedded environmental measures, there will be no significant adverse effects towards potential receptors (Section 26.9 to 26.12).</p>

Table 26-9 Formal Consultation feedback, Volume 2, Chapter 26, Water Environment, Third statutory consultation exercise (February – March 2023)

Theme / Comment	How this is addressed in this ES and DCO Application
<p>Environment Agency</p>	
<p>Flood Risk: <i>“As far as practically possible, we recommend avoiding the use of temporary culvert crossings. We would support the use of existing access points or using temporary bridges as an alternative.”</i></p>	<p>A suite of embedded environmental measures (C-5, C-126, C-127, C-145 C-176, C-177 and C-229) are included to minimise the number of temporary culvert crossings (see Section 26.7).</p>
<p>Flood Risk: <i>“Any stockpiles should be ideally situated outside of Flood Zones 2 and 3. If they are proposed in the floodplain, we recommend the floodplain remains connected to minimise any impacts on flow conveyance. The location of stockpiles will need to be agreed.”</i></p>	<p>The proposed approach to soil stockpile management is that discussed with the Environment Agency at a targeted stakeholder meeting on 10 March 2022 (see paragraph 26.3.29). There will be no soil stockpiling in the floodplain associated with the haul road. The only potential soil storage in the River Arun floodplain will be limited in extent and short term in duration (reinstated within a matter of days) associated with localised open cut trenching. A suite of embedded environmental measures are</p>

Theme / Comment	How this is addressed in this ES and DCO Application
	included in Section 26.7 (C-130, C-131, C-132 and C-133) to ensure floodplains remains connected.
<i>“Consideration for pre-construction and post-construction asset condition surveys will be required. This will be relevant to any construction activities in close proximity to Main Rivers and subsequent assets.”</i>	Environmental measures (C-17, C-77, C-126, C-142 and C-182) are included to ensure adherence to the permitting regime (see Section 26.7) which will cover any temporary construction activities in close proximity to Main Rivers and subsequent assets.
<i>“We would recommend further consideration regarding disapplication of consents for both FRAPs and Flood Defence Consents (FDC) going forward and will be happy to discuss this option in the future.”</i>	Noted, further engagement with the Environment Agency will be facilitated with respect to the proposed approach to permitting following the DCO Application submission.
<i>Groundwater: “Clarification should be made on the operations proposed in any area that impinges on the SPZ1 for Patching Hill, if any.”</i>	There will be a construction and operational access route along Michelgrove Lane (A-26). There are proposals for minor road upgrades associated with passing places in several locations within Patching SPZ1. This was raised during a targeted stakeholder meeting with the Environment Agency and Southern Water on 6 March 2023. Following this meeting, specific embedded environmental measures have been included (C-250 and C-251) in Section 26.7 in order to minimise any risks posed towards water supplies in the Patching Hill area.
<i>Groundwater: “There are no licenced abstraction marked within the proposed new potential route area. There are also not any licenced or closed landfills marked within the footprint of the proposed new potential route area.”</i>	Noted. No further action required.
<i>“There may be private water supplies within the proposed new area. There</i>	Assessments in relation to PWSs have been carried out in Appendix 26.1:

Theme / Comment	How this is addressed in this ES and DCO Application
<p><i>may also be potential sources of contamination, such as industrial site. There should be appropriate assessments / surveys for these undertaken if utilising this extension area is pursued.”</i></p>	<p>Detailed water environment baseline information, Volume 4 of the ES (Document Reference: 6.4.26.1) and Appendix 26.4: Hydrogeological Risk Assessment, Volume 4 of the ES (Document Reference: 6.4.26.4) and summarised in Section 26.9 to 26.11 of this chapter. This includes up-to-date baseline information and the provision of specific embedded environmental measures (C-78 and C-253) in order to minimise the potential for effects on PWSs from the Proposed Development.</p> <p>Appendix 24.1: Phase 1 geo-environmental desk study, Volume 4 of the ES (Document Reference: 6.4.24.1) includes a geo-environmental desk study which investigates potential sources of contamination along the onshore cable route, however the study concludes that a section of the proposed DCO Order Limits is nearby historical Swillage Lane Landfill and Long Furlong landfill but that the overall likelihood of contamination is unlikely to low likelihood.</p>

Formal Consultation feedback, Volume 2, Chapter 26, Water Environment, Fourth Statutory Consultation exercise – April to May 2023

Fourth Statutory Consultation exercise – April to May 2023

The fourth Statutory Consultation exercise was undertaken from 28 April 2023 to 30 May 2023. This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the Rampion 2 onshore cable route into the national grid electricity infrastructure. As part of this fourth Statutory Consultation exercise, RED sought feedback on the proposed substation extension works to inform the onshore design taken forward to the DCO Application.

The Environment Agency stated that they had no objection to the proposal and that they had no further comments to make on the fourth consultation.

A full list of all comments received during the fourth Statutory Consultation exercise in 2023 and the responses to those comments is provided in the **Consultation Report** (Document Reference: 5.1).

Table 27-4 Formal Consultation feedback, Volume 2, Chapter 27, Major accidents and disasters – First statutory consultation exercise (July- September 2021)

Stakeholder	Theme	How this is addressed in this ES
<p>Historic England</p>	<p>We therefore look forward to seeing how the ES will consider the statement made in EN-1, paragraph 5.3.15 that <i>“...proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design.”</i> For example, in recognition of how this project occurs in a known area of palaeo-environmental interest. Furthermore, in reference to mitigation EN-1 states that action to reduce harmful effects should apply <i>“good design principles”</i>. EN-1, Paragraph 4.5.1 mentions <i>“Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place.”</i> We recommend that the term <i>“place”</i> is informed by the concept of <i>“place”</i> as used within Historic England’s Conservation Principles (Historic England, 2008). We therefore look forward to seeing how this will be assessed and how mitigation will be proposed in any ES produced.</p>	<p>Effects on biodiversity are described in Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES (Document Reference 6.2.22).</p> <p>Effects on geological features are described in Chapter 6: Coastal processes, Volume 2 of the ES (Document Reference 6.2.6) (offshore) and Chapter 24: Ground conditions, Volume 2 of the ES (Document Reference 6.2.24) (onshore).</p> <p>Good design in relation to ‘place’ is described in Chapter 18: Landscape and visual impact, Volume 2 of the ES (Document Reference 6.2.18).</p> <p>Good design in relation to the management of MA&Ds risk means ensuring that the risk of harm is reduced to ALARP. How this will be achieved within the Proposed Development is described further in Section 27.7.</p>
	<p>It is also relevant to see the attention given to the published South Marine Plans and what you described as “general commitments to minimise the harm to marine receptors”. It would seem however that this</p>	<p>It is noted that the definition of a major accident excludes items which are intended or expected effects of the Proposed Development as this would not be considered an ‘accident’. For matters</p>

does not give sufficient attention to how minimisation of harm is expressed in these plans. Specifically, in the text of the published policy for cultural heritage S-HER-1, as necessary to deliver plan Objective 8 “To identify and conserve heritage assets that are significant to the historic environment of the south marine plan areas.”

relating to protection of marine heritage assets, see **Chapter 16: Marine archaeology, Volume 2** of the ES (Document Reference 6.2.16).

Table 274 (Planning Inspectorate scoping opinion responses – major accidents and disasters) includes text that states “*There are no significant effects considered likely to arise from major accidents and disasters on the basis of the embedded environmental Measures*” which in paragraph 28.3.5 refers to MCA and Environment Agency.

RED proposed to scope the assessment of MA&Ds out of further consideration in the Scoping Report (RED, 2020). This was on the basis that there were no likely significant effects. It is noted that Historic England did not object to this position in response to the Planning Inspectorate (Ref: AH32).

While we appreciate the legal obligations you will be under to report any wreck encountered to the Receiver of Wreck (within MCA) as required by the Merchant Shipping Act 1995. We add that it has yet to be determined how you might prevent accident(s) to cultural heritage occurring as the proposed mitigation mechanism is based on reporting after any possible destructive action caused by the proposed development has occurred. The statement made in paragraph 28.4.4 requires further explanation within the ES as it appears that despite the PINs Scoping Opinion, this topic is now “scoped out of further assessment”.

Neither the Planning Inspectorate, nor any other stakeholder commented with respect to the scoping out MA&Ds from further assessment.

Chapter 16: Marine Archaeology, Volume 2 of the ES (Document Reference 6.2.16) and **Chapter 25: Historic environment, Volume 2** of the ES (Document Reference 6.2.25) describe the measures in place to identify previously unknown heritage receptors in proposed construction areas (offshore and onshore), and how these will be treated if present.

RED’s obligations under the Merchant Shipping Act 1995 are acknowledged.

Table 27-6 (Receptors requiring assessment for MA&Ds) includes

The MA&Ds criteria are drawn from and aligned to

only a few categories of designated heritage assets, which is insufficient if the consideration of risk is extended to harm as might be caused to Registered Parks and Gardens and other sites that may qualify for designation, but are presently unknown. We add also that should this project encounter any known or presently unknown crashed military aircraft that such sites will be automatically afforded Protected Place status under the Protection of Military Remains Act 1986.

Table 27-8 (Major accident threshold by receptor type) it is our advice that the description of 'major accident/disaster threshold' that the statement "Damage sufficient for designation of importance to be withdrawn" should be expanded to include heritage assets sufficiently disturbed, damaged or destroyed that prevents designation.

government (DETR, 1999) and joint regulator / industry (CDOIF, 2016) guidance. These criteria are widely applied to all operational COMAH establishments in the UK.

The guidance is clear that only damage to Grade I listed buildings, Scheduled Monuments or Conservation areas is to be considered a major accident. This has been expanded to consider Grade 2* listed buildings for the purpose of EIA.

Chapters 16: Marine archaeology, Volume 2 of the ES (Document Reference 6.2.16 and **Chapter 25: Historic environment, Volume 2** of the ES (Document Reference 6.2.25) describe the measures in place to identify previously unknown heritage receptors in proposed construction areas, and how these will be treated if present.

In line with the approach taken for ecologically designated sites, where a particular receptor is identified as a candidate or potential designated site (e.g., nominated for Grade 1 listing), it will be treated as such.

It should be acknowledged that a major accident is very unlikely to occur during the course of the Proposed Development.

Different criteria are applied to effects which are considered likely to occur as a result of the Project and these aspects are covered in

Chapter 25: Historic environment, Volume 2 of the ES of the ES (Document Reference 6.2.25).

The Projects obligations under the Protection of Military Remains Act 1986. are acknowledged.

Table 27.9 (Relevant major accidents and disaster embedded environmental measures) it states that “Where practical, sensitive sites will be avoided” (e.g., C-6), we therefore request that any ES expands on the caveat of “where practical” as sufficient to still represent viable “embedded” mitigation. For example, in C-75 mention is made of a “sequential approach to siting of infrastructure and passing the Exception Test where appropriate”.

The design change process considers a variety of factors including environmental, commercial and engineering constraints. This measure is intended to embed the principle that separation between the Proposed Development and sensitive receptors is a stronger form of mitigation. The design change process and alternatives considered are given in **Chapter 3: Alternatives, Volume 2** of the ES (Document Reference 6.2.3).

Paragraph 28.7.18 mentions “Other measures can be specified to prevent harm at design stage”, the ES should expand on this point for example if “other measures” are considered inclusive of pre-construction survey, evaluation and sampling to ascertain presence of any heritage assets, as might be present and therefore to determine whether or not an avoidance strategy can be adopted.

The measures employed to protect heritage assets during construction are discussed in **Chapter 25: Historic environment, Volume 2** of the ES (Document Reference 6.2.25).

Under “Offshore major accidents” we suggest that the equivalent chapter in the ES appropriately cross-references other chapters etc that provide the risk strategy for dealing with Unexploded Ordnance (UXO).

Offshore UXO is considered within **Section 27.10**. Consent for the specific removal of UXO will be sought under a future marine license application, and this will be based upon a UXO strategy developed in line with the measures proposed

For example, it seems the UXO risk is only considered in terrestrial

in **Section 27.7**.

context (paragraph 28.10.2) and it would seem that such assessment was equally applicable in a marine context.

The attention given in paragraph 28.11.9 regarding survey to inform suitable foundation is design should also include full assessment of accidental impact to presently unknown elements of the historic environment as might be present. The collation of data to support this assessment is crucial if this project is to avoid substantial harm to cultural heritage.

For matters relating to protection of marine heritage assets, see **Chapter 16: Marine archaeology, Volume 2** of the ES (Document Reference 6.2.16).

Table 27-5 Formal Consultation feedback, Volume 2, Chapter 27, Major accidents and disasters – Second statutory consultation exercise (October- November 2022)

Stakeholder	Theme	How this is addressed in this ES
HSE	<p><i>“According to HSE’s records the proposed DCO application boundary corridor for the onshore element of the works for this Nationally Significant Infrastructure Project falls into the inner, middle and outer zones of a number of Major Accident Hazard Pipelines. This is based on the plans contained in “Rampion 2 Second Round of Statutory Consultation: Potential Onshore Cable Route Changes” which is found at Fact Sheets A4 portrait V17 - A3 landscape [sic] double A4 pages (for screen viewing) copy (rampion2.com). The Major Accident Hazard Pipelines are: Pipelines: 8037, 8043 and 8044. These pipelines are operated by Southern Gas Network Limited. The Applicant should make the necessary approaches to the relevant pipeline operator. There are three particular reasons for this:</i></p>	<p>RED has already undertaken extensive engagement with Southern Gas Networks Limited and all other relevant utility providers to ensure a suitable design for works in proximity to existing assets especially high-pressure gas pipelines.</p> <p>The approach to these works will be agreed with the relevant operator prior to being undertaken.</p> <p>Wherever possible, the Proposed Development has minimised the population for working in proximity to these pipelines but some temporary construction compounds will be required where these pipelines are to be crossed using trenchless techniques.</p>

i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.

ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.

iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.”

“HSE’s Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in “Rampion 2 Second Round of Statutory Consultation: Potential Onshore Cable Route Changes” which is found at Fact Sheets A4 portrait V17 - A3 landscape [sic] double A4 pages (for screen viewing) copy (rampion2.com), it is unlikely that HSE would advise against the development.”

This is noted. Embedded measure C-173 has been included to take account of HSE’s approach to Land Use Planning, and the Proposed Development will be designed to ensure that a response of 'Do Not Advise Against' is received from the HSE.

“With regards to Areas 1, 4, 5, 6 and 7, HSE has no comment to make as there are no licensed explosives in the vicinity. With regards to Areas 2 and 3 there is an explosive site in the vicinity and HSE may need to review the appropriateness of the existing licence if this development were to proceed as planned and access routes to support the laying of the cable and any buildings used to house construction workers or their equipment were to be within the safeguarding distance of the explosives site. The developer might want to consider consulting the site to

This site has been identified as Wells Fireworks Ltd operating out of Home Farm at Wepham, BN18 9RA. The HSE Planning Advice Web App (HSE, 2023) indicates that this licensed site has a safeguarding distance of approximately 275m.

While the onshore cable corridor presented in the PEIR (RED, 2021) passed in close proximity to this site, the onshore cable route has subsequently evolved such that the proposed DCO Order Limits avoid this location entirely. The nearest point to

<i>identify the potential consequences for the cable (if it is critical infrastructure) from the explosives on-site, including initial ground shock and cratering and any secondary ground shock and cratering that might result from secondary events associated with an incident.”</i>	the proposed DCO Order Limits is approximately 850m to an access, with the nearest temporary construction compound located over 2km to the east. This site is therefore discounted from further consideration.
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Formal Consultation feedback, Volume 2, Chapter 27, Major accidents and disasters, Third Statutory Consultation exercise – February to March 2023 and Fourth Statutory Consultation exercise – April to May 2023

Third Statutory Consultation exercise – February to March 2023

The third Statutory Consultation exercise was undertaken from 24 February 2023 to 27 March 2023. This was a targeted consultation which focused on a further single onshore cable route alternative being considered following feedback from consultation and further engineering and environmental works. As part of this third Statutory Consultation exercise, RED sought feedback on the potential changes to the onshore cable route proposals to inform the onshore design taken forward to DCO Application.

There were no key themes emerging from Rampion 2’s third Statutory Consultation exercise in April 2023 specifically relating to MADs.

A full list of all comments received during the third Statutory Consultation exercise in 2023 and the responses to those comments is provided in the **Consultation Report** (Document Reference 5.1).

Fourth Statutory Consultation exercise – April to May 2023

The fourth Statutory Consultation exercise was undertaken from 28 April 2023 to 30 May 2023. This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the Rampion 2 onshore cable route into the national grid electricity infrastructure. As part of this fourth Statutory Consultation exercise, RED sought feedback on the proposed substation extension works to inform the onshore design taken forward to the DCO Application.

There were no key themes emerging from Rampion 2’s fourth Statutory Consultation exercise in April 2023 specifically relating to MADs.

A full list of all comments received during the fourth Statutory Consultation exercise in 2023 and the responses to those comments is provided in the **Consultation Report** (Document Reference 5.1).

Table 28-7 Formal Consultation feedback, Volume 2, Chapter 28, Population and human health

Stakeholder	Theme	How this is addressed in this ES
Mid-Sussex District Council	With the Wineham Lane North substation site being in close proximity to residential properties, it is essential that any potential long term health implications on nearby residents have been fully considered and demonstrated within your submissions.	Potential health impacts associated with a range of health determinants have been assessed for all project aspects, including the extension to the existing National Grid Bolney substation (on Wineham Lane).
West Sussex County Council	It is appreciated that studies show the risk of exposure to electromagnetic field from offshore wind farms as being negligible with not much evidence to suggest the contrary. However, to serve as reassurance to the public and all other stakeholders who may have concerns around this, we recommend that RED demonstrates that the risks, however little- have been assessed.	The potential health effects from exposure to EMF has been assessed in Section 28.10 .

Formal Consultation feedback, Volume 2, Chapter 28, Population and human health, Second Statutory Consultation exercise – October to November 2022, Third Statutory Consultation exercise – February to March 2023 and Fourth Statutory Consultation exercise – April to May 2023

Following feedback to the Statutory Consultation in 2021 and after further analysis, it was identified that some coastal residents did not receive consultation leaflets as intended. Therefore, the Statutory Consultation was reopened between 7 February 2022 to 11 April 2022 for a further nine weeks. The original PEIR (RED, 2021) published as part of the Statutory Consultation in 2021 was unchanged and reprovided alongside the reopened Statutory Consultation in early 2022. No further comments were received in relation to the stand-alone human health assessment.

In addition to the first Statutory Consultation exercise in 2021, RED undertook three further targeted Statutory Consultation exercises:

- Second Statutory Consultation exercise – October to November 2022: This was a targeted supplementary consultation which focused on updates to the

onshore cable route proposals which were being considered following feedback from consultation and further engineering and environmental works.

- Third Statutory Consultation exercise – February to March 2023: This was a targeted consultation which focused on a further single onshore cable route alternative being considered following feedback from consultation and further engineering and environmental works.
- Fourth Statutory Consultation exercise – April to May 2023: This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the onshore cable route into the national grid electricity infrastructure.

As part of the second, third and fourth Statutory Consultation exercises, RED sought feedback on the potential changes to the onshore cable route proposals and the proposed existing National Grid substation extension works to inform the onshore design taken forward to Development Consent Order (DCO) Application.

No specific feedback relating to the stand-alone human health assessment was received in the second, third and fourth Statutory Consultation exercises.

A full list of all comments received during the Statutory Consultation exercises and the responses to those comments is provided in the [Consultation Report](#) (Document Reference: 5.1).

Table 29-17 Formal Consultation feedback, Volume 2, Chapter 29, Climate Change

Stakeholder	Issue	How this is addressed in this ES
West Sussex County Council (WSCC)	WSCC stated that it was difficult to get a full representation of how the Proposed Development has considered climate change resilience across the aspects. There are opportunities to improve this and make it easier for the reader, therefore WSCC expects this to be presented in more detail in the ES.	The approach has been extending from that presented at both the scoping stage and at PEIR (RED, 2021), to include a full CCRA. Included in this, Section 29.20 contains an In-combination Climate Impact (ICCI) assessment. This includes an assessment of the significance of the impacts of the climate change trends outlined in Section 29.16 , on the effects and measures included within other relevant topic chapters.
WSCC	WSCC stated that when cross checking chapters that were listed as relevant to climate change in this Appendix at PEIR (RED, 2021), it was often difficult to find evidence of how climate change had been considered within those chapters.	
Natural England	Natural England stated that Additional baseline parameters should be assessed in the Chapter 6: Coastal processes,	Appendix 6.1: Coastal processes technical report: Baseline description, Volume 4 of the ES (Document Reference

Volume 2 including coastal frontage variability under a range of coastal management and climate change scenarios.

6.4.6.1) includes information about coastal frontage variability under a range of coastal management and climate change scenarios.

Formal Consultation feedback, Volume 2, Chapter 29, Climate Change, Second Statutory Consultation exercise – October to November 2022, Third Statutory Consultation exercise – February to March 2023 and Fourth Statutory Consultation exercise – April to May 2023

Following feedback to the Statutory Consultation in 2021 and after further analysis, it was identified that some coastal residents did not receive consultation leaflets as intended. Therefore, the Statutory Consultation was reopened between 7 February 2022 to 11 April 2022 for a further nine weeks. The original PEIR (RED, 2021) published as part of the Statutory Consultation in 2021 was unchanged and reprovided alongside the reopened Statutory Consultation in early 2022. No further comments were received in relation to CCR.

In addition to the first Statutory Consultation exercise in 2021, RED undertook three further Statutory Consultation exercises:

- Second Statutory Consultation exercise – October to November 2022: This was a targeted consultation which focused on updates to the onshore cable route proposals which were being considered following feedback from consultation and further engineering and environmental works.
- Third Statutory Consultation exercise – February to March 2023: This was a targeted consultation which focused on a further single onshore cable route © WSP Environment & Infrastructure Solutions UK Limited August 2023 Rampion 2 Environmental Statement Volume 2, Chapter 29: Climate change Page 53 alternative being considered following feedback from consultation and further engineering and environmental works.
- Fourth Statutory Consultation exercise – April to May 2023: This was a targeted consultation which focused on the proposed extension works to the existing National Grid Bolney substation to facilitate the connection of the onshore cable route into the national grid electricity infrastructure.

As part of the second, third and fourth Statutory Consultation exercises, RED sought feedback on the potential changes to the onshore cable route proposals and the proposed existing National Grid substation extension works to inform the onshore design taken forward to Development Consent Order (DCO) Application.

For CCR, no feedback was received in the second, third and fourth Statutory Consultation exercises.

A full list of all comments received during the Statutory Consultation exercises and the responses to those comments is provided in the **Consultation Report** (Document Reference: 5.1).