

Rampion 2 Wind Farm Category 6: Environmental Statement

Volume 4, Appendix 15.1: Sea scape, Landscape and Visual Im pact Assessment consultation responses

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1. Introduction

- 1.1.1 This Appendix to Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Refence 6.2.15) covers those statutory consultation responses that have been received as a response to the Scoping Report (RED, 2020) and early engagement.
- 1.1.2 RED submitted a Scoping Report and request for a Scoping Opinion to the Secretary of State (administered by the Planning Inspectorate) on 2 July 2020. A Scoping Opinion was received on 11 August 2020. The Scoping Report set out the proposed seascape, landscape and visual assessment methodologies, outline of the baseline data collected to date and proposed, and the scope of the assessment. **Table 2-1** sets out the comments received in Section 4.12 of the PINS Scoping Opinion, and Appendix 2 (Respondents to Consultation) containing other stakeholder comments that were received in relation to the Scoping Report.
- 1.1.3 **Table 15-7** of **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES (Document Reference 6.2.15) provides details of the of the feedback received during statutory consultation in relation to seascape, landscape and visual. A list of comments received during the statutory consultation period and the response to comments is provided in the **Consultation Report** (Document Reference 5.1).



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2. Summary of SLVIA Consultation Responses



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Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Arun District Council	Viewpoint Selection Method Statement November 2020	 Arun District Council confirm that it would be in agreement of those captured in relation to Arun District and the area of Arun District within the SDNP. Arun District Council would note there were non selected from the middle distance settlement areas between the coastal frontage to the rising land to the north, this I would conclude due to these areas concealed by viewing distance and the screening affect of intervening landform and vegetation. Arun as a district has several new strategic housing designations coming forward in these intermediate areas, particularly Yapton, Ford, Barnham Eastergate and Westergate. Arun District Council don't believe the proposals will impact on these but could be considered from the geographical population increase in these areas. Arun District Council would assume also that viewpoints have been selected in consideration of turbine lighting at night. 	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14, and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
Brighton and Hove City Council	Scoping Opinion August 2020	The methodology for landscape and seascape assessment is thorough and sound and the proposed extent and area of study is agreed.	Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.4.

Table 2-1 Scoping responses and early engagement feedback related to seascape, landscape and visual

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Brighton and Hove City Council	Scoping Opinion August 2020	It is unclear from the documents whether the development would extend across the entire area identified by the red line which is very extensive. Neither do they indicate how many turbines at this stage. It is not clear how they will illustrate this in visual submissions and what they will actually be assessing in this context.	Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7.
Brighton and Hove City Council	Scoping Opinion August 2020	The assessment of impact on seascape/ landscape would need to consider the effects on local distinctiveness and sense of place within the various character areas.	Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10.
Brighton and Hove City Council	Scoping Opinion August 2020	 They have listed the key viewpoints to be assessed and whether these will be illustrative where they will produce either a wireline or rendered image of the development from these key views. Some from East Sussex and Brighton and Hove have been excluded from the assessment. It is recommended that some of these are reconsidered and others added as outlined below: Viewpoint 8: Brighton is upgraded from representative to illustrative because it is such a busy recreational area. Viewpoint 5: Newhaven Castle Hill coastguard lookout is upgraded from representative to illustrative because it is very sensitive. Viewpoint 4: Seaford Head Heritage Coast is upgraded from representative to illustrative because it is very sensitive. Viewpoint 16: Firle Beacon is upgraded from representative to illustrative because it is very sensitive. 	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Brighton and Hove City Council	Scoping Opinion August 2020	 Viewpoints which have been excluded for various reasons and it is recommended they are assessed: Ditchling Beacon Hollingbury Golf Course Newhaven ferry or if not a key view from an area of the sea within the study area used for recreational boating such as sailing or fishing. 	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), which include views from Ditchling Beacon, Hollingbury Golf Course and Newhaven.
Brighton and Hove City Council	Scoping Opinion August 2020	The zone of theoretical visibility diagrams indicates that there could be areas of the High Weald AONB and the low weald in East Sussex where the development would be seen. Although these are distant it would be helpful to have assessment from these viewpoints where the development may be seen.	ZTV shown in Figure 15.14a-b, Volume 3 the ES (Document Reference 6.3.15). Viewpoints from High Weald AONB (Viewpoint 47, Figure 15.62, Volume 3 of the ES (Document Reference 6.3.15)) and Low Weald (Viewpoint 26, Figure 15.49, Volume 3 the ES (Document Reference 6.3.15)) assessed in Appendix 15.4: Viewpoint assessment,

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			Volume 4 of the ES (Document Reference 6.4.15.4).
Brighton and Hove City Council	Scoping Opinion August 2020	With regard to section 5.13 on 'Seascape, landscape and visual', in terms of viewpoints, the comments of the County Landscape Architect are agreed with.	Noted.
Brighton and Hove City Council	Scoping Opinion August 2020	Brighton, Hove and Rottingdean are the closest coastal settlements to the scoped array area according to the Report, yet only two viewpoints from within the B&H area have been selected. The Report says (para. 5.13.92) that "it is also considered that there is also now familiarity with the visual effects of Rampion 1, such that people will be better able to visualise the effects of Rampion 2 based on fewer viewpoints". However, given that the proposed turbines would be more than twice the height of the Rampion 1 turbines I do not think that this is necessarily the case. I would certainly agree with the County Landscape Architect that a view from Hollingbury Golf Course, given its proximity to the scheduled monument, should be reinstated. I also consider that R1 viewpoint 11, from Marine Parade, should also be reinstated given its elevated position and wealth of designated heritage assets.	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), which include views from Brighton seafront (Viewpoint 8), Rottingdean (Viewpoint 7) and Hollingbury Golf Course (Viewpoint 27).
Brighton and Hove City Council	Scoping Opinion August 2020	A key point is the need to quantify the visual impact of the windfarm extension by itself, and cumulatively, and the resulting impact on tourism. Brighton & Hove is where the greatest number of people would be affected the most in the long term.	Visual impacts of the operation of the Proposed Development are assessed in Chapter 15: Seascape, landscape and



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			visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10. Tourism impacts are assessed in Chapter 17: Socio- economics, Volume 2 of the ES (Document Reference 6.2.17).
Brighton and Hove City Council	Scoping Opinion August 2020	Given that the design envelope indicates that the offshore part of the proposal may extend east of its current location, the potential for negative landscape and visual impacts on areas within Brighton and Hove (B&H), and particularly cumulative visual impact along with the existing windfarm, is significant.	Noted. Significance of effects of the operation of the offshore elements of Rampion 2 are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10.
Brighton and Hove City Council	Scoping Opinion August 2020	The viewpoints within Brighton & Hove identified in Figure 5.13.6 should be agreed with Landscape Officers before the SLVIA is carried out, noting that there appear to be only two within the authority's boundary (numbers 7 (Beacon Hill, Rottingdean; and 9 – Brighton sea front promenade, adjacent to pier).	A further viewpoint within Brighton & Hove was added at Hollingbury Golf Course (Viewpoint 27) and is assessed in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).



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Brighton and Hove City Council	Scoping Opinion August 2020	B&H is by far the most built-up, populous area on the coast, and heavily reliant on tourism, based on its seaside location (see paragraph 5.15.40 of the Scoping Request). It is also the closest coastal settlement to the windfarm, as noted at paragraph 5.13.88 of the report.	Noted.
Brighton and Hove City Council	Scoping Opinion August 2020	The potential landscape and visual impact of the windfarm expansion on the authority area, both during daytime and night time, therefore need to be considered in detail, and this must feed into considerations of the potential economic impact of the expansion on the tourism sector, as well as on local residents.	The visual impacts of the operation of the Proposed Development are assessed in Chapter 15: Seascape , Jandscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10 and Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4). Tourism impacts are assessed in Chapter 17: Socio- economics, Volume 2 of the ES (Document Reference 6.2.17).
Brighton and Hove City Council	Scoping Opinion August 2020	The cumulative impacts detailed in the SLVIA should, we consider, focus on Rampion 1 which is mentioned only in passing, but which has the potential to result in a much broader expanse of windfarm off the coast of B&H than is currently the case.	Rampion 1 is considered as part of the baseline conditions in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference

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			6.2.15), Section 15.6 and impact assessments in Section 15.10.
Brighton and Hove City Council	Scoping Opinion August 2020	 I do not have significant concerns regarding impacts on the view from the seafront. However the areas listed below are in need of further consideration: Consultation with Brighton Marina Consultation with local fishing industry The existing wind farm site is visible from the Eastern Seafront area and the Madeira Terrace site. 	Noted.
Brighton and Hove City Council	Scoping Opinion August 2020	Moving to zero/low carbon energy seems necessary and inevitable. The restoration of Madeira Terrace will seek to work with natural capital available to the site, as such, a view of other sustainable forms of energy production i.e turbines on the horizon of the Eastern Seafront for cleaner energy generation could help to reinforce the sustainable energy generation being sought at Medeira Terrace.	Noted.
Chichester Harbour Conservancy	Informal consultation and engagement 15/09/2020	Please note that the revised Chichester Harbour Landscape Character Assessment (2019) is available to download here: https://www.conservancy.co.uk/page/management-plan	Noted.
East Sussex County Council	Viewpoint Selection Method Statement	Essex Sussex County Council have reviewed the updated Method Statement and viewpoint selection and can confirm that it has no further comments.	Noted.



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	November 2020		
Hampshire County Council	Early engagement 12/08/2020	 Here are the additional viewpoints we would like you to consider-obviously without going to the extent of checking in mapping some may need refinement in terms of exact location: within Hampshire but outside the South Downs National Park- two views from the shore, to illustrate what will be sequential views seen from sections of the our coastline : a) Lepe/Calshot foreshore b) Gilkicker Point within Hampshire, inside the South Downs National Park-where we have the benefit of the Park's published Viewshed study which identifies 'Representative' and 'Landmark' viewpoints, each of which is accompanied by a ZTV- three additional viewpoints e) VP5/ L2 Old Winchester Hill, f) VP8 Butser Hill and g) L39 Catherington Windmill 	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), which include views from Gilkicker Point (Viewpoint 43) and Butser Hill (Viewpoint 31).
Havant Borough Council	Scoping Opinion August 2020	Based on the information provided, the Council's Landscape Architect has advised that from a landscape perspective there are no adverse comments in relation to this consultation. As yet, I have received no response from the Council's Coastal Engineering or Engineering/Drainage Teams. Once received, I will forward them on to you.	Noted.



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High Wield AONB Unit	Early engagement 27/05/2020	On first glance, this looks a long way from the High Weald AONB. It seems likely that the only potential impact on the High Weald would come from the substation options.	Noted. A viewpoint from High Weald AONB (Viewpoint 47, Figure 15-62, Volume 3 the ES (Document Reference 6.3.15)) is assessed in Appendix 15.4 : Viewpoint assessment , Volume 4 of the ES (Document Reference 6.4.15.4).
Historic England	Viewpoint Selection Method Statement November 2020	Broadly, we think the viewpoints chosen provide a good representation of key locations across the study area from which impacts to historic landscapes and individual designated heritage assets can be assessed (though see our detailed recommendations below). It is possible (and indeed likely) however, that once the heritage assessment has progressed, more locations that require visual and setting impact to be assessed may be identified.	Noted.
Historic England	Viewpoint Selection Method Statement November 2020	 Support of chosen viewpoints <u>Viewpoint 9:</u> We support the choice of viewpoint 9 over 60. Viewpoint 9 is very close to Shoreham Fort which is a scheduled monument, and considered an exemplar of its type. Viewpoint 9 will therefore additionally provide us with a suitable understanding of visual impact on the Fort. <u>Viewpoint 11</u>: We support the choice of viewpoint 11 over 40. Viewpoint 11 is very close to Littlehampton Fort which is a scheduled monument, and (like Shoreham Fort) is considered an 	Noted.



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		exemplar of its type. Viewpoint 11 will therefore additionally provide us with a suitable understanding of visual impact on the Fort.	
Historic England	Viewpoint Selection Method Statement November 2020	 Excluded viewpoints <u>Viewpoint 23</u>: We are unsure why this viewpoint has been excluded from selection? Viewpoint 23 is the only representative view from Portsmouth and is appropriately positioned at Southsea Castle which is a scheduled monument. The table in Appendix A notes that there are no landscape designations here; Southsea and Old Portsmouth include a range of highly designated and important heritage assets, and landscapes here include Conservation Areas and Registered Park and Garden (Southsea Common) which also contains a Grade I listed war memorial. We recommend inclusion of viewpoint 23 to adequately represent seascape views from the amenity coastal route, seaside resort, and designated heritage assets at Southsea. <u>Viewpoint 56</u>: It is proposed to exclude viewpoint 56 (Mount Cabern) in favour of viewpoint 16. Mount Cabern contains a scheduled Iron Age hillfort and additionally has other tiers of designation including SSSI. Viewpoint 16 is located too far away to be adequately representative. We recommend that both viewpoints 16 and 56 are included in the SLVIA. <u>Viewpoint 30</u>: It is proposed to exclude both viewpoints 30 and 41. This leaves a significant 'gap' in assessing outpost South Downs views. Viewpoint 30 is on Halnaker Hill; the hill contains a scheduled I listed WWII defences, and Grade II Listed 	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), which include views from Gilkicker Point (Viewpoint 43) and Halnaker Hill (Viewpoint 30). Mount Caburn is excluded from the viewpoint assessment due to the inclusion of Viewpoint 16 Firle Beacon nearby; however, impacts on Mount Caburn are assessed in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference 6.2.25).



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		Windmill and is a prominent public amenity route. The alternative of viewpoint 50 (The Trundle) is proposed, but this is some distance away and has a different outlook and historic character, particularly through landscape changes created by the scheduled Iron Age hillfort. We therefore recommend that viewpoint 30 is included in addition to 50.	
Historic England	Viewpoint Selection Method Statement November 2020	Omitted viewpoints Portsdown Hill No viewpoints have been provided from Portsdown Hill (Portsmouth). Portsdown Hill is a significant high point in the landscape with far reaching views out to sea. Along the ridge are a series of Forts (all scheduled monuments) built in the later 1800's, designed to overlook Portsmouth and protect the harbour from an invasion force attacking from the north or east by land. We therefore recommend that at least one viewpoint is included from Portsdown (or potentially two – one at each end of the ridge). If positioned in relation to both public viewpoints and the Forts (Widley or Purbrook at the east end) and Nelson (The Royal Armouries Museum) at the west, this would provide us with a suitable understanding of visual impact on the Forts, and overlap neatly with other amenity or landscape concerns. Solent sea forts No viewpoints have been included from the Solent sea forts. All of the sea forts are scheduled monuments, and additionally would provide a good location for representative seascape views as experienced by Solent amenity/leisure users. We recommend that a	Portsdown Hill is located approximately 42km from the array area and separated by extensive intervening urban areas around the City of Portsmouth, Havant and Hayling Island. <u>Horse Sand and/or No Man's Land fort</u> are not publicly accessible for viewpoint photography, however effects on the setting of these Solent sea forts are assessed in Chapter 25: Historic environment, Volume 2 of the ES (Document Reference 6.2.25) <u>Chichester</u> is set-back on the coastal plain away from the coast and visibility of the Proposed Development from the



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		viewpoint/s from Horse Sand and/or No Man's Land fort be included in the SLVIA. <u>Chichester</u> We are unsure why no viewpoints from Chichester have been included – will there be any inter-visibility? On the supporting maps Chichester lies in an area of Higher Theoretical Visibility. Chichester is a cathedral city containing a highly significant range of designated heritage assets. Please can you explain to us why it has not been included at this stage?	city is very limited, as shown in the ZTV in Figure 15-15, Volume 3 of the ES (Document Reference 6.3.15) due to it being low lying and the extent intervening screening provided by urban areas and woodland, such that no suitable viewpoints within Chichester with offshore views to Rampion 2 have been identified.
Horsham District Council	Scoping Opinion August 2020	The 50km study area for the SLVIA offshore assessment and 2km study area for the LVIA onshore assessment is considered appropriate and agreed with.	Noted.
Horsham District Council	Scoping Opinion August 2020	HDC has taken note of and is satisfied with the initial embedded environmental measures proposed to reduce the potential impacts. It is confirmed the approach and methodology (appendix C and D) proposed to assess both the SLVIA and LVIA follows the current guidance and is considered comprehensive and proportionate.	Noted.
Horsham District Council	Scoping Opinion August 2020	The Council would welcome the opportunity to further refine the scope of the visual impact assessment as pre-application discussions progress.	Noted.

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Isle of Wight Council	Informal consultation and engagement 06/10/2020	Much of the information regarding the (AONB) designation is within the AONB Management Plan and I have copied a link to it below: <u>https://www.iow.gov.uk/azservices/documents/2981-AONB-Management-Plan-20192024.pdf</u> We have asked colleagues within the AONB Partnership to provide the special qualities report for the designation. The Isle of Wight Landscape 'An Assessment of the AONB' subsequently provided.	Noted. Effects on special qualities of the Isle of Wight are addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Section 15.10.
Isle of Wight AONB Partnership	Early engagement 25/06/2020	We would be pleased to be involved in any pre-application discussions regarding the site, in order to assess any potential impacts upon the Isle of Wight AONB.	Noted.
Isle of Wight AONB Partnership	Informal consultation and engagement 13/11/2020	Provision of shapefiles for the Isle of Wight landscape character assessments.	Noted.
Isle of Wight AONB Partnership	Informal consultation and engagement 13/11/2020	The list of special qualities of the IWAONB are clearly listed on page 6, Chapter 2, para 2.1. of the Isle of Wight AONB Management Plan 2019-24. They are descriptive rather than bullet points, separated by semi-colons rather than numbers.	Effects on special qualities of the Isle of Wight are addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Section 15.10.

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ММО	Scoping Opinion August 2020	The MMO defers to Historic England, Natural England (as the SNCB) and relevant local planning authorities on the suitability of the scope of the assessment with regards to Seascape and Landscape.	Noted.
ММО	Viewpoint Selection Method Statement November 2020	The MMO defers to Natural England and other interested parties in SLVIA matters. The MMO would advise the Applicant to ensure they have taken into account the South Marine Plans (https://www.gov.uk/guidance/explore-marine-plans) specifically the S-SCP-1 Seascape Policy.	Noted.
MOD	Scoping Opinion August 2020	The report considers the requirement for aviation obstruction lighting and states that the development will comply with the legal requirements with regards to aviation marking and lighting. In the interests of air safety, the MOD would request that the development be fitted with MOD accredited aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016.	Noted. The Proposed Development will be fitted with MOD accredited aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016 as described in Chapter 14: Civil and military aviation (Document Reference: 6.2.14).
National Trust	Early engagement 29/06/2020	Thank you to you and the rest of the Rampion 2 team for taking the time to introduce the project to the National Trust. In terms of the viewpoints we have set out in the table below the additional ones that the Trust suggested and details as to why we would like you to consider them, as well as providing you with information around our	<u>Gayles Farm</u> : It is considered that there is adequate representation of effects form this area of the Sussex Heritage Coast with nearby Viewpoint 2



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		thoughts on some that you are currently proposing to exclude and why we would like you to re-consider these.	(Birling Gap) and Viewpoint 3 (Seven Sisters Country Park).
		Additional Viewpoints <u>Gayles Farm:</u> (TV 538 969) This is land that was purchased by the National Trust in 2014 as an area that had previously had no public access but commanded some amazing views and was the site of RAF Friston. It is felt that the views that you get out to sea from this point are different from the viewpoint already identified at Seven Sisters Country Park because they look across to Seaford and Newhaven as well as out to sea and inland. <u>Beach at end of Climping Street:</u> (TQ 008 008)	Beach at end of Climping Street: The effects of the onshore infrastructure from Climping Beach are assessed in Chapter 18: Landscape and visual impact, Volume 2. Slindon Folly: Sindon Folly (Viewpoint 41) is assessed in the ES.
		Consider that this location within one of the only areas of undeveloped coastline between Brighton and Bognor Regis should be considered in the SLVIA as it is a dynamic piece of coastline which has a sense of remoteness and wildness which is hard to find elsewhere along the Sussex coastline due to limited development and expansive views along the coast. <u>Slindon Folly:</u> (SU 955 095) This is a Grade II listed Folly which lies on the Trust's Slindon Estate in West Sussex. It provides views down to the coast and out to sea and would provide assessment of the impact of the proposal in an area between the scarp slopes of the South Downs and the coastline views. It is a popular feature for people to walk to and obtain this different experience in the SDNP.	Birling Gap: It is considered that an additional viewpoint at beach level is not necessary and the effects from Birling Gap are shown and assessed from Viewpoint 2 at the top of the steps in Figure 15-27, Volume 3 the ES (Document Reference 6.3.15) and Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
		Excluded Viewpoints	



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		 <u>Birling Gap Beach:</u> The experience that you obtain when looking out to sea and along the cliffs on Birling Gap beach is totally different to that from the car park/top of steps. This is especially true at low tide when the chalk sea ledges are exposed. The focus is much more seaward and little development is visible. <u>Ditchling Beacon</u> A 360° view can be obtained from Ditchling Beacon across both the Weald and out to sea. This site is distinctly different from Devil's Dyke, even though they are in relatively close proximity, due to the nature of the views afforded and lack of urban influences at the site which are much more dominant at Devil's Dyke with the large car park and pub. The views at Devil's Dyke are also much more dominated by those across the Weald, rather than the 360° ones at Ditchling Beacon. 	
National Trust	Viewpoint Selection Method Statement November 2020	 <u>Viewpoint No. 34 - Bembridge Fort</u>: Having spoken to the National Trust team on the Isle of Wight it is suggested that the viewpoint is at Culver Battery which is slightly further east along the ridge. Bembridge Fort is only open to the public on a very limited basis and is currently closed for the foreseeable future. Culver Battery has parking and is heavily used by visitors as a viewpoint on the eastern end of the Isle of Wight. <u>Viewpoint No. 35 - St Boniface Down, Ventnor</u>: The Trust is not entirely clear whether two viewpoints are being suggested at this location. We would agree with the viewpoint on National Trust land 	<u>Viewpoint 34</u> (Figure 15-57, Volume 3 the ES (Document Reference 6.3.15)) has been taken at the OS viewpoint position to the east of Bembridge Fort. <u>Viewpoint 35</u> (Figure 15-58, Volume 3 the ES (Document Reference 6.3.15)) has been taken at the OS marked



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		Rampion 2, but would suggest that a view from in Ventnor itself would represent a different user and have a different perspective of the proposals.	viewpoint on Bonchurch Down, to the east of the radar station.
		<u>Viewpoint No. 40 - Climping Beach</u> : The Trust is disappointed that this viewpoint has been excluded especially given that it was suggested by West Sussex County Council as well as the Trust. We would question the statement regarding detracting influences as this area of coastline is very undeveloped and "wild", primarily as a result of the National Trust Covenant which has been in place since 1973. The users of this piece of coastline are very different from those at viewpoint 11 and the landscape within which people will experience the potential windfarm development is very contrasting with viewpoint 11 being urban and developed where as Climping Street and the beach are natural and dynamic as a result of little coastal protection. The Trust would ask for reconsideration of the exclusion of this viewpoint from the SLVIA, especially as it is the favoured location for coming onshore.	Viewpoint 40: Climping Beach (Figure 15-59, Volume 3 the ES (Document Reference 6.3.15)): The effects of the onshore infrastructure from Climping Beach are assessed in Appendix 15.4: Visual assessment, Volume 2. Viewpoint 55 noted. Viewpoint 57 noted. Viewpoint 62 noted.
		<u>Viewpoint No. 55 - Beeding Hill</u> : The Trust owns and manages Beeding Hill	
		<u>Viewpoint No. 57 - Telscomb Tye</u> : The Trust has covenanted land at Telscomb Tye.	
		<u>Viewpoint No. 62 - Beacon Hill</u> : It would appear that this viewpoint is likely to be on National Trust land and also open access land.	



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Natural England	Early engagement 18/06/2020	As promised here are 5 suggested locations for viewpoints in the loW AONB, using a 1:50,000 map to locate these using the nearest spot heights to indicate AOD: 1. Culver Down. Either Bembridge Fort (104m) or the WW1 fortifications (99m) would make suitable locations 2. St. Boniface Down above Ventnor. Probably the easterly OS viewpoint by the car park symbol (221m). 3. Trig Point Shanklin Down (235m). 4. Lighthouse St Catherine's Point (about 150m?). 5. Somewhere to the east of Newport. Please check with the IoW AONB Partnership.	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), which include views from Bembridge Fort (Viewpoint 34) and St Boniface Down above Ventnor (Viewpoint 35). The other suggested locations (3, 4 and 5) were scoped out of the SLVIA in agreement with the ETG.
Natural England	Scoping Opinion August 2020	Natural England (NE) welcomes this opportunity to comment on the landscape, seascape, visual assessments and related chapters of the Rampion 2 EIA Scoping Report. In keeping with our previous comments to the applicant on the potential landscape and visual effects likely to arise from the development we will limit our comments to those effects associated with the South Downs National Park, Chichester Harbour AONB, Isle of Wight AONB, Sussex Heritage Coast and Tennyson Heritage Coast and their seascape setting. Subject to confirmation, NE may also provide comments going forward for the High Weald AONB.	Noted.



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Natural England	Scoping Opinion August 2020	For landscape, visual and seascape effects both within and outside of these designated and defined landscapes we advise that close attention is paid to the comments and advice provided by the relevant Local Planning Authorities, including the South Parks National Park and AONB Partnerships. The detailed local knowledge that these parties can provide, particularly in respect of the special qualities of these designations, will be of a greater depth and detail than that provided by Natural England.	Noted. Addressed during consultations and ETG meetings with the relevant Local Planning Authorities, including the South Parks National Park and AONB Partnerships.
Natural England	Scoping Opinion August 2020	NE offers its comments and advice without prejudice. Our comments and advice on the landscape, seascape and visual effects of the scheme may change as further evidence and information emerges from further assessments undertaken by the applicant as a part of the EIA process. We may also receive other relevant information from local authorities, the AONB Partnership 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.	Noted.
Natural England	Scoping Opinion August 2020	Our comments are based solely on the documents provided by the applicant and site visits to selected viewpoints undertaken in July 2019, combined with our experience of advising on other major offshore renewable energy schemes located within the seascape setting of nationally designated landscapes. Evidence obtained during the determination and construction of the Rampion 1 OWF (2013 – 2015) will also be drawn upon.	Noted.
Natural England	Scoping Opinion	Natural England is disappointed to see that the applicant is proposing to develop the area located to the east and south of the	As described in Chapter 3: Alternatives, Volume 2



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
	August 2020	existing Rampion OWF (as shown in Figure 5.13.1). We understand that this area, referred to as 'Zone 6', formed part of the original Rampion 1 Round 3 development area and that the applicant maintains development rights for this area.	(Document Reference: 6.2.3), further design evolution has occurred since the Scoping stage, which has resulted in the reduction of the Scoping Boundary to the Proposed DCO Order Limits (Figure 1-1, Volume 3 the ES (Document Reference 6.3.1)). RED has had regard to comments provided and as a result, the Zone 6 Area (to the east) was reduced from the Scoping Boundary to that in the Proposed DCO Order Limits and this is illustrated on Figure 15-2, Volume 3 the ES (Document Reference 6.3.15).
Natural England	Scoping Opinion August 2020	Following recent conversations, Natural England now understands that in the autumn of 2019, Crown Estate agreed in principal that the applicant could bring these two sites i.e. Zone 6 and the Rampion Extension forward as a single project. Natural England were not however, consulted on this matter. We understand that the extension to the original project under the 2017 extension round will have a capacity of 400MW (equivalent to the original Rampion project) and be located to the west of this project. And in addition there is also being proposed a further Round 3 project known as Rampion 2 located to the south and east of the original project, which will have a capacity of 800MW. The combined capacity of	Noted.

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
		these two projects presented in the EIA Scoping Document is 1200MW which would quadruple the scale of the existing project capacity. Therefore given the issues we previously raised in relation to Rampion 1 we advise that there is a risk that the scale of the proposed combined development maybe beyond what could be considered acceptable.	
Natural England	Scoping Opinion August 2020	In respect of the statutory purposes of the South Downs National Park. Dependant on the final layout design and technology choice Natural England advises that there is the potential for the purposes of this designated landscape to be adversely effected.	Noted. Operational phase effects of the South Downs National Park are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10.
Natural England	Scoping Opinion August 2020	Noting that the existing Rampion OWF is a significant element within the seascape setting of the South Downs National Park (located at 26km from Beachy Head) Natural England advises that the development of a second OWF to the west of the existing array has the potential to further adversely affect the seascape setting of the National Park. Although located at a greater distance from the national park boundary the likely technology choice i.e. the use of larger turbines than those used for the Rampion Array and the positioning of a new array within the extension site, have the potential to further degrade views out to sea from the South Downs National Park.	Noted.

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	 Natural England is concerned that: A new array constructed immediately to the west of the existing Rampion OWF so that it appears, when viewed from the shore, to be an extension of Rampion. We are concerned that a curtaining effect (see earlier comments for explanation) will be created thereby reducing the extent of open views from the shore to the horizon and thereby enclosing a greater portion of the visible horizon. Substantially larger turbines (likely maximum height 300m) are used to those used for the Rampion OWF (maximum height of 140m), particularly if the new array is located immediately to the west of the existing OWF. The disjointed visual effect this would create would be inelegant and detracting as the join between the two OWF would be emphasised when viewed from the shore and potentially from within the South Downs National Park. 	Noted. The maximum design scenario assessed is described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7 and the result operational phase effects of the South Downs National Park are assessed in Section 15.10.
Natural England	Scoping Opinion August 2020	 NE advices that to prevent or at least reduce the magnitude for these effects that any future OWF built within the extension site should; Maintain a perceptible separation distance (from all land based viewpoints) between the existing Rampion OWF and any new array. 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 shore and from within the South Downs National Park. 	Noted. The maximum design scenario assessed is described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7 and the result operational phase effects of the South Downs National Park are assessed in Section 15.10.



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
		 That clear lines of sight are left between the arrays so that open views to the horizon are maintained when viewed from shore and from within the South Downs National Park. Either select turbines which are the same height as those used in Rampion (NE understands this may not be possible), or design any new array so that the turbines appear to be the same height as those used for the Rampion OWF by locating them further off-shore i.e. at a greater separation distance from on-shore viewpoints. The intention would be great a balanced vista where the height of the two, clearly distinct arrays, when appear at least to be the same. 	
Natural England	Scoping Opinion August 2020	Natural England proposes that these principals of good design are adopted in order 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.	The assessment in this Appendix is based on a maximum design scenario appropriate to seascape, landscape and visual effects as described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7. RED has had regard to these comments and the statutory purpose of the SDNP designation, and as a result, the Zone 6 Area (to the east) and the Extension Area (to the west) have been reduced from the

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
			Scoping Boundary to that in the Proposed DCO Order Limits and this is illustrated on Figure 15-2, Volume 3 the ES (Document Reference 6.3.15).
Natural England	Scoping Opinion August 2020	 The evidence generated and conclusions reached in the seascape, landscape and visual assessments should be used to inform an assessment the potential significant effects of the scheme on the statutory purpose(s) and special qualities of the following designated landscapes; South Downs National Park (SDNP) Isle Wight AONB (IoW AONB) Chichester Harbour AONB. (CHAONB) Thought should be given to a similar assessment for the High Weald AONB. Please see below for further details. Attention should also be given to the following Heritage Coasts: Sussex Heritage Coast (SHC) Tennyson Heritage Coast (THC) 	The operational phase effects on the special qualities of the SDNP, IoW AONB and CHAONB are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10.
Natural England	Scoping Opinion August 2020	NE agrees that the SLVIA Study Area should cover a radius of 50km measured from the outer edges of the Scoping Boundary (as illustrated in Figure 5.13.1). We also agree that significant effects will not occur beyond the outer limits of the SLVIA Study Area (Figure 5.13.1).	Noted. Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.4.



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	 With reference to Figures 5.13.2 and 5.13.3 as shown on pages 363 and 365. In addition to the SDNP and SHC the Chichester Harbour AONB is also within 30km of the Scoping Boundary whilst both the Isle of Wight AONB and High Weald AONB are within 35km. In addition a portion of the Tennyson Heritage Coast (located within the IoW AONB) falls within the 50km radius. NE advices that the High Weald AONB is unlikely to experience significant adverse effects due to the intervening land form of the South Downs. We note also that 'bare ground' terrain model has been used in the creation of the ZTV and the commentary at 5.13.81. We note however that there are locations with the designation where theoretical visibility within the 'medium' banding occurs. Although we are minded to suggest that the High Weald AONB is scoped out of the analysis NE advises that the applicant consults with the High Weald AONB Partnership to determine this and should they be in agreement to scope this designation out of the EIA. NE advises that the New Forest National Park and Surrey Hills AONB can be discounted from the scope of the EIA. With the exception of the High Weald AONB all of these designated and defined landscapes have locations where theoretical visibility is within the 'higher' banding. It is clear therefore that multiple designated and defined landscapes are located well within the 50km Study Area and have the potential to be adversely effected by the scheme. It is for this reason that NE wishes to see that the potential effects of the scheme on the statutory purposes and special 	Noted. High Weald AONB confirmed that it seemed likely that the only potential impact on the High Weald AONB would come from the onshore substation options. A viewpoint from the High Weald AONB (Viewpoint 47, Figure 15-62, Volume 3 the ES (Document Reference 6.3.15)) is assessed in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
		qualities of these designations is scoped into the EIA.	

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	NE notes the cumulative SLVIA assessment will include an assessment of 'the ways in which Rampion 2 will have additional effects when considered with other existingdevelopments' . We take 'exisitingdevelopments' to mean Rampion 1. We note the Combined Theoretical Visibility mapping shown in Figure 5.13.5a. NE will also be paying close attention to the appearance of the Rampion 2 as it relates to Rampion 1. As we made clear in our advice to the Crown Estate in 2018 (see above for details) this is a critical issue for Natural England. NE considers that the concept of 'Good Design' (as set out in NPS 1) should be applied in order that a visually disjointed and incoherent scheme design is avoided.	Rampion 1 is considered as part of the baseline conditions in Chapter 15: Seascape , landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and impact assessments in Section 15.10 . The additional visibility of Rampion 2 in relation to Rampion 1 is shown in the ZTV in Figure 15-22 and in the photomontages in Figure 15-26 to 15-79, Volume 3 the ES (Document Reference 6.3.15).
Natural England	Scoping Opinion August 2020	 NE requests that the latest versions of the following designated landscape Management Plans are included in the baseline information. SDNP Management Plan 2019 - 2024 Chichester Harbour AONB Management Plan 2019 - 2024 Isle of Wight AONB Management Plan 2019 - 2024 Should the High Weald AONB be scoped into the EIA the latest management plan for this designated should also be included in the baseline information. These documents will provide detailed information about the special qualities of each designated landscape. We note that these documents are referred to at 5.13.57. We note also at 5.13.56 that reference is made to the Sussex 	Noted and referenced in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.18.



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
		Heritage Coast Strategy and Action Plan (2016 – 2020). This document should also be added to the baseline documents.	
Natural England	Scoping Opinion August 2020	NE notes the use OS Terrain 5 Digital Terrain Model for coastal sections of the study area. NE would like to understand the geographical extent of the coastal sections of the study area. For instance does this include the coastal sections of the IoW AONB? Does it include the entirety of the Sussex Heritage Coast? In addition NE would like to see the use of the OS Terrain 5 Digital Terrain Model extended to 30km from the boundary of the Scoping Area.	OS Terrain 5 Digital Terrain Model has been utilised within 30km of the array area in the ZTVs in Figure 15.14 – Figure 15.25, Volume 3 the ES (Document Reference 6.3.15).
Natural England	Scoping Opinion August 2020	NE also requests that the SDNP View Shed Analysis is incorporated into the baseline information. The documents associated with this information can be found here: https://www.southdowns.gov.uk/planning-policy/south-downs-local- plan/local-plan-evidence-base/evidence-and- supportingdocuments/viewshed-analysis/	Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and the viewpoint assessment in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
Natural England	Scoping Opinion August 2020	The key consideration for NE is understanding how Marine Character Areas 07 and MCA08 contribute to the seascape setting and special qualities of the SDNP, Chichester Harbour AONB and Isle of Wight AONB.	Noted. The operational phase effects on the special qualities of the SDNP, IoW AONB and CHAONB are assessed in Chapter 15: Seascape, landscape and visual impact

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
			assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10, contained within Table 15-33, Table 15-36 and Table 15-86 respectively.
Natural England	Scoping Opinion August 2020	National Parks and Areas of Outstanding Natural Beauty are designated for their natural beauty. Natural beauty is a statutory expression used in sections 5 and 11A of the National Parks and Access to the Countryside Act 1949, as amended; sections 85 – 87 of the Countryside and Rights of Way Act 2000, and section 99 of the Natural Environment and Rural Communities Act 2006. 'Scenic qualities' and 'historic landscape qualities' although useful as a label for describing aspects of natural beauty, are not statutory expressions. Heritage Coasts are defined in part for their natural beauty.	Noted.
Natural England	Scoping Opinion August 2020	NE requests that the Tennyson Heritage Coast is included in this listing.	Noted. Effects on Tennyson Heritage Coast are scoped out of the SLVIA as addressed in Chapter 15: Seascape , landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-10 (PINS ID 4.12.2).



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	NE notes the extensive listing of locations from where views of the MCA7 are possible. We advise the sea surface of MCA7 is also visible from a number of places located on the eastern side of the Isle of Wight. These include Ventnor Down and Culver Down which are located within the IoW AONB.	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), The operational phase effects of the Proposed Development on views from the eastern side of the Isle of Wight is assessed in Chapter 15: Seascape, Iandscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10, which includes assessment of the visual effects from Ventnor Down (Viewpoint 35, Figure 15- 58, Volume 3 the ES (Document Reference 6.3.15)) and Culver Down (Viewpoint 34, Figure 15-57, Volume 3).



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	The 2014 MMO view shed analysis refers to 'areas of the sea'. The visual analysis for the Rampion 2 project (as illustrated in Figure 5.13.2) should seek to understand the visual envelope of structures which are up 325m in height. As a consequence there will be locations, both on the coast and inland where the surface of the sea is not visible but the turbines are. We note this fact is acknowledged at 5.13.75. The MMO analysis provides a broad indication of locations on land where the turbines would be visible. However this evidence provides only a guide to such locations and should not be used to define these locations.	The ZTVs included in the SLVIA in Figure 15-14, 15-15 and Figure 15-18 to Figure 15-24, Volume 3 the ES (Document Reference 6.3.15) are based on the maximum WTG blade tip height for Rampion 2 at 325m.
Natural England	Scoping Opinion August 2020	NE notes and welcomes the statement that 'likelihood will not be considered as a factor of significance' and that the worst case will use excellent visibility. In such conditions the turbines will be plainly visible in views available from both coastal and inland areas located in multiple designated and defined landscapes.	Noted.
Natural England	Scoping Opinion August 2020	 NE welcomes the confirmation that the principal visual receptor groups will include: Users of long distance paths (including the South Downs Way National Trial) Users of long distance cycle routes Users of Public Rights of Way Visitors to tourist and visitor locations Visitors to the South Downs IDSR. 	Noted. Users of open access land are considered in the viewpoint assessment in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	NE notes the categorisation of viewpoints in Table 5.13.3. NE offers no comment on the suitability of the categorisation made. However advise that the applicant pays close attention to the advice of the SDNP and Chichester Harbour AONB Partnership.	Noted. Addressed during consultations and ETG meetings with the relevant authorities, including the SDNP and AONB Partnerships.
Natural England	Scoping Opinion August 2020	 We note the applicant's argument that 'familiarity with the visual effects of Rampion 1, such that people will be better to visualise the effects of Rampion 2'. Whilst we understand the merits of this line of reasoning Natural England notes that; The far greater geographical spread of Rampion 2 when compared to Rampion 1. The far greater visual envelop of Rampion 2. The use of turbines which over twice the height as those used in Rampion 1. The need to understand the in-combination effect; how the Rampion 2 will relate visually to Rampion 1. Whilst we accept that some of the Rampion 1 viewpoints are now reductant the notion that 'people will be better able to visualise the effects of Rampion based on fewer viewpoints' in misplaced for the reason set out above. NE agrees that the greater geographical extent of the ZTV means viewpoints located at greater distances will be required. Hence the additional viewpoints suggested above. 	Noted.
Natural England	Scoping Opinion	In addition to the viewpoints listed Natural England request that the following locations are also used as viewpoints within the SLVIA. To avoid confusion these been identified by letter rather than number.	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and

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Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
	August 2020	The distance figures stated are the approximate separation distance from the EIA scoping boundary. Distance figures quoted are to the edge of the Rampion 2 Scoping Boundary. <u>South Downs National Park</u> A. Butser Hill. (45km) B. The Trundle. (29km) C. Ditchling Beacon. (24km) NE notes that the applicant is seeking to exclude this viewpoint. D. Chanctonbury Ring. (24km) E. Amberley Mount. (26km) F. Chantry Hill. (25km) G. Beeding Hill. (21 km) same as Rampion 1 (VP25). NE notes that the applicant is seeking to exclude this viewpoint. H. Kingley Vale. (31km) I. Mount Caburn. (22km) J. Arundel Castle. (23km) K. Halnaker Windmill. (26km) L. Telscomb tye. (16km) M. Beach, Cuckmere Haven (16km). N. Hollinbury Hillfort. (18km) O. Wolstonbury Hill. (23km) P. Petworth Park. (37km) NE has been advised by the SDNP Authority as to the suitability of these locations.	visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4). The majority of these requested viewpoint locations are included in the ES as agreed with the ETG. The following viewpoints are not included in the SLVIA in agreement with Natural England and SDNP: Mount Caburn and Petworth Park.
Natural England	Scoping Opinion	<u>Chichester Harbour AONB</u> Viewpoint 22 as proposed in the EIA Scoping is fine to use.	Noted. Viewpoint 22 Eastoke Point (CHAONB) (Figure 15-58,

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	August 2020		Volume 3 the ES (Document Reference 6.3.15)) is assessed in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
Natural England	Scoping Opinion August 2020	<u>Isle of Wight AONB</u> Q. Culver Down. Either Bembridge Fort or the WW1 fortifications would make suitable locations. (32km) R. St. Boniface Down above Ventnor. Easterly OS viewpoint. (36km) S. Lighthouse St Catherine's Point (45km)	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4), which include views from Bembridge Fort (Viewpoint 34) and St Boniface Down above Ventnor (Viewpoint 35). The lighthouse at St Catherine's Point was scoped out of the SLVIA in agreement with the ETG.
Natural England	Scoping Opinion	NE undertook join site visits to these locations in July with the IoW AONB Partnership. NE advices that the IoW AONB Partnership is consulted on these locations in order to confirm there suitability.	Noted. Viewpoint 24, Bembridge Isle of Wight is included in the SLVIA (Figure 15-48, Volume 3

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	August 2020	NE suggests that viewpoint 24 is retained in order that a location outside of the IoW AONB is included in the EIA.	the ES (Document Reference 6.3.15)) and assessed in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
Natural England	Scoping Opinion August 2020	NE notes the parameters of the Maximum Development Scenario and requests that a diagrammatic representation of this is made available by the applicant at the earliest opportunity. The diagram should include the boundaries of the designated and defined landscapes which fall with the 50km radius study area and the location of all viewpoints.	A diagrammatic representation of the Maximum Development Scenario was presented at ETG meeting on 25 February 2021.
Natural England	Scoping Opinion August 2020	Aviation lighting. NE notes the intention to use medium density aviation warning lights (2000cd intensity) on the significant peripheral WTG. NE notes that other offshore windfarms currently in the design and determination phrases are opting to use 200cd intensity lightening. NE requests that the applicant explores the possibility of using these lower intensity lights when weather conditions permit in order that any potential adverse effects on the South Downs IDSR are mitigated as far as possible	Noted. Addressed in Appendix 15.5: Assessment of aviation and navigation night-time lighting, Volume 4 (Document Reference: 6.4.15.5).
Natural England	Scoping Opinion August 2020	NE notes the inherent nature of the embedded mitigation measures within the design of the scheme and notes that these evolve over the course of the design development process.	Noted. Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7.



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	 Natural England fails to understand how the Environmental Measure Proposed constitutes embedded environmental measures (primary mitigation as defined at 4.4.19) which will reduce potential effects on seascape, landscape and visual receptors. Taking each in turn: C - 36: Due to minimum spacing requirements between 250m and taller WTG the geographical limitations of the Scoping Boundary would prevent the erection more than 116 WTG of 16Mw output. The current MDS is for either 75 (16Mw) or 116 (10Mw). NE understands that machines of 10Mw (190m to blade tip) may not be available by the mid-20s. C - 37: 325m is a current maximum projected size of WTG which are likely to be available by the mid-20s'. C - 38: The choice of foundation type has little influence on the seascape, landscape and visual effects resulting from the operation of the scheme. C - 40: No information is currently available on the location of these structures. Generally substations are located on the land side boundary of an OWF. Is the intention for Rampion 2 to locate these structures as far away from onshore landscape and visual receptors as possible? 	Noted. Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7.
Natural England	Scoping Opinion August 2020	In line with GLVIA3 (para. 3.34 p.41) NE advises that moderate effects should not be completely disregarded in determining the final design of the scheme.	Noted.

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	NE notes the commitment to 'focus the SLIVA on the effects resulting Rampion 2 in conjunction with the existing Rampion 1 project' in respect of cumulative effects.	Noted. Rampion 1 is considered as part of the baseline conditions in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and impact assessments in Section 15.10.
Natural England	Scoping Opinion August 2020	 Accepting the following NE agrees with the summarised information contained in Table 5.13.5 Duration of construction effects. These are referred to as short-term. GLIVA3 defines short-term as 'zero to 5 years'. Can the applicant confirm that the construction phase of the project will be completed within 5 years or thereabouts? Tennyson Coast Heritage Coast should remain scoped in at this stage (all instances). NE advises that some to the excluded viewpoints listed in Table 5.13.3 will need to remain in scope (all instances). NE advices that all the SDNP special qualities should remain in scope. The relevant special qualities for the Chichester Harbour AONB and Isle of Wight AONB need to scoped into the EIA 	RED can confirm that the that the construction phase of the project will be completed within five years (i.e. will be short- term). Effects on Tennyson Heritage Coast are scoped out of the SLVIA as addressed in Chapter 15: Seascape , Iandscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-10 (PINS ID 4.12.2). Viewpoints selected for the SLVIA are presented in Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint assessment , Volume 4 of the ES (Document

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
			Reference 6.4.15.4). The majority of these requested viewpoint locations are included in the ES as agreed with the ETG. The Planning Inspectorate agreed that effects on special qualities 2 and 4 can be scoped out of the EIA (PINS ID 4.12.3). The operational phase effects on the special qualities of the IoW AONB and CHAONB are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10.
Natural England	Scoping Opinion August 2020	Natural England advices that the potential effects of the scheme should be assessed on both statutory purposes of the SDNP. For this reason we advise that the special qualities listed here remain in scope.	As set out in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-10, The Planning Inspectorate agreed that effects on special quality 2 ('A rich variety of wildlife and habitats including rare and internationally important species') and 4 ('An

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
			environment shaped by centuries of farming and embracing new enterprise') can be scoped out of the EIA (PINS ID 4.12.3).
Natural England	Scoping Opinion August 2020	Natural England agrees that the New Forest National Park can be scoped out at this stage.	Noted.
Natural England	Scoping Opinion August 2020	Natural England agrees that the Surrey Hills AONB can be scoped out at this stage.	Noted.
Natural England	Scoping Opinion August 2020	Natural England agrees that the Hamstead Heritage Coast can be scoped out at this stage.	Noted.
Natural England	Scoping Opinion August 2020	Natural England disagrees that the Tennyson Heritage Coast can be scoped out at this stage.	Effects on Tennyson Heritage Coast are scoped out of the SLVIA as addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-10 (PINS ID 4.12.2).

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
Natural England	Scoping Opinion August 2020	NE requests that the Chichester Harbour AONB Partnership and the Isle of Wight AONB Partnership are invited to join the Expert Topic Group.Should the High Weald AONB remain in scope then representatives from this Partnership should also be invited to attend.	CHAONB, IoW AONB and High Weald AONB Partnerships were all invited and attended the ETG meetings for the SLVIA.
Natural England	Scoping Opinion August 2020	 Natural England notes that separate consultancies have been employed by the applicant to undertake the SLVIA and the LVIA. Natural England expects that there is high degree of commonality in the methodologies used in these assessments in respect of (but not limited to): Creation of the baseline. Visual representations. Sensitivity assessment (value and susceptibility). Magnitude of change methodology. Evaluation of significance. Narrative justification of the evaluation of significance. Assessment of the potential effects of Rampion 2 on the special qualities of designated landscapes. 	Noted.
Natural England	Scoping Opinion August 2020	We note the intention to 'follow a broadly similar assessment methodology'.	Noted.
Natural England	Scoping Opinion	NE notes there is no description of how the assessment of the potential effects of Rampion 2 on the special qualities of designated	The operational phase effects on the special qualities of the SDNP, IoW AONB and

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
	August 2020	landscapes will be undertaken. We request that such a description is provided as a matter of urgency.	CHAONB are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10, contained within Table 15-33, Table 15-36 and Table 15-43 respectively.
Natural England	Scoping Opinion August 2020	We note the reference to 'special landscape qualities' (at 1.3.3 under construction effects) and 'effects on defined special qualities of designated landscapes' (at 1.3.4 under operational effects). NE assumes that these are one and same i.e. effects on defined special qualities of designated landscapes.	Noted.
Natural England	Scoping Opinion August 2020	Due to Covid-19 restrictions NE wishes to have confirmation that the viewpoint photography and visual assessment surveys were undertaken at the times stated.	Viewpoint photography and visual assessment surveys were undertaken during August, September and November 2020 as described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-12.
Natural England	Scoping Opinion	NE notes the requirement for images which represent the 'maximum visibility scenario'. NE requests that due to the orientation of Rampion 2 with the Sussex coast and viewpoints located within the	Noted. As described in Appendix 15.2: SLVIA methodology, Volume 4

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	August 2020	SDNP (and Chichester Harbour AONB) careful consideration is given to the time of day that the images are captured. Opportunities to see turbines 'back-lit' i.e. in silhouette is a notable feature of the Rampion 1 as nearly all viewpoints are southerly facing. This is a unique attribute of Rampion 1 but would be shared by the turbines of Rampion 2. Back-lighting is most extreme in the early morning and late evening during the months of October through to March. At this time the colour rendering of the turbines provides no mitigation for the adverse visual effects caused. Rather the machines are seen as dark objects upon the horizon. In certain instances this effect can be extreme. NE advices that for selected viewpoints photomontages will need to prepared for this lighting scenario as well for a more typical 'maximum visibility scenario' which generally pertains to the front lighting of turbines in the late afternoon of summer months. For Rampion 1 (and 2) when seen from the SDNP this would only occur in the summer months when the suns sets in the north-west. We note at 1.10.13 the applicant considers this point of the year and time of day is considered to be the 'maximum visibility scenario' for Rampion 2. NE advices that due to the unique orientation of the Rampion arrays a second 'maximum visibility scenario' is also possible and that the SLVIA needs to take account of this factor. For the IoW AONB a 'maximum visibility scenario' based upon late afternoon summer of the months is appropriate.	(Document Reference: 6.4.15.2) viewpoint photographs have been taken to represent the prevailing viewing conditions in which Rampion 2 will be viewed. Since the majority of viewpoints are southerly facing, panoramic photography for Rampion 2 inevitably captures the sun in some part of the southerly view panorama and the opportunity to view Rampion 1 and 2 'into the sun' is the typical visibility scenario that will generally pertain from the southerly facing views.
Natural England	Viewpoint Selection Method Statement	Viewpoint Prioritisation On initial viewing of the meeting slides Natural England are content for the following viewpoints to be excluded from the assessment:	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment,

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	November 2020	 VP 59 Petworth Park VP 62 Beacon Hill, South Downs Way NT VP 39 Trig Point Shanklin Down VP 37 Lighthouse St. Catherine's Point VP 38 East of Newport As Natural England highlighted in the meeting the number of viewpoints should be based upon the extent of the study area, the complexity of the landscape receptors and the number of visual receptors (people) who will be effected by the proposal. For Rampion 2 all three of these criteria are large; the viewpoints used in the SLVIA need to reflect this complexity and not be limited purely because there are considered to be too many to assess. Natural England consider that the viewpoints should be carefully chosen to assess the range of impacts on the SDNP to reflect the changes in angles , elevation, foreground and context which will occur across the park from East to West. 	Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint Assessment, Volume 4 of the ES (Document Reference 6.4.15.4). All of these viewpoint locations were omitted from the ES in agreement with Natural England, with the exception of Viewpoint 62 Beacon Hill which is a useful viewpoint to inform assessment of the effects on users of the South Downs Way between Harting Down and Heyshott Down/Graffham Down.
Natural England	Viewpoint Selection Method Statement November 2020	<u>Viewpoints</u> The applicant wishes to ensure that a proportionate number of viewpoints are used in the SLVIA. So does Natural England. However NE does not believe that the number proposed by the applicant, 40, is proportionate. The number of viewpoints for a given scheme should be based upon the extent of the study area, the complexity of the landscape receptors and the number of visual receptors (people) who will be effected by the proposal. For Rampion 2 all three of these criteria are large; the location, number	RED considered that 40 viewpoints included in the PEIR was proportionate for the SLVIA of Rampion 2, based on the extent of the study area, the ZTV and the landscape and visual receptors effected, as described in the Method Statement. The location, number



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	and type of viewpoints used in the SLVIA needs to reflect this complexity. The bullet point listing provided on page 7 of the report illustrates this. Having reviewed the evidence again and having taken further advice from the South Downs National Park Authority NE can confirm that from the original list of 62, 6 viewpoints can be removed. Natural England considers that 56 viewpoints is a proportionate number considering the geographical extent of the study area, which includes a large resident population (Brighton, Worthing, Littlehampton etc.), the nationally designated landscapes of the South Downs National Park, Isle of Wight AONB and Chichester Harbour AONB as well as the numerous popular recreational locations and routes located both within and without of these nationally designated landscapes.	and type of viewpoints proposed for the SLVIA recognise that the offshore elements of Rampion 2 have the potential to be visible from and effect three national landscape designations (SDNP, CHAONB and IoW AONB) and views from a number of coastal settlements/visited tourist destinations. Although RED considered that 56 viewpoints are not required to assess the likely significant seascape, landscape and visual impacts - that it could have been done robustly and proportionately with the 40 viewpoints proposed, in recognition of the sensitivities and the advice provided by Natural England/SDNPA, a number of further viewpoints that are not assessed in the PEIR were agreed to be included in the ES, as identified in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-14, comprising

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			the original 40 viewpoints and a further 14 viewpoints added in the ES.
Natural England	Viewpoint Selection Method Statement November 2020	Photomontages The Scottish Natural Heritage 2017 advice that photomontages are most valuable 'for views within 20km of a wind farm site, turbines up to 150 high to blade tip' (page 13) is correct but only when the apparent height of these structures is also considered. As Government's statutory adviser for English landscapes NE advises that it is the apparent height of the turbine which is the key consideration. For example when a common viewing height of 25m is used for both 150m and 325m turbines, when viewed at 20km a 150m turbine has an apparent height value of 0.430. For 325m turbine the separation distance from viewers to turbine needs to increase to 43km before a comparable apparent height can be recorded (0.433). For distances less that 43km 325m turbines would appear taller than a 150m machine (with an apparent height greater than 0.430) and at 20km would appear to be over twice the height.This comparison between apparent heights, for 150m and 325m turbines at varying distances is illustrated by the East Anglia 2 SLVIA (which was based on the use of 300m turbines). 29 viewpoint locations are used in this assessment with the furthest away being located at a distance of 59km. For this SLVIA the authors considered it necessary to provide photomontages for all viewpoints.We note that all but 5 of the 56 viewpoints proposed by Natural England and others are within 43km of the nearest turbine. The	Figures 15-26 to Figure 15-65, Volume 3 the ES (Document Reference 6.3.15) include a range of visualisations including baseline panoramas, wirelines and full photomontages from viewpoints that demonstrate effects at a range of distances within the agreed study area (up to 50km). Viewpoints located within the closest and most susceptible parts of the coast to the changes have been prioritised for photomontages, based on their increased likelihood of significance at such range and illustration of effects that are material to the consenting process, over and above locations towards the outer edges of the study area, where the effects can still be readily understood with the use of a baseline photograph and wireline. It is agreed that not all

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		conclusion of the argument set out above would be that these 5 viewpoints do not require photomontages. However as illustrated by the East Anglia 2 SLIVA it is entirely appropriate for photomontages to be produced for viewpoints located well beyond 43km. We agree with the applicant that 'not all viewpoints require a photomontage' (p.13). The capturing of photographic imagery can be a time consuming and unpredictable task. Consequently the removal of the need to create a photomontage for every viewpoint location allows for a greater number of viewpoints to be included within the SLVIA as wireline diagrams (as already produced by the applicant) can be used.	viewpoints require a photomontage and RED has aimed to find a proportionate balance between the provision of viewpoints with full photomontages and a number of viewpoints with either baseline photograph + wireline; or as wireline only, to predict and illustrate landscape and visual effects.
Natural England	Viewpoint Selection Method Statement November 2020	Wireline Diagrams Appendix D We note the wireframes as presented appear to be extracts from 90 degree (18mm focal length lenses equivalent) cylindrical projection panoramic images. However, as no attribute information is presented with these diagrams we cannot be certain of this. We accept that these diagrams are merely illustrative at this stage, are not intended for use in the SLVIA and act merely as a rough impression of how Rampion II will appear for a given viewpoint. For the SLVIA NE requests that the applicant provides the necessary attribute information for the wireframe diagrams and other photomontage images in order that they can be correctly interpreted by both statutory consultees and members of the public. Based upon our understanding of the presence of Rampion I in views from certain locations (VP2 Birling Gap for instance) the wireline diagrams under represent the scale of Rampion I as it	Wireline diagrams provided with the Viewpoint Selection Method Statement were merely illustrative, intended for the use of selecting and prioritising viewpoints, and were not intended for use in the SLVIA. Wirelines provided with the SLVIA in Figures 15-26 to Figure 15-65, Volume 3 the ES (Document Reference 6.3.15) include all relevant attribute information and are presented at both 90° and 53.5° horizontal field of view (HFoV), in order



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	actually appears in the seascape. The use of a 90 degree cylindrical projection would account for this. For the SLIVA Natural England requests that 'single frame' 39.6 degree (50mm focal length lenses equivalent) projection images are provided in addition to the 53 degree (35mm focal length lenses equivalent) panoramic images for all viewpoints. In addition for selected viewpoints we request that a single frame image wireframe diagrams of 27 degree (75mm focal length lens equivalent) projection are also provided. We consider this to be especially important for viewpoints within the South Downs National Park, Isle of Wight AONB and Chichester AONB. The provision of a suite of diagrams and images will allow the Examining Authority, statutory consultees, other interested parties and members of the public to be fully informed about the likely visual presence of the scheme.	that they can be correctly interpreted. Single frame 39.6° (50mm focal length) images have been provided in addition to the 53.5° HFoV images from a selection of viewpoints as requested by Natural England. It should be noted that the single frame 39.6° HFoV images do not always capture the full horizontal spread of Rampion 2, which is shown in the wider 53.5 HFoV images. A 39.6° HFoV single frame image is also an enlargement and is not representative of the apparent height of the turbines when viewed with the photomontage in the field (Highland Council, 2016). The Applicant also notes Natural England's request that 27° (75mm focal length lens equivalent) images are also provided in the SLVIA. There is no benefit of using 27° (75mm focal length lens equivalent)

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			images, since they represent the same vertical scale as shown in the 53.5° panoramic photomontages, but simply have a narrower HFoV and they are not included in the ES.
Natural England	Viewpoint Selection Method Statement November 2020	Rationale for the 8 additional viewpoints requested by NEVP30 Halnaker WindmillIt is clear that this is a destination point for many visitors to theSDNP who are seeking to enjoy the visual amenity afforded in viewsfrom this location. It has a character which is significantly differentfrom that found at VP 50 for it to be included in its own right.Uninterrupted views towards Rampion II are available from thislocation meaning the turbines would be plain sight.VP32 Levin DownAnother destination point for many visitors to the SDNP who areseeking to enjoy the visual amenity afforded in views from thislocation.VP41 Slindon FollySee our reasoning for viewpoint 30.VP44 Old Winchester HillAlthough located at 49km from nearest turbine the inclusion of thisviewpoint will assist in understanding the geographical limit at whichsignificant effects are unlikely to occur. The wireline diagram clearlyshows turbines will be visible form this location.VP45 Catherington WindmillSee our reasoning for viewpoint 30.VP45 Amberley Mount	Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 and assessed in full in Appendix 15.4: Viewpoint Assessment, Volume 4 of the ES (Document Reference 6.4.15.4). The majority of these requested viewpoint locations are included in the ES as agreed with the ETG. The following viewpoints are not included in the SLVIA in agreement with Natural England and SDNP: Old Winchester Hill (Viewpoint 44) and Catherington Windmill (Viewpoint 45).

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		Rampion II would occupy the majority of the seaward horizon in views from this location. In combination with VPs 20, 21and 54 this viewpoint helps to illustrate the sequential effects of the scheme on users of the South Downs National Trail. A similar approach was taken in the EA2 scheme for users of the Suffolk Coast Path between Dunwich Heath and Thorpeness. Consider making a representative viewpoint. <u>VP54 Chantry Hill</u> Rampion II would occupy the majority of the seaward horizon in views from this location. In combination with VPs 20, 21and 53 this viewpoint helps to illustrate the sequential effects of the scheme on users of the South Downs National Trail. A similar approach was taken in the EA2 scheme for users of the Suffolk Coast Path between Dunwich Heath and Thorpeness. Consider making a representative viewpoint. <u>VP58 Wolstonbury Hill</u> Rampion II would occupy the majority of the seaward horizon in views from this location. Thorpeness. Consider making a representative viewpoint. <u>VP58 Wolstonbury Hill</u> Rampion II would occupy the majority of the seaward horizon in views from this location. The turbines would also be framed by the Downs thereby presenting a different aspect than would seen from locations such as VP17.	
South Downs National Park	Scoping Opinion August 2020	 The reference to the 'large scale landform massing of the South Downs' is noted however the SDNPA would draw attention to the long history of the visual relationship between the sea and the land of the National Park, including: the line of iron age hillforts which occur across the length of the downland the bronze age tumuli and barrows on many parts of the high downs 	Noted. Addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6.



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		 the ancient ridge top track of the South Downs Way, which crosses the landscape and provides repeating and changing views over the landscape and seascape for much of it's length The undeveloped backdrop to the coastline and the extensive view system from the high downs over the Bay of Sussex The line of the downs and the cliffs at Seven Sisters which are an iconic English cultural landscape The dramatic contrast between the flat coastal plain and the undeveloped slopes of the South Downs The strong connection between the land and the sea from Seaford to Eastbourne where the SDNP meets the coastline 	
South Downs National Park	Scoping Opinion August 2020	The identification of viewpoints does not address the scale of visibility of the proposal from the SDNP. The effect of the proposed taller heights and larger geographic extent of the proposed array when compared to the existing array is acknowledged in paragraph 5.13.93, but this has not been translated into the identification of appropriate viewpoint locations. The omission of the SDNPA's View Characterisation and Analysis (2015) document (also referred to here as 'Viewshed Study') from the reference material for this report is surprising, which, coupled with the failure to respond to the ZTV evidence means that there are many viewpoints which have been omitted from the outline viewpoint list. In response SDNPA has prepared a table and map of suggested viewpoints which form appendices 1 and 2 to this letter. APPENDIX 1 – Suggested additional viewpoints The following viewpoint list has been identified largely from the	The SDNPA's View Characterisation and Analysis (2015) document (also referred to here as 'Viewshed Study') has been considered in the viewpoint selection as described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6. Viewpoints selected for the SLVIA are presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document

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		SDNPA's View Characterisation and Analysis Report (2015) together with further viewpoints based on local knowledge. Please refer to the map at appendix 2 which displays these viewpoint locations. Butser Hill The Trundle Ditchling Beacon Chanctonbury Ring Amberley Mount Chantry Hill Beeding Hill Kingley Vale Mount Caburn Arundel Castle & Parkscape Halnaker Windmill Telscomb Tye Cuckmere Haven beach Hollingbury Hillfort Wolstonbury Hill Petworth Park	Reference 6.2.15), Section 15.6 and Table 15-14, assessed in full in Appendix 15.4: Viewpoint Assessment, Volume 4 of the ES (Document Reference 6.4.15.4). The majority of these requested viewpoint locations are included in the ES, as agreed with the ETG. The following viewpoints are not included in the SLVIA in agreement with Natural England and SDNP: Mount Caburn and Petworth Park.
South Downs National Park	Scoping Opinion August 2020	The impacts on the 2 statutory purposes of the SDNP have not been set out in the scoping table.	The statutory purposes of the SDNP are identified in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 baseline conditions of this

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			chapter. The operational phase effects on the special qualities of the SDNP are assessed in Section 15.10 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 (Document Reference: 6.2.15) contained within Table 15-33.
South Downs National Park	Scoping Opinion August 2020	This comment refers to the construction, operation, maintenance and decommissioning of the offshore elements of Rampion 2. The SDNPA does not support the scoping out of Special Qualities 5 and 6 from this scope – being; 5 - Great opportunities for recreational activities and learning experiences – this goes to the heart of purpose 2 of National Parks, and is relevant to the assessment of landscape and visual impacts, and landscape value 6 - Well conserved historical features and a rich cultural heritage – this special quality is embedded in the landscape and the cultural history of the SDNP, which is relevant to the assessment of Landscape character impacts and landscape value.	The operational phase effects on special quality 5 of the SDNP is assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10 of this chapter, contained within Table 15-33. Effects on the setting of 'well conserved historical features' (special quality 6) as a result of the offshore elements of Rampion 2 are assessed in Chapter 25: Historic environment, Volume 2 (Document Reference: 6.2.25).



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South Downs National Park	Scoping Opinion August 2020	We do not agree that there are viewpoints considered in Rampion 1 where Rampion 2 would not have additional/cumulative effects.	Noted.
South Downs National Park	Scoping Opinion August 2020	SDNPA asks that it should be set out how cumulative and in combination effects with Rampion 1 will be assessed. No detail of how this will be assessed is given.	Cumulative seascape, landscape and visual effects of Rampion 2 with other wind farm projects have been scoped out as described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-10 in agreement with The Planning Inspectorate (PINS ID: 4.12.4). Rampion 1 is considered as part of the baseline conditions in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and impact assessments in Section 15.10.
South Downs	Scoping Opinion	The SLVIA and LVIA do not set out the process of how optioneering will inform the development of the scheme's design.	The assessment in Chapter 15: Seascape, landscape and visual impact assessment,

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National Park	August 2020	It is noted that commitment C61 refers to the design principles in Rampion 1. The design principles for Rampion 1 may be useful but will not be completely transferrable or conclusive. In any case the Scoping Report does not set how these Rampion 1 design principles will be used to influence Rampion 2. It would be helpful if the SLVIA set out the likely design risks which are predictable at this stage such as, for example, the area in proximity to the Heritage Coast and the SDNP coastline and the visual relationship between the two arrays of differing sizes and scales. A statement setting out the methodology for refining the design parameters in terms of design options and potential array formations would be helpful. There are two options considered at the moment in the proposed Environmental Statement but it is unlikely that these two options would provide the level of detailed refinement needed within this highly sensitive landscape. Further design parameters presented via photomontage and wireframe visuals are requested for various options which follow the suggested design parameters by Natural England (as made to the Crown Estate in 2018).	Volume 2 (Document Reference: 6.2.15) is based on a maximum design scenario appropriate to seascape, landscape and visual effects as described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.7. As part of the Rampion 2 design process, a number of embedded environmental measures have been adopted to reduce the potential for impacts on seascape, landscape and visual receptors. These embedded environmental measures will evolve over the development process as the EIA progresses and in response to consultation. RED has had regard to these comments and the statutory purpose of the SDNP designation, and as a result, the Zone 6 Area (to the east) and the Extension Area (to the west) have been reduced from the Scoping Boundary to

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			that in the Proposed DCO Order Limits and this is illustrated on Figure 15-2, Volume 3 the ES (Document Reference 6.3.15).
South Downs National Park	Scoping Opinion August 2020	Photomontage images within the SLVIA that show the proposed array viewed from the SDNP from a wide range of angles and lighting conditions according to the time of morning/day/evening would be useful.	Photomontage visualisations showing the offshore elements of Rampion 2 are provided in Figure 15-26 to Figure 15-79, Volume 3 the ES (Document Reference 6.3.15).
South Downs National Park	Scoping Opinion August 2020	The row headed 'landscape scale;' the two descriptions for lower and higher sensitivity are in the wrong columns.	Noted.
South Downs National Park	Scoping Opinion August 2020	'Open views with no specific point of interest' could be very sensitive to the addition of an assertive focal point where this is inconsistent with an existing passive character.	Noted.
		 The SDNPA considers that the Environmental Statement should also reference and have regard to the following documents: English National Parks and the Broads Circular, DEFRA, 2010 South Downs National Park: Partnership Management Plan 202025 	Noted.



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		 South Downs National Park: View Characterisation and Analysis (2015) Review of Seascape and Visual Buffers for Offshore Windfarms by Simon White Associates (March 2020) 	
South Downs National Park	Scoping Opinion August 2020	We welcome the confirmation given, in table 5.13.5, that the effects of the Rampion 2 lighting on the quality of dark night skies in the South Downs National Park is scoped in to the EIA. We also welcome the commitment given, in paragraph 6.2.84, that lighting requirements for the onshore elements of the proposed development will be reviewed and assessed and agreed with stakeholders between scoping and the PEIR. The effects of the Ramp aviation and marine nav lighting on the quality of night skies in the SDNP assessed in Appendix Assessment of aviation navigation night-time effects, Volume 4 of the (Document Reference 6)	
South Downs National Park	Scoping Opinion August 2020	This identifies principal visual receptors including people walking and cycling and intends to identify particular visual receptors for more detailed assessments. The SDNPA considers that the South Downs Way sites should be identified for more than simple assessments – especially where visitor numbers are highest in the east and/or where the proposed new additional turbines will be visible for the first time due to the wider extent of the array and the additional height. SDNPA asks that the EIA should set out an approach to assessing cumulative and successional impacts on the users of the South Downs Way along the route. Several viewpoints on the South Downs Way have been suggested in appendix 1 of this letter, not	Noted. An assessment of the effects of the offshore elements of Rampion 2 on users of the South Downs Way is provided in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Table 15-16 and Table 15-32. Visual assessments from numerous viewpoints along the route of the South Downs Way are provided in Appendix 15.4: Viewpoint assessment,

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		least as there are extensive sea views from many parts of this National Trail (acknowledged in paragraphs 5.13.66 and 5.13.67).	Volume 4 of the ES (Document Reference 6.4.15.4) together with corresponding photomontage visualisations.
West Sussex County Council	Early engagement 26/06/2020	At this stage unless there is an real desire for some more detailed pre-application advice at this stage from WSCC in landscape terms (which we could consider doing through our charged pre-application advice service), or a particular matter you feel would benefit from discussion, we would suggest that you liaise with the relevant District Councils and SDNPA. They have the relevant in house landscape specialists and will presumably lead in that regard for now, in particular viewpoint locations. We would also direct you to the relevant WSCC web resources. https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/	Noted.
West Sussex County Council	Scoping Opinion August 2020	It is understood that Rampion 2 capacity will be 1.2GW as opposed to 400MW for Rampion 1, and that a commitment has been made by RED that the number of turbines will not exceed that of Rampion 1. WSCC understands the process for design refinement and at this stage RED need to undertake further surveys and assessment to best site the WTGs and associated offshore substations. WSCC is concerned however over the large area of the offshore scoping boundary, and the potential impacts to a number of receptors within	A full seascape, landscape and visual assessment (SLVIA) is provided within Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15) and Appendix 15.1: SLVIA

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		West Sussex and beyond if larger WTGs and additional substations are to be potentially placed over such a large expanse. WSCC expects to see a full Seascape and Landscape Visual Impact (SLVIA) assessment of how views in the defined study area will be affected. Further comment on this is provided within the technical chapter sections of this table.	consultation responses to 15.5: Assessment of aviation and navigation night-time lighting, Volume 4 (Document References: 6.4.15.1 to 6.4.15.5), including an assessment of how views in West Sussex will be affected.
West Sussex County Council	Scoping Opinion August 2020	SLVIA will also interface/interact with other technical topics of the EIA, including shipping and navigation, other marine users etc. WSCC wish to see these interactions fully outlined in the PEIR.	Noted.
West Sussex County Council	Scoping Opinion August 2020	WSCC refers RED to responses from the relevant district and borough councils and their landscape experts, including with regards to the proposed SLVIA study area of 50km. The study area should be based upon the extent of likely impacts, rather than an arbitrary figure, (i.e. using that based upon other windfarms, such as East Anglia ONE North and East Anglia TWO). A full justification of the study area chosen and assessed, in keeping with the outlined technical guidance, should be discussed with key stakeholders as part of Expert Topic Group (ETG) meetings at an early stage and presented transparently within the PEIR/ES. The key concerns for SLVIA relate to the potential visual impacts to the SDNP, the Sussex Heritage Coast and key visual receptors within West Sussex and beyond, which must be robustly assessed, along with the cumulative effect of Rampion 1 and other development in the area. WSCC would expect all viewpoint	The study area for the SLVUIA is addressed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.4 of this chapter and agreed with The Planning Inspectorate in Table 15-10 in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15). The proposed study area for the SLVIA was discussed and



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		locations to be discussed and agreed with relevant stakeholders prior to any further development of the assessment.	agreed with key stakeholders as part of Expert Topic Group (ETG) meetings. Potential operational phase effects of the Proposed Development on the SDNP, the Sussex Heritage Coast and key visual receptors within West Sussex are assessed in Chapter 15: Seascape, Iandscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.10 and Appendix 15.4: Viewpoint assessment, Volume 4 of the ES (Document Reference 6.4.15.4). Viewpoints selected for the SLVIA are presented in Section 15.6 and Table 15-14 of Chapter 15: Seascape, Iandscape and visual impact assessment, Volume 2 (Document Reference: 6.2.15) and were agreed with relevant stakeholders.

Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
West Sussex County Council	Scoping Opinion August 2020	WSCC expects RED to consult all relevant stakeholders on the development of the visual baseline as described in section 5.13.26, including identifying the extent of possible ZTVs, identifying the receptors that may be affected, and selecting a range of suitable viewpoint locations. As stated by RED, it is important to note that Rampion 2 will be visible from areas that Rampion 1 is not and this must be robustly assessed. WSCC would also like to note that some viewpoints must be considered to also rule out affected views to give confidence to the local communities and stakeholders of West Sussex and beyond. See below for specific comments in regard to the ZTVs presented in the Scoping Report.	RED has consulted all relevant stakeholders on the development of the visual baseline and identification of the visual receptors and viewpoints that may be affected, which is described in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 (baseline conditions) of this chapter.
West Sussex County Council	Scoping Opinion August 2020	WSCC would make comment that, as noted in the Scoping Report, the proposed WTGs for Rampion 2, will be larger and potentially covering a larger expanse than Rampion 1, based upon the offshore Scoping Boundary. WSCC is therefore concerned that there are fewer identified viewpoint locations for the SLVIA than was undertaken for Rampion 1.	Viewpoints selected for the SLVIA are presented in Chapter Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Table 15-14 of this chapter and were agreed with relevant stakeholders. A total of 54 viewpoints are included in the ES – considerably more than the 31 viewpoints included in the Rampion 1 ES.



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
West Sussex County Council	Scoping Opinion August 2020	 5.13.88 highlights key visual receptors but does not then provide associated viewpoint locations to assess the impact upon these receptors in Figure 15.13.6. Therefore, WSCC wishes to note the following: Figure 15.13.6 shows a number of viewpoints identified in West Sussex in the coastal and inland eastern areas, but a very limited number/concentration to the west of the County. WSCC would like to fully understand the reasoning for this, especially as a large proportion of the offshore Scoping Boundary is to the western side and the theoretical visibility indicates views from this area. WSCC expects this to be discussed as a priority prior to further assessment work being undertaken; Tourist and Visitor locations highlight popular beaches like Lancing and Shoreham, but some appear to have been missed (e.g. Climping Beach - the proposed landfall location). This should be reviewed. Further it is noted that the only viewpoint identified near Shoreham is VP9 on the A259 which is set back from the coast and may not be representative for both 'Main road routes' and 'Tourist and Visitor attractions' in this area; Main Routes section highlights the principle highway routes, the A259 and also the A27, which may experience 'limited scope for views'. WSCC would question whether a key route as this should be included as a viewpoint at a suitable location along its route; Reference to potential views for users of the Downs Link has not been mentioned in paragraph 5.13.88; 	 RED notes following in relation to each point: Views to the sea and the offshore elements of Rampion 2 from the West Sussex coastal plain, which broadly comprises the area of West Sussex between the urban coastline and boundary of the SDNP, are notably restricted by intervening vegetation, woodland and buildings within urban areas, as shown in Figure 15-15, Volume 3 the ES (Document Reference 6.3.15). Viewpoints from tourist and visitor locations in West Sussex including popular beaches have been included at Viewpoint 10 (Worthing), Viewpoint 11 (Littlehampton), Viewpoint 12 (Bognor Regies), Viewpoint 13 (Pagham) and Viewpoint 14 (Selney) The

Viewpoint 14 (Selsey). The



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
		 Although not listed in the key visual receptors, consideration should be given to those heritage assets identified in section 6.9, and the potential for any visual disturbance to views and setting; and Based upon statement in 5.13.85 (Rampion 2 will be viewed from areas where the existing Rampion 1 isn'tthese include areas of Low Weald and High Weald) it should be considered that a viewpoint location from the more northern extent of the Scoping Boundary be chosen to illustrate the view of the WTGs from this area (near the AONB). Viewpoint 26, Low Weald is the most northerly considered. 	 effects of the onshore infrastructure from Climping Beach are assessed in Chapter 18: Landscape and visual, Volume 2 (Document Reference: 6.2.18). An additional viewpoint on the A27 at Viewpoint 61 ha been included to represent views from main road route in the area. Effects on the setting of heritage assets is assessed in Chapter 25: Historic environment, Volume 2 (Document Reference: 6.2.25). Viewpoints from High Weal AONB (Viewpoint 47, Figure 15-62, Volume 3 th ES (Document Reference 6.3.15)) and Low Weald (Viewpoint 26, Figure 15-49, Volume 3 the ES (Document Reference 6.3.15)) assessed in Appendix 15.4: Viewpoint



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
			assessment, Volume 4 of the ES (Document Reference 6.4.15.4).
West Sussex County Council	Scoping Opinion August 2020	WSCC expects the Landscape Character to be assessed at all levels, including National, County and District. The table doesn't specifically mention the Strategy for the West Sussex Landscape https://www.westsussex.gov.uk/media/1771/landscape_strategy.pdf.	The landscape of the onshore parts of the SLVIA study area are described at the national level by National Character Areas (NCAs) and assessed in relation to the published County Council and National Park Landscape Character Assessments within the SLVIA study area in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference 6.2.15), Section 15.6 and Section 15.10. The Strategy for the West Sussex Landscape is referred to in Section 15.6.
West Sussex County Council	Scoping Opinion August 2020	WSCC also refers RED to the Local Distinctiveness Study of West Sussex: <u>https://www.westsussex.gov.uk/land-waste-and-</u> <u>housing/landscape-andenvironment/local-distinctiveness-study-of-</u> <u>west-sussex/</u>	The Local Distinctiveness Study of West Sussex is referred to in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference



Consultee	Date / Document	Scoping Opinion Comment	How this is addressed in this ES
			6.2.15), Section 15.6 baseline conditions.
West Sussex County Council	Scoping Opinion August 2020	Comments on potential Seascape and Landscape impacts including special qualities of the SDNP will be provided by the SDNPA.	Noted.

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3. Glossary of terms and abbreviations

Term (acronym)	Definition
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
CHAONB	Chichester Harbour Area of Outstanding Natural Beauty
DCO	Development Consent Order
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed project or development over and above the existing circumstances (or 'baseline').
Environmental Statement (ES)	The written output presenting the full findings of the Environmental Impact Assessment.
ETG	Expert Topic Group
GLVIA	Guidelines for Visual Impact Assessment
HFoV	Horizontal Field of View
IDSR	International Dark Sky Reserve
IOW	Isle of Wight
LVIA	Landscape and Visual Impact Assessment
ММО	Marine Management Organisation
MOD	Ministry of Defence

NE	Natural England
OS	Ordnance Survey
OWF	Offshore Wind Farm
Preliminary Environmental Information Report (PEIR)	The written output of the Preliminary Environmental Impact Assessment undertaken for the Proposed Development. It was developed to support Statutory Consultation and presented the preliminary findings of the assessment to allow an informed view to be developed of the Proposed Development, the assessment approach that was undertaken, and the preliminary conclusions on the likely significant effects of the Proposed Development and environmental measures proposed.
Planning Inspectorate	The Planning Inspectorate deals with planning appeals, national infrastructure planning applications, examinations of local plans and other planning-related and specialist casework in England and Wales.
Rampion Extension Development Limited (RED)	Rampion Extension Development Ltd (the Applicant)
SDNP	South Downs National Park
SDNPA	South Downs National Park Authority
SHC	Sussex Heritage Coast
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNCB	Statutory Nature Conservation Body
SSSI	Site of Special Scientific Interest
тнс	Tennyson Heritage Coast
WSCC	West Sussex County Council



ZTV

Zone of Theoretical Visibility



