

Relevant Representation of South Downs National Park Authority under Section 56 of the Planning Act 2008 in respect of the Rampion 2 Offshore Wind Project

(PINS Reference EN010117)

Summary

The proposed development will in part be located within the South Downs National Park (SDNP) - the onshore cable corridor element bisects the SDNP for approximately 13km - whilst further aspects will also impact on the setting of the SDNP, principally the offshore wind turbine array.

The SDNPA recognises the national need for offshore wind generation and recognises the important role this will play in tackling climate change. It does, however, have concerns about the proposed scheme and the underplaying of the impacts on the SDNP, which are outlined as part of our response below. We will participate in the examination process to advance SDNPA's interests and will make further detailed representations at the appropriate time.

Overall, we consider the scheme downplays its significant impacts. We are very disappointed that the applicant hasn't yet sufficiently addressed these points and there is wholly inadequate mitigation and compensation.

Main Areas of Concern

1. Principle of Developing in a National Park

National Parks are a protected landscape and afforded the highest level of protection in terms of landscape. The SDNPA considers that the cost and scope for delivering outside of the National Park has not been appropriately considered as required by paragraph 5.9.10 of National Policy Statement EN-1. This states that the Secretary State may only grant consent in these areas in exceptional circumstances and where the development is in the public interest, subject to a series of 'Major Development Tests'. Further, the selected route for the onshore cable corridor has failed to adequately undertake an assessment of detrimental effect on the environment, landscape and recreational activities, and the extent to which these could be moderated.

2. Seascape, Landscape and Visual Impact (Offshore)

The offshore array, by virtue of their proximity to the coastline, size, number and spread is considered to have significant adverse effects on the character and setting of the SDNP. In particular, and as advised in Review and Update of Seascape and Visual Buffer Study for Offshore Windfarms (March 2020) commissioned by the Department for Business, Energy and Industrial Strategy (BEIS as it was then) the combination of National Park and Heritage Coast is particularly sensitive and needs to be given great weight in the planning balance.

3. Landscape and Visual Impact Assessment (Onshore)

The effects on landscape character throughout the construction period, as well as beyond, are considered to have been underestimated. This includes the effects on tranquillity and those caused by noise and lighting. Importantly, the visual assessment insufficiently reflects the impacts on receptors within and looking into the National Park. Insufficient mitigation - and no compensation - has been put forward by the applicant to address the harm caused (e.g. the application is not accompanied by a draft S106 legal agreement).

4. Lessons Learned from Rampion 1 Offshore Wind Farm

Much has been made by the applicant of the success of the reinstatement of the Rampion 1 onshore cable corridor in the application, however the SDNPA's experience (which it will evidence at the

examination) has been that whilst some areas have been successfully reinstated, other elements still cause harm to the landscape many years later. There have also been issues regarding the ongoing maintenance and management of the corridor, again which is causing harm to the SDNP.

5. Terrestrial Ecology and Nature Conservation (Chapter XX of Environmental Statement)

The landscape-scale ecological effects are considered to have been inadequately assessed, particularly in assessing the direct and indirect effects of removing potential important linear features from the landscape. We are also concerned that insufficient evidence has been provided to demonstrate the likely significant impact of Horizontal Directional Drilling on the hydrology, soil structure and geology of ancient woodland, chalk streams and chalk grassland habitats. Overall, it is considered there are large areas of missing survey data that are needed to support the assertions made in respect of ecology and nature conservation.

6. Transport and Rights of Way

The SDNPA has concerns regarding the impact on the local highway network during construction for both the onshore and offshore aspects of development, and the Public Rights of Way Network within the National Park.

7. Historic Environment

The area between (and including) Blackpatch Hill and Harrow Hill forms a rich and complex multi-period prehistoric landscape of national significance. The selection of this route was flagged as being of significant concern during the consultation stage given the area constitutes some of the earliest evidence of industrial activity in Britain. Although mitigation is proposed, it is considered that this has still under-estimated and under-represented the potential for this dry valley in the context of the landscape setting and known archaeological sites in the area. Given the extremely high potential for archaeology of national significance it is considered further works need to be undertaken prior to the determination of the application.