

# AUDIO\_RAMPION2\_ISH1\_SESSION5\_07022

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Thu, Feb 08, 2024 9:22AM • 56:31

00:00

To resume the hearing, obviously, in terms of time we're running on running close to it. So if I can ask that, the answers to the questions we can

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perhaps

00:22

provide concise answers to the questions. And if there are items that perhaps we can't answer, then perhaps refer them for written submissions, if possible. So we're now on agenda item six, which is the effects on the South Downs National Park. Rather than introducing the items, I'm just going to dive straight into the question. So in sort of the time reasons. So the first question really is in relation to the special qualities of the National Park. Now, in the current submission, there's quite a lot of documents that reference the special qualities or the National Park. And we think that it would assist the essay if we had one documents. Sorry, can you hear? We had one document with all the the assessment on the special causes of National Park, particularly in the context of the National Parks concern that they raised in their relevant representation and the principal areas of disagreement statement. So just the applicant would be would you be able to provide such a document so that we've got all the assessment in one place? Would that be possible?

02:00

Paul miles to the applicant, have to take that away and see what's possible within the confines of the various I understand the question within the confines of the various assessments that have been undertaken. I certainly think that at the very least, it should be possible to provide a good third signposting document as to where as to what the special qualities are, and where assessments have been undertaken, and the conclusions that had been reached in relation to those special qualities. If we can pull it all into one digestible format, we will endeavour to do so.

02:35

Thank you, that would be useful. Thank you.

02:42

So the next question really is in relation to concerns that have been raised in respect to the magnitude of harm that would be caused by the size, proximity and lateral spread the wind turbine generators.

03:05

In natural England's absence, is this something that the South Downs national park could provide a bit more detail on and explain that concern?

03:19

Richard tourney for Southdowns entropot. We can do you want that already. Now, as a further explanation. I mean, it is a I say at the outset, the South Downs national park position is that these impacts are unacceptable, and that development potential be refused on that basis. So just to be clear, as to the level at which we're putting it, it's that these impacts are not acceptable. And and you should recommend refusal. And we certainly endorse your request that the applicant starts to really grapple with impacts of this scheme, offshore and onshore on the special qualities and does so coherently, because at the moment, we will say that you've got no evidence on which to roll on development consent, in light of the impacts are not sufficient evidence. So that's our starting point. I don't know. Do you want to provide a brief summary in terms of the seascape aspects? Or should I should I briefly summarise for our brief, I'll briefly summarise for present purposes, and obviously we'll set this out in detail in our local impact report and written representations. But I think the particular concerns that we have the start with with baseline and a particular concern is the way in which the applicant has treated rampion one as being baseline for the assessment of its effects, the effects of the array, rather than treating it as another project. With which there's a there's an accumulative assessment. And we say that's a fundamental error, because first of all the relative timing of rampion, one coming forward, and the identification of the special qualities of the national park, but also, because rampion one obviously has a limited lifetime, and this project will extend well beyond the lifetime of rampion. One, in terms of its presence in the seascape. So that point will explain further, but it's that baseline point. The next point is about considering the extent of the array. And a detailed study was carried out in 2021 on behalf of the National Park Authority to consider the capacity in seascape terms for accommodating further offshore wind farm development in the wider setting of the National Park. And the recommendations of that report, and that capacity study do not seem to be improperly taken into account in defining the parameters and design principles of rampion to. And as a result, the effects reach a level which is unacceptable. The third sort of headline point that I'd make is about the interaction between ramp in one and this ramp into proposal. And in particular, the relative heights of the turbines, and the totality of those impacts and the way in which ramp into will be viewed beyond and either side of rampion. One, those are just some very headline points in terms of those impacts. So that's impacts which we say could have been avoided, and or could be mitigated through better parameters parameterization of the of the array by imposing stronger and more coherent design principles on the array. And then we get to the question of compensation for those effects on the National Park, and in particular, this key special quality of the breathtaking views from the National Park towards the seascape. And in those those impacts we say are significant and adverse, and a ones which call for a proper and coherent approach to compensation. And as you know, the statutory duty in respect to National Parks has been amended. It's incumbent on the Secretary of State to further those those features and special qualities now, or consider how to further them in making a decision. So we can't just stop it. We've done what we can to mitigate we've got to say, Well, can we go further, can we compensate for those impacts such that the special qualities are not diminished, but also is the opportunity to further those special qualities to provide enhancement? And, to put it bluntly, we think the applicants a long way off on on that front, that sort of compensation and furtherance piece of work. That's a very high level on the seascape points I have deliberately then, because the question not

address the landscape points. But what we do say there is that we're looking at the impact on the park as a whole. And there's a combination of the development of the offshore wind farm in the setting of the park, and that impact on its special qualities. But also, we say quite extensive physical effects through the onshore cable route, going through the park. And there's an interaction between the two, if you take a simple point about a user of a public right of way, who may be diverted from that public right of way you may encounter construction activities for the onshore route, but also will be the same receptor that will view out from the National Park and have their their view interrupted by the presence of rampion. To just to put it in very simple terms. Is there anything you want to add at this stage? That's very brief summary. There'll be there'll be more in the in our written submissions.

09:45

Thank you that was noted. Does the applicant want to come in on on that point, or do we want to? Is it something that perhaps is going to be covered in the responses to the relevant? Rep. Well, I

10:02

think I think to be fair to Mr. Attorney, I think he's anticipating the detail being in the written rep and the LIRR from the South Downs National Park, which will be received in due course. And obviously, then there'll be more detail in that. And under the more detailed response from the applicant in due course, I guess as far as the applicant is concerned, will be guided from you as to what level of response you'd find useful. At this stage, certainly, the applicant quite happy to indicate the extent to which it's engaged with the the the the issues that have been raised by the National Park, and also the sort of steps that it's taken in formulating its design to try and mitigate and address those, those issues with the the the applicants not agnostic to those points. So if that will be a useful exercise to you at this stage, then I'm quite happy to ask the applicant team to to deal with that point. Before I do that, could I just raise one point which was in relation to the cumulative assessment and the treatment of rampion. One. Now, the applicants position that is that it's clearly followed. The advice in the inspectors advice note 17. On on this point, and advice, note 17 is is is clear. And there's a note on the table too, which says, when dealing with cumulative projects, where other projects are expected to be completed before construction of the proposed end, CIP rampion. One obviously falls within that category and the effects of those projects are fully determined effects arising from them should be considered as part of the baseline. So that's the lead that the the assessment took on that basis. I think Mr. Turney is considering potential impacts arising from a change in the future baseline, which the applicant is quite happy to consider and it may be best that we deal with that point when the detail comes through in due course in the written rapidly and the what and all the LIRR.

12:32

Stats. As such, I think it would be useful as you suggest to just but I know it's a complicated subject, but to briefly outline as you as you suggested, I think that'd be useful in this context.

12:49

The certainly so thank you all, we'll try to do that briefly. In in doing so, ask the two people responsible for assessing the impacts of the project from a landscape and seascape perspective to introduce themselves, and also to define their roles in how they've gone about that exercise. And then there's

discussed briefly outline, how the the consideration of the special qualities from those perspectives has influenced the design process that resulted in the scheme that's put forward.

13:32

Becker eyelet on behalf of the applicant, I have been responsible for leading on the landscape and visual impact assessment which is related to the onshore elements of the proposed development. And my colleague here

13:49

Good afternoon, I'm Simon Martin. I work for a practice called open. We specialise in landscape visual impact assessment and seascape impact assessment, particularly for big, big energy projects. And I talking on behalf of the applicant on seascape and visual matters particularly. And I've been in my role on this project really has been to undertake the SL BIA. So we authored chapter 15 of the of the Yes. And I have been working with the applicant and quite an early stage on the projects been involved in all of the ETG meetings in all the consultations with stakeholders and working with the applicant and the stakeholders to look at measures to try and address the effects through embedded design measures.

14:46

So in respect to the South Downs National Park, it's important to note that both the landscaping visual impact assessment and the seascape landscape and visual impact assessment have taken account of the national importance and The statutory duties and purposes of the South Downs National Park. And this is afforded by way of high sensitivity of that receptor, or the highest sensitivity rating in the assessment. And we have undertaken assessments concerning the special qualities of the National Park. And we should also note that we use the same methodology as well. Now, there are seven special qualities in the South Downs National Park. And it's important to just run through those quickly page 118 of appendix 18.3 which is landscape assessment. I'm just looking at that they are summarised in the South Downs National Park Authority document from 2015. So number one is diverse and inspirational landscapes and breathtaking views. Number two, a rich variety of wildlife and habitats including rare and internationally important species. Number three tranquillity and unspoiled places for environmental environment shaped by centuries of farming embracing new enterprise five great opportunities for recreational activities and learning experiences. Six well conserved historical features and rich cultural heritage, and seven distinctive towns and villages and communities with real pride in that area. In undertaking, the onshore analysis, we have elected through agreement with consultees that number one diverse and inspirational landscapes and breathtaking views is important to our assessment. Number three, tranquil and unspoiled places is important to the assessment. And number five opportunities for recreational activities is important to landscape and visual impact assessment. And it's important to note that from the outset, the design and the evolution of the design and the assessment process and EIA process has had due consideration to the special qualities. So for example, commitment one the whole route is underground. The route selection process through the National Park has evolved to ensure things such as there are no significant effects on settlements at Pier stage we had several significant effects on local settlements within the National Park. There are no significant effects that we've identified on tourist or visitor attractions. For example, the view from Arundel Castle, which is viewpoint II, the route design includes areas of HDD and trenchless crossing to be avoided, and areas of that which will be further amplified through the additional evidence. For

example, the A 27 and areas of ancient woodland and the chalk, Scotland at solid and Hill. The outline landscape and Environmental Management Plan studies on ecology and arboricultural also reducing the effects and measures taken to avoid veteran trees and ancient woodland impacting on those landscape elements within the works. Reducing the corridor with working with from 14 metres down to six metres in some cases where there are sensitive receptors, techniques involving copper sin, notching and replanting and replacing hedges and trees that are removed or impacted as part of the works on avoidably. And it commitments on working hours on lighting and many more. And obviously, I'm not going to repeat all of those out just now. So in terms of the significant effects, we have looked at the breathtaking views, and I wanted to draw your attention to figure 18 point 49 Which I believe is Devil's dyke. You don't need to turn it up. But that's, that's one of the examples of a breathtaking view. And in our assessments are my computer's gone to sleep? I just need to open that up again.

19:26

And we get

19:34

Yes, so we provide on page 125. Under special quality one, we provide a number of examples of breathtaking views. And we look at that criteria across the National Park and across some of the viewpoints that we've undertaken some analysis on and we find that is it is variable. So for example, if we were to look at the view from Well, an easier way to do it would be look at figure 18 point 76. And then if it's possible to pull that one up, it's right at the back of the figures. And it takes us sequentially through the South Downs Way. And so you can see as you as you walk along, or as you take a examinees photographs from South Downs Way, we've got things like the view from chanting Bree Hill and spree ring and also Amberley, mount and Chantry Hill, all long distance views out to the north across to the weald, which in my view would be breathtaking and exhibit this special quality. We've also got views of the cable corridor at Simonton Hill. And looking back towards the visible parts of the work there. If you look at those figures, as well, you can see that they're breathtaking elements to those views looking at the cable corridor, are less well expressed because of the brow of the hill. And because of the short foreshortening of the landform in those particular views.

21:25

However, in terms of looking at this special quality and drawing together all of the landscape and visual effects that we've identified, we do come to the conclusion that there will be a significant effect on special quality one and special quality two, which is about tranquillity. And that has involved consultation with the noise team to understand both visual and audible effects on receptors within the National Park, we did not find that there would be significant effect in respect of special quality number five, which relates to recreation. I could elaborate more, but I think you want me to keep it as short as possible. Simon Do you wanted to do offshore?

22:16

Yeah, Simon Martin on behalf of the applicant. So I think it'd be useful to just to bring up one of the figures that shows the study area for the SL BIA at this point, just to give a bit of context to the study area that we've been assessing in the SL BIA, I'll try and pick up on some of the points that were made by the National Park in relation to the extent to the array and the interaction between rampion one and

ramping two and so on. George during during this but thing you can see here, the study area and the zone of visual influence around going to so it kind of gives us a good understanding of the extent of visibility within which there may be an effect on views and special qualities within the National Park. So the National Park is kind of indicated in the area sweeping across the study area. And it shows the wider extents to the Isle of Wight to the west to just the harbour AONB and the heritage coast to the east. And then the position of rampion rampion, one and Rankin to in relation to those kind of key receptors. And the darker blue collar on the map gives gives an indication of the zone a bit of visibility just based on the terrain. So it was really clear through this modelling that the extent of the visibility of the project was contained by the upland spine and the landform of the size downs. So there are views from the from the tops of the downs, the open downs, which provide, I suppose, a bit of an auditorium for sea views open CVS to the south and, and also views to the north over the weald and to other sort of very valued features with within the National Park.

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So

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in terms of the the sort of wider points around especially extend to the array area and the point about the purposes as the National Park, that's something that the applicant has had regard to throughout the assessment and design of the project. Looking at their special qualities through the through the detailed assessments that we've undertaken, and the breadth of the consultations that we've undertaken with relevant stakeholders and the design changes that have been made to the array area to address address the various comments from stakeholders In terms of the array area, we wanted to point out it is a development that's located outside of the designated area that will be visible from within it. That in itself shouldn't necessarily be a reason to refuse consent that's recognised in npc and one, the aim really, that the applicant has focused on has been to try and reduce effects on special qualities insofar as possible really around the the other siting and operational and viability constraints of projects and to, to to avoid compromising the purposes of the designation as a whole, am I to conserve and enhance natural beauty? The way that we've done that is through characterization of the seascape and the landscape character and to assess the effects of the project on representative viewpoints from both the open downs and from within the heritage heritage Coast area. I mean, relation to the heritage coast, I think that's there's a particular focus on that through the assessments and through the design, the design principles that we've developed, that have informed the spatial extent of the site. And the heritage coast, I suppose, is obviously representative of the maritime section of the National Park. And in relation to special quality one, there are it's an area where there is a focus, so it's on panoramic views to the sea, which is specifically referred to and in special quality one. And views on the sidelines way, in particular, crossing the open downs and then into the chart down to the heritage coasts are referred to, because that particular recreational route offers the these opportunities to take in the panoramic views to the sea. So yeah, I think while we recognise that the extent of the array area has been, particularly the lateral spread, and the horizontal in the horizontal field of view, has been a particular factor in determining in the assessments that we've made. The there has been a particular focus on reducing that lateral spread and increasing the proximity of the of the turbines and the the DCR boundary, particularly from the Heritage coast. And those, those those design principles sort of informs the boundaries shown in the offshore works plans that are all set out in ES chapter 15. And, I

think, in relation to the panoramic views, particularly, there's been a specific focus on a concentration on trying to reduce the lateral spread and lateral extent of the development in views. And you can see that in there's a set of wireline visualisations included within the s, which are figures 15.93 to 15.109, that's at 095. And they give a really clear comparison of the impacts of the projects at the earliest stages appear and the impacts of the project at the environmental statement stage when the design principles were embedded into the reduction of the DCR boundary. So I suppose just to conclude around that, for now, and appreciate this is something that we're going to need to put perhaps more more written representation on but as our conclusions around harm in terms of the array area was that we, there's a recognition that there would be some harm to the breathtaking views and the panoramic views of the sea, that had find in special quality one. But it's the conclusion of the environmental statement chapter 15, that those changes wouldn't compromise the purpose of the National Park as a whole. The majority of its special qualities would be unaffected by by the array area. The panoramic views would still be experienced. And the opportunities for breathtaking views both of the sea and of the other features that are valued in the in the National Park would would still be Main and the understanding and enjoyment of the National Park, which would continue in that context.

30:12

I think that concludes that overview. So if there's anything else that you'd like to ask, obviously, we're happy to respond. But we're probably on the verge of getting into a lot of detail which you may not want to do.

30:23

That's useful Thank you. To South Downs National Park want to respond to any of those

30:37

points or who reg attorney for South Downs National Park Authority? I'm not going to go into the detail. Can I just make these points and obviously, well, as they obviously, we think this is a major issue for this examination, and we welcome it being revisited at a later hearing. To explore the issues in more detail, once the parties have seen had the opportunity of further exchanges between themselves and the applicants viewed our submissions. But I just say very briefly, the kind of mitigation measures for the onshore works that were described, we say a just ordinary, you know, not chopping down ancient woodland is not a specific mitigation measure to address the National Park designation. Because if you were proposing a cable route anywhere in the country, National Park or not, you wouldn't be chopping down ancient woodland. So these are not special mitigation measures below ground cable routes the same everywhere identify they are the same everywhere. Identify a setting in which above ground cable routes are being promoted as a means of transmitting power from the offshore wind farm to its it scheme substation. And there may be one or two. But I think it's fair to say that given given the vast number of schemes that are coming forward, it would be difficult to identify a development consent order application, which contains overhead lines for the project itself. Those sorts of mitigation measures we say are just ordinary. And you need to be looking for the extraordinary when dealing with a National Park. In terms of the effects that are being described of seascape, I think what we've just heard, sort of reaffirms our view that the wrong question is being asked by the applicant. Because this reductive assessment of well look at what is left, look at what is left when you build the wind farm. And all sorts of special qualities remain. Yes, of course, we know that it's a national park of significant scale.

And it will remain special even if this development comes forward, as proposed. But that's not the test. The question is whether in through these proposals, those special qualities are preserved or enhanced, and thus whether the objectives that furthered and once you start to ask the question in that way, you come to quite a different answer. It's not that you would still have some breathtaking views in the in other directions. It is, well hang on the breathtaking views here are compromised, how might that issue be addressed through design? How might it be addressed through compensation measures? So those are the real questions not to look at look at it in a sort of reductive way of what is what is left once we've finished. But as I say, we have detailed submissions already, which will be refined between now and deadline one. And I don't think it's half past six, it's going to help to go through in detail why we disagree with each aspect.

34:03

Thank you.

34:09

Can I just Well, obviously not really England on here, and they've raised a number of similar concerns and similar concerns, not only in terms of national park, but also the heritage coast, six heritage curse, rather than go through a similar exercise. Can I ask where the where the discussions are at the moment between the applicant and Southdown National Park on these particular issues and get our discussions ongoing?

34:50

Are there discussions are ongoing? So yes.

34:54

Can I stress then that these discussions that we we want to see In detailed discussions and if movement can be made on the issue movement made on the issue, or clear submissions as to what the respective parties opinion on the matter is moving forward.

35:21

Thanks. So I think obviously, there's, there's a fair amount of due process to be gone through on this in terms of seeing the detail of the National Parks submissions through their written rep in their in their Li Er, I think there is, it's probably unlikely that that agreement is going to be reached on on all issues with with the National Park, simply because of the you know, the nature of the project and the nature of the differences between us in terms of the visual impact. And there are divergent positions on the acceptability of that, as you as they've just heard, I think where discussions will probably prove most fruitful around the contents of management plans and mitigation measures and, and those kinds of things. And we're quite happy to engage on that basis and and will continue to do so.

36:13

So, originally for National Park Authority, obviously, we welcome discussion, but I can I just suggest that it goes to a slightly higher level than management plans and so on, because at the moment, we've got an really quite fundamental concern with these proposals. So I'd suggest that it should extend to consideration of the extent of the array and revising those parameters. Because of the specific



concerns that we've raised, it obviously needs to deal with the alternatives to the route through the National Park and to satisfy the examining authority where we started today on the absence of alternatives to crossing national park. So that so there's sort of two avoidance points. And then, whilst there is a discussion about mitigation, and that's important, I'm not dismissing it, that there needs to be that consideration of management plans and so on. But then the next limb is is the compensation and the furtherance. So what's this project going to do to leave the national park in a better state than it is now. And at the moment where we don't think the applicants nearer to that, and that is that is what furthering means It means leaving leaving the park in a better state than they started with it. So I think it quite right, we need to look at management plans, mitigation measures, and so on. But also we need to be looking at the bigger picture, reducing the size of the wind farm, confirming that there are no alternatives to crossing the National Park, and that those have been rejected on the grounds that are set out in policy, that you're satisfied that that's a robust assessment, and then saying, well, what's the totality of the remaining effects? And what can this developer do to ensure that the National Park is objectives have furthered by this project rather than compromised by it?

38:14

Thank you for that. We move on to the next question. Again, probably in the interest of moving things forward, obviously, Natural England aren't here. And I've expressed a number of views in terms of potential amendments and potential at additional further assessments in their relevant representation, particularly in relation to the eastern array in the form of an exclusion area. They talked about the reduction of the combined lateral spread of R one and R two, and have their impact assessments rather than asking questions on those particular points, can they act as that in the applicant submission on natural England's representations there that they specifically reflect on those suggested amendments and assessments in terms of feasibility and the implications for the scheme overall? So that we have rather than having in the hearing the cost question ends on those points. We have that in written form if that's possible.

39:56

Yes, sir, obviously, we wish once the relevant Revenue Code So we'll address those points

40:09

the moving on to the next subsection of the agenda which was in relation to South Downs Way.

40:26

The National Park question the methodology on the viewpoint assessment in terms of kinetic viewpoints and sequential testing of viewpoints. Can the National Park explain the necessity for kinetic testing and the policy or guidance requirements for each us?

41:00

Yeah, it's Robin Bucha. Speaking on behalf of the South dance, the request for kinetic testing was made at peer review stage as well as looking at potential sequential testing. Sequential testing has been carried out to a certain extent. But the South Downs National Park feel very much that there are a lack of viewpoints along the South Downs Way to answer for a proper assessment or a thorough assessment has not been made, there are big gaps. There are views that look in the northern direction

and knocks after action, etc, etc. So we still feel that whilst there is some sequential testing at the very back of the fingers as portrayed at a smaller size, that we feel there could be more added to this to give us a more thorough picture the Southdowns ways a National Trail, and therefore is of national importance.

42:04

Simon Martin on behalf of the applicant, I can cover that from an array area perspective, I think maybe that crosses over into onshore impacts of the construction category as well. But just from an offshore array area perspective,

42:20

sorry, because every Porsche there's just.

43:01

As with there's obviously quite a lot of difference between South Downs National Park and where the applicant is. And a lot of the questions are on a similar to similar line to what we started to discuss. And we're getting to the position where from a methodology point of view and from other points of view, the now the South Downs National Park is saying that a certain approach and the applicant saying a certain approach, and potentially lack of evidence and maybe more evidence is needed. So I'm actually with, from the exercise point of view, wondering at this point, whether actually more talking between the parties is needed rather than carrying on with this line of questioning.

44:09

Yeah, I'm, It just occurs to me that the questioning that we had was based on some sort of individual concerns raised but the answers we seem to be getting is that we're still stuck at stage one, which is the South Downs National Park believe Natural England believe that that needs more discussion and more more information is needed and further progression is needed. So I'm questioning whether that's as far as we can go at the moment really with any any questions we have, because clearly there needs to be more discussions to be had and more. And the furthering of the position given particularly, Mr. Tan your your responses you've just given. It seems to me that there's nothing further really we can do at this moment in time and further questioning clearly these days. They need to answer your concerns, your objective concerns. It's not that we're not dealing with matters of detail here or master mitigation. I think your your responses have suggested to me that we're at stage one we're at right the first stage, and there's nothing really more we can do, or any questions we can benefit here today, until such as we've had your, your local impact report and written representation, and that substantial progress has been made in discussion between yourselves and the applicant. So

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they're rich, certainly for South Downs National Park. I'm, from my perspective, perfectly happy not to sort of pursue the the detailed exchanges, I think, what I would say is there are obviously there's, there's a sort of group of methodological issues, have we seen enough viewpoints has, you know, the right views been taken into account, and so on. So that those points, ultimately, you'll form your own view. And, frankly, we'll probably invite you to take some of your site visits from those places, which we say have been omitted, and you can make judgments yourself, there's then the sort of bigger points of

principle, which I think are probably going to be more usefully served as later by sh where we have had the ability to narrow the differences between us on assessment, and we can hone in on the conclusions, which I think is probably going to be the most fruitful thing for you in your reporting. Sir, certainly, we were content with with with that approach to sort of speed things up for today.

46:55

Thank you. So the last point in the agenda was around the habitats, regulations assessment for the Aaron Valley special protection area. And just in the interest of time, most of the questions that I had with between the applicant and Natural England, so I what I will do is defer those now to post hearing questions. I would just like to give South Downs National Park the opportunity to say or whether they have any specific anything specific they'd like to raise regarding the loss of functionally linked land used by water birds, or requirements for water neutrality.

47:30

Registered only for sale starts after 1230. It's not a point with which we have concerned ourselves. And I think if those questions are probably for Natural England, rather than for St. MPa,

47:41

thank you for confirming that.

47:43

Okay, that's what I had taught him perhaps sorry. Okay.

47:48

These guys are smashy Porter from ocean Council. I think there's probably, understandably, why you put it under the Southdowns could have a location. But the water resource zone covers the entirety of Horsham district and only a small portion of Southdowns. So we've actually as a council been far more involved in the consequences to development and the need to mitigate. So I'm conscious of time, like you mentioned. I mean, if you want to have us invited to exchange your Natural England,

48:24

yeah. So if I put those into post hearing questions, and I will address those questions to yourselves as well. Yep. Again.

48:36

Did I just I'm sorry, Could I could I just raise before we move off topic six and in enlightenment, so moving on to action points. Obviously, I think there's there's scope for technical discussion on the assessments that have been carried out, but I realised there's been a lot of that already. I think one of the points that has been raised twice today in respect of impacts on the National Park is the question of project viability. So you'll recall that this morning on the alternative folly option. It was said that would mean the project was unviable. And we heard again today, this evening on the question of the extent of the array, that the viability of the project was in question from in considering the extent of the array. At the moment, the examination, as far as I can see doesn't have any information about that. So if if it's going to be said that viability is a decisive issue on these impacts, then we will need to see more from

the applicant to understand how many turbines are needed to make the project viable, and also what are the impacts in terms of alternative rerouting of K balls that would prevent the project from being viable. So I just raised that because at the moment, it's it's just assertion and we haven't seen any evidence. Yes, thank you notice. Thank you

50:23

is there any action points that you've ordered from that

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thus far? So I mean, I was just wondering whether it was in very, very brief time, did you want to touch on anything regarding archaeology, because that was also on on the agenda is simply to hear in the space of a minute, what the relevant Party's position is at this stage? Or would you prefer to leave that like other issues?

50:51

I think that the issues on archaeology are those issues that are centred around from some of the relevant representations from Historic England. So at this point, I think we'll have the responses in writing to their concerns.

51:11

And I was just keen on establishing whether the South Downs National Park had anything particular that they wanted to raise in relation to that issue in overall summer.

51:21

Returning for Southdowns, I was, it seemed, who wants to move on, but we, we, we have raised and we will raise in detail a concern in particular about the black black patch hills and the aggregation of sheduled ancient monuments in that area, and the cable route going through that location in area of very high archaeological interest. Applicant says major adverse effects on cultural heritage in that location because of the interests that have been identified. We remain concerned about the proposed mitigation measures there in terms of preservation and also whether alternatives have been properly explored in that location to avoid those impacts. But again, we'll set that out in detail in our representations and Li R.

52:32

I, sorry, excuse me. I see that we've got a hand up online. Would you like to make some brief comments there?

52:46

Thank you, Chloe. Honey sets West Sussex County Council. Yes, just very briefly, to reiterate the points raised by South Downs National Park, in regard to national significance archaeology. At a very high level, there are some sort of some some key major concerns with with this section. Consideration of alternatives. Sufficient weighting, we believe has not been given to, to heritage, in particular, the potential for archaeological remains as yet undiscovered, which could be of equal significance to known as your monuments, in which case, they will be subject to the same policies and protections as

scheduled monuments. The lack of ability evidence and prior evaluation field evaluation within this section of the routes, there's been very little evaluation within the order limits as a whole. But within this section, it's wholly unacceptable, with the result that the significance of effected assets can't currently be understood. The worst case scenario assessments within the S will result in potentially an unacceptable degree of harm to the historic environment. And the proposed solutions. In the worst case scenario of nationalist significant remains revolve around avoidance mitigation by avoidance, micro citing design solutions, and it's currently not clear what whilst there are commitments along these lines, it's not currently clear that these can be delivered, and what sort of what engineering solutions may or may not be possible, especially racing to the discussion earlier regarding additional HDD sections and treacherous crossings. So, yeah, there's there's some some key concerns there. And we'll be covering those further, obviously, within our written representations. Thanks.

54:34

Thank you for that.

54:38

Thanks. I mean, we'll wait for those representations. Obviously, there are a lot of issues raised in there around issues of acceptability which engage wider Polit wider policy considerations. We'll be responding to those in that light in due course. But I you know, that that that exchange is helpful to the applicant. Thank you.

55:00

I'm most action points. Did you have any recorded for the last time

55:03

I just had the one obviously there was a desire for the applicant in the South Downs National Park to keep those discussions going. And we certainly will certainly do that. It was the request for a consolidated document summarising the impacts on the special qualities of the National Park. If if, if that's if that's possible, I said that we'd at least pull together a comprehensive signposting document. And if there's reasons why that consolidated document we don't think is possible, because of the way the essay is constructed. Within the time that we've got the deadline, one will certainly look at what we can provide you by by deadline one in that regard.

55:51

I didn't have anything else other than that, so I can move to adjourn for the day. So this concludes the matters for today. This recording of the hearing will be placed on the inspectorates website as soon as practicable after this meeting. Thank you very much for attending today. I know it's been a very long day and I hope you'll find it useful. We shall resume the hearing tomorrow at 930 in which we will commence on offshore matters and commercial fisheries. Thank you