

SOUTH DOWNS NATIONAL PARK AUTHORITY

SUMMARY OF SUBMISSIONS MADE AT ISH1

1. By way of summary, South Downs National Park Authority (SDNPA) made the following key points at ISH1:
 - a. In the context of alternative cable routes, SDNPA emphasised that national policy sets a high threshold for justifying major development in the National Park. To meet that high threshold on the grounds of economic viability, the Applicant is required to provide clear evidence as to the effect of the alternative alignment on project viability, which it has not done to date;
 - b. In respect of HDD locations, SDNPA emphasised:
 - i. The need for certainty as to the locations of the HDDs, and to ensure that the terms of the dDCO do not permit open trenching in those locations identified for trenchless crossings. There should be a list of committed trenchless crossings;
 - ii. The need for clarification on the language used to described trenchless crossings and HDDs, given that the phrases are used inconsistently in the dDCO, COCP and ES;
 - iii. The need to consider further locations for trenchless crossings given particular concerns raised by SDNPA e.g. in respect of hedgerow and tree loss. There should be identified criteria to establish whether trenchless techniques should be used in other locations when detail is provided is COCPs;
 - iv. The need to reconsider the detail of proposed HDDs particularly around the South Downs Way National Trail.
 - c. There is a particular issue around construction access at Michelgrove which requires further careful consideration. The impacts of the introduction of passing places needs to be assessed;
 - d. There is a need to consider the totality of transport effects on the National Park, including any impacts from construction traffic associated with the offshore elements of the Project. There is also a need for these impacts and cumulative impacts on users of public rights of way to be assessed as part

of a holistic assessment of the impacts of the Project on the special qualities of the National Park;

- e. Where tree and hedgerow loss figures are provided, the Applicant should distinguish between the extent of loss within the National Park and that which is outside the National Park;
- f. In relation to the impacts of the Project on landscape and seascape, SDNPA's position is that the impacts are sufficient to justify refusal of the application:
 - i. The Applicant will need to do further work to assess the impacts on the special qualities of the National Park since the current assessment is inadequate.
 - ii. The Applicant's assessment wrongly treats Rampion 1 as part of the baseline, rather than (a) considering the cumulative impacts of Rampion 1 and Rampion 2 as required by the 2017 Regulations (which requires a description of the likely significant effects including "the cumulation of effects with other **existing** and/or approved projects" (Sch 4 Para 5)) and (b) assessing against the future baseline when Rampion 1 is decommissioned.
 - iii. The Applicant has failed to take into account SDNPA's assessment of the capacity to construct further offshore windfarm development within the setting of the National Park. Accordingly the proposed extent of the array is too great.
 - iv. The Applicant has failed to consider how adverse impacts on the special qualities of the National Park can be compensated.
- g. The Applicant should engage further with the SDNPA beyond discussing mitigation and including on:
 - i. The economic justification for not making a grid connection at Fawley (to avoid the National Park);
 - ii. The extent of the array and other parameters such as swept area and height (to minimise the impact on the National Park);
 - iii. The provision of compensation for the adverse effects on special qualities. In this respect, the Examination should consider whether the statutory purposes have been furthered by the Project, not just whether mitigation has been provided.

2. These issues will be revisited in the Written Representation and Local Impact Report, and at future ISHs.

Richard Turney
Landmark Chambers

28 February 2024