

# Rampion 2 Wind Farm

## Category :

## Examination Documents

Applicant's Post Hearing Submission – Issue Specific Hearing 1

Appendix 5 – Further information for Action Point 27 – South Downs National Park

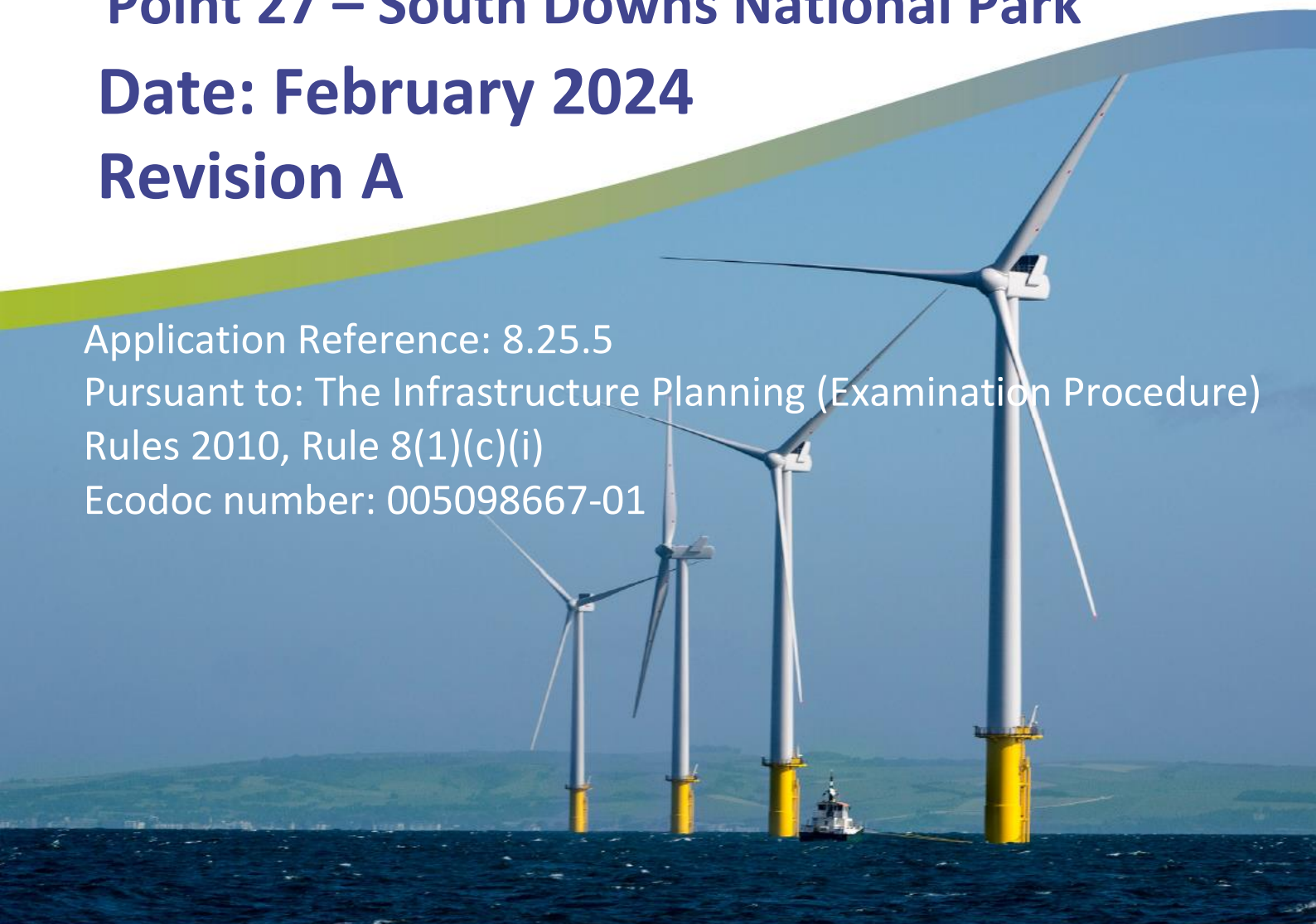
Date: February 2024

Revision A

Application Reference: 8.25.5

Pursuant to: The Infrastructure Planning (Examination Procedure) Rules 2010, Rule 8(1)(c)(i)

Ecodoc number: 005098667-01



## Document revisions

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Revision	Date	Status/reason for issue	Author	Checked by	Approved by
A	28/02/2024	Response to ISH1 Action Point 27	WSP	RED	RED

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# 1. Introduction

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## 1.1 Overview

- 1.1.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the 'Applicant') is developing the Rampion 2 Offshore Wind Farm Project ('Rampion 2') located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.
- 1.1.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km<sup>2</sup>. A detailed description of the Proposed Development is set out in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) [APP-045], submitted with the Development Consent Order (DCO) Application.

## 1.2 Purpose of this Document

- 1.2.1 This document provides further information requested in response to Action Point 27 which states "*Submission of a singular document on the effects of the Proposed development on the special qualities of the South Downs National Park including mitigation and enhancement proposals. The Applicant may, if this cannot be provided, instead submit a sign-posting document to this effect.*"

## 1.3 Response to Action Point 27

- 1.3.1 The first section of this document provides an overview of the statutory duties in relation to the South Downs National Park (SDNP) and then sets out a summary of the key policy tests in the National Policy Statements (NPSs) that apply to these statutory purposes.
- 1.3.2 The following sections then outline the findings of the Environmental Statement (ES) assessment of effects of the Proposed Development on the special qualities of the South Downs National Park (SDNP) including mitigation and enhancement, referred to as embedded environmental measures. The document signposts where the relevant information is contained in the ES and provides reference to where embedded environmental measures are provided in the application documents and how they are secured. The information is presented by SDNP special quality.

## Overview of statutory duties in relation to the South Downs National Park

- 1.3.3 The relevant legal tests with regards to the statutory duties relevant to the SDNP are set out in the Rampion 2 DCO Application documents, and in particular within:
- **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES; [APP-056]

- **Chapter 18: Landscape and visual impact, Volume 2** of the ES [APP-059]
- Section 4.4, Section 4.6, and Section 4.7 of the **Planning Statement** [APP-036]

1.3.4 In summary the following is relevant:

- Section 5(1) of the National Parks and Access to the Countryside Act (1949) provides the framework for the establishment of National Parks and Areas of Outstanding Natural Beauty (AONBs) and sets out the statutory purpose of conserving and enhancing natural beauty, wildlife and cultural heritage of National Parks and of promoting opportunities for the understanding and enjoyment of the special qualities of those Parks by the public. This places a duty on public bodies to have regard to the purposes for which National Parks are designated. In relation to the SDNP, this includes both (a) conserving and enhancing the natural beauty, wildlife and cultural heritage; and (b) promoting opportunities for the understanding and enjoyment of the special qualities by the public;
- The Countryside and Rights of Way Act 2000 (CRoW) introduced provisions to help secure the better management and protection of National Parks including providing better access and enjoyment in harmony with the aim to safeguard the landscape; and
- Since acceptance of the Rampion 2 application in September 2023 [PD-001], the Levelling-up and Regeneration Act 2023 (26 December 2023) was enacted and a new duty came into force in respect of all 'relevant authorities' (such as the Secretary of State) in that they "*must seek to further the purposes*" of national parks in 5(1) of the 1949 Act.

## National Policy Statements

- 1.3.5 Section 104 of the Planning Act 2008 outlines that the DCO Application must be decided in accordance with the relevant National Policy Statement (NPS). Section 1.6 of NPS EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a), which came into force in 2024, sets out a transitional arrangement confirming that for DCO applications accepted for examination before designation of the 2023 amendments '*the 2011 suite of NPSs should have effect in accordance with the terms of those NPS.*'
- 1.3.6 As the Rampion 2 DCO Application was accepted for determination in September 2023 [PD-001] this means that it is the 2011 suite of NPSs that will have effect rather than the suite of revised NPSs. In this case, therefore, NPS EN-1 (Department of Energy and Climate Change (DECC), 2011a), NPS EN-3 (DECC, 2011b) and NPS EN-5 (DECC, 2011c) have effect and are the NPS against which the application will be assessed.
- 1.3.7 However, the Applicant accepts that the revised NPSs designated in January 2024 ((NPS EN-1 (DESNZ, 2023a), NPS EN-3 (DESNZ, 2023b) and NPS EN-5 (DESNZ, 2023c)) are important and relevant considerations. At the time of submission, the 2023 NPSs were in draft. To assist the Examination, the Applicant has submitted at Deadline 1, a statement outlining the significant differences between the March 2023 draft NPSs and the November 2023 NPSs, and the

implications that the 2023 NPSs (as designated by Parliament) may have for the Proposed Development. Furthermore, accordance trackers, showing compliance with the 2011 NPS and 2023 NPS, which were designated in January 2024, will be submitted at Deadline 2.

1.3.8 The relevant policy tests in the NPS which have effect are set out in paragraph 5.9.9, 5.9.10, 5.9.12 and 5.9.13 of NPS EN-1 (DECC, 2011a):

1.3.9 5.9.9 *“National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.”*

5.9.10 *“Nevertheless, the IPC may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:*

- *The need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;*
- *The cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy alternatives set out in Section 4.4; and*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

1.3.10 5.9.12 *“The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.”*

5.9.13 *“The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent”*

1.3.11 Paragraphs 5.9.21 is relevant with regards to mitigation and states:

5.9.21 *“Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.”*

- 1.3.12 The revised NPS EN-1 (DESNZ, 2023a), which came into force in 2024, includes references to furthering the statutory purposes in line with the Levelling-up and Regeneration Act 2023 (at paragraphs 5.10.7, and 5.10.8):
- 1.3.13 *5.10.7 “National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.”*
- 5.10.8 “The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.”*
- 1.3.14 In terms of the applicant’s assessment, the revised NPS EN-1 (DESNZ, 2023a), advises (at paragraph 5.10.20) that:
- “The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an AONB the assessment should include effects on the natural beauty and special qualities of these areas.”*
- 1.3.15 Paragraphs 5.10.26 - 5.10.27 focus on mitigation and advise:
- 5.10.26 “Reducing the scale of a project can help to mitigate the visual and landscape effects of the proposed project. However, reducing the scale of otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.”*
- 5.10.27 “Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.”*
- 1.3.16 With regards to the Secretary of State decision making, revised NPS EN-1 (DESNZ, 2023a) (paragraphs 5.10.32, 5.10.33 and 5.10.34), amongst other requirements, set out the exceptional circumstances to be demonstrated for development to take place in nationally designated landscapes (as contained in the 2011 NPS (DECC, 2011a)), stating that:
- 5.10.32 “When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty*

*should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:*

- The need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;*
- The cost of and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and*
- Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.*

*5.10.33 “For development proposals located within designated landscapes the Secretary of State should be satisfied that the measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.”*

*5.10.34 “The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.”*

- 1.3.17 In the context of the consideration of exceptional circumstances in paragraph 5.10.32 of revised NPS EN-1 (DESNZ, 2023a), the Government’s conclusion that there is a critical national priority (CNP) for nationally significant low carbon infrastructure is relevant and important. As an offshore wind development, the Proposed Development is classed as CNP as defined in paragraph 4.2.5 of revised NPS EN-1 (DESNZ, 2023a). Paragraph 4.2.14 requires the Secretary of State to consider the impacts and benefits of all CNP infrastructure applications on a case-by-case basis. Paragraph 4.2.16 of revised NPS EN-1 (DESNZ, 2023a) states, for residual non-HRA or non-MCZ impacts: *“As a result, the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.”* NPS EN-1 (DESNZ, 2023a) paragraph 4.2.17 sets out that this starting point for decision making applies (*inter alia*) *“where development in nationally designated landscapes requires exceptional circumstances to be demonstrated”*.



Within **Chapter 3: Alternatives, Volume 2** of the ES [APP-044] the Applicant has set out the reasons for the grid connection being located at the National Grid Bolney substation in in Section 3.3 and further consideration of alternatives for the onshore cable route and the reasons for selection of the route that crosses the SDNP, in Section 3.4. The Applicant has also provided further evidence requested under Action Point 3 (Document reference 8.25.1) submitted at Deadline 1 with regards the Fawley option and Dungeness as requested by the ExA.

## Summary of rationale for consideration of effects on the special qualities of the SDNP

- 1.3.18 To aid the Examination this response to Action Point 27 sets out where and how the DCO Application includes information in relation to the effects of the Proposed Development on the special qualities of the SDNP. It does so in the context of the relevant policy tests as set out in NPS EN-1 (DECC,2011a) and the revised NPS EN-1 (DESNZ, 2023a) which have been outlined above.

### Special Qualities of the South Downs National Park

- 1.3.19 There are seven special qualities of the SDNP which are described in full in the following document 'South Downs National Park Special Qualities' (South Downs National Park, 2015) and included in **Annex A**. These are summarised as follows:

- 1) *diverse, inspirational landscapes and breath-taking views;*
- 2) *a rich variety of wildlife and habitats including rare and internationally important species;*
- 3) *tranquil and unspoilt places;*
- 4) *an environment shaped by centuries of farming and embracing new enterprise;*
- 5) *great opportunities for recreational activities and learning experiences;*
- 6) *well-conserved historical features and a rich cultural heritage; and*
- 7) *distinctive towns and villages, and communities with real pride in their area.*

- 1.3.20 At its closest point the offshore array is 15.8km distance from the South Downs National Park (SDNP). The onshore elements of the Proposed Development includes construction of the underground onshore cable which passes through the SDNP and associated works including temporary construction and operational and maintenance accesses. The permanent above ground structures are the onshore substation and the National Grid Bolney substation extension works, these are located in Horsham District and Mid-Sussex District respectively and at a significant distance (approximately 7km at the nearest point) from the SDNP and do not affect the SQs.

## Special Quality 1: Diverse, inspirational landscapes and breathtaking views

- 1.3.21 The Applicant has assessed this special quality in the assessment of effects from the offshore array area on the special qualities of the SDNP in Table 15-32 of **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES [APP-056]. The effects on the onshore landscape and visual amenity related special qualities of the SDNP and their setting are provided in **Appendix 18.3: Landscape assessment, Volume 4** of the ES [APP-169] and summarised in **Chapter 18: Landscape and visual impact, Volume 2** of the ES [APP-059] section 18.9 to 18.13. The following text summarises the outcome of these assessments.

### *Offshore elements of the Proposed Development: the Offshore array*

- 1.3.22 Many of the SDNP special qualities are not affected by the offshore array area due to its position outside the SDNP. The main relevant special quality is special quality 1 (SQ1) – ‘Diverse, inspirational landscapes and breath-taking views’. ‘Breathtaking views’ of this special quality refer to both ‘stunning, panoramic views’ to the sea and across the Weald. Views across the Weald will remain entirely unaffected by the array area since they are oriented northwards. Panoramic sea views are one specific component of the overall special qualities referred to in SQ1. The physical features of the SDNP’s diverse landscapes will not be changed by the offshore area and the diversity of landscapes of the SDNP, expressed through wooded and heathland ridges of the western Weald, its wide, open chalk downlands, river valleys, hidden villages, market towns and estates, will all remain definitive to its character and diversity.
- 1.3.23 In relation to seascape, SQ1 manifests in the ‘*panoramic views to the sea*’ from the South Downs Way both over the inland open downs and from the chalk cliffs at Seven Sisters, which may be affected by the offshore array area. This Heritage Coast of the SDNP is of particular relevance to the seascape aspects of the special qualities, due to its relationship with the marine environment. It has the most prominent association with the seascape along its section of coastal cliffs forming the maritime edges of the SDNP, from which there are ‘*panoramic views of the sea*’ that may be considered ‘*breathtaking*’, in particular due to the views over the chalk cliffs and geological features of the coastline, rather the sea itself, which includes the operational Rampion Wind Farm and one of the busiest shipping lanes in the world.
- 1.3.24 The assessment in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES [APP-056] finds the array area will result in some significant effects on the ‘*panoramic views to sea*’ described in SQ1 as experienced from the closest parts of the Heritage Coast, including parts of the South Downs Maritime MCA (08) coastline, the Ouse to Eastbourne Open Downs (A1) and its adjacent Seaford to Beachy Head Shoreline (S1) Landscape Character Areas (LCAs) (Figure 15.18 and Figure 15.19 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 2 of 8), Volume 3** of the ES [APP-089]); and from views experienced by people along this closest stretch of the Heritage Coast identified at representative viewpoints:

- ▶ Seven Sisters Country Park (Viewpoint 3) Figure 15.28 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3** of the ES [APP-091] (26.6km);
- ▶ Cuckmere Haven (Viewpoint 28) Figure 15.51 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 6 of 8), Volume 3** of the ES [APP-093] (26.2km);
- ▶ Seaford Head (Viewpoint 4) Figure 15.29 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3** of the ES [APP-091] (23.9km); and
- ▶ These high sensitivity receptors experience a medium magnitude of change, resulting in major/moderate (significant) effects. Effects are not considered to be of high magnitude (given the distance over approx. 24km).

1.3.25 Not significant effects on ‘stunning, panoramic views to the sea’ are assessed from the eastern part of the Sussex Heritage Coast area of the SDNP, between Birling Gap Figure 15.27 and Beachy Head Figure 15.26 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3** of the ES [APP-091] at distances of approximately 29km – 32km:

- These high sensitivity receptors experience a medium-low magnitude of change, resulting in moderate (not significant effects), with effects considered not significant, on balance, based on professional judgement and assessment, including:
  - ▶ Distance/proximity: Rampion 2 is located at distances of approximately 29km – 32km from these parts of the Heritage Coast;
  - ▶ Scale: Wind turbine generators (WTGs) will have reduced apparent scale at such long range. Scale juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs has been avoided;
  - ▶ Narrow horizontal field of view (HFoV): Rampion 2 occupies a narrow lateral spread in the ‘panoramic views to the sea’ (an additional 7.3° from Birling Gap and 6.5° from Beachy Head) - there will remain a panoramic seaward outlook and open sea skyline that are unaffected across the majority of the field of view;
  - ▶ Wind farm separation: a clear line of sight between Rampion 1 and 2 arrays ensures that it appears as a distinct array with less contrast and a degree of balance with Rampion 1;
  - ▶ Consistency of image: Rampion 2 will introduce elements that are characteristic in the receiving view with a similar form to the Rampion 1 WTGs; and
  - ▶ Avoids valued features in view: Clear separation between the valued white cliffs along the coast and the array area, which is viewed ‘offshore’ in its open seascape.

1.3.26 Embedded design measures have focused particularly on reducing effects on these views from the Heritage Coast, including from Beachy Head Figure 15.26 and Birling Gap Figure 15.27 in **Chapter 15: Seascape, landscape and visual**

**impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091]**, focusing on the field of view (lateral spread), proximity and separation with Rampion 1. The design principles shaped the reduction in spatial extent of the offshore array between Scoping, Preliminary Environmental Information Report (PEIR) and ES is shown in Figure 15.2 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3 of the ES [APP-088]** and Figure 3.3 in **Chapter 3: Alternatives – Figures, Volume 3 of the ES [APP-075]**. The reduction in effect is evident in the comparative wirelines in Figures 15.93 – 15.109 in **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 8 of 8), Volume 3 of the ES [APP-095]**. These changes made to the DCO order limits have reduced the adverse effects of Rampion 2 on the Heritage Coast of the SDNP (which is recognised by Natural England and the National Park) with effects on some Heritage Coast views becoming not significant and effects of ‘major’ significance avoided.

- 1.3.27 In response to feedback on the first statutory consultation exercise from both the South Downs National Park Authority (SDNPA) and Natural England (NE), significant changes were made to the Proposed Development. This included reducing the Zone 6 Area (to the East) and the Extension Area (to the west) from the Order Limits following the stakeholder concerns regarding visual issues (as well as shipping and navigation issues). Figure 3.3 of **Chapter 3: Alternatives – Figures, Volume 3 [APP-075]** of the ES illustrates these areas removed and is included for reference in this document in **Annex 2**.
- 1.3.28 The Applicant has responded to ‘good design’ in respect of seascape, landscape and visual receptors through the application of SLVIA topic specific design principles that have shaped the design of Rampion 2, with the aim of reducing the magnitude and geographic extent of seascape, landscape and visual effects of the Proposed Development and minimising harm to the special qualities of nationally designated landscapes, particularly the SDNP and the associated Sussex Heritage Coast.
- 1.3.29 These design principles have been developed in consultation with stakeholders and applied within the application to reduce the spatial extent of the array area and the number of Wind Turbine Generators (WTG) proposed, such that the project design responds to these combined principles and reduces the magnitude and geographic extent of effects, as follows:
- ‘Field of view’ – reducing the field of view or ‘horizontal extent/lateral spread’ of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2;
  - ‘Proximity’ – increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles);
  - ‘Wind farm separation zones’ – achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays; and
  - ‘Separation foreground’ – avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible.

- 1.3.30 These reductions in the developable area and design principles are embedded within the project through the Order Limits and Works Areas shown on the **Offshore Works Plans [PEPD-004]** and Works Area Descriptions provided in full in Schedule 1 of the **Draft Development Consent Order (DCO) [PEPD-009]**.
- 1.3.31 Further clarification is provided in the **SLVIA MDS and Visual Design Principles Clarification Note (Document Reference 8.35)** submitted at Deadline 1, regarding how the design of the Proposed Development limits the impacts on the SDNP and Sussex Heritage Coast), insofar as possible.
- 1.3.32 **Chapter 3: Alternatives, Volume 2** of the ES **[APP-075]** paragraphs 3.2.29 to 3.2.44 provide further description and summary of the evolution of the design.
- 1.3.33 The SDNP has the highest status of protection in relation to landscape and scenic beauty. The Applicant has had regard to the statutory purposes through the selected project design, which helps ensure its continued protection, which also applies when considering applications outside the boundaries of the SDNP which might have impacts within. It is considered that Rampion 2 avoids compromising the purposes of the SDNP designation and has been designed sensitively with due regard to its statutory purpose, despite the fact that it will be visible from within the SDNP and that it may have significant effects on certain special qualities – its ‘breathtaking views’ and ‘stunning, panoramic views to the sea’ defined in Special Quality 1.
- 1.3.34 The assessment reported in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]** (paragraphs 15.10.48, Table 15-32 and paragraphs 15.15.33 to 15.15.40) has found that significant effects would occur to this special quality of the SDNP. However, it is considered that Rampion 2 would not undermine the statutory purpose of the SDNP. Harm is caused to one of the SDNP’s special qualities and this is limited to certain locations, particularly on the coastal extent of the SDNP and the elevated tops of the downs. Whilst harm would be caused to this special quality (‘breathtaking views’ and ‘stunning, panoramic views to the sea’), this would not compromise the purpose of the designation.

#### *Onshore elements of the Proposed Development*

- 1.3.35 SQ1 – ‘*Diverse, inspirational landscapes and breath-taking views*’ refers to both a range of ‘*diverse and inspirational*’ landscapes which include the geology of the chalk downland, wooded ridges and heathland, and ‘*stunning, panoramic views*’ to the sea and across the Weald that can be experienced from the South Downs Way. All of these components are relevant to the assessment of the onshore elements of the Proposed Development which include the construction of the onshore cable corridor and associated works including accesses within the SDNP.
- 1.3.36 With regards the effects of the onshore cable route which passes through the SDNP, the Applicant notes that the entire onshore cable will be placed underground which is fundamental to avoidance of any permanent significant effects on the SDNP. This is secured in the **Onshore Works Plans [PEPD-005]** Work No.9 (a) in the **Draft Development Consent Order [PEPD-009]**. This aligns with paragraphs 2.8.8 - 2.8.10 of NPS EN-5 (DECC, 2011c) which specify undergrounding as mitigation for potential adverse landscape and visual impacts,

particularly in the context of nationally designated landscapes such as “*National Parks, AONBs and the Broads*” (DECC, 2011c, paragraph 2.8.9). It also aligns with the strong starting presumption for placing electricity lines underground in nationally designated landscapes, which is set out in paragraph 2.9.20 of revised NPS EN-5 (DESNZ, 2023c), which came into force in 2024.

1.3.37 The Applicant has sought to avoid, minimise, mitigate, and compensate onshore landscape and visual impacts from the onshore cable construction (and associated works such as trenchless crossing construction compounds and construction accesses) which could impact the SDNP or its setting. A summary of the main mitigation measures set out in the **Commitments Register [APP-254]** (updated at Deadline 1) and with the appropriate securing mechanism provided as follows:

- The onshore cable route is underground in commitment C-1, as secured within the description of Work No. 9 in the **Draft Development Consent Order [PEPD-009]** avoiding above ground infrastructure during the operation of the Proposed Development.
- Route selection has evolved to avoid sensitive sites with the result that there will be no significant effects on settlements or tourist / visitor attractions within the SDNP (e.g. the views from Arundel Castle Viewpoint E in Figure 18.25 a - b **[APP-099]**). The onshore cable route selection also benefits from higher levels of tree / vegetation screening in comparison the route consulted on at the first statutory consultation. These measures mitigate potential effects on landscape and visual receptors.
- No main construction compounds will be located within the SDNP, avoiding consequential landscape and visual effects.
- The embedded environmental measures have been developed to avoid and mitigate adverse effects on a range of landscape and visual receptors including the chalk escarpments at Sullington Hill and Michelgrove; the A27 and A283 and sensitive vegetation including ancient woodland through the use of trenchless crossing techniques (commitments C-5, and C-216) as secured in Appendix A – Crossing Schedule of the **Outline Code of Construction Practice [PEPD-033]**.
- A number of measures developed with the ecology team will mitigate effects on landscape elements including sensitive vegetation through the avoidance of veteran trees and combinations of reduced construction working width, coppicing / notching / translocating and replanting areas within the cable corridor that cannot be avoided (Commitments C-21, C-115, C-174, and C-220) as secured in the **Outline Code of Construction Practice [PEPD-033]** which is secured through Requirement 22 of the **Draft Development Consent Order [PEPD-009]**.
- The **Outline Landscape and Ecological Management Plan (Outline LEMP [APP-232])** will ensure reinstatement planting is undertaken in a timely manner and maintained and monitored for 10 years as secured by Requirements 12 and 13 of the **Draft Development Consent Order [PEPD-009]**. See commitments C-196 and C-199.

- There are also a large number of other mitigation measures related to the construction operations including traffic management, soil handling, the management and aftercare of PRoW, restrictions on working hours, noise and lighting. All of these measures will contribute towards the mitigation of effects on landscape and visual receptors as explained in Table 18-25, **Chapter 18: Landscape and visual impact, Volume 2** of the ES [APP-059].

- 1.3.38 Residual and significant landscape and visual effects resulting from the direct and indirect effects of the onshore cable corridor are however unavoidable.
- 1.3.39 During construction, the onshore cable corridor will significantly affect the landscape character and associated elements (treelines, woodland, hedges and scrub) of 4 Landscape Character Areas within the SDNP. These are:
- R1: South Downs Upper Coastal Plain;
  - B4: Angmering and Clapham Wooded Estate Downland;
  - A3: Arun to Adur Open Downs; and
  - J3: Arun to Adur Scarp Footslopes.
- 1.3.40 Table 1-3 of **Appendix 18.2: Viewpoint Analysis, Volume 4** of the ES [APP-168], includes 29 viewpoints within the SDNP of which 13 have been assessed as significant and are representative of views from a range of visual receptors including views experienced by people on roads, PRoW and in Open Access Land. Each of these receptor areas are assessed individually **Appendix 18.4: Visual Assessment, Volume 4** of the ES [APP-170]. They include effects on views and visual amenity experienced by people on parts of the A283, the South Downs Way, up to 24 PRoW, and Open Access Land at Sullington Hill and Barpham Hill.
- 1.3.41 The onshore cable corridor will not alter the geology or extent of landscape diversity as referenced in the detailed description for SQ1 (see **Annex 1**), but it will temporarily introduce a new and detracting feature to the landscape during the construction phase. The linear nature of the cable corridor has the ability to affect landscape character simultaneously and sequentially and from some elevated areas it will be visible extending into the distance and / or connected with offshore elements of the Proposed Development during construction. This is assessed as constituting a significant effect on part of SQ1. However, this effect during construction will be short term in duration and temporary in nature.
- 1.3.42 Temporary construction works along the onshore cable corridor will be completed in discrete sections, typically 600-1000m between joint bays, with progressive backfill and reinstatement commenced in the shortest timeframe as practical to shorten duration. The Applicant will provide a final Programme of Works as per Requirement 10 in the **Draft Development Consent Order [PEPD-009]** in this regard. The **Outline Code of Construction Practice [PEPD-033]** includes measures to minimise loss of vegetation during construction including notching of hedgerows and treelines rather than removing them across the whole width of the cable corridor. This measure is described further in commitment C-115 in Table 5-5 of the **Outline Code of Construction Practice [PEPD-033]**. Requirement 22 (5) of the **Draft Development Consent Order [PEPD-009]** requires submission of

stage specific CoCP in accordance with the **Outline Code of Construction Practice [PEPD-033]**. The **Outline Landscape and Ecology Management Plan [APP-232]** details the reinstatement measures and is secured by Requirement 12 and the commitment to maintenance and monitoring of landscaping for ten years after planting is secured by Requirement 13.

- 1.3.43 During operation significant effects will be of limited duration due to the replacement of specific landscape elements (mainly trees and hedges) and their growth and establishment (during Years 1-5) which will progressively reduce significant effects to non-significant levels. The nature of these effects will be noticeably different from the construction phase and relates to replacement planting within the setting of a reinstated onshore cable corridor. Some limited loss of tree cover replaced by smaller growing trees and shrubs over the cable corridor will constitute a permanent change. The effects will be limited to small sections of vegetation the landscape and visual effects of which will have a small geographical footprint.
- 1.3.44 In terms of the integrity of the SDNP, the short duration of the onshore effects and their largely reversible nature (in that the onshore cable corridor will be reinstated and vegetation replanted and maintained) demonstrates that the integrity will not be harmed. It is concluded that in relation to SQ1 the SDNP designation and statutory purpose would not be compromised as a result of the onshore cable route.
- 1.3.45 The whole project or inter-related effects from the combined SLVIA and LVIA would have a significant effect of limited duration (approximately 12 months when considering the overlap of the onshore construction works in the indicative construction programme). During operation, there will be significant SLVIA effects which will overlap with significant effects identified for LVIA during the early operational years as described in the paragraph above.

### **Special Quality 2. A rich variety of wildlife and habitats including rare and internationally important species**

- 1.3.46 The Proposed Development has considered special quality 2 (SQ2) in the consideration of alternatives presented in **Chapter 3: Alternatives, Volume 2** of the ES [APP-044] and the Ecological Impact Assessment (EclA) that is presented in **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES [APP-063] through the implementation of the mitigation hierarchy and the commitment to delivering biodiversity net gain (BNG).
- 1.3.47 Avoidance of key ecological features within the SDNP has been achieved through design. This has included avoidance of any direct land take from within European sites, Sites of Special Scientific Interest (SSSI), Local Wildlife Sites (LWS) or ancient woodland.
- 1.3.48 The Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site lies within the South Downs National Park and is approximately 4.8km from the proposed DCO Order Limits at the closest point. Potential indirect effects on this European site have been considered including securing that the Proposed Development will achieve water neutrality (see **Chapter 26: Water environment, Volume 2** of the ES [APP-066]) and potential



effects on designated features through construction within functionally linked land will not result in changes to the fitness of individual birds associated with the SPA and Ramsar site.

- 1.3.49 The Mens SAC also lies within the SDNP (approximately 11.2km from the draft Order Limits). A small area of the Proposed Development lies within 12km of this SAC, ensuring that potential effects on the designated feature (barbastelle bats) require consideration. The potential effects on The Mens SAC are considered within **Chapter 22: Terrestrial ecology and nature conservation, Volume 2** of the ES [APP-063] and the **Report to Inform the Appropriate Assessment [APP-038]**. Within the area of overlap all habitats that would be considered suitable for barbastelle bats have been avoided.
- 1.3.50 No SSSI within the South Downs National Park will be directly or indirectly effected by the proposed construction, operation or decommissioning of the Proposed Development.
- 1.3.51 The Warningcamp and New Down LWS has been avoided by the onshore cable route, following feedback from stakeholders including the SNDPA during the formal consultation process. This has included avoiding a potentially significant effect as described in paragraph 3.4.63 to 3.4.65 of **Chapter 3: Alternatives, Volume 2** of the ES [APP-044]. The Sullington Hill LWS has the level of potential effect minimised through the specification of a trenchless crossing underneath this area. Likewise, ancient woodland at Michelgrove is crossed by a trenchless crossing meaning that ground works (including tree felling and soil disturbance) are not required. These have been secured as TC-12 and TC-15 in Appendix A – Crossing Schedule of the **Outline Code of Construction Practice [PEPD-033]**.
- 1.3.52 The design has also minimised the amount of habitat within the SDNP shown on the Priority Habitat Inventory that will be subject to temporary or permanent loss. From the Priority Habitat Inventory approximately 0.1ha of deciduous woodland would be subject to loss, and three areas of good quality semi-improved grassland would be crossed (although it is noted that field survey has not identified these grassland fields as being of particular interest; noting that the Priority Habitats Inventory is not necessarily informed by field survey or up to date information). It is noted that native hedgerows are Habitats of Principle Importance that are not shown on the Priority Habitats Inventory but will be subject to temporary losses due to cable installation. However, the extent of losses has been minimised through the proposed use of a notching technique (as opposed to broader habitat removal), as described in paragraph 1.3.43 above. The option to use translocation of hedgerows is also being offered to further seek to minimise impacts. The application of this will be agreed on a hedgerow by hedgerow basis pre-construction.
- 1.3.53 The SDNP has been shown to support a range of legally protected and notable fauna including great crested newts, bats, badger and breeding birds. The embedded environmental measures within the **Outline Code of Construction Practice [PEPD-033]** provide the measures that ensure that any potential effects are avoided, minimised or mitigated to ensure both legal compliance and to avoid effects on the conservation status of local populations. For great crested newts see paragraphs 5.6.64 to 5.6.67, bats paragraphs 5.6.58 to 5.6.61, badger

paragraph 5.6.48 to 5.6.41 and breeding birds paragraph 5.6.70 to 5.6.72 of the **Outline Code of Construction Practice [PEPD-033]**.

- 1.3.54 Although it is not possible to avoid all impacts associated with the construction of the onshore cable route the loss of habitat has been minimised with focus of temporary land take being within habitats considered generally to be of lower biodiversity value, namely intensively managed arable fields and pasture.
- 1.3.55 It is acknowledged by the Applicant that during and following construction there will be residual effects (though not significant) on the habitats and species within the construction area. To ensure an overall positive outcome to the biodiversity of the SDNP all temporary habitat loss will be reinstated within two years of the loss occurring (see **Outline Landscape and Ecology Management Plan [APP-232]**, secured by Requirement 12 of the **Draft Development Consent Order [PEPD-009]**), trees removed will be replaced in greater numbers (see **Appendix 22.16: Arboricultural Impact Assessment, Volume 4** of the ES **[APP-194]** which is to be added to the **Outline Landscape and Ecology Management Plan [APP-232]** for Deadline 3) and an overall biodiversity net gain (BNG) will be delivered following the system implemented by the Department for Environment, Food and Rural Affairs (Defra) and Natural England (see **Appendix 22.15: Biodiversity Net Gain Information, Volume 4** of the ES **[APP-193]**, secured by Requirement 14 of the **Draft Development Consent Order [PEPD-009]**). This BNG will be front-loaded to ensure that new habitats are being created or existing habitats enhanced prior to and during the construction phase. The Applicant is seeking to work proactively with SDNPA to identify strategic habitat creation projects that they would see priorities for investment.
- 1.3.56 In conclusion, the Proposed Development will not result in a loss of integrity of designated sites or the ecological features they support. Measures in place minimise the loss of habitats of principal importance and provides for their restoration. The Proposed Development does not threaten the conservation status of local populations of legally protected or notable flora and fauna. Despite short term negative effects, the medium to long term outcomes will be greater extents of habitats being managed for the benefit of nature conservation.
- 1.3.57 It is also notable that the Proposed Development occupies a relatively small area of the SDNP overall, whereas many of the habitats and local populations of species occupy much greater areas. This means that localised effects are less likely to result in a change in the favourable conservation status of a habitat type or local population of a legally protected or notable species. There are no predicted significant effects on ecology associated with the Proposed Development following the application of the mitigation hierarchy and the embedded environmental measures. In conclusion, SQ2 regarding biodiversity will not be harmed.

### **Special Quality 3. Tranquil and unspoilt places**

*Offshore elements of the Proposed Development: Offshore array*

- 1.3.58 **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]** (Table 15-32) assesses the effects on the tranquillity aspects

of special quality 3 (SQ3), noting that the offshore elements of Rampion 2 will form an intervention in the distant, but not immediate, seascape setting of the coastal landscapes of the SDNP, extending the existing wind farm development influence in the offshore waters of Sussex Bay. The visual movement of the rotor blades incorporates a kinetic element into an already dynamic seascape. The relatively slow visual movement of the WTG rotors, the WTG scale and long distance offshore reduces the potential changes in perceived tranquillity. A material sense of unrest/disturbance of calmness and quietude would not be induced by this slow and consistent visual movement, especially at such distance outside the SDNP.

- 1.3.59 In many areas of the SDNP, the landscape lacks intrusive development and includes relatively ‘unspoilt places’. These are however, *‘not characteristics that apply uniformly across the National Park’* (SDNPA, 2017). Some areas are more tranquil than others, dependent on a number of influences. Areas of relative tranquillity are mapped within the SDNP in Appendix 1 of the SDNPA Tranquillity Study (2017). Areas of lowest tranquillity are often located within or on the edge of urban areas, particularly along the southern edges of the SDNP, or along major transport routes. Areas of intermediate tranquillity are frequent and include the lower slopes around the ‘core’ areas, their southern dip slopes, upper coastal plain and the upper valley sides. Areas of highest tranquillity are consistently the tops of the chalk downs along the whale backed spine of the SDNP, but particularly the Wooded Estate Downland LCAs (B1 and B2); the tops of the Open Downs LCAs (A1, A2 and A3); and the cliff tops of the SDNP coastline and pockets between Beachy Head and Cuckmere Haven. The inland ‘core’ areas of the downs are recorded as having higher tranquillity, in general, than the coastal parts of the SDNP within the Sussex Heritage Coast.
- 1.3.60 The inland ‘core’ areas formed by the tops of the chalk downs of the SDNP, which experience highest levels of relative tranquillity, are separated from the seascape by large and almost contiguous urbanised areas of the south coast plain. The magnitude of change to the ‘tranquil and unspoilt places’ of the inland ‘core’ areas formed by the tops of the chalk downs of the SDNP resulting from the Operation and Maintenance of the offshore elements of Rampion 2 is assessed in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]** (Table 15-32) as medium-low resulting in Not Significant (Moderate), direct, long-term and reversible effects.
- 1.3.61 Rampion 2 will introduce some changes to the tranquillity experienced in sea views, as an array of additional built/modern elements, which interrupt and define a further presence or limit on the aspect out to sea through the apparent height, spread and movement of the WTGs rotor blades. On balance however, changes of medium-low magnitude and Not Significant (moderate) effects are also assessed as occurring on the SDNP special quality of ‘Tranquil and unspoilt places’ from the coastal parts of the SDNP within the Sussex Heritage Coast, including pockets of more remote sections of elevated chalk downs and discrete shoreline locations at the coastal edge.
- 1.3.62 The influence on the experience of tranquillity and ‘unspoilt’ place is diminished by the combination of the distance of Rampion 2 array area and the apparent influence of human activity, man-made features and development in the intervening south coast urban area. The changes do not affect the strength of the tranquillity perceived within the SDNP to the degree that the qualities are

compromised and are considered not significant. A sense of tranquillity will remain, as the array area would not over-ride the existing naturalistic elements in the landscape, nor its open space and extensive sea views. The ‘feeling of peace and space’ referred to in this special quality will also be retained.

- 1.3.63 The offshore elements of Rampion 2 also have potential to affect the ability to experience dark night skies, which are referred to in SQ 3 and are assessed separately in **Appendix 15.5: Assessment of aviation and navigation lighting, Volume 4** of the ES [APP-161] and summarised in Section 15.10 of this SLVIA. With regards the ‘dark night skies’ referred to in SQ3 and the potential effects on tranquillity from night time light from the WTGs, the South Downs International Dark Sky Reserve (IDSR) ‘Dark Sky Core’ and area of ‘Intrinsic Rural Darkness’ represent the areas ‘around the tops of the downs’ where dark night skies may be experienced and tranquillity is greatest at night.
- 1.3.64 The majority of the Dark Sky Core and Areas of Intrinsic Rural Darkness of the South Downs IDSR have no visibility of the Rampion 2 aviation lights, as illustrated in the ZTV in Figure 15-25 of **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 2 of 8), Volume 3** of the ES [APP-089]. The tranquillity of the large majority of the geographic area of the Dark Sky Core will therefore not be affected by visibility of the aviation lights at night.
- 1.3.65 The visual effects of the lighting of Rampion 2 at night are restricted to the elevated tops of the wooded downlands and open downs, and the visual effects at night from these areas have been assessed from representative viewpoints at dark skies discovery sites and have been found to be not significant (**Appendix 15.5: Assessment of aviation and navigation lighting, Volume 4** of the ES [APP-161]).
- 1.3.66 The elevated tops of the wooded downlands and open downs that experience highest levels of relative tranquillity (and darkness) at night, are separated from the seascape by large and almost contiguous urbanised areas of the south coast plain that are extensively lit at night. Views invariably encompass extensive lighting of settlement and urban development on the coastal plain, with the seascape extending beyond, which includes lighting of the existing Rampion 1 Wind Farm.
- 1.3.67 The majority of the coastal plain and urban coastal strip that is situated between the South Downs and Rampion 2, extending between Bognor Regis, Worthing, Brighton and Seaford has high levels of light pollution at night, at the highest light-influenced end of the spectrum in Figure 15-11 of **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3** of the ES [APP-088]. The dark landscape of the core downs of the SDNP are set-back and separated from the seascape by the existing night-time lighting of the intervening urbanised coastal strip, which disrupts the dark landscape continuity between the majority of the SDNP and the seascape.
- 1.3.68 There are opportunities to experience tranquillity at night within the core areas of the tops of the downs, which are relatively ‘undisturbed’ and ‘most tranquil’ at night despite the presence of lighting largely outside the SDNP. This will continue to be the case with the addition of the visible lighting of Rampion 2. Simply seeing the lighting of Rampion 2 in the distance would not be sufficient to negate

opportunities to experience tranquillity at night within the Dark Sky Core and Intrinsic Areas of Rural Darkness of the SDNP.

- 1.3.69 Perceptions of tranquillity gained from the darkness and views of the night sky will be retained despite the changes arising from the lighting of Rampion 2. The lighting of Rampion 2 will be low to the horizon and will not extend high into the sky, with little influence on the views above to dark skies and stars in the night-sky, which will continue to be visible and unimpeded in the skies above the viewer.
- 1.3.70 The lighting of Rampion 2 will not result in obtrusive light that impedes opportunities to experience tranquillity, nor result in brightening of the night sky (skyglow) and would therefore not be of detriment to the overall experience of tranquillity gained from the night skies in these areas.
- 1.3.71 The tranquillity that may be experienced through a continuity between the dark landscape of the downs below and the dark skies above is already interrupted by urban lighting along the coast and the proposed Rampion 2 WTG lighting will have little influence on this ‘continuity’ of darkness, which is already fundamentally interrupted by the urban lighting, and to a lesser extent the discernible Rampion 1 WTG lighting beyond. The view of the dark skies above will continue to be predominately affected by skyglow from the lighting within the intervening urban environment, rather than the additional influence of the Rampion 2 aviation and marine navigational lighting and the overall experience of tranquillity gained from the experience of dark night skies will be retained.
- 1.3.72 Overall, the magnitude of change at night to the ‘tranquil and unspoilt places’ of the inland ‘core’ areas formed by the tops of the downs of the SDNP resulting from the lighting of the offshore elements of Rampion 2 is assessed as medium-low resulting in Not Significant (Moderate), direct, long-term and reversible effects. The influence on the experience of tranquillity and ‘unspoilt’ place is diminished by the combination of the distance of the lighting of the Rampion 2 array area, such that its intensity is reduced, and the apparent influence of lighting in the intervening coastal plain and south coast urban area. Fundamentally areas of dark night skies within the SDNP referred to in Special Quality 3 will be retained.

#### *Onshore elements of the Proposed Development*

- 1.3.73 SQ3 refers to the “*sense of tranquillity*” which relates to areas of the landscape that have a “*timeless quality, largely lacking intrusive development and retaining areas of dark night skies*”. Tranquillity is a perceptual quality that is influenced by both visual and audible effects which have involved both LVIA and noise assessments.
- 1.3.74 Mitigation measures referred to in relation to SQ1 also apply to the assessment of SQ3.
- 1.3.75 The effects on the onshore landscape resource and visual amenity are reported in **Chapter 18: Landscape and visual impact, Volume 2** of the ES [APP-059], drawing from the assessment of the effects on the special qualities of the SDNP and their setting which are assessed in **Appendix 18.3: Landscape assessment, Volume 4** of the ES [APP-169].
- 1.3.76 The perception of tranquillity across the SDNP is variable as indicated in Appendix 1, of the SDNPA Tranquillity Study (2017). Considering the Study Area for the

LVIA, the areas with the lowest tranquillity tend to follow main transport routes and the edges of the SDNP and the areas of highest tranquillity related to areas of ancient woodland and chalk grassland. The landscape assessment identifies significant effects on four LCAs within the SDNP including the R1: South Downs Upper Coastal Plain; the B4: Angmering and Clapham Wooded Estate Downland the A3: Arun to Adur Open Downs and the J3: Arun to Adur Scarp Footslopes. Many of the viewpoints illustrate intermittent visibility of the onshore cable corridor through the landscape and the effects of construction noise will ensure that effects on perceived tranquillity will extend to areas where the onshore cable corridor may be screened by landform or vegetation. This will significantly affect the receptor experience from a number of PRow and areas of Open Access Land.

- 1.3.77 The geographical extent of these effects will be contained within one or two field boundaries (approximately 250m of the onshore cable corridor) due to the screening effects of existing trees, woodland and hedgerows and extend further (from approximately 650m of the onshore cable corridor when viewed from hill tops and open areas within the A3: Arun to Adur Open Downs LCA.
- 1.3.78 During operation there will be no significant residual effects on perceived tranquillity and SQ3 due to the reinstatement of the cable corridor and cessation of construction works.
- 1.3.79 **Chapter 21: Noise and vibration, Volume 2** of the ES **[PEPD-018]** assesses the noise effects during construction. In particular, the following areas of construction activity are noted:
- The impact of the Washington Temporary Construction Compound which is in close proximity to the SDNP border and is expected to be in place for the duration of construction. This compound is located next to the A283, where the tranquillity is relatively low as reflected on the South Downs National Park Tranquillity Study (SDNPA, 2017). The noise impact at this location is concluded to be not significant due to the low magnitude of impact, the temporary nature and the existing low tranquillity in this location;
  - The ES also assesses presence of the trenchless crossings, including those at Michelgrove (TC-12) and Sullington Hill (TC-15), are in areas of higher tranquillity near Public Rights of Way and Open Access Land at Sullington Hill and therefore high sensitivity in the assessment. This will include periods of continuous working while crossings are undertaken and it is acknowledged this will temporarily affect tranquillity in these locations. The **Outline Code of Construction Practice [PEPD-033]** includes commitment to mitigation of noise including trenchless crossings (C-26 in Table 5-3) with detail secured via Requirement 22 (5) (h) of the **Draft Development Consent Order [PEPD-009]**. With this considered and the short term duration of such works taken into account the ES concludes these are not significant effects.
  - Access routes from access A-26 and A-28 cross the areas of higher tranquillity too and are assigned high sensitivity for noise and vibration. While it is predicted that there will be some impact from the use of the access, the assessment does not identify significant effects at receptors on these routes when considered against the criteria provided in the assessment.

- 1.3.80 SQ3 also refers to dark skies and the SDNP is also an International Dark Sky Reserve. The effects of construction lights have taken account of embedded mitigation measures that accord with the recommendations of the SDNP Local Plan Policy SD8: Dark Night Skies.
- 1.3.81 The effects of construction lights been considered as part of **Appendix 18.2: Viewpoint Analysis, Volume 4** of the ES [APP 168] and from some visual receptors **Appendix 18.4: Visual Assessment, Volume 4** of the ES [APP 170]. Drawing from this information, ‘dark skies’ were considered as part of the assessment of SDNP SQ3 in **Appendix 18.4: Landscape Assessment, Volume 4** of the ES [APP 169] – Noting that there would be *no effect* on the South Downs International Dark Sky Reserve and no significant effects on ‘dark skies’ within the SDNP.
- 1.3.82 This conclusion was based on the fact that *none* of the Dark Skies Discovery Sites or core areas of the Dark Sky Reserve are located within the LVIA Study Area (see Figure 15.12 [APP 088]). The nearest of these being located *beyond 10km distance* from the DCO boundary. The cable corridor is however routed through the “*E1a - 2km Buffer Zone & Intrinsic Rural Darkness*” area and as such the recommendations of the SDNP Local Plan Policy SD8: Dark Night Skies have been followed through the commitment measures.
- 1.3.83 The SDNP Local Plan Policy SD8: Dark Night Skies includes specific lighting requirements for developers (SDNPA, 2019). – “*Wherever possible new development will be required to avoid installing lighting. If new lighting is unavoidable steps must be taken to avoid its impacts on our dark night skies by making sure that it’s properly designed, taking into consideration direction of lighting and number of lumens emitted. If that is not possible, adverse impacts of lighting will be required to be mitigated – for example, by installing timing restrictions and making sure that the light emitted is of a colour that won’t disturb wildlife.*”
- 1.3.84 Therefore, the focus has been on the embedded environmental measures including C-200 in the **Commitment Register [APP 254]** (updated at Deadline 1) and secured in Section 4.5 of the **Outline Code of Construction Practice [APP 224]** with further details to be provided in the stage specific CoCP to be provided as per Requirement 22 of the **Draft Development Consent Order [PEPD-009]**. This requires that construction lighting (where required) will be limited to directional task lighting positioned to minimise glare and nuisance to residents and walkers within the SDNP and informed by British Standard (BS) EN 12464-2:2014 Lighting of outdoor workplaces (British Standards Institution (BSI), 2014) and guidance provided by the Chartered Institution of Building Services Engineers (CIBSE), Society of Light and Lighting, The Bat Conservation Trust and the Institution of Lighting Professionals.
- 1.3.85 In summary, the assessment finds that the onshore elements of the Proposed Development will have a significant effect on the perceptions of tranquillity within the SDNP during the construction period. The effects of construction lighting will be mitigated to accord with SDNP Local Plan Policy SD8. The short duration, temporary and reversible nature of these effects will ensure that the integrity of the SDNP will not be adversely or significantly affected. It is concluded that in

relation to SQ3 the SDNP designation and statutory purpose would not be compromised as a result of the onshore cable route.

- 1.3.86 The whole project or inter-related effects from the combined SLVIA, LVIA and noise assessments would have a limited duration (approximately 12 months due to the overlap of the indicative construction programme). The SLVIA reports that the effects on tranquillity and dark skies resulting from the offshore elements will not be significant, although they will be long-term and reversible.

#### **Special Quality 4. An environment shaped by centuries of farming and embracing new enterprise**

- 1.3.87 The effects on farming within the SDNP are assessed in **Chapter 20: Soils and agriculture, Volume 2** of the ES [APP-061]. The soils and agriculture assessment focuses on likely significant effects on soil resources and functions; agricultural land resources; and financial impact on farming businesses.
- 1.3.88 Within the SDNP, the soils are mainly shallow over chalk, with deeper soils in dry valleys. The SDNP has a mixture of arable and livestock farms with woodland plantation.
- 1.3.89 The nature of the onshore elements of the Proposed Development are such that following construction, the majority of the soils and agricultural land within the proposed DCO Order limits will be restored to baseline condition (except for where access manholes are required to the subsurface joint bays). During the operation and maintenance phase there will be minimal change to the current land use. The undergrounding of the onshore cable route (as secured in Works No. 9a of the **Draft Development Consent Order [PEPD-009]**) allows the original soils to be replaced on top of the buried cables, the topsoil can be returned to its original state and agricultural land returned to its original grade. The permanent best and most versatile agricultural land loss is primarily linked to the location of the onshore substation, which is located outside of the SDNP. No significant effects have been identified on soil and agricultural land receptors during the construction, operation and maintenance, and decommissioning phase in **Chapter 20: Soils and agriculture, Volume 2** of the ES [APP-061].
- 1.3.90 The **Outline Soils Management Plan (SMP) [APP-226]** provides the embedded environmental measures to manage the impact on soil resources for the onshore element of the Proposed Development. This is secured in Requirement 22 (5) (f) of the **Draft Development Consent Order [PEPD-009]**. The **Outline SMP [APP-226]** includes information on soil types, the baseline agricultural land quality and the further surveys required prior to construction. It also includes the embedded environmental measures including soil handling techniques, timing and any remediation measures to manage impacts on soil resources arising during the construction of the Proposed Development.
- 1.3.91 The **Outline SMP [APP-226]** and (commitment C-183 in the **Commitments Register [APP-254]** updated at Deadline 1) also commit Rampion 2 to full soil and ALC Survey coverage within the proposed DCO Order Limits during pre-construction so that measures to be included in the stage specific SMP can be defined during pre-construction for all soil types and all agricultural land grades present. The stage specific SMPs will be produced in accordance with the **Outline**



**SMP [APP-226]** for approval of the relevant planning authority as part of the stage specific Code of Construction Practice secured through Requirement 22 of the **Draft Development Consent Order [PEPD-009]**.

- 1.3.92 Soils in the proposed DCO Order Limits within the SDNP have not been surveyed to date. Parts of the SDNP were historically used for military training as the South Downs Training Area (SDTA) and as a result there are moderate to high unexploded ordnance (UXO) hazard zones within the SDNP which are coincident with the proposed DCO Order Limits. The required actions to mitigate the UXO risk sufficiently in these areas to enable Soil and Agricultural Land Classification (ALC) Survey, and other pre-construction surveys, to proceed will involve a combination of non-intrusive survey and intrusive survey to identify whether avoidance, investigation or removal/clearance of anomalies is needed before other surveys/other works can progress. Once sufficient UXO clearance is completed, the Soil and ALC Survey will be completed for all areas within the proposed DCO Order Limits and the stage specific SMP will include any new measures or amend existing measures to protect soils within the SDNP. This will be completed during pre-construction.
- 1.3.93 Given the likely presence of shallow silty soils over chalk within the SDNP/former SDTA, the **Outline SMP [APP-226]** includes specific measures for these soils. These include suitable seeding of soil stockpiles, to be confirmed by an ecologist, and measures to protect excavated chalk to assist with returning the soil drainage conditions to baseline following reinstatement.
- 1.3.94 With regard to farming businesses, **Chapter 20: Soils and agriculture, Volume 2** of the ES **[APP-061]** assesses that the Proposed Development has no significant effects on the farming economy but likely significant effects arise at the level of individual farms and diversified farm-based businesses. These show a wide variety of circumstances and exposure to the impacts of the Proposed Development. However, there are a range of mitigations available in the local area due to the large markets and potential for substitutability. In addition, financial compensation provides a mechanism which mitigates individual effects so the residual significance overall is 'Not significant'.
- 1.3.95 Given the findings of the ES in relation to the soils and agriculture assessment, there will not be any harm on special quality 4 of the SDNP.

## **Special Quality 5. Great opportunities for recreational activities and learning experiences**

- 1.3.96 **Chapter 17: Socio-economics, Volume 2** of the ES **[APP-058]** considers the effect on enjoyment and access to recreation in SDNP. The chapter states that *"...it has been noted in the ES that a number of routes within the South Downs National Park will be subject to temporary closure and other potential impacts upon their recreational users. These potential impacts have been considered and assessed on a path-by-path basis, along with assessments of areas of access land, commons and other publicly accessible open space. Particular weight has been given to promoted routes such as the South Downs Way and the Monarch's Way."*

- 1.3.97 No Public Rights of Way (PRoW) will be permanently closed, and a range of mitigation measures are detailed in Table 17-19 of **Chapter 17: Socio-economics, Volume 2** of the ES [APP-058]. This includes the management measures that are in the **Outline Public Rights of Way Management Plan [APP-230]**, secured by Requirement 20 in the **Draft Development Consent Order [PEPD-009]**. For the majority of paths and other recreational assets assessed in the ES significant effects were not identified with these measures in place. This includes the users of open access land and within the SDNP (OAL1 shown on Sheets 1 and 2 of the **Open Access Land Plan [APP-014]** and the concentration of ‘open country’ access land along the northern border of the Downs (described in paragraph 17.6.62 of **Chapter 17: Socio-economics, Volume 2** of the ES) [APP-058]
- 1.3.98
- 1.3.99 However significant (moderate/major) effects were found on Restricted Byway 2092 and 2693 which forms a section of the South Downs Way at Sullington Hill in the SDNP. The assessment recognises the very high sensitivity of this location. The **Access, Rights of Way and Streets Plan [APP-012]** Sheets 15 and 19 show the temporary closure and indicative diversion of these sections. The **Outline Public Rights of Way Management Plan [APP-230]** includes a commitment (C-121) to manage in a way that minimises the closure or diversion. This is secured by Requirement 20 (1) (b) in the **Draft Development Consent Order [PEPD-009]** which includes for provision of “a diversion and closure scheme which is to include a programme for the temporary closure and re-opening of the National Trail comprising – (i) a plan for the sequencing of construction of the connection works; (ii) the management of any alternative routes during the temporary closure; and (iii) the re-opening of the National Trail upon the cessation of that part of the authorised development requiring the temporary closure of the National Trail.”
- 1.3.100 When the effects from the Proposed Development on recreational assets are considered in the overall scale of the special quality number 5 of the SDNP, the overall impact on opportunities for recreational activities and learning experiences is negligible. This is because no paths will be permanently closed, diversions will be in place for temporary path closures with the effects experienced by users representing a small portion of the overall experience they have in the SDNP.
- 1.3.101 No significant socio-economic effects have been found on museums, churches, historic houses, outdoor education centres and wildlife reserves (places which provide both enjoyment and learning) in the assessment contained in **Chapter 17: Socio-economics, Volume 2** of the ES [APP-058]. Effects on the volume and value of visitors are also not significant and therefore any impact on the quantity of visitors to the SDNP engaging in recreation and learning activities would be negligible. In fact, the Proposed Development may offer further learning experiences by encouraging the general public to learn more about the need for renewable energy sources and the measures needed to address climate change. In addition, the Proposed Development will provide employment and skills opportunities (secured in the **Outline Skills and Employment Strategy [APP-256]** under Requirement 33 of the **Draft Development Consent Order [PEPD-009]**).

- 1.3.102 Further assessment of the effects on the views and visual amenity experienced by people on PRowWs, including the South Downs Way, open access land and at other recreational / visitor attraction locations are set out in [Appendix 18.4: Visual Assessment, Volume 4](#) of the ES [APP-169].
- 1.3.103 In summary, the assessment finds that the onshore elements of the Proposed Development will not cause harm to SQ 5 “*Great opportunities for recreational activities*”. Although a significant effect is identified during construction on the South Downs Way, this is temporary and the resource within the SDNP will not be significantly diminished or affected and the overall opportunities for recreational activities and learning experiences in the SDNP will remain.

## Special Quality 6. Well conserved historical features and a rich cultural heritage

- 1.3.104 SQ6 is evidenced by a wide range of well-preserved features including bronze age barrows, iron age hill forts, medieval churches, dew ponds and historic houses and the pattern of field boundaries partly reflecting former farming practices. There are scheduled monuments of national importance within the SDNP, and these are located within wider Archaeological Notification Areas (ANAs), which cover extensive areas across the SDNP.
- 1.3.105 The location and extent of known heritage assets has informed the scheme design, with adopted measures to avoid scheduled monuments and to carefully consider effects on known and potential archaeological remains in the refinement of the design.
- 1.3.106 The methodology for establishing the historic environment baseline for the scheme is set out in Section 25.6 of [Chapter 25: Historic environment, Volume 2](#) of the ES [PEPD-020]. A comprehensive suite of documents supporting [Chapter 25: Historic environment, Volume 2](#) of the ES [PEPD-020] was submitted within the ES. These documents set out the historic environment baseline, including that which is relevant to the section of the route passing through the SDNP. Those relevant to the SDNP include:
- [Appendix 25.1 Gazetteer of onshore heritage assets, Volume 4](#) of the ES [APP-199], which lists heritage assets and records within the proposed DCO Order Limits and Study Areas;
  - [Appendix 25.2 Onshore historic environment desk study, Volume 4](#) of the ES [APP-200 and APP-201]. The baseline within this document was established using a landscape approach which identifies different landscape zones within which the scheme crosses. Document sections which relate to *Zone 2: South Downs* are of primary relevance to the SDNP;
  - [Appendix 25.3: Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4](#) of the ES [APP-202]. Whilst this document covers the whole scheme, Landscape Subzones 2 and 2a are of primary relevance to the SDNP;
  - [Appendix 25.4: Onshore geophysical survey report, Volume 4](#) of the ES [PEPD-031 and PEPD-113 to PEP-119]. The geophysical survey results are

reported according to fields numbers organised from south to north along the scheme. Fields 50 to 117 and 121 to 130 fall within the SDNP;

- **Appendix 25.7: Settings scoping appraisal, Volume 4** of the ES **[APP-213]** details the approach to identifying heritage assets for inclusion in the assessment of indirect effects, including those within the SDNP, and sets out the results of this scoping exercise; and
- **Appendix 25.8: Onshore heritage asset baseline, Volume 4** of the ES **[APP-214]** provides baseline information for assets scoped into the assessment of effects resulting from change to setting.

1.3.107 **Chapter 25: Historic environment, Volume 2** of the ES **[PEPD020]** provides a summary of the overall baseline and the assessment of historic environment effects. Where information is presented according to landscape zones, *Zone 2: South Downs* are of primary relevance to the SDNP.

1.3.108 Whilst the design process has sought to avoid or minimise impacts to heritage assets, the scheme passes through three ANAs within the SDNP. These relate to multiperiod features within this landscape and the wider areas outside the Order Limits include numerous scheduled monuments (as described in **Appendix 25.2: Onshore historic environment desk study, Volume 4** of the ES **[APP-200 and APP-201]**). The Applicant notes that a number of routes were considered through the SDNP, each of the alternative routes presented pass through Archaeological Notification Areas (ANAs) with potential or known archaeological remains of high heritage significance. Based on the available historic environment evidence, when comparing the environmental effects or policy outcomes during the decision-making process, there was no material difference for each route for archaeology. Further detail is provided in **Chapter 3: Alternatives, Volume 2** of the ES **[APP-075]** paragraphs 3.4.60 to 3.4.67 and provides further description and summary of the evolution of the design in this area.

1.3.109 The ES (**Chapter 25: Historic environment, Volume 2** of the ES **[PEPD-020]**) identifies the potential for the presence of archaeological remains within proposed the DCO Order Limits where it crosses the South Downs, including those of national (high) significance. The assessment identifies residual significant effects through loss of or disturbance to archaeological remains within the SDNP, including:

- Remains associated with Neolithic flint mining and mortuary activity;
- Remains associated with Neolithic settlement;
- Remains of Bronze Age date, including potential for settlement features, associated field systems and cross dykes; and
- Early medieval mortuary remains and settlement.

1.3.110 The assessment also identifies residual significant effects through change to setting of heritage assets within the SDNP, including:

- Scheduled monument Prehistoric flint mine and a Martin Down style enclosure on Harrow hill, 850m south east of Lee Farm (NHLE 1015239).

- 1.3.111 A programme of further evaluation to be undertaken prior to construction is described within the **Outline Onshore Written Scheme of Investigation [APP-231]**. Where appropriate, further evaluation options within the SDNP include geoarchaeological boreholes, geophysical survey and an extensive programme of trial trenching, as well as fieldwalking and test pitting. The scope of evaluation phase of works will be set out in site specific written schemes of investigation, to be provided for approval of the relevant planning authority in consultation with West Sussex County Council as per **Draft Development Consent Order [PEPD-009]** Requirement 19.
- 1.3.112 Embedded environmental measure C-225 set out a commitment to use engineering solutions in addition to measures already taken within the design process, to minimise impacts to previously unknown archaeological remains of high heritage significance along the cable route. Following a meeting on 27 October 2023 with West Sussex County Council (WSSCC) Archaeologist, commitment C-225 has been updated by the Applicant within the **Outline Code of Construction Practice [PEPD-033]** (submitted at the Pre-Examination Procedural Deadline A on 16 February 2024) and the **Commitments Register [APP-254]** (updated at the Deadline 1 submission) to the following:
- 1.3.113 C-225 states: *“Where previously unknown archaeological remains of high heritage significance are identified through surveys along the cable route, and where these locations have not been possible to avoid during earlier design stage, consideration will be made for engineering solutions (e.g. narrowing of the construction corridor, **divert cable route within DCO Order Limits, re-siting stockpiles**) to **avoid impacts in the first instance** ~~minimise direct impacts~~. Where impacts are not avoidable, **these will be minimised where possible through design solutions and an appropriate programme of mitigation will be undertaken to ensure preservation by record. Such measures will be reviewed in consultation with relevant stakeholders (WSSCC Archaeologist and Historic England). An onshore outline WSI provides detail of appropriate methodologies to be implemented during the evaluation and mitigation stages of the archaeological works.**”*
- 1.3.114 Flexibility has been sought in the width of the Order Limits where it passes west and north of Blackpatch Hill within the area of high archaeological potential and sensitivity to allow the detailed design to take account of further archaeological evaluation to inform the location of the final onshore cable corridor. This provides the potential to avoid areas of archaeological remains identified during further survey work. Options include:
- Avoidance of remains by locating the standard 40m working width of the onshore cable corridor within the Order Limits of approximately 100m width;
  - Avoidance by further reducing the working width to approximately 20m by relocating soil storage areas; and
  - Minimising trench depth over deeper remains to avoid impacts.
- 1.3.115 In line with the requirements of NPS EN-1 paragraph 5.8.20 (DECC, 2011a) (paragraph 5.9.17 of revised NPS EN-1 (DESNZ, 2023a) which came into force in 2024), where it is not possible or appropriate to avoid disturbance to archaeological remains then the **Outline Onshore Written Scheme of Investigation [APP-231]** provides for a programme of archaeological

investigation, recording, reporting, archiving, outreach and dissemination of the results. This would have the effect of partially mitigating any loss of archaeological interest. The measures are secured by Requirement 19 (Onshore Archaeology) of the **Draft Development Consent Order [PEPD-009]** for site specific written schemes of investigation, which are to accord with the outline document submitted with the application. The approach and methods in the Outline Onshore Written Scheme of Investigation have been drafted to reflect the survey and assessment work completed to date and reflect the statutory consultation and engagement with relevant stakeholders.

- 1.3.116 In summary, the ES has identified a significant residual effect (which in policy terms is identified to be less than substantial harm) on heritage assets within the SDNP related to the construction of the onshore cable route. These assets contribute to SQ6 however the Applicant considers this does not constitute harm to this SQ. The established design and embedded environmental measures, set out an approach to avoid and/or minimise the effects on these heritage assets, through a strategy of evaluation and mitigation (both avoidance through engineering solutions and investigation and recording).

## **Special Quality 7. Distinctive towns and villages, and communities with real pride in their area**

- 1.3.117 The Applicant has assessed special quality 7 (SQ7) in the assessment of effects from the offshore array area on the special qualities of the SDNP in **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]**.
- 1.3.118 **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]** outlines that the market towns of Lewes, Petersfield and Midhurst; and the villages of Selborne, Charlton and Alfriston, are described as part of the baseline special qualities. Although these settlements are located within the SDNP, all of these towns and villages are outside the ZTV (Figure 15.20 in **Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 2 of 8), Volume 3** of the ES **[APP-089]**) with no visibility of the offshore elements of Rampion 2, which results in zero change and no effect on the character and appearance of these towns and villages in the SDNP, which derives in large part from the distinctive local building materials and their setting in the landscape, which will not be affected.
- 1.3.119 **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the ES **[APP-056]** outlines that of all the towns and villages located within the SDNP, only Brighton and Hove has been scoped into the assessment as requiring detailed assessment of the potential significant effects resulting from the offshore elements of Rampion 2. The City of Brighton and Hove includes areas within the SDNP, at the coast between Brighton and Rottingdean (Viewpoint 7, Figure 15.32a-f in **Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3** of the ES **[APP-091]**), and around its inland backdrop including Falmer Downs, Stanmer Park, Hollingbury Hill (Viewpoint 27, Figure 15.50a-h in **Chapter 15 Seascape, landscape and visual impact assessment - Figures (Part 6 of 8), Volume 3** of the ES **[APP-093]**) and the open downs to the south of Devils Dyke.

- 1.3.120 Although the magnitude of change to views from these areas within the city and SDNP, has been assessed as high and effects on views significant (major), the assessment concludes that the visual effects are not considered to directly translate to significant effects on the distinctiveness of Brighton and Hove that is experienced, or the pride of this community in its area, which are assessed as experiencing low change and not significant (moderate/minor) effects.
- 1.3.121 The assessment concludes that the distinctive city and townscape of Brighton and Hove would not be affected by the offshore elements of Rampion 2, only the views from certain, mainly coastal, parts of it. The distinctive views towards the settlement from the elevated edges of the SDNP will also be affected by the increased influence of larger scale and spread of WTGs in its seascape backdrop to the city, however the City of Brighton and Hove and its townscape would still remain distinctive in these views and a source of pride for people living in the area. The wider setting of the city at the edges of the open downs of the SDNP will also be retained and is not affected by the presence of additional development offshore.
- 1.3.122 In terms of the onshore elements of the Proposed Development, route selection of the onshore cable corridor has resulted in the removal of significant effects on up to five settlements and SQ7, identified at PEIR.
- 1.3.123 Consequently, the effects on the onshore landscape resource and visual amenity is set out in **Chapter 18: Landscape and visual impact, Volume 2** of the ES **[APP-059]**. **Appendix 18.4: Visual assessment, Volume 4** of the ES **[APP-170]** sets out the visual effects of the onshore cable corridor (including trenchless crossing construction compounds, temporary construction compounds at Washington and temporary construction access routes) on settlements, transport routes, recreational routes, and recreational and tourist destinations. Washington (including Washington recreation Ground, allotments and village green) is the only settlement within the SDNP scoped in for assessment. This is because there will be negligible to zero/no visibility of the onshore cable corridor from other settlements beyond the LVIA Study Area due to onshore cable route changes and the screening effects of intervening vegetation, built form and/or landform. **Chapter 3: Alternatives, Volume 2** of the ES **[APP-075]** Section 3.4 provides further description and summary of the evolution of the design.
- 1.3.124 The assessment outlines that the onshore cable corridor is routed to pass through the fields and playing field to the north of Washington and will be underground as illustrated by Viewpoint H (Figure 18.31 in **Chapter 18 Landscape and visual impact assessment – Figures (Part 3 of 6), Volume 3** of the ES **[APP-100]**). Views of the cable corridor further to the west will be screened by mature woodland along the A24 and to the east and northeast by mature woodland along the A283 and layers of successive intervening hedgerows and trees. Viewpoint H1 (Figure 18.32 in **Chapter 18 Landscape and visual impact assessment – Figures (Part 3 of 6), Volume 3** of the ES **[APP-100]**) is located at the road junction with the A283 to the north-east, just beyond the village entrance sign, the Washington construction compound would be significantly visible at close range on the other side of the A283, beyond trees. However, it is noted that this view is not representative of views from the settlement which is located further to the south beyond trees. The assessment concludes that, due to the long section of trenchless crossing and intervening mature vegetation, the magnitude of change

on the views and visual amenity experienced from the settlement will be negligible-zero, and the level of effect will be minor and Not Significant. These effects will be temporary. As construction areas will be reinstated there will be no effects in the operation and maintenance phase.

- 1.3.125 Overall, **Chapter 18: Landscape and visual impact, Volume 2** of the ES [**APP-059**] concludes that there will be no significant effects on the views and visual amenity of settlements during the construction and operation and maintenance phases.
- 1.3.126 **Chapter 21: Noise and vibration, Volume 2** of the ES [**PEPD-018**] assesses the assesses noise effects including residential receptors within the SDNP and concludes that no significant effects are identified. The key embedded environmental measures in relation to noise and vibration are included in Section 5.4 of the **Outline Code of Construction Practice [PEPD-033]** and secured by Requirement 22 (5) (h) of the **Draft Development Consent Order [PEPD-009]**.
- 1.3.127 With regards transport during construction, as detailed within Section 5 of the **Outline Construction Traffic Management Plan [PEDP-035a]** which has been updated at Deadline 1, HGVs must use the Strategic Highway Network (A27 and A23) as far as possible before routing onto the local highway network within the towns and villages referred to in this SQ. Such routing then considers constraints such as height and weight restriction, layout, sensitive receptors adjacent to the highway, visibility and traffic congestion to determine the most suitable routes for construction traffic to use. This is secured in Requirement 24 (2) (a) of the **Draft Development Consent Order [PEPD-009]** which includes a routeing plan to avoid settlements as part of the stage specific CTMP.
- 1.3.128 In some locations, it is necessary for construction traffic to use single track lanes to access the onshore cable route (such as Michelgrove Lane from A-26) but this is avoided wherever possible. The Applicant is developing a traffic management strategy to ensure safe access can achieved by construction traffic, noting that impacts will be short-term only.
- 1.3.129 Given the findings of the ES assessment and the embedded environmental measures secured, there will not be harm to the distinctive towns and villages within the SDNP, covered under SQ7.

## **1.4 Conclusion on the effects on the special qualities of the SDNP**

- 1.4.1 This document includes the extensive embedded environmental measures which have been included within the DCO Application in order to avoid, reduce and minimise these impacts as far as possible which have included major design decisions including the reduction in the array area following statutory consultation. NPS EN-1 (DECC, 2011a) paragraph 5.9.21 and NPS EN-1 (2023a) paragraph 5.10.26 both recognise this as a potential to reduce visual impact but note this may also reduce function such as the electricity output. The Applicant notes the reductions made following consultation responses including those from the SDNP for reasons including visual impact which were made prior to the DCO Application. NPS EN-1 (DESNZ, 2023a) has identified offshore wind as a critical national



priority (CNP) to deliver nationally significant low carbon infrastructure and the Applicant considers that any further reduction would reduce the benefits of the project, including providing low carbon electricity, which are considered to outweigh the harms identified.

- 1.4.2 The Applicant is committed to delivering the project to the highest environmental standards, both within and beyond the SDNP, as referred to in NPS-EN1 (DESNZ, 2023a) and has developed the measures described above that are secured through the management plans and related requirements of the **Draft Development Consent Order [PEPD-009]**.
- 1.4.3 The Applicant will continue to engage with the SDNP with regards the mitigation and additional enhancement opportunities to further the purposes of the National Park and seek to reach agreement on these matters during the course of the Examination.
- 1.4.4 While there is harm to SQ1 “*Diverse, inspirational landscapes and breathtaking views*” (during construction and operation) and SQ3 “*Tranquil and unspoilt places*” (during construction), the statutory purpose of the SDNP would not be compromised and reasons for its designation will not be undermined by the Proposed Development. The natural beauty of the SDNP will remain and opportunities will still be present for understanding and enjoyment of the special qualities of the SDNP. Rampion 2 will not therefore undermine the statutory purpose of the SDNP or compromise the purposes of its designation. Therefore, the Proposed Development accords with the requirements of the legal tests and the policy tests set out in the NPS in relation to the SDNP.

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# **Annex 1**

## **South Downs National Park Special Qualities**

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# South Downs National Park

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## Special Qualities

# South Downs National Park

## Special Qualities

### Introduction

Within the diversity of the English countryside, the National Parks are recognised as landscapes of exceptional beauty, fashioned by nature and the communities which live in them. The National Parks and Access to the Countryside Act 1949 enabled the creation of the National Parks, and ensures that our most beautiful and unique landscapes have been, and will continue to be, protected in the future.

The purposes of National Parks are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Working in partnership with other Local Authorities and organisations, National Park Authorities also have a duty to seek to foster the economic and social-well being of communities within the Park in carrying out the purposes.

The South Downs National Park is Britain's newest National Park. Situated in the heavily populated south east it has strong social, historical and environmental links with the major towns and cities in its hinterland.

The South Downs National Park is a living, working and ever-changing landscape, shaped by its underlying geology and its human history. It has many special qualities which together define its sense of place and attract people to live and work in the area and visit the National Park. These special qualities need to be understood, appreciated, conserved and enhanced.

The special qualities reflect both the engagement with stakeholders of the National Park and technical evidence.

# I. Diverse, inspirational landscapes and breathtaking views

The geology of the South Downs underpins so much of what makes up the special qualities of the area: its diverse landscapes, land use, buildings and culture. The rock types of the National Park are predominately chalk and the alternating series of greensands and clays that form the Western Weald. Over time a diversity of landscapes has been created in a relatively small area which is a key feature of the National Park. These vary from the wooded and heathland ridges on the greensand in the Western Weald to wide open downland on the chalk that spans the length of the National Park, both intersected by river valleys. Within these diverse landscapes are hidden villages, thriving market towns, farms both large and small and historic estates, connected by a network of paths and lanes, many of which are ancient.

There are stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne, culminating in the impressive chalk cliffs at Seven Sisters. From near and far, the South Downs is an area of inspirational beauty that can lift the soul.



Harting Down, West Sussex



Seven Sisters, East Sussex



The Hangers from Stoner Hill, Hampshire

## 2. A rich variety of wildlife and habitats including rare and internationally important species

The unique combination of geology and micro-climates of the South Downs has created a rich mosaic of habitats that supports many rare and internationally important wildlife species. Sheep-grazed downland is the iconic habitat of the chalk landscape. Here you can find rare plants such as the round-headed rampion, orchids ranging from the burnt orchid and early spider orchid to autumn lady's tresses, and butterflies including the Adonis blue and chalkhill blue.

The greensand of the Western Weald contains important lowland heathland habitats including the internationally designated Woolmer Forest, the only site in the British Isles where all our native reptile and amphibian species are found. There are large areas of ancient woodland, for example the yew woodlands of Kingley Vale and the magnificent 'hanging' woodlands of the Hampshire Hangers.

The extensive farmland habitats of the South Downs are important for many species of wildlife, including rare arable wildflowers and nationally declining farmland birds. Corn bunting, skylark, lapwing, yellowhammer and grey partridge are notable examples.

The river valleys intersecting the South Downs support wetland habitats and a wealth of birdlife, notably at Pulborough Brooks. Many fish, amphibians and invertebrates thrive in the clear chalk streams of the Meon and Itchen in Hampshire where elusive wild mammals such as otter and water vole may also be spotted. The extensive chalk sea cliffs and shoreline in the East host a wide range of coastal wildlife including breeding colonies of seabirds such as kittiwakes and fulmars.



Adonis blue butterfly



Round-headed rampion



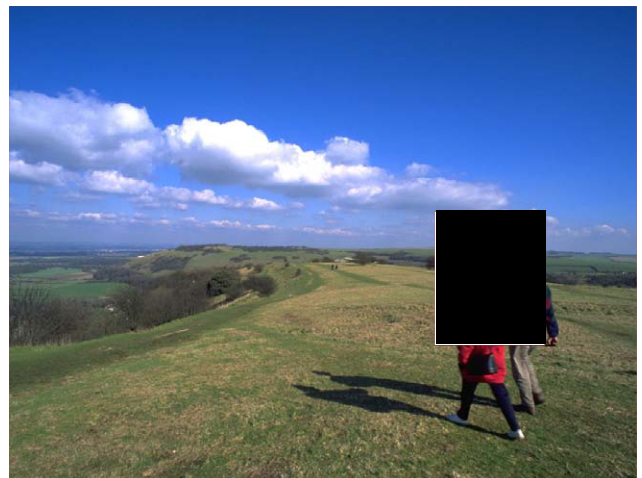
Heathland habitat, Iping Common, West Sussex

### 3. Tranquil and unspoilt places

The South Downs National Park is in South East England, one of the most crowded parts of the United Kingdom. Although its most popular locations are heavily visited, many people greatly value the sense of tranquillity and unspoilt places which give them a feeling of peace and space. In some areas the landscape seems to possess a timeless quality, largely lacking intrusive development and retaining areas of dark night skies. This is a place where people seek to escape from the hustle and bustle in this busy part of England, to relax, unwind and re-charge their batteries.



Amberley Wildbrooks, West Sussex



Walkers on the South Downs Way, Devil's Dyke



Orchids on Beacon Hill, Hampshire



## 4. An environment shaped by centuries of farming and embracing new enterprise

The rural economy has strongly influenced the landscape and over 80 per cent of the South Downs is farmed. Past agricultural practices have produced some nationally valuable habitats including chalk downland and lowland heath, with traditional breeds specific to the area such as Southdown and Hampshire Down sheep significant in the past and still bred today. Many farmers and landowners are helping to conserve and enhance important habitats through environmental stewardship schemes. Large estates such as Goodwood, Cowdray, Petworth and Firle, with their designed parklands, have a significant effect on the landscape and the rural economy. The ownership of large areas of the eastern Downs by local authorities or the National Trust is a legacy of the early 20th century conservation movements to protect the iconic cliffs and Downs and the water supply to coastal towns.

Farming has always responded to the economy of the day and continues to do so. Some farmers are diversifying their businesses, for example by providing tourist accommodation and meeting the growing market for locally produced food and drink. Climate change and market forces continue to influence the landscape leading to new enterprises such as vineyards, and increasing opportunities for producing alternative energy, for example wood fuel.

However, the economy of the National Park is by no means restricted to farming. There are many popular tourist attractions and well-loved local pubs which give character to our towns and villages. The National Park is also home to a wide range of other businesses, for example new technology and science, which supports local employment.



Durleighmarsh Farm & Orchard, West Sussex



Harveys Brewery, Lewes, East Sussex



Sheep in the Meon Valley, Hampshire

## 5. Great opportunities for recreational activities and learning experiences

The South Downs offers a wide range of recreational and learning opportunities to the large and diverse populations living both within and on the doorstep of the National Park, and to visitors from further afield.

With 3,200 kilometres (2,000 miles) of public rights of way and the entire South Downs Way National Trail within the National Park there is exceptional scope for walking, cycling and horse riding. Many other outdoor activities take place such as paragliding, orienteering and canoeing. There is a chance for everyone to walk, play, picnic and enjoy the countryside, including at Queen Elizabeth Country Park in Hampshire and Seven Sisters Country Park in East Sussex.

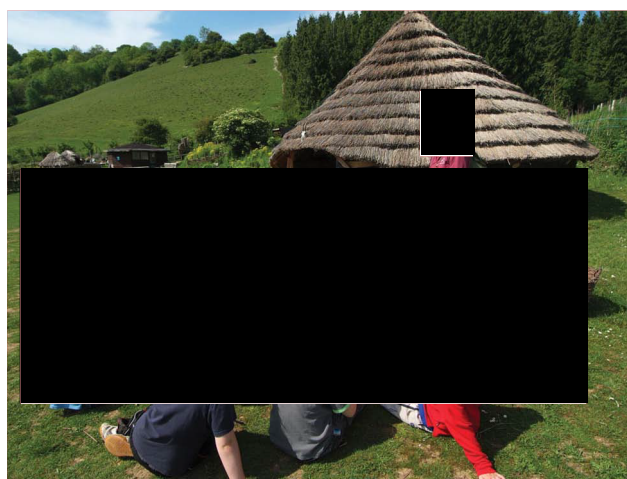
The variety of landscapes, wildlife and culture provides rich opportunities for learning about the South Downs as a special place, for the many school and college students and lifelong learners. Museums, churches, historic houses, outdoor education centres and wildlife reserves are places that provide both enjoyment and learning. There is a strong volunteering tradition providing chances for outdoor conservation work, acquiring rural skills, leading guided walks and carrying out survey work relating to wildlife species and rights of way.



Cycling on the South Downs Way



Paragliding near Lewes

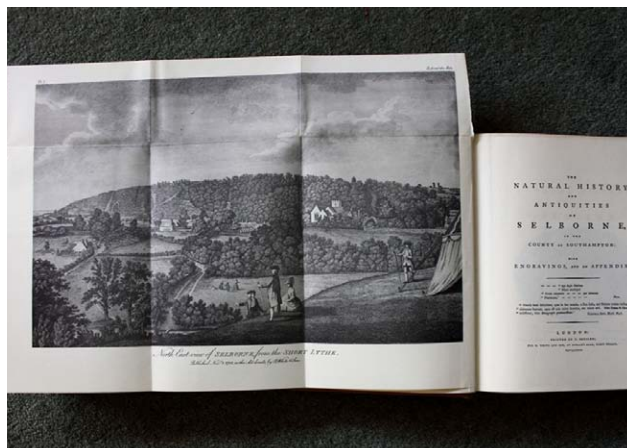


Butser Ancient Farm, Chalton, Hampshire

## 6. Well-conserved historical features and a rich cultural heritage

The distinct character of many areas of the South Downs has been created by well-conserved historical features, some of which are rare and of national importance. Bronze Age barrows, Iron Age hill forts, Saxon and Norman churches, dew ponds, historic houses and landmarks of the two World Wars help to give the National Park strong links to its past human settlement. These links are reinforced by the variety of architectural building styles spanning the ages. Evidence of earlier farming traditions can still be seen today in the pattern of field boundaries, and relics of the industrial past remain in the form of old iron workings, brickworks, quarries and ancient coppiced woodlands.

The South Downs has a rich cultural heritage of art, music and rural traditions. There is a strong association with well-known writers, poets, musicians and artists who have captured the essence of this most English of landscapes and drawn inspiration from the sense of place: Virginia Woolf, Jane Austen, Hilaire Belloc, Edward Thomas, Gilbert White, Edward Elgar, Joseph Turner, Eric Gill and Eric Ravilious, among many others. Today traditions continue through activities such as folk singing and events like Findon sheep fair. Culture lives on with new art and expression, celebrating the strong traditions of the past.



'The Natural History and Antiquities of Selborne' 1st Edition, by Gilbert White



Saxon Church, Singleton, West Sussex



The Chattri, above Brighton, East Sussex

## 7. Distinctive towns and villages, and communities with real pride in their area

The South Downs National Park is the most populated National Park in the United Kingdom, with around 110,000 people living within the boundary. Significantly more people live in the major urban areas and villages that surround the National Park including communities that are actively involved in the South Downs such as Brighton and Hove, and Eastbourne.

The South Downs is unique in having the largest market towns of any UK National Park - Lewes, Petersfield and Midhurst. The character and appearance of these and many other settlements throughout the National Park derives in large part from the distinctive local building materials. Picturesque villages like Selborne, Charlton and Alfriston blend into their landscapes.

Many of these settlements contain strong and vibrant communities with much invested in the future of where they live, and a sense of identity with their local area, its culture and history. Across the South Downs there are also communities of people who come together through common interests, for example, farming, conservation and recreation. These communities dedicate time and resources to enhancing community life, conserving what is important to them and planning for future generations.



The Lynchmere Society, West Sussex



Alfriston, East Sussex

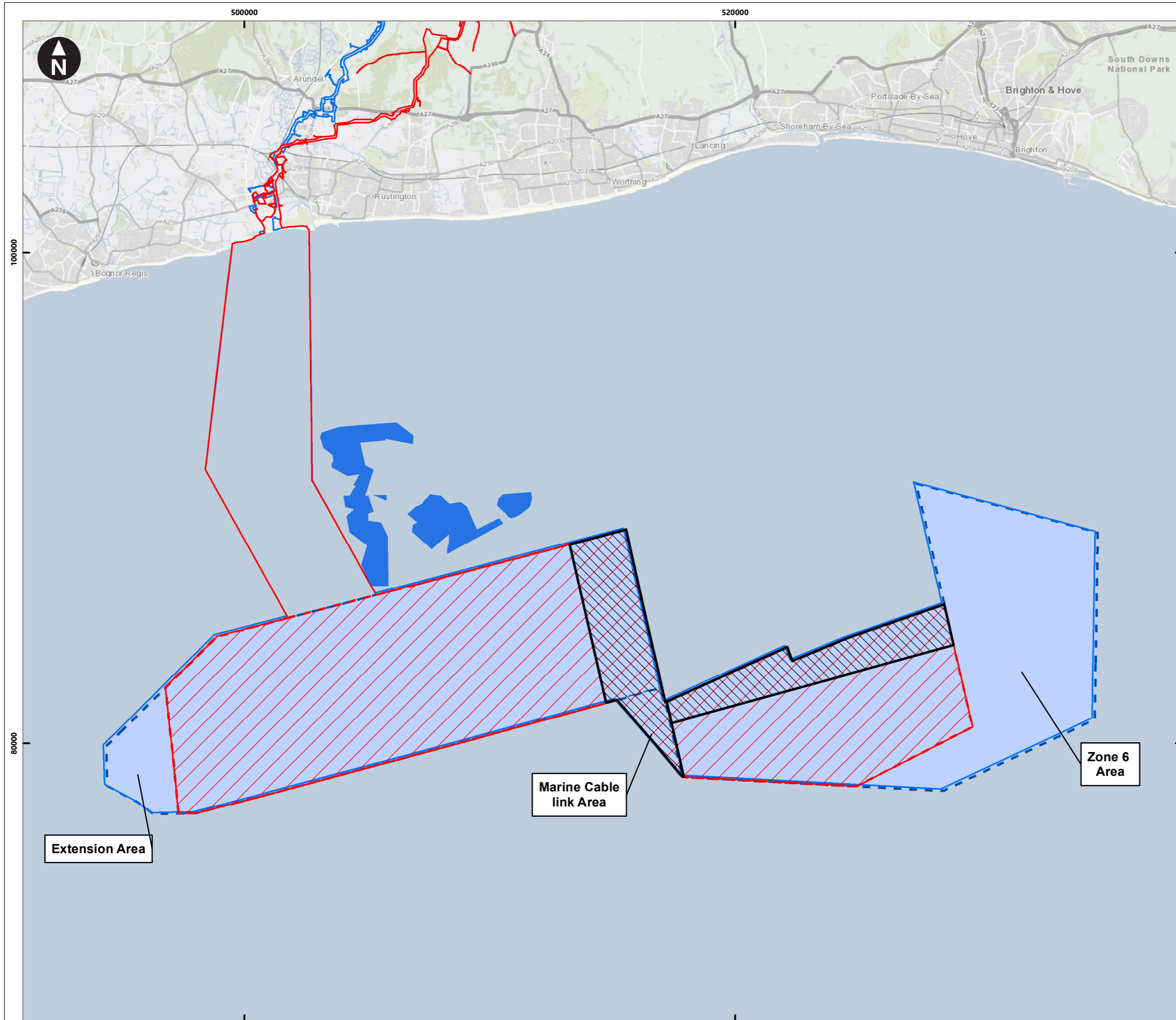


Farmers' Market, Petersfield, Hampshire

# Annex 2

## Figure

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**Key**

- Proposed DCO Order Limits
- Proposed DCO Order Limits Offshore Array Areas
- PEIR Assessment Boundary
- PEIR Assessment Boundary Offshore Array Area
- Active marine aggregate licence areas
- Wind farm separation zones

0 0.75 1.5 3 4.5 6  
Kilometres  
1:150,000  
British National Grid Transverse Mercator

Rampion Extension Development

Rampion 2 Offshore Wind Farm

Figure 3.3 PEIR Assessment Boundary and proposed DCO Order Limits

Environmental Statement

System Identifier: 42285-WSPE-ES-CC-FG-O-3096		Version: 1.0
Company: WSP	Drawn By: SUTET	Chk/Aprvd: ROBEH
Drawn Date: 27/07/2023	Status: FINAL	