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Subject: Rampion 2 Offshore Wind Farm Project - Arun District Council's Local Impact Report
Date: 16 February 2024 16:21:19
Attachments: [Rampion 2 Local Impact Report Final Issued.pdf](#)

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Good afternoon,

On behalf of Arun District Council, please find attached the Council's Local Impact Report for Rampion 2 Offshore Wind Farm (Interested Party Reference number: 20045300). This submission, on behalf of the Council, is in relation to Deadline 1 of the Examination Timetable of the Rule 8 letter.

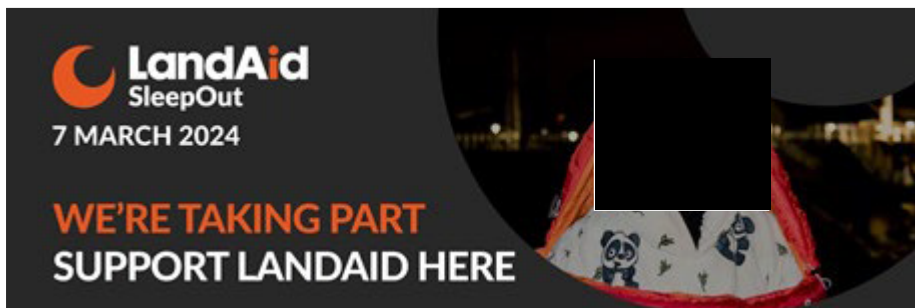
We would be grateful if you could confirm receipt of the Council's Local Impact Report at your earliest convenience.

Many thanks,

Alice

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Arun District Council - Local Impact Report

EN010117: Rampion 2 Offshore Wind Farm

February 2024

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1. INTRODUCTION

Background

- 1.1 Rampion Extension Development Limited (the 'Applicant') has submitted an application for a Development Consent Order (DCO) to construct, operate (including maintenance) and decommission an offshore wind farm, located approximately 13km off the Sussex Coast. This is known as Rampion 2 Offshore Wind Farm and herein referred to as the 'Project'.
- 1.2 This is the Local Impact Report from Arun District Council (ADC), which sets out the likely impacts of the Project within the administrative area of ADC, beyond the South Downs National Park. ADC is a host authority for the Project, with landfall within the parish of Climping (also known as Clymping) and buried onshore cables proposed north and east through the District.

Purpose, Scope and Terms of Reference of the Local Impact Report

- 1.3 This Local Impact Report has been prepared with due consideration of Advice Note 1¹ from the Planning Inspectorate. This Advice Note refers to the Planning Act 2008 and states that:

'The sole definition of an LIR is given in s60(3) of the Act as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'. The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition'.

- 1.4 ADC is the planning authority for Arun, apart from the area of Arun within the South Downs National Park, which falls under the planning responsibility of the South Downs National Park Authority (SDNPA). However, the SDNPA refer to advice from the Environmental Health Department at ADC. The SDNPA has a duty to work in partnership with all local authorities and, as such, with ADC. In addition, West Sussex County Council is the highways authority, education authority and Lead Local Flood Authority that covers Arun. This Local Impact Report therefore focuses on subject and geographical areas which ADC has primary planning responsibility.

¹ Planning Inspectorate (2012) "Advice Note One: Local Impact Reports". Available at [<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-one-local-impact-reports/>] Accessed 4 December 2023

- 1.5 This Local Impact Report does not replicate the Environmental Statement (ES) submitted with the application for the Project, but instead seeks to draw together local knowledge and evidence of issues within the administrative area of Arun beyond the South Downs National Park that can be robustly reported to the Examining Authority. The likely impacts are presented as either positive, neutral or negative effects during construction and operation, where relevant. However, as set out in the Advice Note, it is for the Examining Authority to conduct a balancing exercise of the likely impacts.
- 1.6 Having reviewed the documentation submitted with the application for the DCO, ADC broadly agrees with the results of the assessments and the adequacy of mitigation for the archaeological, geoarchaeological and palaeo-environmental potential within the District beyond the South Downs National Park. Given this, archaeology is not considered further in this Local Impact Report.
- 1.7 In addition to identifying key local issues and impacts, this Local Impact Report provides ADC's appraisal of the Projects compliance with local policy. However, in line with Advice Note 1, an appraisal has not been undertaken in relation to National Policy Statements (NPS).
- 1.8 This Local Impact Report builds upon the Relevant Representation and the initial Principal Areas of Disagreement Statement submitted by ADC to the Examining Authority in November 2023.

Overview of the Project

- 1.9 The key offshore elements of the Project will be as follows:
- up to 90 offshore wind turbine generators and associated foundations;
 - blade tip of the wind turbine generators (WTG) will be up to 325m above Lowest Astronomical Tide and will have a 22m minimum air gap above Mean High Water Springs;
 - inter-array cables connecting the WTG to up to three offshore substations;
 - up to two offshore interconnector export cables between the offshore substations;
 - up to four offshore export cables each in its own trench, will be buried under the seabed within the final cable corridor; and
 - the export cable circuits will be High Voltage Alternating Current, with a voltage of up to 275kV.

1.10 The key onshore elements of the Project will be as follows:

- a single landfall site near Climping, Arun District, connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques;
 - buried onshore cables in a single corridor for the maximum route length of up to 38.8km using:
 - trenching and backfilling installation techniques; and
 - trenchless and open cut crossings.
- a new onshore substation, proposed near Cowfold, Horsham District, which will connect to an extension to the existing National Grid Bolney substation, Mid Sussex, via buried onshore cables; and
- extension to and additional infrastructure at the existing National Grid Bolney substation, Mid Sussex District to connect Rampion 2 to the national grid electrical network.

2. OVERVIEW OF THE DISTRICT

Description of the District and Key Challenges

2.1 The District is located on the South Coast and approximately half of the former Arun planning authority area is now within the South Downs National Park.

2.2 The main urban areas are on the coast, with centres of population in Littlehampton, Bognor Regis and Arundel. The coastal towns are also the main employment and service areas, with Bognor Regis also supporting a campus of the University of Chichester. Beyond these towns is largely rural with scattered villages and hamlets.

2.3 The key environmental sensitivities within and immediately surrounding the DCO Limits of the Project within the District are shown in Figures 1a, 1b and 2. Notably this includes:

- Scheduled monuments: Littlehampton Fort and Medieval Earthworks E and SE of St Mary's Church, listed buildings and Conservation Areas;
- Site of Special Scientific Interest (SSSI): Climping Beach;
- Local Wildlife Sites: Littlehampton Golf Course and Atherington Beach; and
- Local Nature Reserve: West Beach.

2.4 The key challenges currently facing the District include:

- **Housing:** as with many local authorities, Arun faces challenges in housing supply and deliverable housing sites;
- **Education:** educational achievement in the District is relatively low. The 2021 Census indicates that 25.4% of the District's population has achieved tertiary qualifications, compared to a national average of 33.9%²;

² Office for National Statistics (2022) "2021 Census data". (Edition: June 2022). UK Data Service. Available at [\[https://www.ons.gov.uk/census\]](https://www.ons.gov.uk/census) Accessed 4 December 2023

- **Employment:** Arun’s Economic Profile 2020-2025 found that in 2019, employment rates were generally lower (74.5%) than the West Sussex County average (80.4%). The employment rate is variable indicating a high level of insecure employment in Arun, most likely associated with the seasonal tourism industry. The occupational profile indicates to a low skill, low wage labour market profile within Arun³;
- **Deprivation:** 2021 Census data indicate that Arun is the second most deprived area in Sussex⁴. Specifically, deprivation is associated with education and barriers to housing. Arun is the 66th most deprived local authority in England for barriers to housing and 89th for education⁵; and
- **Biodiversity:** preserving and enhancing biodiversity is a key focus within Arun. Within the Biodiversity Net Gain Evidence Study⁶, several priority habitats are considered to be at risk by the Sussex Local Nature Partnership due to declines in extent, condition and distribution. These include: coastal vegetated shingle; lowland fen; reedbed; lowland heathland; intertidal mudflats; lowland meadows; and lowland calcareous grassland.

Strategic Site Allocations

- 2.5 The adopted Local Plan⁷ sets out the requirement for at least 20,000 new homes over the plan period to 2031; an equivalent of 1,000 dwellings per annum. A significant proportion of the housing land supply is proposed from strategic site allocations.
- 2.6 As shown on Figures 1a and 2, strategic site allocations within the vicinity of the Project include Climping and Littlehampton – West Bank for approximately 300 and 1,000 dwellings, respectively, as set out in Policy H SP1 of the adopted Local Plan.

³ Arun District Council (2019) “Arun Economic Profile 2020-2025”. Available at [<https://www.arun.gov.uk/economic-strategy/>] Accessed 30 November 2023

⁴ Office for National Statistics (2022) “2021 Census data”. (Edition: June 2022). UK Data Service. Available at [<https://www.ons.gov.uk/census>] Accessed 30 November 2023

⁵ UK Government (2019) “English Indices of Deprivation”. Available at [<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>] Accessed 30 November 2023

⁶ Arun District Council (2022) “Arun District Council Biodiversity Net Gain (BNG) Evidence Study”. Available at [<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n19224.pdf&ver=24187>] Accessed 1 December 2023

⁷ Arun District Council (2018) “Arun Local Plan 2011-2031”. Available at [[arun.gov.uk/adopted-local-plan/](https://www.arun.gov.uk/adopted-local-plan/)] Accessed 4 December 2023

2.7 A reserved matters application (CM/48/21/RES) has been submitted for Climping (at Land to the West of Church Lane South of Horsemere Green Lane) and a decision is currently awaited at the time this report was prepared. This is for:

'Approval of reserved matters following the grant of CM/1/17/OUT for the erection of 300 No dwellings & a building within use class E, together with public open space, LAPs, LEAP & ancillary works, including car parking & drainage arrangements, with access off Church Lane & Horsemere Green Lane'.

2.8 The DCO Limits of the Project extend along the eastern boundary of Land to the West of Church Lane South of Horsemere Green Lane, with Work No. 13 relating to temporary construction access extending marginally onto the edge of this site.

2.9 Whilst at this stage, no planning application has been submitted for Littlehampton - West Bank, this site forms a significant part of the regeneration plans for Littlehampton. As shown in Figure 1, the DCO Limits for the onshore cable corridor extends through the western part of the Littlehampton – West Bank strategic allocation, which is discussed in Section 5.

Climate Change and Renewable Energy

2.10 On 15 January 2020, ADC declared a 'Climate Emergency' and pledged to be carbon neutral by 2030⁸. Since this was declared, ADC has implemented a range of strategies and produced a Carbon Neutral Strategy⁹, which details carbon reduction targets, sets out emissions baselines and high-level actions.

2.11 In addition, in the adopted Local Plan, there is specific reference to renewable energy within Policy ECC DM1. This policy states that ADC will support renewable energy development, subject to policy-specific criteria. Furthermore, this policy states that ADC expects renewable development schemes within the District to contribute positively to the social, economic and environmental development and the overall regeneration of Arun.

⁸ Arun District Council (2023) "Climate Change". Available at [<https://www.arun.gov.uk/climate-change>]. Accessed on 30 November 2023.

⁹ Arun District Council (2023) "Carbon neutral strategy". Available at [<https://www.arun.gov.uk/carbon-neutral-strategy>]. Accessed on 30 November 2023.

2.12 Given the above, ADC acknowledges the benefits of the renewable energy in contributing to the UK's national target of net zero by 2050 and to responding to climate change. Energy from the Project would, however, be to the national grid, rather than for local use within Arun.

Figure 1a: Approximate Extent of DCO Limits and Surrounding Environmental Sensitivities (Part 1)

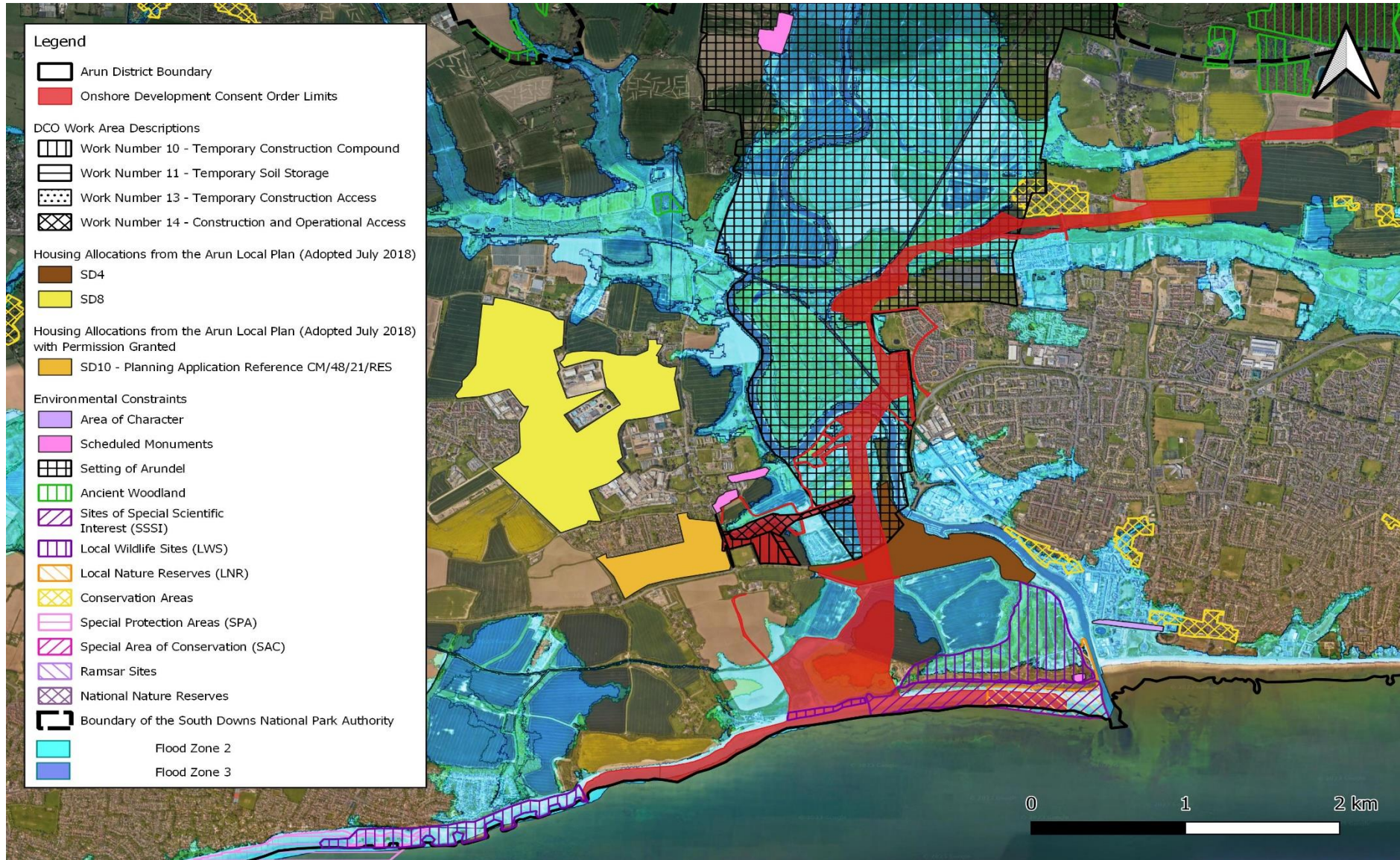


Figure 1b: Approximate Extent of DCO Limits and Surrounding Environmental Sensitivities (Part 2)

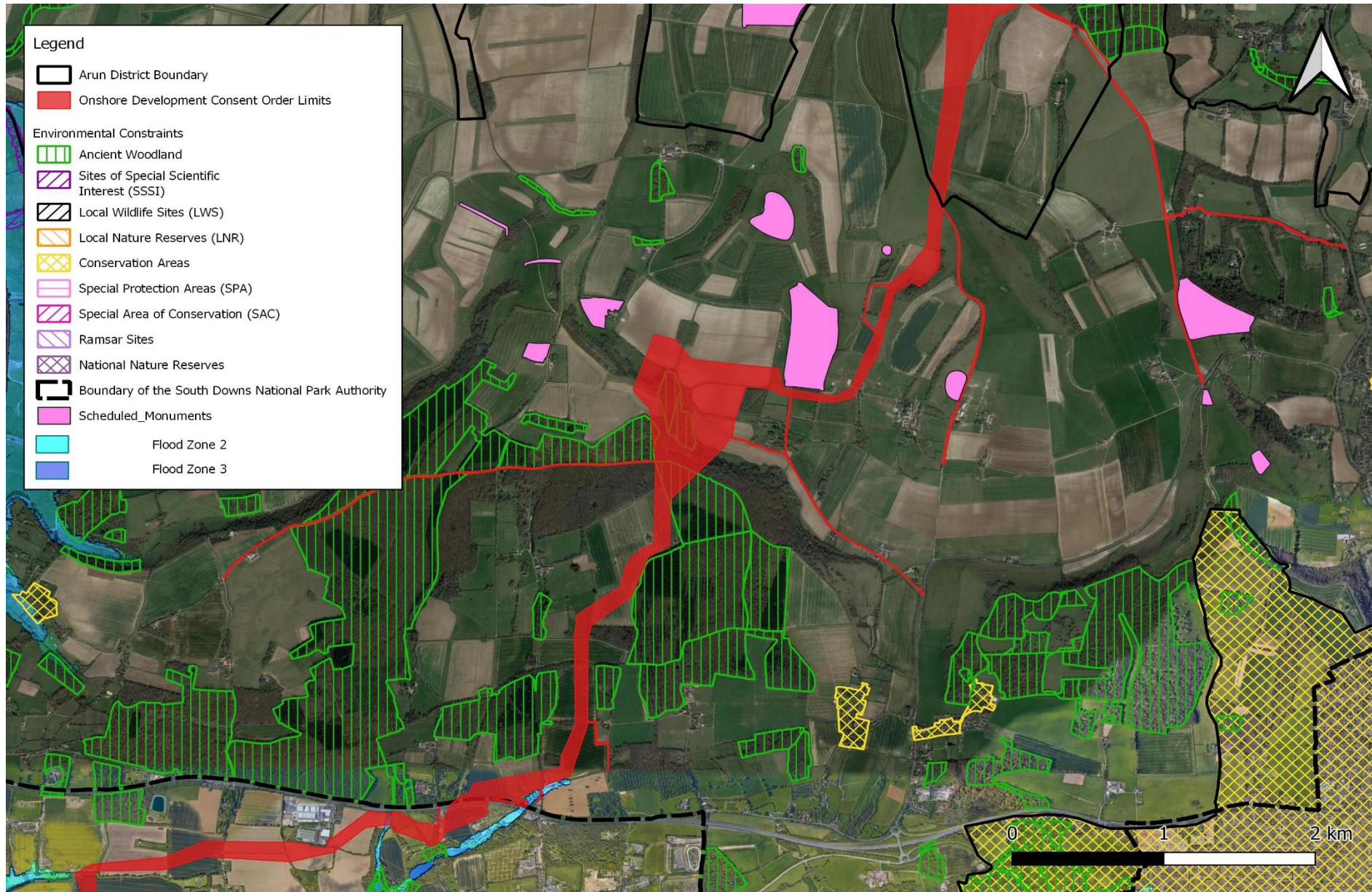
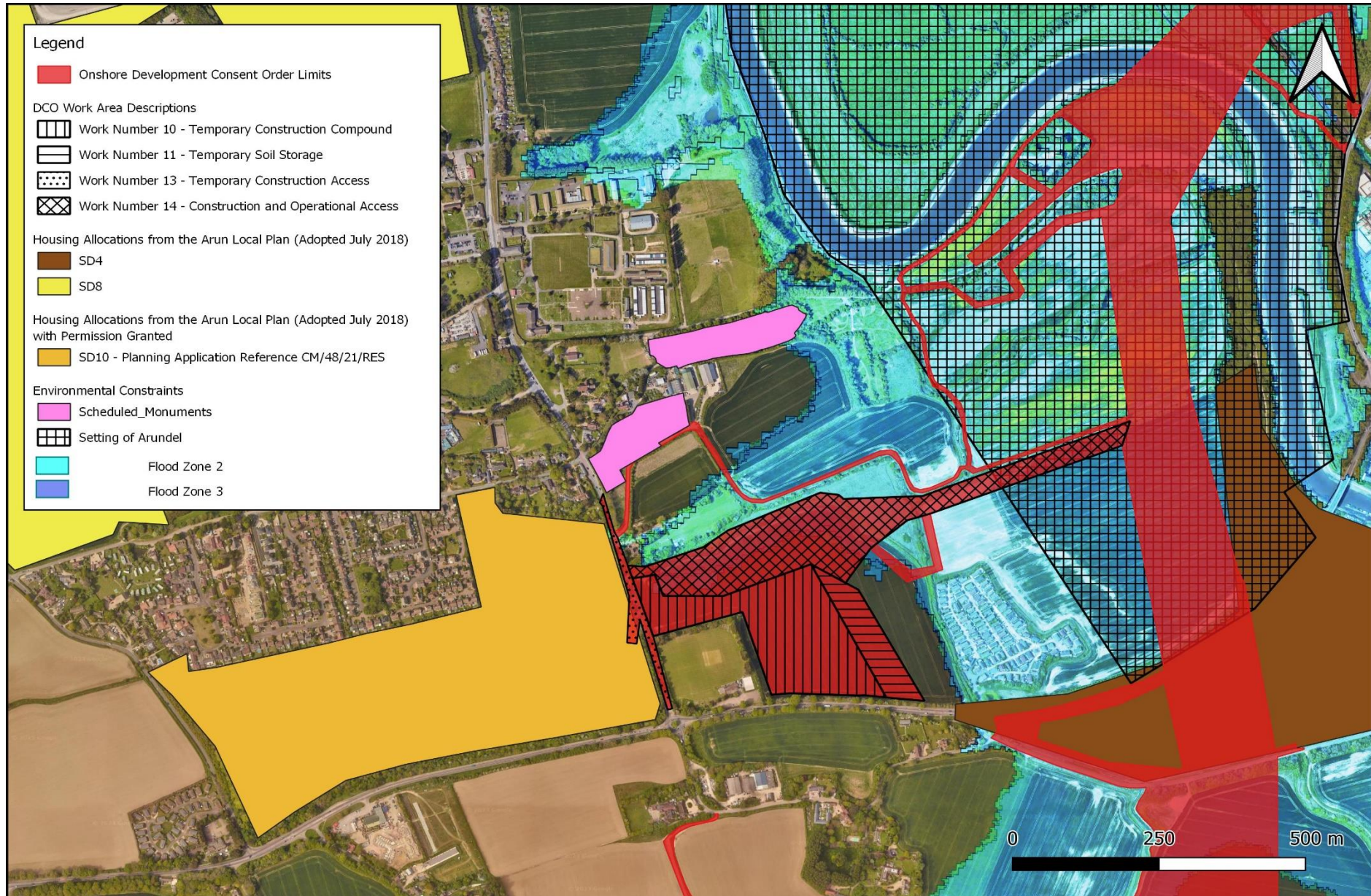


Figure 2: Climping Compound (Inset of Figure 1a)



3. LOCAL POLICY

3.1 ADC's statutory development plan comprises a suite of documents, including:

- the Arun Local Plan 2011 – 2031;
- 'made' Neighbourhood Plans;
- the West Sussex Waste Local Plan 2014¹⁰; and
- the Joint Minerals Local Plan 2018 and the Soft Sand Review¹¹.

Arun Local Plan 2011 – 2031

3.2 The Local Plan, which was adopted in 2018, covers the period 2011-2031 for the area of Arun. A summary of the key adopted policies that are considered relevant to the subject areas within Arun beyond the South Downs National Park and under the primary planning responsibility of ADC are summarised in Sections 5 to 9.

Made Neighbourhood Plans

3.3 Beyond the South Downs National Park, the DCO Limits of the Project extends through four different areas where Neighbourhood Plans have been 'made'. These include:

- Clymping Neighbourhood Plan 2015 - 2030 (2016)¹²;
- Littlehampton Neighbourhood Plan 2014 – 2029 (2014)¹³;

¹⁰ West Sussex Council (2021) "Waste Local Plan". Available at [<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/waste-local-plan/>] Accessed 4 December 2023

¹¹ West Sussex Council (2023) "Joint Minerals Local Plan 2018" and "Soft Sand Review". Available at [<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/>] Accessed 4 December 2023

¹² Clymping Parish Council (2015) "Clymping Neighbourhood Plan 2015-2030". Available at [[arun.gov.uk/made-plans](https://www.arun.gov.uk/made-plans)] Accessed 4 December 2023

¹³ Littlehampton Town Council (2014) "Littlehampton Neighbourhood Plan 2014-2029". Available at [[arun.gov.uk/made-plans](https://www.arun.gov.uk/made-plans)] Accessed 4 December 2023

- Lyminster & Crossbush Neighbourhood Plan 2020 – 2031 (2022)¹⁴; and
- Angmering Neighbourhood Plan 2014 – 2029 (2015)¹⁵.

3.4 Where District-wide impacts are discussed in this Local Impact Report such as in relation to landscape, biodiversity and socio-economic considerations, reference is made to the policies within the adopted Local Plan rather than in relation to policies of the ‘made’ Neighbourhood Plans. However, policies of the ‘made’ Neighbourhood Plans are referenced where they are considered specifically relevant to Climping Compound or locally important non-designated heritage assets that could be significantly affected by the Project.

Arun Local Plan Update 2023 - 2041

3.5 The adopted Local Plan is currently being updated as it is more than 5 years old. Prior to commencing Regulation 18 Issues & Options in Spring 2024, a Direction of Travel (2023)¹⁶ has been published. This sets out ADC’s vision and objectives, together with the direction of travel for emerging new policy options under the following themes:

- Climate Change;
- Environmental Life Support Network;
- Homes in the Right Places;
- Economy, Health & Wellbeing and Telecommunications & Digital;
- Infrastructure;
- Placemaking, Heritage and Culture; and
- Infrastructure to Support Our Needs.

¹⁴ Lyminster and Crossbush Parish Council (2022) “Lyminster and Crossbush Neighbourhood Development Plan 2020-2031”. Available at [arun.gov.uk/made-plans] Accessed 4 December 2023

¹⁵ Angmering Parish Council (2015) “Angmering Neighbourhood Plan 2014-2029”. Available at [arun.gov.uk/made-plans] Accessed 4 December 2023

¹⁶ Arun District Council (2023) “Draft Direction of Travel Document”. Available at [https://www.arun.gov.uk/arun-local-plan-update-2023-2041] Accessed 4 December 2023

4. GENERAL

Alternatives

- 4.1 As part of the statutory consultation process, ADC advised that it needs to be satisfied that the chosen route is the most favourable based on evidence and justification. In particular, ADC noted that this would need to include, but not be limited to, consideration of ecological designated sites.
- 4.2 Chapter 3 of the ES details the alternatives considered by the Applicant. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations 2017') require the ES to include a *'a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment' (regulation 14(2)(d))'* (ADC emphasis).
- 4.3 In addition, the NPS for Energy (EN-1) (2011a) and the revisions to the NPS due to come into force in early 2024) require an Applicant to *'present the main alternatives considered as part of the Proposed Development and to demonstrate consideration of environmental, social and economic effects including, where relevant, technical and commercial feasibility'* (ADC emphasis).

Route Options and Selection

- 4.4 The assessment of alternatives identifies that the landfall at Climping was selected prior to the scoping exercise undertaken, however, did not consider the impact on the Climping Beach SSSI in its decision for selecting it ahead of the five alternatives (paragraph 3.4.23 of Chapter 3 of the ES).
- 4.5 Within the examples of what constitutes a 'soft' constraint as part of the Applicant's constraints mapping exercise, the following is noted: *'some designated sites for biodiversity such as Ancient Woodland and National Nature Reserves'*. SSSI are not specifically identified as a 'soft' constraint, nor is it evidenced that the Climping Beach SSSI was considered at this stage. Despite this, Chapter 3 of the ES states that Climping was chosen, in part, due to *'the limited number of statutory designations at the coast and immediately inland in association with the Climping landfall'*.
- 4.6 Only subsequent to the above it is apparent that consideration was given to *'avoidance of the Climping Beach SSSI at the eastern part of the landfall'* ahead of the first statutory consultation exercise (paragraph 3.5.8 of Chapter 3 of the ES), when a decision had already been made to locate the onshore cable corridor within its vicinity. ADC do not consider the justification and evidence for choosing Climping as the landfall location sufficient with regard to environmental impacts.

Construction Compound

- 4.7 Insufficient evidence of reasonable alternative locations (taking account environmental effects) has been given for Climping Compound. Main reasons for the selection of this location next to a residential area and tourist/community assets have also not been given. Further details on the likely effects are outlined below.

Adequacy of the DCO Application, Actions and Commitments

- 4.8 Given the above, it is considered that the Applicant has not sufficiently justified the location of the landfall at Climping. ADC subsequently request further information be provided regarding the justification to choosing Climping as the landfall location. Notwithstanding this, it is acknowledged that C-112 within the Commitments Register is as follows:

'No ground-breaking activity or use of wheeled or tracked vehicles will take place south of the seawall (above mean high water springs) within Climping Beach Site of Special Scientific Interest (SSSI) or Littlehampton Golf Course and Atherington Beach Local Wildlife Site (LWS) unless remedial action is required. Any predicted activity will be restricted to foot access for the purpose of surveying and monitoring of the progress of the horizontal directional drill (HDD).'

- 4.9 Whilst this is welcomed as a commitment, consideration should be given to the mitigation hierarchy and avoidance of HDD beneath the western part of Climping Beach SSSI. Furthermore, Section 7 below identifies that further information needed so that the effects can be fully understood.

Climping Construction Compound

- 4.10 A temporary construction compound (Work No.10) and a temporary soil storage area (Work No. 11) are proposed near the small village of Climping, as illustrated on Figure 2. This, together with associated construction traffic would be close to residential areas, community facilities (school and village hall), tourist assets, listed buildings and scheduled monuments, which are discussed further in the sections below.
- 4.11 Climping Compound is also located immediately adjoining a strategic housing allocation, where a reserved matters application is currently being considered by ADC. Should this be approved, it is of the view of ADC that the residential development is likely to coincide with the use of Climping Compound given that should the Project be granted consent, the Project would commence later in 2025 and the compound likely to be in use for approximately 3.5 years.
- 4.12 Whilst Climping Compound is referenced in the draft DCO only as a *'temporary construction compounds'*, Chapter 4 of the ES refers to Climping Compound as approximately covering 6.13ha and Chapter 18 of the ES indicates Climping Compound as containing welfare facilities/offices, parking, construction plant and storage of materials and equipment (up to 7m high) and a concrete

batching plant up to 20m high. For greater certainty of the use of Climping Compound, a description (comparable detail to other Work No. descriptions in the draft DCO) of its use is sought in the draft DCO or another document so that there is a commitment to comply with the description. Furthermore, approval should be sought from ADC for the exact positioning of the concrete batching plant and soil/aggregate stockpiles and be placed as far away as possible from residents/other sensitive receptors. Whilst temporary concrete batching plants do not fall under the environmental permitting regulations, good practice should follow all applicable sections of the Process Guidance Note PG 3/01(12).

- 4.13 ADC has raised concerns and sought justification regarding the size and location of Climping Compound given the likely effects, as set out below. Firmer commitments to mitigation measures specific to Climping Compound are also sought, including appropriate landscaping/boundary treatments, a Communications Construction Plan, a Dust Management Plan and stage specific management plans, particularly given the potential for dust, noise and visual effects. The Dust Management Plan should take into account emissions of off-road construction vehicles, NO_x and particulate matter.

Private Water Supplies

- 4.14 ADC consider that the Applicant has reasonably taken the public register of private water supplies and has identified wells that have the potential to be detrimentally affected by the onshore cable corridor and compounds. However, it is possible that not all private water supplies are listed in the public register and therefore further consideration should be given to investigating potential locations.
- 4.15 Although a setback area has been provided around each of these wells, some supplies are very close, within 300m of the works. The Applicant has highlighted monitoring (C-253 of the Commitments Register) to be carried out in each case. This should be for both microbiological and chemical parameters. The Environmental Health Department at ADC seeks the proposed long-term monitoring of these sites, which should be agreed with the Department.

5. SOCIO-ECONOMICS, ECONOMICS AND TOURISM

Local Planning Policies

5.1 The following policies within the adopted Local Plan are considered relevant to the socio-economic aspects of the Project within the District (beyond the South Downs National Park):

- Policy SKILLS SP1 encourages proposals that raise skills levels and employability;
- Policy ECC DM1 supports renewable energy development provided that schemes contribute to the social, economic and environmental development and overall regeneration of the District;
- Policy TOU SP1 encourages sustainable tourism development providing it protects as well as promotes the District's main tourism assets including the coast, rivers and estuaries; and
- Policy H SP1 states the aim to deliver 20,000 new homes in the District within the plan period (2011-2031). The Local Plan allocates a number of Strategic Site Allocations which will provide an "important contribution" to meeting this housing need including Policy H SP2b, SD4.

5.2 The policy within the following 'made' Neighbourhood Plan is considered relevant to Climping Compound:

- Policy CPN 1 of the Clymping Neighbourhood Plan seeks to protect community facilities. Proposals that will result in the loss or significant reduction in the scale and value of a community facility will not normally be permitted.

5.3 The Project has the potential to align with the adopted policies around skills and employability. It is likely to be at odds in terms of protecting tourism assets including the coast.

Key Local Issues and Likely Impacts

Skills and Employment

5.4 Arun's Economic Profile 2020-2025 found that in 2019, employment rates were generally lower (74.5%) than the West Sussex County average (80.4%)¹⁷. The Project has the potential to support jobs in Arun during both the construction, operation and maintenance phases.

¹⁷ Arun District Council (2019) "Arun Economic Profile 2020-2025". Available at [<https://www.arun.gov.uk/economic-strategy/>] Accessed 30 November 2023

Construction

- 5.5 In Chapter 17 of the ES (at paragraph 17.9.4) estimates that the Project will support a total of 80 FTE jobs per annum¹⁸ within the Sussex study area¹⁹. This estimate is derived using the anticipated proportion of supply chain expenditure retained by businesses located within Sussex – this is estimated at 1.0% of total construction costs. The low levels of retained expenditure in Sussex are attributed to the fact that there are no Tier-1 major plant suppliers (e.g. WTG or foundations) nor an established supply chain cluster in Sussex.
- 5.6 The ES does not attempt to estimate construction employment effects at the District level. This means that no estimation of the impact of the Project on employment in the District has been undertaken.
- 5.7 It is estimated herein that the Project would support 5 FTE jobs per annum within the District during the construction period (6% of the Sussex employment impact). This estimate is calculated based on the proportion of employment in the manufacturing, construction, transportation and professional services industries in Arun compared to the Sussex study area²⁰. This represents a 0.01% increase in overall employment in Arun over the four-year temporary construction period, thus is deemed a **neutral** effect.
- 5.8 Where the onshore cable route passes through agricultural land, this would lead to the degradation of land in terms of productivity during construction and until the land has been reinstated and agricultural use reestablished. This would lead to a localised **negative** economic impact on agriculture during construction. ADC therefore seeks for the cable route to be located as close as possible to the field boundaries to minimise disruption to agricultural activity.

Operation and Maintenance

- 5.9 In Chapter 17 of the ES (at paragraph 17.10.4) estimates that the Project will support a total of 100-110 FTE jobs²¹ per annum within the Sussex study area. This is based on estimates of the anticipated number of FTEs required to operate and maintain the wind farm.

¹⁸ Including Direct, Tier 1 and Indirect FTEs

¹⁹ Defined within the ES as the county of East Sussex, county of West Sussex and the Brighton and Hove Unitary Authority.

²⁰ Sussex defined as per the ES as the county of West Sussex, county of East Sussex and the Brighton and Hove Unitary Authority.

²¹ Including Direct and Indirect/Supply Chain FTEs

5.10 As per the construction phase, the ES does not attempt to estimate employment effects at the District level. It is estimated herein that the Project would support 7-8 FTE jobs in the District based on the proportion of total employment in Arun compared to the Sussex study area. This is considered a generous assessment given that no operational activity is anticipated in Arun. This represents a **neutral** effect (0.02% increase) on total employment for the District.

Tourism and Tourism Assets

5.11 Tourism and the visitor economy is vital to the Arun District being one of its major industries. The District sees 3.9m annual visits, generating £374m²² and around 5,000 jobs. In 2019, Arun was the fifth largest visitor economy in Sussex and had the highest proportion of tourism employment of all Sussex districts²³. The market town of Arundel and the seaside towns of Bognor Regis and Littlehampton provide a variety of coastal and rural tourist attractions.

5.12 The proportion of employment in accommodation and food services provides a proxy for employment within the tourism industry. Arun has the 4th highest proportion of employment in the accommodation and food services sector out of 64 local authority districts in the South East at 11.8%²⁴ or 6,000 jobs. This is higher than the average for West Sussex (8.4%) and the average across the South East (7.4%).

5.13 Some areas of Arun are particularly reliant on tourism and hence are significantly more sensitive to negative impacts on tourism as a result of the Project. Figure 3 shows the proportion of employment in accommodation and food services at the Middle Layer Super Output Area (MSOA) level. The proportion of employment in accommodation and food services is significantly concentrated in some areas, with up to 35% of employment within this sector. A number of towns and villages along the coast are particularly sensitive to impacts on tourism, for example Bognor Regis and Pagham, which have over a quarter of their employment within the accommodation and food services sector.

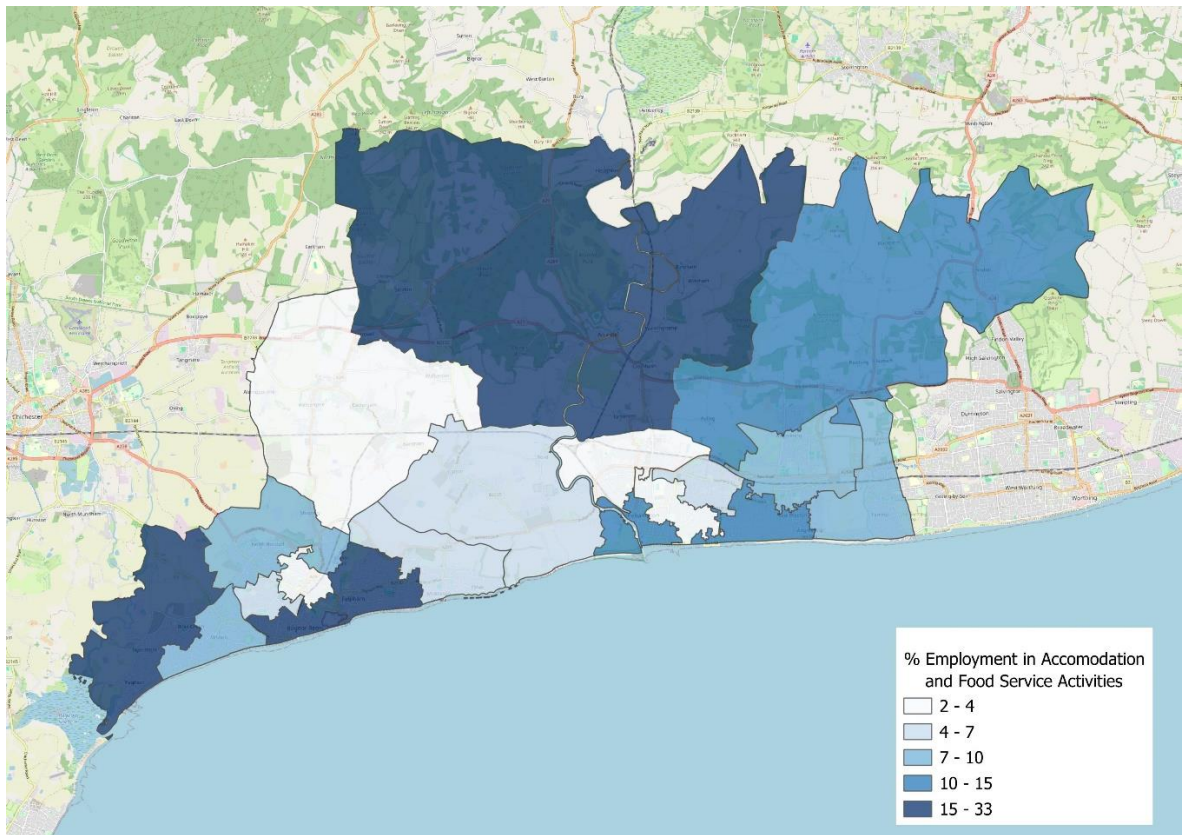
5.14 Given this context, the District has a great reliance on the tourism sector and a very high level of sensitivity to change, much higher than other areas potentially affected by the Project. Adverse effects on the tourism sector have the potential to have significant negative consequences for economic well-being of residents.

²² Economic Impact of Tourism in the Arun District (2022), Destination Research

²³ Economic Impact of Tourism in the Arun District (2019), Destination Research

²⁴ BRES Data (2022), ONS (most recently available dataset)

Figure 3: Proportion of Employment in Accommodation and Food Services at the MSOA Level



Source: Analysis of BRES 2022 data

- 5.15 ADC has concerns regarding **negative** effects from the construction and operation of the Project on the tourism economy and tourism assets, including displaced tourism from Arun, as explored below.

Construction

- 5.16 Construction of the Project will directly impact Arun. Offshore construction will create visual effects, as described in Section 6. Landfall is located on Climping beach, west of Littlehampton. The onshore cable route connecting the windfarm to the national grid will then travel from Climping north-eastwards through Arun to Bolney substation.
- 5.17 Chapter 17 of the ES (at paragraphs 17.9.35, 17.9.39, 17.9.42) states that there will be a negligible effect on the volume and value of tourism at the Sussex level, for specific coastal towns, and along the onshore cable corridor. The evidence base used to inform the ES conclusions was primarily formed of a literature review on the impact of wind farms on tourism. The majority of studies are ex-ante which the ES (Appendix 17.3, paragraph 1.4.4) acknowledges '*lead to a high level of uncertainty about the scale of potential impacts, particularly as the evidence base is mixed and findings vary across studies*'.

5.18 Furthermore, Chapter 17 of the ES states that *'ex-post research suggests that even where there have been negative effects, these often occur in the form of displaced tourism with visitors diverting to neighbouring areas instead'*. Whilst this may suggest a neutral effect at the Sussex level, it suggests that areas directly affected by construction such as Arun will at least experience temporary **negative** effects which are amplified given the reliance on tourism.

5.19 The ES identifies 28 tourism assets close (500m) to the onshore cable corridor which it acknowledges may potentially be impacted by the construction works. A large proportion of these tourism assets are located in Arun²⁵ (11 out of the 28 identified or approximately 40%), meaning a substantial number of the negative impacts are concentrated within the District, despite the ES identifying a negligible effect at the Sussex level. The 11 tourism assets located within the District are:

- Climping beach and car park;
- Climping Beach Café;
- The cheese making workshop
- Brookside caravan park;
- Cuckoo Camp;
- Loanian villas;
- Lyminster nursery caravans;
- 2 Radar Cottages;
- Amanda Hopkinson Wedding planner;
- Decoy Ponds / Let's Retreat; and
- Norfolk House.

5.20 In addition to the tourism assets listed above, a large number of Public Right of Ways (PRoW) and cycle routes will be impacted during the construction period which could reduce visitor numbers further. The ES states that the landfall, onshore cable corridor and substation (the latter beyond the District) will potentially impact up to 154 PRoW. Of these, 37 PRoW were identified as highly sensitive "key PRoW" due to attributes such as high levels of usage²⁶. 28 of the 37 key PRoW are located within Arun District (inclusive of those located within the South Downs National Park) reflecting the disproportionate impact that Arun will experience.

²⁵ Arun District, inclusive of assets located within the SDNP

²⁶ Rampion 2 Wind Farm ES Volume 4, Appendix 17.3: Socio-economic technical baseline, Aug 2023, Table 1-19

5.21 Beyond this, other tourism assets have not been included within the list identified in the ES. These include:

- Bailiffscourt Hotel, Restaurant & Spa;
- The Black Horse Climping - Opening Spring 2024;
- The Barn by the Beach, Climping;
- The Captain's Cottage Climping;
- The Arundel Gardener, including Coffee Stop;
- Woodpecker Camping Field and The Piglets Holiday Accommodation;
- The Oystercatcher Pub & Restaurant;
- Jaybelle Grange Holiday Lodges;
- Shots – Target Range;
- Ryebank Corner Glamping Campsite;
- Leaside B&B;
- Amberley Court B&B;
- Church Farm Hub (Cuckoo Farm), Climping;
- Climping Historic Church;
- The Flying Fortress, Children's Activity Centre;
- Ford Airfield Car Boot and Sunday Market;
- Serving Thyme, Horticultural Nursery;
- Edgecumbes Tea & Coffee Roastery;
- Ship & Anchor Marina Campsite and Pub / Restaurant;
- Brooklands Barn Retreat;
- Six Bells Pub;
- Littlehampton Caravan Club site;

- Stable Cottage Holiday Let, Lyminster;
- Lyminster historic church;
- Fox Wood Campsite;
- Selden Barns;
- Long Furlong Barn Wedding Venue;
- Wild Heart Hill Campsite; and
- Other local tourist accommodation such as Airbnb and Vrbo lets.

5.22 Despite not being located within the 500m buffer it is possible that these assets will be negatively impacted by lower footfall within the District.

5.23 ADC is of the view that the volume and value of tourism within the District would be reduced during the construction period – a **negative** effect for the local economy. As previously discussed, Arun District is particularly sensitive to these negative effects as its economy is heavily reliant on tourism. Tourism assets within the District would see significant negative visual and landscape effects (see Section 6), which are highly likely to deter visitors during the construction period. One of the main attractions of the area is its natural beauty, for example, the undeveloped Climping beach and rural stretch of land between Littlehampton and Middleton-on-Sea. The quiet, undeveloped character of the Climping area makes the tourism industry particularly sensitive to negative impacts to views or landscapes.

5.24 **Negative** local noise effects (see Section 8) will also contribute to the deterrence of visitors during the construction period who are attracted to the area by its peaceful, rural setting.

5.25 Increased traffic as a result of construction in the local area may also cause disruption to the visitor experience or deter visitors from particular visitor assets which are heavily impacted by congestion.

Operation and maintenance

- 5.26 During operation, the Project is considered to have permanent negative visual impacts on the views from a number of locations in Arun most notably along the coastline at Bognor Regis seafront promenade, Climping beach and Littlehampton seafront promenade, as reported in Chapter 15 of the ES. These locations, which are identified in Chapter 15 of the ES as having a medium to high sensitivity, are important visitor/tourist locations for Arun – and as a result employment for residents – as well as having resident amenity. As previously evidenced, certain areas of Arun, including Bognor Regis, are particularly reliant on the visitor economy as it makes up a substantial proportion of their total employment. This reliance on tourism makes Arun particularly sensitive to negative visual effects.
- 5.27 The photomontages below in Figure 6 and Figure 7 (sourced from Chapter 15 of the ES) illustrate the negative visual effects of the WTG on views from the Bognor Regis seafront and Climping beach. As discussed in Section 6, the WTG are considerably larger than those of Rampion 1, with a blade tip height up to 185m greater than the Rampion 1 WTG. The detrimental impact of the WTGs on seascape in the District is likely to reduce the volume and value of tourism within Arun throughout the operational period, thus having the potential for a long-term **negative** effect on the local economy which is particularly sensitive to negative impacts on tourism. Whilst it is recognised that the evidence is mixed in terms of ex-post evaluation for other areas (as per the ES), the scale of the WTGs and the acknowledged negative visual impact is considered to be particularly prominent in Arun and likely to have a more discernible negative effect.

Figure 6: Photomontage of the Project from Climping Beach



Source: Environmental Statement, Volume 3, Chapter 15: Seascape, landscape and visual impact assessment

Community Disruption

- 5.28 A number of the tourism assets listed above are equally assets to the local community, for example Climping beach and Climping Beach Café. Furthermore, Climping Village Hall and playing fields and Clymping Church of England Primary School would be near Climping Compound. This means that the **negative** effects to these assets during the construction period would also affect the local community, reducing amenity for residents in the area.
- 5.29 In addition, temporary road closures and/or diversions during the construction period would cause further disruption for residents of Arun.
- 5.30 It is ADC's view that the construction of the Project will cause localised **negative** effects in terms of disruption to local communities such as Climping.

Strategic Housing Allocation

- 5.31 The onshore cable corridor transects through one of the strategic housing allocations (Policy H SP2b, SD4: Littlehampton – West Bank) identified in the adopted Local Plan. The allocation is for circa 1,000 residential dwellings that will be key to supporting future regeneration of the town and the Littlehampton Economic Growth Area.
- 5.32 ADC has significant concerns that the onshore cable corridor would sterilise the western part of the allocation and impede the ability to bring forward this site for housing.
- 5.33 Arun faces a significant challenge in ensuring there is enough good quality and affordable housing available for its residents and is required to meet its housing needs targets. Should allocation SD 4, or part thereof, become sterilized as a result of the Project and thus no longer be able to be brought forward for circa 1,000 residential dwellings, this will further increase pressures on housing supply in the District. Alternative housing sites would need to be identified and allocated. This presents a potential **negative** effect on Arun.

Fishing Industry

- 5.34 Arun has a small but locally significant fishing industry. Littlehampton, located at the mouth of the River Arun, has a harbour with small-scale fishing operations.
- 5.35 Sussex Inshore Fisheries and Conservation Authority's (IFCA) states²⁷ that '*developments such as offshore wind farms, should not compromise the Authority's ability to maintain and promote sustainable fisheries and protection of the marine environment*'.

²⁷ https://secure.toolkitfiles.co.uk/clients/34087/sitedata/files/Authority_Reports/Planning-Policy-Statements.pdf

- 5.36 The ES provides an assessment of the potential impacts to the fishing industry. This assesses a range of potential impacts during the construction and operational and maintenance phases such as reductions in access to established fishing grounds, increased pressure on adjacent grounds and disturbance of commercially important fish and shellfish resources.
- 5.37 The ES assesses the impact at the fisheries level, identifying UK and international fleet impacts. It is likely that Arun-based fisheries would be amongst those impacted. ADC welcome the Applicant's commitment to ongoing liaison with fishing fleets and issue of notifications to the fishing community to provide advanced warning of Project's activities and associated Safety Zones (Commitments C-47, C-92, C-93 in the Commitments Register).

Adequacy of the DCO Application, Actions and Commitments

- 5.38 Whilst a Sussex level estimate of job creation has been undertaken in the ES, it has not been assessed at the District level within the administrative area of Arun. An indicative estimate of the proportion of job creation likely to take place in Arun has been provided above, however, the Applicant should undertake a full assessment of employment effects at the District level to inform developing skills and employment opportunities within the District.
- 5.39 Low levels of supply chain expenditure are expected to be retained within Sussex. This contributes to concerns regarding the Outline Skills and Employment Strategy which provides very limited detail and does not list ADC as a consultee. More detail should be provided on the strategy and benefits for ADC, including linking to long term investments in local opportunities for apprenticeships and education institutes in Arun such as the University of Chichester Bognor Regis Campus. Objectives need to include support for local Small Medium Enterprises (SMEs) and opportunities for SMEs to access the supply chain including potentially supply chain managers. Measures should be secured through the Outline Code of Construction Practice (CoCP). In addition, ADC should be sought as a consultee for the development of the Skills and Employment Strategy. The Supply Chain Plan similarly requires definition and commitment. ADC expect this Plan to be secured through the CoCP.
- 5.40 ADC has concerns regarding adverse effects on tourism and tourism assets, including displacement of tourism from Arun. The current list of tourism assets is not considered complete. It is acknowledged that C-33 in the Commitments Register seeks to minimise impact but does not necessarily mean that negative impacts will not occur.

- 5.41 To help to mitigate against the long-term negative effects to tourism that Arun are likely to experience, consideration should be given to a visitor centre in Arun to act as a tourist attraction, engaging visitors with the Project similarly to the centre established as part of Rampion 1 in Brighton. As a part of this the centre could offer boat trips to visit the windfarm. The Look & Sea Visitor Centre at 63-65 Surrey Street, Littlehampton (also hosting the Harbour Lights Café) provides an opportunity location for such a proposal and has direct access to a slipway for boat trips. Due consideration should be given to this by the Applicant as part of the mitigation strategy.
- 5.42 ADC request further information on what impact the Project is likely to have on the strategic housing allocation at Littlehampton – West Bank, including any sterilisation of land and the effect on housing delivery within Arun.
- 5.43 Overall, ADC is of the opinion that the District will not significantly benefit from the Project, rather the area will experience disruption and negative or neutral effects. Job creation is likely to be neutral based on current estimates and any benefit likely to be outweighed by harm to the local tourism industry, impact to housing supply and local community disruption.
- 5.44 ADC request further information on the Community Benefits Package and commitments to be made to ADC for the Community Benefits Package to adequately compensate and offset adverse effects within the District that cannot be otherwise mitigated. There are concerns regarding the mechanism by which the Community Benefits Package is secured and the criteria/funds involved which are not referenced within the draft DCO. There are a range of potentially suitable tourism partnership mechanisms for distributing funds from the Community Benefits Package such as Experience West Sussex and Sussex by the Sea as well as direct development as per the suggestion above.

6. LANDSCAPE, VISUAL AND SEASCAPE

Local Planning Policies

6.1 The following policies within the adopted Local Plan are considered relevant to the landscape and visual aspects of the Project within the District (beyond the South Downs National Park):

- Policy LAN DM1 seeks development to respect the particular characteristics and natural features of the landscape character areas and, wherever possible, to reinforce or repair the character of those areas;
- Policy C SP1 relating to where new development in the countryside, early consideration will need to be given to landscape enhancement; and
- Policy ECC DM1 relating to renewable energy development seeks the location and design to minimise adverse impacts on the landscape and to take into account ADC's landscape assessment and sensitivity studies.

6.2 Once the vegetation and landscape elements have re-established, the Project is considered over the long term to be compliant with Policy LAN DM1. However, owing to the lack of commitment to landscape enhancement within the District and the effects of the WTG on the coastline, the Project does not accord with the overall aims of the other policies identified above.

Key Local Issues and Likely Impacts

6.3 As set out in the adopted Local Plan, the landscape character of the area within Arun varies between the low coastline, open agricultural landscape and the backdrop provided by the scarp slope of the South Downs National Park. Approximately 50% of Arun is within the South Downs National Park, which is a statutorily protected landscape, recognised by Government to be of the very highest quality.

6.4 The area within Arun beyond the South Downs National Park is generally low lying with views across a flat open landscape. The countryside between urban settlements and villages are valued parts of the landscape with 'Climping Gap' one of the few remaining stretches of open, undeveloped coastline. The coastal plain exhibits a high level of landscape and visual sensitivity. Climping Gap, whilst not a nationally designated landscape, is a protected landscape within the adopted Local Plan.

Landscape and Visual

6.5 Owing to the prevailing landscape character and the topography being flat with no significant changes in elevation, together with the proximity of the Project to residential areas, the principal concerns and effects are considered to relate to the construction activities, as follows:

- significant **negative** visual (amenity) effects on residents and settlements (such as on Climping village and Climping Caravan Park; the latter a semi-retirement park for over 50's), together with from transport routes and visitor attractions (Climping beach, Climping Camp Site, PRow and Sustrans Cycle Route) in relation to the landfall construction compound (Work No. 8), cable installation works (Work No.9) and Climping Compound (Work No.10);
- significant **negative** landscape and character effects, such as on the Climping Lower Coastal Plain, Lower Arun and Middle Valley Floors and Lyminster-Angmering Coastal Plain from the construction works, as acknowledged as in Chapter 18; and
- **negative** effects on landscape elements from the loss and disturbance of vegetation (such as trees, scrub and hedgerows) during and beyond the construction works for a significant duration, until the vegetation thrives and becomes established. All restoration of land to its prior use, former condition and same habitat type (principally agricultural) would have a **neutral** effect in the long-term. However, there is an opportunity for a **positive** effect in the long term if the reinstatement enhances habitat.

6.6 Given the location and substantial size of the Climping Compound in proximity to the village of Climping, individual properties and the village hall and playing field, together with the likely nature of the uses within the compound (such as welfare cabins, a concrete batching plant up to 20m in height and materials and equipment up to 7m high, it is of the view that the visual effects would be significant. ADC concerns relate to the spatial presence as the compound would be visible from different vantage points and the visual dimension of openness as it is not only people in the immediate surroundings that might see but also the wider environ.

6.7 It is noted that the level of effect reported in Chapter 18 of the ES on settlements of Climping and Atherington, Littlehampton, Lyminster and Poling is identified as '*Moderate to Minor*' during construction works, which are identified in the assessment as not significant. Based on the information provided, ADC disagrees that it can be concluded that there will be '*no significant effects on the views and visual amenity of settlements*' during the construction, which is reported in Chapter 18 of the ES.

Seascape

- 6.8 ADC recognise that the WTG would inevitably result in changes to seascape character and views. Nevertheless, owing to the height, extent and relative proximity to the coastline, the principal concerns and effects are considered to relate to the operational of the Project, as follows:
- significant **negative** effects on views along the coastline at Bognor Regis seafront promenade, Climping beach and Littlehampton seafront promenade during operation, as acknowledged in Chapter 15 of the ES.
- 6.9 It is acknowledged that the spatial extent of the WTG has been reduced during consultation and the design process. However, the extent and scale would be much greater than Rampion 1. The Non-Technical Summary for the ES reports that for the 116 WTG of Rampion 1, the WTG have a 140m blade tip height, whilst the WTG for the Project are up to a height of 325m when measured from Lowest Astronomical Tide to the tip of the vertical blade. This is a considerable difference in height. These WTG would have significant visual effects on the views from the coastline at Bognor Regis seafront promenade, Climping beach and Littlehampton seafront promenade, as reported in Chapter 15 of the ES. These locations, which are identified in Chapter 15 of the ES as having a medium to high sensitivity, are visitor/tourist locations.

Adequacy of the DCO Application, Actions and Commitments

- 6.10 Whilst some of the viewpoints for the landscape and visual assessment were agreed with ADC, this was prior to details being available for the landfall construction compound (Work No.8), trenchless crossing compounds as part of the cable installation (Work No. 9) and Climping Compound (Work No.10). The coverage of viewpoints and photomontages within these areas is not considered to be sufficient given the scale, nature and potential for significant visual effects of the Project. ADC therefore seeks additional viewpoints (locations to be agreed with ADC) to be assessed. This would enable the likely significance and extent of effects, including on settlements, to be fully understood and, where necessary, adequately mitigated for the duration of the construction works.
- 6.11 In Chapter 18 of the ES, reference is made to a temporary onshore cable corridor up to 40m in width and a permanent infrastructure corridor width up to 25m (or wider at trenchless crossing locations). It is unclear what the surface treatment requirements would within the permanent infrastructure corridor and any requirements for easements in these areas. Details are therefore sought to understand the impact on reinstatement.
- 6.12 It is acknowledged that in C-196 of the Commitments Register that a stage specific Landscape and Ecological Management Plan (LEMP) would be developed. This would be secured through Requirement 12 of the DCO, which would require submission of a stage specific LEMP to, and approval by, the relevant planning authority in advance of that stage commencing. It is therefore important that the programme of works secured through Requirement 10 of the DCO clearly defines

the stages, phasing and associated timings of works within the District. With regard to reinstatement, the stages and, thus stage specific LEMP should include covering the landfall construction compound (Work No.8), the onshore cable corridor (Work No. 9) and Climping Compound (Work No.10).

- 6.13 Commitment C-196 of the Commitments Register refers to '*attention will also be given to maintaining levels and types of vegetation and landscape patterns*', however, ADC seeks that the commitment to the staged reinstatement also includes for enhancement to a higher quality and species diversity, particularly in relation to trees and hedgerows of boundary/field treatments. As well as species selection and reinstatement taking account of climate resilience, there should also be a commitment to the selection of species diversity in consideration of emerging threats from pests and diseases, such as Ash die-back which is prevalent in the District.
- 6.14 Given the likely significant landscape and visual effects within the District, it is requested that the details of the boundary treatment and programme of landscaping works of the construction compounds; particularly the landfall construction compound (Work No.8) and Climping Compound (Work No.10) are submitted to and agreed with ADC. A mechanism for securing this is sought. Boundary treatment should include maximising opportunities for advanced planting of new native trees (feathered trees rather than whips) to soften and filter views, as well as for biodiversity enhancement.
- 6.15 ADC encourages a phased approach is taken to the restoration to enable land to be reinstated at the earliest possible opportunity. Commitment C-19 in the Commitments Register suggests that the onshore cable corridor would be constructed in sections at regular intervals (typically 600m to 1,000m) and the reinstatement process commenced as soon as practicable. However, there is currently no mechanism to guarantee that this would be achievable based on the information provided. Furthermore, C-103 refers to '*areas of temporary habitat loss will begin reinstatement within 2 years of the loss, other than at the temporary construction compounds, cable joint bays, some haul roads, some construction access roads, landfall and substation location where activities may take longer to complete*'. However, ADC request that there is the commitment and an appropriate securing mechanism for reinstatement within the first planting season following completion of the construction works and backfilling within the section, rather than within two years, as currently defined within C-103.
- 6.16 ADC would welcome further engagement with the Applicant on the layout of the WTG and the development of design principles (C-61 of the Commitments Register), which is currently not defined. However, ADC is of the opinion that the significant effects of the WTG, as identified in the ES, cannot be mitigated for and are of such a significance that warrants compensation in the form of a Community Benefits Package, as discussed in Section 5.

7. TERRESTRIAL AND MARINE ECOLOGY

Local Planning Policies

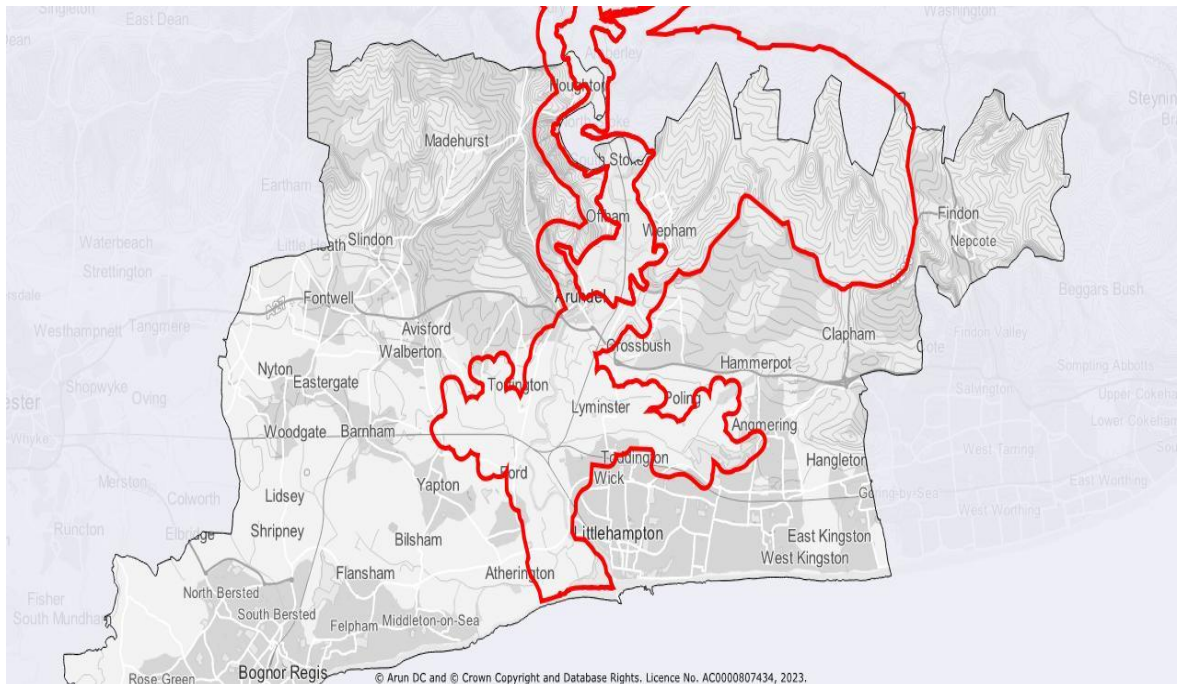
- 7.1 The following policies within the adopted Local Plan are considered relevant to the biodiversity aspects of the Project within the District (beyond the South Downs National Park).
- 7.2 The adopted Local Plan seeks the protection and enhancement of biodiversity and the protection of trees. The policies also include protection of designated European, national and local status sites. The relevant policies include:
- Policy ENV SP1, which seeks the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Where possible, new areas for habitats and species are encouraged. The Project is on or within proximity to several sites listed in Policy ENV SP1, including:
 - Special Area of Conservation (SAC): Arun Valley (Site Code UK0030366);
 - SSSI: Climping Beach (Site Code 1000225);
 - Special Protection Area (SPA) Arun Valley (Site Code UK9020281); and
 - Local Nature Reserves: Littlehampton Golf Course and Atherington Beach, Littlehampton.
 - Policy ENV DM3 covers Biodiversity Opportunity Areas (BOA). Much of the onshore cable corridor within Arun fall within existing BOA. Within BOA, development shall minimise disturbance, retain and sympathetically incorporate locally valued and important habitats. Where there is a habitat loss, mitigation measures shall be agreed with ADC; and
 - Policy ENV DM5 seeks biodiversity net gain as part of the development process. Due regard for protected species is required and consideration of any impacts that will affect the species directly or indirectly, whether within the site or in an area outside of the site.
- 7.3 The protected species surveys and mitigation proposed is compliant with the policies above. Whilst biodiversity net gain is proposed for the Project as a whole, biodiversity net gain has not been demonstrated within the District. Given this, the Project is not considered compliant with Policy ENV DM5.

Key Local Issues and Likely Impacts

Climping Site of Scientific Interest and Arun Valley Special Protection Area Impact Risk Zone

- 7.4 Climping beach is home to rare habitats and species. The SSSI is a stretch of coast with a vegetated shingle beach, behind which is a sand dune system. The intertidal zone supports important populations of wintering birds. The numbers of wintering sanderling are of European significance.
- 7.5 Vegetated shingle beaches are a nationally uncommon habitat. The beach at Climping is broad in the west but narrows to the east. Plant communities are mainly restricted to sheltered areas behind the main shingle bank and include yellow horned poppy *Gaucium flavum*, sea dale *Crambe maritima*, sea beet *Beta vulgaris*, curled dock *Rumex crispus* and sea holly *Eryngium maritimum*. Scrub of tamarisk *Tamarix gallica* and hawthorn *Crataegus monogyna* has developed in a few places behind the shingle.
- 7.6 Notable and rare invertebrates include Large sharp-tailed bee - *Coelioxys conidia*, Coast leaf-cutter bee - *Megachile maritima*, Red banded-sand wasp - *Ammophila sabulosa*, Grey bush cricket - *Platycleis albopunctatubut*, and the moth *Platytes alpinella*.
- 7.7 Sand dunes are fragile systems, susceptible to erosion and often unstable. Stabilised parts of these dunes are dominated by marram-grass *Ammophila arenaria*. Other plants which are present include dune fescue grass *Vulpia membranacea*, red fescue grass *Festuca rubra*, sand catchfly *Silene conica*, sand sedge *Carex arenaria*, viper's bugloss *Echium vulgare* and a locally uncommon plant, Nottingham catchfly *Silene nutans*.
- 7.8 The intertidal zone consists of soft muds and sands which support large populations of marine invertebrates. The invertebrates are an important food source for wintering birds. Up to 300 Sanderling have been recorded from this site in winter; a figure which represents 1% of the West European population of this bird which breeds in the high Arctic but flies south to winter on sandy coasts and estuaries. Other wintering birds include grey plover and oystercatcher.
- 7.9 The adopted Local Plan reports that the Impact Risk Zone for the Arun Valley SPA covers areas in the foraging distance of Bewick's Swans, which include a wide area within the District, as shown in Figure 3.

Figure 3: Impact Risk Zone of Arun Valley Special Protection Area



7.10 The following construction activities of the Project have the potential to affect ecological sites and Impact Risk Zone identified above:

- landfall and onshore cable route – damage and disturbance of Climping Beach SSSI potentially because of indirect effects of HDD under the beach; and
- onshore cable route and compounds – damage and disturbance to habitats from construction activities associated with the onshore cable route and compounds (Climping Compound and landfall compounds) within the Impact Risk Zone of the Arun Valley SPA that is used by foraging Bewick's Swans. Loss of habitat within the Impact Risk Zone, which is regularly used by foraging Bewick's Swans (i.e. is functionally linked to the SPA), could have a significant effect on the SPA.

Terrestrial Biodiversity Net Gain

7.11 The onshore cable corridor runs through BOA and part of the Arun River Valley which contains priority habitats including coastal flood plain and grazing Marsh, mudflats, deciduous woodland and good quality semi-improved grassland. As a result of construction activities, areas of habitats would be temporarily lost or degraded, leading to habitat fragmentation.

7.12 A few important species are present including Bewick Swans, bats, hazel dormice, water voles, badgers, reptiles and a variety of coastal and woodland birds.

7.13 Owing to the terrestrial ecology on or within proximity to the Project, the following principal concerns and effects relate to construction activities and once operational:

- risk to protected species such as dormice and commuting/foraging bats from habitat fragmentation and disturbance from noise, vibration and lighting; and
- lack of biodiversity net gain and habitat enhancement within the District (see below).

7.14 The effects on badgers, great crested newts, water vole and reptiles have been rated as low and not significant. Great crested newts and water voles are recorded around Climping and Atherington area. Licences may be required if the works impact on ponds and ditches in this area.

7.15 As reported in Chapter 22 of the ES, the Project in its entirety would deliver terrestrial biodiversity net gain of at least 10% to offset land cover change (habitat loss) and fragmentation (reduction of connectivity). ADC is supportive of achieving net gain for the Project and this is a policy requirement of the adopted Local Plan. However, ADC has concerns regarding the proposals and details provided for terrestrial biodiversity net gain, including the lack of ecological enhancements and net gain specifically in the District, which are outlined below.

Marine Biodiversity Net Gain

7.16 Marine net gain has not been considered. The Environment Act 2021 recommends that marine net gain to be assessed as part of national infrastructure projects, although it is acknowledged that this is not mandatory. Recent Government consultation in response to marine net gain was undertaken and the results published showed broad support for marine net gain.

7.17 The Project could provide marine net gain via a contribution to the Sussex Kelp Recovery Project (Help Our Kelp). This restoration project was formed in 2021 after the Sussex Nearshore Trawling Byelaw was introduced. This protects the seabed from fishing activities and stretches from Brighton towards Selsey. The project is a collaboration of local and national organisations to provide protection for and help regenerate the kelp beds in the Sussex bay. ADC is actively engaging with the project to help restore these kelp beds off our coast.

7.18 The offshore cable route avoids the marine Conservation Areas and the most valuable marine habitats. This may reduce potential impacts to marine ecosystems.

Adequacy of the DCO Application, Actions and Commitments

- 7.19 Whilst surveys of habitats and species have been provided with regard to terrestrial habitats and species, the results have not been summarised at District level. The local effects on terrestrial ecology specifically within the District are therefore difficult to ascertain. It is, however, welcomed that an Ecological Clerk of Works will work in conjunction with the contractors to ensure compliance with relevant wildlife legislation, agreed mitigation and best practice.
- 7.20 Pre-construction surveys for protected species are committed to within the Commitments Register and Outline CoCP. Further details on the timing these surveys are requested to be provided to ADC. The presence of any European protected species will require a licence from Natural England to disturb them or their habitat. This will also require approval by ADC.
- 7.21 Whilst a biodiversity net gain assessment has been completed for the Project as a whole, there is a lack of biodiversity net gain assessment at the District level. Biodiversity net gain should be delivered within the District. It is also integral that this is then secured through appropriate means directly with ADC.
- 7.22 Chapter 22 of the ES states that biodiversity net gain will be delivered on and off-site, with the focus of habitat creation around the proposed substation at Oakendene, which is outside of the District. The remainder of the habitats are proposed to be reinstated to current condition only. There is also a reliance of delivery of net gain off-site. As a result, the Project is currently not proposing new or enhanced habitat creation within the District.
- 7.23 ADC seeks the delivery of biodiversity net gain and ecological enhancements within the District in accordance with the biodiversity gain hierarchy where on site biodiversity gains should be considered first followed by registered offsite biodiversity gains and – as a last resort – biodiversity credits. Without biodiversity net gain, the Project is not compliant with ADC's policies.
- 7.24 There is an assumption in the ES that destroyed, damaged or disturbed hedgerows will be ecologically functioning features again in a period of three to seven years from the start of construction. This is considered to be optimistic and is dependent on good growing conditions in all years. Given the varying 'quality' of growing seasons experienced in West Sussex in recent years a longer period to achieve ecological functionality may well be required. Owing to this, ADC seeks advanced planting. Furthermore, as above in Section 6, ADC seeks a commitment for reinstatement of the temporary habitat loss within the first planting season rather than within two years of the loss.

7.25 Stage specific LEMP will be developed to ensure all reinstated habitats are effectively established (C-199 of the Commitments Register). For effective restoration, habitats will be subject to appropriate maintenance, management (including adaptive management) and monitoring for ten years (measured from the time of planting/seeding in each discrete location). Further details on the monitoring plan and reporting mechanisms are required for biodiversity net gain. Where habitats are included in the biodiversity net gain commitments for ADC, a maintenance and monitoring plan for 30 years and a legal agreement with ADC is required.

7.26 The following actions are sought:

- invertebrate survey of Climping Beach SSSI and an assessment of indirect effects (e.g. noise/vibration) owing to the presence of rare species and potential HDD beneath;
- assessment of biodiversity net gain at District level, including a metric assessment and net gain plan;
- consideration of marine biodiversity net gain; and
- a maintenance and monitoring plan of biodiversity net gain within the District to be agreed and secured with ADC through appropriate means.

8. NOISE AND VIBRATION

Local Planning Policies

8.1 The following policies within the adopted Local Plan are considered relevant to the noise and vibration aspects of the Project within the District (beyond the South Downs National Park):

- Policy QE DM1 seeks developers proposing new noise generating development to gain advice to determine the level of noise assessment required and for the proposals to be supported by evidence that there are no suitable alternative locations for the development;
- Policy QE SP1 require that developments do not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District;
- Policy ECC DM1 relating to renewable energy development seeks the location and design to minimise adverse impacts, including on noise; and
- Policy D DM1 seeks proposals to have a minimal impact to users and occupiers of nearby property and land, including avoiding unacceptable noise and disturbance.

8.2 The following is also of relevance to noise and vibration:

- Planning Noise Advice Document: Sussex (2023)²⁸.

8.3 On review of Chapter 21 of the ES, it is demonstrated that the Project would be in accordance with the above-mentioned policy requirements.

Key Local Issues and Likely Impacts

8.4 It is recognised that noise exposure can impact upon quality of life and give rise to adverse health effects. Tranquil spaces, often located within the more rural parts of the District play a multi-functional role as part of the District's green infrastructure network. One of the most common causes of noise pollution is from traffic.

²⁸ Planning Noise Advice Document: Sussex (November 2023): <https://www.adur-worthing.gov.uk/media/Media.121802.smxx.pdf> (various authors).

Noise

- 8.5 Significant levels of construction noise and vibration are likely to occur at some sensitive receptors during the construction period. The construction period is noted to be approximately 3.5 to four years, with construction works delivered in stages. It is noted from Chapter 21 of the ES that with respect to HDD, in particular, there is potential for prolonged exposure of sensitive receptors to noisy drilling and ancillary works, 24 hours per day over consecutive, often multiple days. Robust control measures will need to be secured to minimise the effects on residents/communities.
- 8.6 BS 5228-1:2009 + A1:2014 and “the ABC method” seek to protect sensitive receptors whilst acknowledging the inherent noise associated with construction activities. The trigger values set out in Chapter 21 of the ES replicate Table E.2 of BS5228, in particular, for the 08:00 – 18:00 time period. However, the proposed construction hours are stated as 07:00 – 19:00 hours where for the shoulder hours are (07:00 – 08:00 and 18:00 – 19:00) Table E.2 BS 5228-1:2009 + A1:2014 suggests a trigger value of 70dB LAeq, T therefore the trigger values do not fully accord with this guidance.
- 8.7 The principal concern with respect to the construction works are around the landfall and trenchless crossings where continuous working may be required for HDD. Although Chapter 21 of the ES advises that the duration of HDD will not be known until exploratory ground conditions have been undertaken, it is entirely feasible that a worst-case scenario could arise where noisy HDD works are required to be undertaken for prolonged periods during the night-time. Potentially continuous noise intrusion is highly likely to be a contentious issue for residents residing close to the trenchless crossing locations and potentially further afield, subject to meteorological conditions during works.
- 8.8 The extent of noise effects during the night-time period is typically driven by impact noise i.e. percussive drilling which has the greatest potential for noise intrusion and sleep awakenings, in addition to any acoustic characteristics of plant and machinery, such features may include tonal features and discernible cyclic on/off conditions. If such characteristics are present the assessment of energy average noise levels are likely to underestimate potential noise impacts because the assessment considers the full duration of the night-time period (23:00 -07:00 hrs) (as presented in Chapter 21 of ES) and not individual noise events which may cause sleep disturbance.
- 8.9 To minimise the extent of night-time noise, Chapter 21 of ES provides for embedded and primary mitigation measures, notably a commitment to undertake trenchless crossings by non-impact methods (C-10 of the Commitment Register) and that HDD work sites, near to sensitive receptors which may exceed target construction noise criteria that operate overnight will be fitted with acoustic mitigation measures (C-26 of the Commitment Register), which should assist in reducing both the absolute noise level and any perceived acoustic characteristics. However, detailed design of such mitigation will need to be addressed in the CoCP along with C-26 of the Commitments Register.

8.10 There are certain points along the onshore cable corridor and, in particular, trenchless crossings that are very close to noise sensitive receptors. Due to the proximity of works, duration of works and/or type of works (which, as noted above, may include significant noise sources such as HDD which may necessitate 24-hour operation) there are likely to be periods when construction noise levels could cause significant disturbance and exceed "Category A" threshold values during the nighttime period. These include locations near Decoy Wood, Poling, Lyminster, Littlehampton and Climping beach (TC01, TCO1A, TCO2, TC03, TC03a, TCO5, TC06, TCO7a, TC08, TC09, TC10, TC10A, TC11, TC16, TC17, TC17a, TC19a, TC20, TC21, TC22, TC22a, TC23 and TC24 as set out in Chapter 21 (Table 21-30) of the ES and as shown in the Figures of Chapter 4 of the ES). It is therefore considered that enhanced mitigation may need to be employed to adequately protect residents close to these locations.

8.11 ADC Environmental Health Department has not previously been consulted on the proposed final location and use of Climping Compound. As described in Section 4, there are concerns regarding the substantial size of Climping Compound, covering 6.13ha and limited detail provided on its use. The draft DCO refers to Work No.10 only as a 'temporary construction compound'. Whilst appreciated a degree of flexibility is required, further detail of Climping Compound, including justification for the substantial size, is sought.

8.12 There are concerns regarding the lack of representative baseline noise monitoring in the ES for noise sensitive locations in the vicinity of the Climping Compound (Work No.10). Only data for a single location to the south-east of the compound has been presented and these data do not accurately characterise existing baseline noise conditions at nearby noise sensitive receptors, in particular, at:

- Climping village;
- Climping Caravan Park immediately east of Climping Compound;
- Climping C of E Primary School;
- Climping Village Hall and playing field;
- glamping site at Cuckoo Farm; and
- land to the West of Church Lane South of Horsemere Green Lane (proposed residential development (Ref CM/48/21/RES) immediately adjacent to the western boundary of Climping Compound). Whilst Chapter 21 of the ES suggests a low certainty of construction overlap, it is of the view of ADC that the residential development is likely to coincide with the use of Climping Compound, should the reserved matters application be approved.

- 8.13 There are concerns regarding the potential effect of Heavy Good Vehicle (HGV) movements on existing quiet residential roads, particularly access to the onshore cable corridor west of Benjamin Gray Drive. Chapter 21 of the ES states that the vehicular numbers for operational and maintenance traffic will be minimal and below threshold values for a change in traffic noise. The concerns raised are not solely related to increases in traffic flows but also the change in composition of traffic and magnitude of noise on dwellings along quiet access roads.
- 8.14 The construction works are considered to result in **negative** local effects, however, to reduce the negative local effects resulting from noise, embedded mitigation measures are proposed within the Commitments Register, which are discussed in the subsequent section. Subject to the further detailed design and appropriate insertion loss performance of any noise mitigation, which will need to be included within a stage specific CoCP and, subject to other regulatory controls (prior consent under Section 61 of the Control Pollution Act 1974) at the most noise sensitive locations, construction works could be reduced to a **neutral** local effect.
- 8.15 Once the construction works are completed and the Project operational, the likely effects within the District would be limited to offshore wind turbine noise. A number of other aspects, such as operational traffic was agreed to be scoped out of the ES by the Planning Inspectorate.
- 8.16 Appendix 21.3 of the ES provides preliminary wind turbine noise predictions based on several 'candidate' turbines including the cumulative impact of Rampion 1. Given that the design and layout of the WTG is not known at this stage, a number of scenarios are modelled. These are considered to represent worst case noise emissions, with receptor locations modelled at the shoreline. A statement is also made that *'the final design of the wind farm is substantially smaller than the scenarios modelled'*. The resultant modelling outputs demonstrate that based on the information available at the time of the modelling, operational noise levels are considered to achieve the 35 dB LA₉₀ lower limit, as set out in ETSU-R-97 *The Assessment and Rating of Noise from Wind Farms* (The Working Group on Noise from Wind Turbines, 1996). However, ADC request that noise modelling is re-run once the Project has progressed to the final turbine types and layout as this may influence the worst case predicted noise levels.
- 8.17 In light of the above and, considering a number of worse case assumptions in the modelling scenarios, the operational noise and vibration effects are considered to be **neutral**.

Vibration

- 8.18 Potential perceptible vibration effects are predicted at properties close to a number of HDD crossings (HDD05-N, HDD05-SW, HDD07-N, HDD07-S, HDD10-S, HDD10-W and HDD11-S in Lyminster, Poling, Hammerpot and Angmering Park, as identified in Chapter 21 (Table 21.36) of the ES) where the Peak Particle Velocity (PPV) threshold for low impact is exceeded by over double at some locations. Whilst only receptors within 100m were assessed, it's likely that properties beyond 100m

may also be subject to such effects. Reference is made to C-33 (outline CoCP) of the Commitments Register, however, no further detail has been provided to justify reducing magnitude of change from medium to low.

- 8.19 High risk impacts are identified at a number of locations (Michaelgrove Lane, North Lodge and residence to the north, Spearfield Stud and Livery) from the vibration effects from construction road traffic (note earlier concerns regarding traffic composition on Benjamin Gray Drive). It is noted that any residence within 2m of the irregularity would experience an impact of high magnitude and any residence within 5m of an HGV travelling over an irregularity at 50mph would experience a high impact.
- 8.20 The construction works are considered to result in **negative** local effects. Subject to the further detailed design and appropriate insertion loss performance of any proposed mitigation (commitment C-26 and C-160 of the Commitments Register), which will need to be included within a stage specific CoCP, and where appropriate, subject to other regulatory controls (prior consent under Section 61 of the Control Pollution Act 1974) at the most vibration sensitive locations, construction works could be reduced to a **neutral** local effect.

Adequacy of the DCO Application, Actions and Commitments

- 8.21 There is an expectation that the principles and requirements of BS 5228-1:2009+A1:2014 '*Code of practice for noise and vibration control on construction and open sites*' – Part 1: Noise and BS 5228-2:2009+A1:2014 '*Code of practice for noise and vibration control on construction and open sites*' – Part 2: '*Vibration*' be implemented in full to reduce the impact on sensitive receptors and this has broadly been adopted within the measures set out in the ES.
- 8.22 The preliminary construction noise assessments may require further refinement for the stage specific CoCP in terms of the finalised construction plant and machinery, location and on-times, as set out in the Commitment Register (C-263).
- 8.23 The Commitment Register sets out embedded mitigation measures, principally through commitments C-22 (core working hours), C-26 (best practicable means), C-263 (and revision of construction noise assessments at design stage). The adequacy of such measures is unclear until further refinement of the construction noise predictions is undertaken. Commitment C-263 suggests that the adequacy of the construction noise assessments will be reviewed by contractors to ascertain if there is '*any significant deviation*' from the initial sound level predictions. The competency of the contractor to review sound level predictions is questioned and the term '*significant deviation*' should be quantified.

8.24 The absence of proposed noise and vibration monitoring from the Commitment Register is noted and it is anticipated that for the worst-case locations (i.e. close to HDD crossings) that continuous noise and vibration monitoring should be undertaken and secured through the stage specific CoCP.

8.25 In terms of construction noise, ADC request that the Outline CoCP is updated to include:

- commitment to augment the existing baseline noise surveys to include those areas identified where representative baseline noise levels are not provided (Climping village, Climping Caravan Park, Climping C of E Primary School, Climping Village Hall and play area and the glamping site at Cuckoo Farm), together with at the location of the proposed residential development (CM/48/21/RES). Additional locations would need to be agreed with ADC and included in an updated construction noise assessment for stage specific CoCP;
- commitment that the stage specific CoCP will be informed by an updated assessment of construction noise effects as and when they are available, to include provide noise modelling inputs for construction compound predictions (including concrete batching plant), revised trigger levels for shoulder hours, corrections for uncertainty;
- commitment construction noise and vibration monitoring will be included in the stage specific CoCP and would be agreed with ADC;
- where despite mitigation measures are implemented and residual noise and/or vibration effects are predicted to arise, consideration should be given to the temporary relocation of residents affected by 24-hour drilling as a method of mitigation where HDD (or other noisy working) is scheduled to proceed for 24 hours per day for longer than 48 consecutive hours;
- commitment that prior to undertaking any essential night-time working, the timing and duration of such works will be approved with ADC through an agreed process to be included in the CoCP i.e. application to ADC for prior approval under Section 61 of the Control of Pollution Act 1974; and
- commitment that core working hours for Climping Compound to be restricted to Monday to Friday 08:00 to 19:00 hours and Saturday 09:00 to 13:00 hours due to longevity of construction period and proximity of sensitive receptors.

8.26 As detailed in Appendix 21.3 of the ES, further noise modelling of WTG noise is required once the Project has advanced to the finalised wind turbine selection and layout, so that likely noise effects at the shoreline and residential locations can be re-evaluated. Updated noise predictions and assessment of wind farm noise to be submitted and agreed with ADC.

9. HISTORICAL ENVIRONMENT

Local Planning Policies

9.1 The following policies within the adopted Local Plan are considered relevant to the historical environment aspects of the Project within the District (beyond the South Downs National Park).

- Policy HER SP1 seeks to conserve or enhance the historic environment. Designated heritage assets will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance. Non-designated heritage assets and their settings will also need to be conserved and enhanced appropriate to their significance and contribution to the historic environment;
- Policy HER DM1 seeks that development affecting statutory listed buildings will be required to preserve or enhance the historic character, qualities and special interest of the buildings and their settings;
- Policy HER DM2 regarding the alteration or extension of buildings on the Local list will be expected to relate sensitively to the building or structure and its setting and respect its architectural, landscape or historic interest. Demolition will only be consented where it can be demonstrated that the building or structure cannot be put to a beneficial use or re-use. Replacement structures will need to be of a high-quality design; and
- Policy HER DM3 seeks to preserve or enhance the character or appearance of the conservation area. Planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a conservation area, provided that the proposals do not cause harm.

9.2 The policy within the following 'made' Neighbourhood Plan is considered relevant to identifying non-designated heritage assets that could be significantly affected by the Project:

- Policy 17 of the Littlehampton Neighbourhood Plan identifies properties in Appendix 4 as locally important heritage assets, which of relevance to this Project are 16 Granville Road, 48 - 95 South Terrace. The effects on the significance of these non-designated heritage assets will be taken into account to avoid or minimise conflict with the heritage asset.

9.3 The following is also of relevance to the historical environment:

- Conservation Areas Management Plan (2014)²⁹; and
- Conservation Areas Supplementary Planning Guidance (2000)³⁰.

9.4 The negative effects of the compounds (landfall compounds near Climping beach (Work No.8), the trenchless crossing compounds within Work No.9 and Climping Compound (Work No.10)) during the construction works would not accord with the above policies with regard to the setting of the affected heritage assets, especially the Grade II listed buildings: Climping Mill, St John's Cottage (NHLE 1027590), Decoy Cottage and Newplace Farmhouse (NHLE 1232882), Church Farmhouse East and Church Farmhouse West (NHLE 1027643), Old Vicarage; and also the Grade I listed St Marys Church, together with the setting of Lyminster Conservation Area.

9.5 However, when the construction works are completed and the Project operational, the Project would generally comply with the overall aims of the policies in terms of the impact of the significance of the heritage assets and their setting.

Key Local Issues and Likely Impacts

Listed Buildings and Locally Listed Buildings

9.6 There are numerous listed buildings and locally listed buildings within and immediately adjacent to the DCO Limits of the Project, particularly around Climping, Littlehampton and Lyminster. Owing to the heritage assets on or within proximity to the Project, the principal concerns and effects are considered to be in relation to construction activities as set out below.

²⁹ Arun District Council (2014) "Conservation Areas Management Plan Consultation". Available at <https://www.arun.gov.uk/conservation-areas/> Accessed 4 December 2023

³⁰ Arun District Council (2000) "Conservation Areas Supplementary Planning Guidance". Available at <https://www.arun.gov.uk/supplementary-planning-documents-spds/> Accessed 4 December 2023

- 9.7 ADC has concerns regarding the visual effects associated with the temporary trenchless crossing compounds and the landfall compounds near Climping beach. As noted for the Grade II listed Climping Mill, the landfall compound (Work No. 8) near Climping beach will be clearly visible from the asset, as reported in Chapter 25 of the ES. This compound is also close to other listed buildings, such as the Grade II listed buildings at Kent's Farm (NHLE 1027674, NHLE 1233446, NHLE 1233447), Brookpit Manor and Brookpit Cottage. It is also noted that a trenchless crossing compound within the onshore cable corridor (Work No.9) is close to the following Grade II listed buildings: St John's Cottage (NHLE 1027590), Decoy Cottage and Newplace Farmhouse (NHLE 1232882).
- 9.8 The location and size of Climping Compound (Work No.10) is such that it would be close to the part of the historic core of Climping, listed buildings and Scheduled Monument. This together with the likely nature of the uses within the compound (such as welfare cabins, a concrete batching plant up to 20m in height) would impact upon the wider setting of the assets and historic core of Climping.
- 9.9 As a result, the construction works would alter the setting of heritage asset, but not the operational stage i.e. this will not harm the understanding of its historic and architectural interests. The construction works would introduce what is identified within Chapter 25 of the ES as '*new visual and audible elements to the asset's setting via the presence of trenchless crossing compounds*'. It is acknowledged that these works would be 'temporary' or 'short term' but that for the duration of these works, the effect upon the setting of the heritage assets would be **negative**.

Conservation Areas and Area of Character

- 9.10 Conservation Areas of relevance to this Project have been identified within the District (beyond the South Downs National Park), as follows:
- Aldwick Bay Conservation Area;
 - Craigweil House, Aldwick Conservation Area;
 - Aldwick Road, Bognor Conservation Area;
 - The Steyne, Bognor Conservation Area;
 - Littlehampton (River Road) Conservation Area;
 - Littlehampton (Sea Front) Conservation Area;
 - Lyminster Conservation Area; and
 - Poling Conservation Area.

- 9.11 Both Aldwick Bay and Craigweil House Conservation Areas were developed in the early 20th century as planned estates where the setting includes the coast. The special character derives from the low density layout, the high quality of the buildings in materials and style, and landscaped gardens and verges. It is a very good example of a 1920 —1930's planned Estate.
- 9.12 The Aldwick Road Conservation Area is characterised by early 19th century Victorian and Edwardian terraces that were developed as part of a westward expansion of Bognor Regis. Again, the coast to the south of the Conservation Area forms part of its setting.
- 9.13 The Steyne, Bognor Conservation Area is located immediately west of the town centre and is centred on an area developed in the late 18/19th century. It is illustrative of the development of the town as a seaside resort by its founder, Sir Richard Hotham. Within the Conservation Area, there are two areas of open space, each with terraces that front on to them. The terraces are predominantly two/three storeys in height and rendered. Of note is the imposing Royal Norfolk Hotel, dating from the 1840's, which is set back diagonally across the corner of Aldwick Road and West Street, which faces out to the sea. The seascape is a major contributor to the areas setting.
- 9.14 The Littlehampton (River Road) Conservation Area is west of Littlehampton town centre and runs parallel to the River Arun. The area covered by the designation was developed in stages during the first half of the 19th century. Buildings were originally occupied by town dignitaries and those who had an interest in the sea and seafaring. Where there were wharfs are now modern buildings, which somewhat separate the Conservation Area from the river, although views are possible from the river front walk.
- 9.15 The Littlehampton (Sea Front) Conservation Area contains terraces from a range of periods. Of note are the oldest buildings along South Terrace, which consist of three storey Georgian and Regency properties built in pairs and short rows as part of a longer terrace. These are domestic in scale and as each pair or group was built individually, there is a variety of detail but without the loss of harmony. The Greensward (an area of open space) immediately south of the Conservation Area affords views towards the sea/beach from the majority of the buildings along South Terrace. The regular building line and design represent the architectural intentions of the architects/builders to incorporate visual links of the seascape.
- 9.16 Lyminster Conservation Area is a small, attractive rural settlement between Littlehampton and Arundel. It is characterised by buildings of various scale, style, date and materials. There is an informality of layout enhanced by mature landscaping and verges. Flint walling is also an important feature of the area, including substantial high walling at the eastern end of Church Lane. The setting of the Conservation Area consists of the surrounding rural landscape.

- 9.17 Poling Conservation Area is split into two distinct parts, separated by more recent development. The eastern part comprises the medieval core of Poling with the Grade I listed church and the western part consists of an informal arrangement of houses of a traditional appearance set within a lane. The setting of the Conservation Area consists of the surrounding rural landscape.
- 9.18 Within the Conservation Areas described above are listed (designated heritage assets) and locally listed buildings (non-designated heritage assets). The Conservation Areas, except for Lyminster, Poling and Littlehampton (River Road), are located on or close to the coast.
- 9.19 Construction works would result in a temporary change to the setting of Lyminster Conservation Area. As described in Chapter 25 of the ES, the construction works would introduce '*new visible and audible elements to the immediate proximity of the conservation area, in contrast with the general sense of a rural, agricultural basis for the settlement and individual buildings*'. The result would be a **negative** effect. The construction works would also potentially have a negative effect on the wider setting of the Poling Conservation Area, including the approach from the north, which would pass the construction works. It is acknowledged that the **negative** effects would be temporary and, as a result, would not permanently harm the setting of the Conservation Area. Consideration should, however, be afforded to the access points and trenchless crossing compounds.
- 9.20 As evidenced in Viewpoint 12 from Bognor Regis promenade (Figure 15.37 of the ES), the WTG of the Project from this viewpoint appear more visible and prominent compared to Rampion 1 WTG. It is clear that for both Bognor Regis and Littlehampton (which includes the Aldwick Road, Bognor Conservation Area, The Steyne, Bognor Conservation Area, the Littlehampton (Sea Front) Conservation Area and the South Terrace Area of Character) the WTG would be visible in sea views. This is described in Chapter 25 of the ES as the 'presence of new, clearly modern visual elements in long distance views' or contributing a 'framing to seaward views rather than interruption'. The seascape setting contributes to the interests of these Conservation Areas; this is agreed within the heritage baseline assessment. Of note is the fact that for the Bognor Regis (The Steyne) Conservation Area '*The visual relationship between the seascape to much of the southern extent of the conservation area is the primary contribution of its setting to the area's interests*'. Additionally, for Littlehampton (Seafront) Conservation Area, it is thought that '*The seascape setting contributes to the interests of the conservation area*'. Having reviewed Chapter 25 of the ES, ADC disagree that the WTG would contribute to the framing a view (of the Littlehampton (Seafront) Conservation Area), but rather result in an interruption, especially when the structures would be permanently on view from the Conservation Areas in views towards the seascape. The WTG, as described above in Section 6 above and in Chapter 15 of the ES, would result in significant **negative** visual effects on the coastline of the District.

Adequacy of the DCO Application, Actions and Commitments

- 9.21 Chapter 25 of the ES identifies listed buildings where the settings could be affected by the Project. However, the ES fails to consider the likely effects of the Project on the setting of the following designated heritage and non-designated heritage assets:
- listed buildings at No. 45 – 47 South Terrace;
 - locally listed buildings at No. 4, 8 – 95 South Terrace and 16 Granville Road; and
 - South Terrace Area of Character.
- 9.22 An assessment of the likely effects of the Project on the above heritage assets should be undertaken to make sure all the effects on the historic environment are fully understood and mitigated for, where possible.
- 9.23 As the duration of Climping Compound, landfall compound and trenchless crossing compounds are expected to be in use for some time, appropriate landscaping/boundary treatments should be implemented to mitigate the effects of the construction activities on the setting of heritage assets (see Section 6 for further details).

10. SUMMARY OF MITIGATION, COMPENSATION AND REQUIREMENTS

Mitigation, Monitoring and Compensation

- 10.1 ADC has concerns regarding the lack of commitment and certainty to some mitigation, monitoring and compensation, together with the mechanisms for securing. An overarching concern is that owing to the wording of some mitigation measures in the Commitment Register, it is not definite or certain that the measures would be implemented to mitigate or compensate effects. Firmer commitment is therefore sought to delivering these mitigation measures, such as a Supply Chain Plan and Community Benefits Package. ADC will continue to engage with the Application to make sure appropriate mitigation is provided.
- 10.2 As described above, ADC is of the opinion that the District will not significantly benefit from the Project, rather the area and local communities will experience disruption and significant negative effects, some of which are unlikely to be mitigated. Where mitigation is not possible, ADC seeks appropriate compensation through a Community Benefits Package (see below).
- 10.3 The adequacy of mitigation, compensation and commitments are described above in Section 4 to Section 9, with a summary of the key points provided below:
- owing to very limited detail given within the Outline Skills and Employment Strategy, ADC seeks the strategy to be developed further in consultation with ADC to develop long term investment opportunities for apprenticeships and local education institutes in Arun, together with measures to support local SMEs and opportunities for SMEs to access the supply chain;
 - the Outline Skills and Employment Strategy refers to a Community Benefits Package, although no details are provided. ADC seeks a firmer commitment to delivering a Community Benefits Package such as that provided for Rampion 1 that includes benefits specific to the local community in Arun. A Community Benefits Package is considered appropriate to adequately compensate for adverse effects that cannot be otherwise mitigated for. Discussions are sought with the Applicant to agree the Community Benefits Package (including the criteria and funding). It is requested that this is secured through the DCO;
 - for the cable route to be located as close as possible to the field boundaries to minimise disruption to agricultural activity;
 - owing to concerns that there is a lack of detail within the Outline CoCP, which would be used to inform the detailed staged CoCP, ADC seek an updated Outline CoCP as the control document. This Outline CoCP should include firmer commitments for supply chain opportunities for local

SMEs (see below), baseline noise surveys, updated noise assessments, noise and vibration monitoring and core working hours specific to the use of Climping Compound. Such noise surveys, assessment, mitigation and monitoring should be agreed with ADC;

- a firmer commitment to developing a Supply Chain Plan, as whilst this is referred to in C-34 of the Commitments Register as exploring opportunities for companies to access the supply chain, this should be secured through the CoCP;
- commitment to preparing and submitting to ADC for approval a Construction Communications Plan for Climping Compound. Whilst Construction Communication Plans are referenced in the Outline CoCP and Chapter 19 of the ES, it is not referenced specifically in relation to Climping Compound, although other locations are suggested as 'applicable'. ADC request a greater commitment for a Construction Communication Plan to be submitted to ADC for approval prior to the commencement of works associated with Climping Compound;
- approval should be sought from ADC for the exact positioning of the concrete batching plant and soil/aggregate stockpiles and be placed as far away as possible from residents/other sensitive receptors;
- owing to concerns regarding the lack of biodiversity enhancement within the District, a firmer commitment to delivering biodiversity net gain specifically within Arun and for this to be demonstrated through a biodiversity net gain assessment at the District level and a maintenance and monitoring plan of biodiversity net gain (to be agreed and secured with ADC via appropriate means). Net gain should be delivered in accordance with the biodiversity hierarchy. ADC also has suggested a contribution to the Sussex Kelp Recovery Project to support marine biodiversity net gain;
- greater commitment to advanced tree/habitat planting, particularly along boundary/field treatments, and for the staged reinstatement of habitats within the first planting season following completion of the construction works and backfilling within the section, rather than within two years, as currently defined within C-103 of the Commitments Register;
- whilst it is acknowledged that Poling Lane would be crossed by a trenchless crossing method and will not be closed, ADC seeks guarantees that the single access road to Poling Village will remain open at all times. Where this cannot be delivered, adequate mitigation should be in place to ensure public passage to and from Poling village is maintained and is suitable for emergency access purposes; and
- Lyminster bypass (northern section) is currently under construction and due to open in Autumn 2024. ADC seeks guarantees that the new road surfaces would not be disturbed and be crossed by trenchless crossing techniques.

DCO and Requirements

- 10.4 In addition to the above, discussions are sought with the Applicant regarding some of the wording within Schedule 1 and the Requirements of the draft DCO to account for the following:
- to provide a description for Work No.10 in Schedule 1 (comparable detail to other Work No. descriptions) of the use of 'temporary construction compounds' or provide in another document where there is a commitment to comply with the description. This would provide greater clarity and certainty of the uses proposed within Climping Compound;
 - with regard to Requirement 10, it will be important that the programme of works secured clearly defines the stages, phasing and associated timings of works within the District so that it is clear to ADC when Requirements will need to be discharged for the stage specific documents, such as the LEMP (Requirement 13) and CoCP (Requirement 22);
 - with regard to Requirement 14, the wording is amended so that the biodiversity net gain strategy for stages that relate to areas within Arun is also submitted to and approved by ADC. ADC requires that this is secured by a S.106 agreement, if appropriate;
 - with regard to Requirement 33, the wording is amended so that the skills and employment strategy is 'agreed with and provided to' the relevant planning authority, which will include ADC; and
 - a commitment and a mechanism to secure a Community Benefits Package, which is currently not secured.
- 10.5 Discussions are sought to agree the role of ADC in the discharge of Requirements that relate to the District (beyond the SDNPA), in particular, with regard to stage specific LEMP, detailed/stage specific CoCP, biodiversity net gain strategy and skills and employment strategy. With regard to these stage specific management plans and strategies, ADC request to be a consultee and for ADC to approve these where they relate to the District (beyond the SDNPA) alongside other relevant consultees.
- 10.6 Owing to the additional expenditure to ADC in relation to the discharging relevant Requirements and S61 applications, ADC seeks to recover the associated costs. ADC would welcome discussions with the Applicant on the recovery of costs.

11. SUMMARY

- 11.1 The purpose of this Local Impact Report has been to outline the likely effects of Rampion 2 Wind Farm at local level on the residents, businesses and the environment within the District of Arun and to briefly evaluate these effects in the context of local planning policy.
- 11.2 ADC supports renewable energy generation and carbon reduction objectives to meet climate change commitments, whilst also promoting economic development and locally skilled jobs. ADC has some concerns regarding the negative effects to residents, communities, the local economy and the environment. ADC is of the opinion that the District will not significantly benefit from the Project, rather the area and local communities will experience disruption and significant negative effects, some of which are unlikely to be mitigated. ADC has highlighted where the effects are not considered to be compliant with local policy; these are notably in relation to biodiversity, tourism, historic environment and visual effects within the District during construction and a lesser extent once operational.
- 11.3 ADC has sought to identify where further work is considered necessary so that the likely effects can be fully understood at local level. ADC has also requested firmer commitments and appropriate mitigation and compensation to delivering social, economic and environmental benefits that are specific to the District, particularly with regard to biodiversity, education, tourism, employment and skills. Where mitigation is not possible, ADC seeks appropriate compensation through a Community Benefits Package. ADC will continue to engage with the Applicant to secure the actions and commitments required during the Examination period and beyond.

SOURCES OF INFORMATION FOR FIGURES

- Landstack, 2023. Available at [<https://app.landstack.co.uk/login>]
- DEFRA, 2023. 'Magic Map', available at [<https://magic.defra.gov.uk/>]
- Historic England, 2023. 'Search the List', available at [<https://historicengland.org.uk/listing/the-list/>]
- Arun District Council, 2018. 'Adopted Local Plan 2011-2031', available at [<https://www.arun.gov.uk/adopted-local-plan/>]