

Response from the South Downs National Park Authority to the Applicant's Deadline 1 Submissions

1. Summary

1.1 The South Downs National Park Authority's (SDNPA) response comprises detailed comments on the submissions made by the Applicant at Deadline 1 in respect of:

- Action Point 3 (Fawley and Dungeness) **[REPI-019]**
- Action Point 27 (South Downs National Park) **[REPI-024]**
- SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note **[REPI-037]**

1.2 The SDNPA's response to the other Action Points from Issue Specific Hearing 1 (ISH1) is provided in the table following these comments.

1.3 The SDNPA and Applicant have been in dialogue following ISH1, in order to identify areas of agreement and potential steps to resolve ongoing areas of concern. We will continue to engage with the applicant to progress the Statement of Common Ground and seek to reduce the number of Principle Areas of Disagreement.

2. Action Point 3 – Fawley and Dungeness

2.1 The SDNPA welcomes the further information provided as to why Fawley has been discounted, as this information has been requested throughout the pre-application process and reiterated at paragraph 6.6 of the SDNPA's Local Impact Report **[REPI-049]**. The additional information, however, raises a number of additional concerns including why the feasibility of the alternative route to Fawley in particular was not revisited once the constraints associated with the selected option were realised.

2.2 For example, in paragraph 1.3.8, where the applicant considers the effects of the constraints associated with connecting at Fawley:

“Managing this safe operation of the navigable water in this busy area would have knock on impacts in terms of scheduling, coordinating with third party vessels, port authorities. In comparison to the selected option this would be complex and entail additional costs”.

This decision was reached in 2020, well before the technical constraints linked to multiple landowners, the amount of onshore trenchless crossing required within sensitive areas and the significant complications associated with areas of potentially nationally significant archaeology were understood.

2.3 At paragraph 1.3.11, the Applicant makes reference to The Crown Estate's Cable Route Protocol. Whilst it is accepted and appropriate that this Protocol is an important consideration, it does not take into account the onshore impacts when identifying an appropriate route. Therefore, it is considered this is an incomplete assessment when assessing alternatives – the offshore impacts should not be looked at in isolation, nor should they be considered of any greater or lesser importance than those onshore.

2.4 In paragraph 1.3.12 it is stated that HDD would need to be launched from a site within the New Forest National Park and exit within the Solent and Southampton Water Special Protection Area (SPA). At paragraph 1.3.13, the impacts on the international level environmental designations and the potential impact on the New Forest National Park are

cited as reasons for why connection to the Fawley substation was discounted. Whilst it is noted that the SPA is not affected as part of the selected route, Sites of Special Scientific Interest are impacted directly by HDD, as well as several other environmental designations onshore. In discounting options to connect at Fawley early on in order to avoid impact on an international site before exploring whether the integrity of the site could be preserved (and/or cost, as has also been stated by the Applicant), it has given rise to a potentially equally damaging or worse alternative within another nationally significant habitat and its irreplaceable habitats. Given the significant and widespread impact on the South Downs National Park as well as other designated sites, the SDNPA suggest that the high-level assessment to discount the option to connect at Fawley is revisited so that parties involved can understand and properly consider the matter.

- 2.5 The consideration of the Dungeness option appears to be even less comprehensively considered. This option had not been presented as an alternative during the pre-application process.
3. Action Point 27 – The South Downs National Park [REPI-024]
 - 3.1 Overarching commentary on the Applicant’s approach to developing in the SDNP is discussed in more detail within the SDNPA’s Written Representation and Local Impact Report (References **REPI-049** and **REPI-052**).
 - 3.2 In summary, we maintain there is a significant and substantial change to the breathtaking views encapsulated by Special Quality I which, in itself, is an overarching Quality of which the remaining six support. This is reflected in the infographic at fig.1 of the SDNPA’s LIR and in paragraph 1.9 and 1.10 of the South Downs Local Plan (Appendix **APP-036**), which states “The special qualities do not sit in isolation, but are interconnected and mutually reinforcing...Landscape is the key to all of the special qualities”. The SDNPA disagrees that the effects on this Special Quality are not of a high magnitude and is considered in more detail in Appendices A and C of **REPI-052**.
 - 3.3 As suggested at ISHI, there is no evidence that the mitigation proposed (for example in paragraph 1.3.37 of **REPI-024**) has taken into account the high status the National Park is afforded; this mitigation would need to have been applied regardless of its location in the National Park. Similarly, at paragraph 1.3.46, it is understood that the commitment to delivering ecological mitigation and biodiversity net gain would not necessarily be within the National Park and so it is not true to say that this would contribute to the Special Qualities. The SDNPA would expect to see mitigation measures specific to the SDNP, which demonstrates how it conserves, enhances and seeks to further the National Park Purposes.
 - 3.4 There are also instances demonstrated in the pulling together of these comments from across chapters of the Environmental Statement that the wrong test has been applied in respect of assessing the impacts. For example, at paragraph 1.3.57 and 1.3.100, where it is suggested that as the Proposed Development occupies a relatively small area of the SDNP overall, the impacts are reduced. The SDNPA disagrees with this approach and considers the effect of the Proposed Development on the Special Qualities should be assessed within the Order Limits and study area, which are much more focussed.
4. SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REPI-037]
 - 4.1 Commentary relating to the SLVIA Maximum Design Scenario and Visual Design Principles are contained within the following SDNPA written representation document:

- SDNPA Written Representation [REPI-052]
 - Sections 3.2.4 and 3.4.6
 - SDNPA Written Representation Appendix A
 - Design Principles: Sections 6.1 - 6.9 and 13.8
 - Maximum Design Scenario: Sections 3.2, 4.2, 4.4, 5.4, 6.6, and 6.9.

In light of the additional information in the Applicant's Clarification Note [REPI-037], the SDNPA would like to add the following commentary.

Rampion 1 design principles and SDNP landscape-led approach

- 4.2 Despite the assertion in section 6 that due regard has been given to the Rampion 1 Design principles this has not been demonstrated to be the case.
- 4.3 The report states at 6.1.3 that *'the Applicant considers that it has had, and is having, due regards the design principles held in the Rampion one design plan..., however Rampion 2 is a different project that should respond to its own design parameters and principles that respond to its location and surroundings'*. The SDNPA would strongly assert that Rampion 1 is part of the surroundings and that the Proposed Development should not only take the Rampion 1 design principles into consideration but should respect them and work with them given the proximity of the Rampion 1 array.
- 4.4 This assertion is strongly backed up by the **South Downs National Park Strategic Policy SD5: Design**, which states *'Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.'* It goes on to say that *'The following design principles should be adopted as appropriate: a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context...'*

Orthogonal layout

- 4.5 The Rampion 1 4th design principle adopted in the Wind Turbine Generator (WTG) layout sets out that the WTGs are laid out orthogonally with straight lines along several axes, which provides clear site lines through the wind turbine layout from certain viewpoints in the SDNP.
- 4.6 At section 4.2.3.iv. it also states that *'the sight lines vary along the coastline depending on the location of the visual receptor and it is notable that the main south-west to north-west axis of the WTGs does not align to the Sussex Heritage Coast and clear sight lines are not evident in views of Rampion 1 WTGs from the Sussex Heritage Coast'*. With the addition of the Proposed Development WTGs on a different grid to the Rampion 1 and positioned behind the Rampion 1 WTGS in views both looking west and south from the SDNP, the benefit of the orthogonal layout and the clear sight lines will be lost from other areas as well.

Limited Horizontal Field of View (HFoV)

- 4.7 The SDNPA welcomes this principle, however the focus has been on the Sussex Heritage Coast and little consideration given to the wider SDNP area.
- 4.8 The SDNPA does not agree with the statement at 6.1.17 that *'Reductions in the HFoV occupied by Rampion 2 in these views from the Heritage Coast would also translate to reductions in the HFoV in views from the range of inland vantage points along the open tops of the central Downs.'* The HFoV may have been reduced through the design evolution the east (which is welcomed), but

the extent of the array to the west has remained relatively unchanged and the HFoV is considerable here.

- 4.9 The views of the array from the Central Downs are at a very different angle to the view from the Heritage Coast. In views from the Heritage Coast, the western area of the Rampion 2 array is seen behind the Rampion 1 array, but in views from the Central Downs, the HFoV is far more considerable with the extent of the western area of the array set in currently open water with clear views out to sea.
- 4.10 It is not clear why the Western area of the array takes such a linear form and cannot be more compact in a similar manner to the Rampion 1 array.
- 4.11 The SDNP special qualities apply across the whole park, with the first Special Quality being diverse, inspirational and breathtaking views. Consideration of the views from the Heritage Coast is welcomed but limiting of the HFoV should be considered from all parts of the SDNP in equal measure.

Wind Farm separation zones

- 4.12 It is the understanding of the SDNPA that the separation zones are provided for the purposes beyond assisting mitigation of landscape and visual impact. On this basis any mitigation provided is coincidental and not purposefully designed. It is the SDNPA's assertion that if these separation zones were design principles set by the need to mitigate landscape and visual impact they would be far wider.
- 4.13 With the Proposed array being set to the south and west of the Rampion 1 array, the SDNPA feel that the separation zones provide little relief to the visual impact. In views from the north there is no separation between Rampion 1 and the southern area of the Proposed array, and in views from the east there is no separation between Rampion 1 and the western area of the Proposed array.
- 4.14 As the report states itself, the separation principles '*afford mitigation in certain viewing angles from the open downs of the SDNP*'. The SDNPA would suggest that these viewing angles are possible from a limited number of locations.

Separation foreground

- 4.15 The report also states that '*Apparent scale differences and complexities in aesthetic appearance between Rampion 1 and Rampion 2 WTGs have been reduced through the revised spatial extent of the array area (avoiding areas to the east of Rampion 1) and the use of wind farm separations zones.*' The SDNPA does not agree with this statement. As stated already the separation zones are not deliberately designed to assist mitigation and are not sufficient in themselves to achieve this and the two different sizes of wind turbines are still seen in combination from many views.

Maximum Design Scenario

- 4.16 The SDNPA has concerns regarding the statement in section 6.2.5 '*Whilst the parameters include for up to 90 WTGs, the inclusion of a parameter limiting the rotor swept area ensures that no more than 65 of the largest turbines can be installed.*' The DCO Order Limits cover a much wider area than that which is required for 65 WTGs, and it is not clear how the rotor swept area would preclude more turbines being installed in the southern area of the western Rampion 2 zone.

- 4.17 The SDNPA would suggest that this needs further clarification, given that the final WTG layout is not confirmed.

SDNPA Response to Applicant's Response to Action Points Arising from Issue Specific Hearing I [REP1-018]

Action Ref	Action Point	Applicant's Response (Summary)	SDNPA Comments
5	Confirmation of onshore cable - route – including points of leaving and entering the South Downs National Park	Location of the onshore cable route in relation to the South Downs National Park (SDNP) is best understood by looking at figures 18.6a Landscape Designations and 18.6b Landscape Designations Environmental Statement [APP-098].	This clarification is welcomed, however we would appreciate clarification that this has been understood across all topic areas within the Environmental Statement and the overall assessment of the SDNP.
9	Submission of detailed information on the proposed design of accesses and HDD proposals at A27 Hammerpot.	Update on progress (with National Highways) will be provided in forthcoming submissions. It is not the intention to submit detailed design information into the Examination for approval; this would be provided to discharge the draft DCO requirement 15 or 16.	The northern edge of the A27 carriageway abuts the boundary with the SDNP. A number of the HDD launch/reception locations are therefore within the SDNP. Whilst it is understood further details of access would be part of a submission to discharge Requirement 16, the details pertaining to the HDD proposals are not sought by this Requirement and we would seek clarification on these details and would welcome the opportunity to discuss these further with the applicant and National Highways.
11	A Traffic Management Plan for Michelgrove Lane is to be provided.	Engagement is ongoing with West Sussex County Council (WSCC) to develop a traffic management strategy that considers how safe access can be achieved at access A-26, A-28 and along Michelgrove Lane.	This location is within the SDNP and SDNPA has repeatedly expressed a desire to be involved in these discussions in order to ensure National Park Purposes are incorporated into the

			strategy. We would hope to feed into this process before Deadline 3.
12	Note to be provided on options for ensuring HGVs do not arrive on site outside of the agreed construction hours.	'Shoulder hours' introduced at either end of the core working hours.	The introduction of 'shoulder hours' and the activities permitted within them are likely to have 'knock-on' effects in respect of tranquillity, ecology and dark night skies. The works permitted are not limited to the construction compounds and so could adversely affect locations throughout the SDNP for a longer period. The SDNPA does not object to their inclusion but seeks clarification on assessment of the effects of introducing these measures and consideration of more detailed mitigation/management to be provided as part of the Outline Code of Construction Practice (CoCP).
22	Applicant to provide details of length and area of temporary and permanent vegetation removal and reinstatement in the form of tabular detail for; hedgerow; important hedgerow; potentially important hedgerow; treeline; woodland; number of trees. This should include the length and areas of the above within the SDNP.	To be provided at Deadline 3.	We welcome the confirmation this information will be submitted as it will help the SDNPA understand the extent of the impacts on wildlife, landscape character and natural beauty. Further comments will be provided following receipt of the documents and we would be happy to work with the applicant in the assessment of the impacts of these works, to inform appropriate mitigation.
23	Review all bell mouth access points on whether necessary hedgerow	Applicant accepts that there may be instances where the extent of hedgerow removal may exceed that currently shown on the Vegetation	We welcome this further assessment. The SDNPA would expect to be engaged in further

	removal has been taken into account.	Retention Plans of Outline CoCP. The applicant will therefore undertake a more comprehensive review of all accesses, including undertaking elements of initial detailed design work, where requested by the highway authority, at a limited number of key locations.	discussion regarding the key locations for further detail design work.
24	Applicant to ensure consistency between the Environmental Statement and Arboricultural Impact Assessment (AIA) regarding tree and hedgerow loss and clearly explain any necessary differences.	Applicant notes there is a difference between the definition of 'tree/tree group/woodland/scrub' applied through the ecological assessment and AIA. There are different methodologies used for these, however a review will be carried out and presented at Deadline 3.	See comments regarding Action Point 22.
26	Applicant to review the Order limits for Work No.9 at Michelgrove Park Area and Sullington Hill to remove the central areas not required.	Applicant has reviewed the DCO corridor widths for Works No.9 at both Sullington Hill and Michelgrove Park. Both locations present non-standard trenchless crossings due to the crossing length required to avoid and protect the designated land areas, the site topography and the bedrock geological conditions. The applicant considers that it is necessary to retain the full extent of the existing corridor for Works No.9 at both locations as per the current Application.	As per our comments in the Written Representation (para 3.5.6) and Local Impact Report (para 6.26), the SDNPA are still unclear whether HDD is achievable in these locations. Based on the additional information provided, it appears further investigation is needed to establish that the principle of HDD in this location, not just the specific route under these sensitive areas.