

Rampion 2 Wind Farm Category 8: Examination Documents

Applicant's Responses to South Downs National Park Authority Deadline 1 Submissions

Date: March 2024
Rev A

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Procedure) Rules 2010, Rule 8(1)(c)(i)
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Document revisions

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Executive Summary

At Deadline 1 of the Examination for Rampion 2 Offshore Wind Farm Project, Interested Parties were invited to submit Local Impact Reports and Written Representations following Issue Specific Hearing 1 (held 07 to 08 February 2024) into the examination. A total of six Local Impact Reports and Written Representations were received from Local Authorities.

Rampion Extension Development Limited (the 'Applicant') has taken the opportunity to review each of the Local Impact Reports and Written Representations received from Local Authorities, this document provides the Applicant's response to South Downs National Park Authority's Local Impact Report and Written Representation and has been submitted for Examination Deadline 2.

1. Introduction

1.1 Project Overview

- 1.1.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the 'Applicant') is developing the Rampion 2 Offshore Wind Farm Project ('Rampion 2') located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.
- 1.1.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km². A detailed description of the Proposed Development is set out in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) [APP-045], submitted with the Development Consent Order (DCO) Application.

1.2 Purpose of this document

- 1.2.1 Interested Parties were invited to submit Local Impact Reports, Written Representations, and Post-hearing submissions at Deadline 1 (28 February 2024) following Issue Specific Hearing 1 (held 07 to 08 February 2024) to provide further information and to expand on views provided in Relevant Representations previously submitted in accordance with the Examination timetable in the Rule 8 letter [PD-007]. Please see below for a summary of the submissions received at Deadline 2, as categorised by the Planning Inspectorate:
- 6 submissions from Local Planning Authorities;
 - 5 submissions from parish and towns councils and Members of Parliament;
 - 6 representations from prescribed consultees;
 - 28 representations from and on behalf of Affected Parties;
 - 44 representations from members of the public or businesses; and
 - 8 representations from non-prescribed organisations.
- 1.2.2 The Applicant has taken the opportunity to review each of the Local Impact Reports, Written Representations, and Post-hearing submissions received. This document provides the Applicant's responses to South Downs National Park Authority's Local Impact Report and Written Representation and has been submitted for Examination Deadline 2.

1.3 Structure of the Applicant's Responses

- 1.3.1 For ease of referencing and to facilitate future cross-referencing, the Applicant has included references for the Applicant's responses to the Local Impact Reports, Written Representations, and Post-hearing submissions received from other Interested Parties, as follows:
- Local Authorities (including both host and neighbouring authorities):

- ▶ Arun District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.44)**);
 - ▶ Brighton and Hove City Council (**Applicant's Responses to Brighton and Hove City Council Deadline 1 Submissions (Document Reference: 8.48)**);
 - ▶ Horsham District Council (**Applicant's Responses to Horsham District Council Deadline 1 Submissions (Document Reference: 8.45)**);
 - ▶ Mid Sussex District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.46)**);
 - ▶ South Downs National Park Authority (this document: **Applicant's Responses to South Downs National Park Authority Deadline 1 Submissions (Document Reference: 8.47)**); and
 - ▶ West Sussex County Council (**Applicant's Responses to West Sussex County Council Deadline 1 Submissions (Document Reference: 8.43)**).
- Parish Councils and Members of Parliament (**Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)**);
 - Prescribed Consultees (as set out in Schedule 1 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2010, noting that Parish Councils are also Prescribed Consultees) (**Applicant's Responses to Prescribed Consultee's Written Representations (Document Reference: 8.49)**);
 - Affected Parties (Category 1, 2 and 3 Land Interests as identified in the **Book of Reference [PEPD-014]**) (**Applicant's Responses to Affected Parties' Written Representations (Document Reference: 8.51)**);
 - Members of the Public and Businesses (**Applicant's Responses to Members of the Public and Businesses' Written Representations (Document Reference: 8.52)**); and
 - Non-Prescribed Consultees (**Applicant's Responses to Non-Prescribed Consultee's Written Representations (Document Reference: 8.53)**).

1.3.2 Each section below includes responses to the submissions received from South Downs National Park Authority. Each response is identified in the relevant table:

- South Downs National Park Authority's Local Impact Report: **Table 2-1**; and
- South Downs National Park Authority's Written Representation: **Table 2-2 to Table 2-7**.

2. Applicant’s Response to South Downs National Park Local Impact Report and Written Representation

Table 2-1 Applicant’s Response to South Downs National Park Local Impact Report [REP1-049]

Ref	Local Impact Report Comment	Applicant’s Response																																																															
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ES.1	<p>Executive Summary</p> <p>The South Downs National Park (SDNP) lies to the north of the proposed offshore array, comprising the higher ground and open downland above the Coastal Plain and includes the Heritage Coast east of Seaford to Eastbourne.</p>	<p>The Applicant has no further comments at this time on these paragraphs (ES1 to ES3) of South Downs National Park Authority’s (SDNPA) Local Impact Report (LIR). The Applicant has provided detailed responses on the impacts identified related to these topic areas, in particular within the responses to Section 6 of the LIR.</p>																																																															
ES.2	<p>One-third of the proposed onshore cable corridor would run through the National Park. The offshore array itself and the construction activity including the temporary construction compound at Washington would take place in the setting of the National Park.</p>																																																																
ES.3	<p>The table below sets out the South Downs National Park Authority’s view on the local impacts associated with the proposed scheme, as submitted. This table assumes the delivery of all currently proposed mitigation measures. The table is ordered by topic area and represents a summary of the points made in Section 6 of this Local Impact Report.</p> <table border="1"> <thead> <tr> <th>Topic Area</th> <th>Positive Impact</th> <th>Neutral or Limited Impact</th> <th>Negative Impact</th> </tr> </thead> <tbody> <tr> <td>Principle of Major Development in a National Park</td> <td></td> <td></td> <td style="background-color: red;"></td> </tr> <tr> <td>Seascape</td> <td></td> <td></td> <td style="background-color: red;"></td> </tr> <tr> <td>Landscape</td> <td></td> <td></td> <td style="background-color: red;"></td> </tr> <tr> <td>Tranquillity</td> <td></td> <td></td> <td style="background-color: red;"></td> </tr> <tr> <td>Dark Night Skies</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Biodiversity</td> <td></td> <td></td> <td style="background-color: red;"></td> </tr> <tr> <td>Cultural Heritage inc. Archaeology</td> <td></td> <td></td> <td style="background-color: red;"></td> </tr> <tr> <td>Renewable Energy</td> <td style="background-color: green;"></td> <td></td> <td></td> </tr> <tr> <td>Water Environment inc. Drainage and Flood Risk</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Highways inc. Public Rights of Way</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Residential Amenity</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Open Access Land and Public Open Space</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Geology and Soils inc. contaminated land</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Material Assets and Waste</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> <tr> <td>Socio-economic</td> <td></td> <td style="background-color: yellow;"></td> <td></td> </tr> </tbody> </table>		Topic Area	Positive Impact	Neutral or Limited Impact	Negative Impact	Principle of Major Development in a National Park				Seascape				Landscape				Tranquillity				Dark Night Skies				Biodiversity				Cultural Heritage inc. Archaeology				Renewable Energy				Water Environment inc. Drainage and Flood Risk				Highways inc. Public Rights of Way				Residential Amenity				Open Access Land and Public Open Space				Geology and Soils inc. contaminated land				Material Assets and Waste				Socio-economic		
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1. Introduction and Terms of Reference

Ref	Local Impact Report Comment	Applicant's Response
1.1	1.1 This Local Impact Report (LIR) relates to the proposed Rampion 2 Offshore Wind Farm Project, as it relates to the administrative area of the South Downs National Park. The South Downs National Park Authority (SDNPA) is the organisation responsible for promoting the statutory purposes of the National Park (see section 3 of this report) and the interests of the people who live and work in it. SDNPA is the Local Planning Authority for the National Park.	The Applicant has no further comments at this time on these paragraphs (1.1 to 1.4) of South Downs National Park Authority's Local Impact Report.
1.2	1.2 The offshore array would be within 24 kilometres of the SDNP at Seaford Head, as well as visible from various points throughout from Beachy Head in the east to the Trundle in the west. The onshore cable corridor runs through the SDNP – entering at Hammerpot, just north of the A27 and exiting at Wiston. This equates to approximately one-third of the overall cable route (Appendix A).	
1.3	1.3 In preparing this document the SDNPA have had regard to the purpose of LIRs as set out in Section 60(3) of the Planning Act 2008 (as amended) and the guidance given in the Planning Inspectorate's Advice Note One: Local Impact Reports, published in 2012. The SDNPA are aware that, as set out in this Advice Note, a LIR should not seek to balance or weigh the impacts upon the National Park but should clearly set out positive, neutral and negative impacts.	
1.4	1.4 This LIR's main purpose is to identify Development Plan policies relevant to the proposed development and the extent to which the proposed development accords, or does not accord, with these policies, requirements and obligations. This report does this under topic-based headings addressing the impacts of the scheme, identifying key issues for the local community and the SDNPA followed by providing commentary on the extent to which the proposed Development Consent Order (DCO) addresses these issues.	
2. Site Description		
2.1	2.1 Rampion 2 Offshore array would be to the west and south of the existing Rampion Offshore Wind Farm, located in the English Channel between the coastal landmarks of Selsey Bill and Brighton. The southern boundary of the SDNP in this location largely follows the upper extent of the Coastal Plain (broadly following the A27 highway between Chichester and Brighton, after which it drops southwards to run along the mean low water mark (MLWM) between settlements from Brighton to Seaford, before continuing along the MLWM to Eastbourne (East Sussex). The Zone of Theoretical Visibility for the array is mainly located within Landscape Character Types A: Open Downland, B: Wooded Estate Downland, G: Major Chalk Valley Sides and S: Shoreline (Document Ref APP- 088).	The boundary of the South Downs National Park (SDNP) is shown in Figure 15.7 in Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3 of the Environmental Statement (ES) [APP-088] . The Applicant considers that this description of the SDNP boundary somewhat overstates the amount of the SDNP running along the mean low water mark (MLWM). The boundary of the SDNP follows the inland edge of urban settlements from Brighton to Seaford, not the MLWM as illustrated in the online discovery map of the SDNP (South Downs National Park Authority, 2024). The coastal edge of the SDNP between Brighton and Eastbourne includes two short coastal sections of coast at Rottingdean (2.7km) (where the boundary is open at the sea) and at Telscombe Cliffs (600m) (where the boundary is defined by the A259), as well as the longer section of chalk cliffs between Seaford Head and Beachy Head (LCA S1) through the Heritage Coast. The Applicant notes that the majority of the SDNP boundary between Brighton and Seaford is set further back from the coast, broadly following the inland urban edge of the settlements of Brighton, Woodingdean, Rottingdean, Peacehaven, Newhaven and Seaford, before the maritime section of the SDNP coastline along Seven Sisters Cliffs to Eastbourne.
2.2	2.2 The area of the SDNP from Seaford to Beachy Head are designated Heritage Coast. The Seven Sisters and Seaford Head (the closest points within the National Park to the Offshore proposals) are major landscape features, which are internationally renowned and visited by thousands each year.	The Applicant has no further comments at this time on these paragraphs (references 2.2 – 2.8) of South Downs National Park Authority's Local Impact Report.

Ref	Local Impact Report Comment	Applicant's Response
2.3	2.3 The onshore cable connecting the array makes landfall at Climping (West Sussex) running north-eastwards to Bolney (West Sussex), where it would connect to the National Grid. The central third of the cable corridor would run through the SDNP for a distance of approximately 13km.	
2.4	2.4 The 13km stretch of cable corridor through the National Park includes the following designations along parts of the route (Appendix A): i) Ancient Woodland (Beech Copse and Michelgrove Park) ii) Sullington Hill Local Wildlife Site (LWS) iii) Multi-period Archaeological Notification Areas (Black Patch and Cock Hill, Chantry Bottom, Sullington Hill and Kithurst Hill) iv) Numerous Ancient/Veteran trees along the route v) Local Green Space at Washington (Jockeys Meadow and Recreation Ground).	
2.5	2.5 The Order Limits are also adjacent to Itford Down Scheduled Monument.	
2.6	2.6 The majority of the land within the onshore cable corridor is farmland, both arable and pasture across a mix of large estates and smaller landholdings. As indicated above there are areas of woodland and recreational spaces also within the proposed Order Limits. Numerous Public Rights of Way (PRoW) run within or adjacent to the corridor, including the South Downs Way National Trail (SDW).	
2.7	2.7 The route passes through five distinct Landscape Character Types as defined by the South Downs Integrated Landscape Character Assessment (2020): i) A3 – Arun to Adur Open Downs ii) B4 – Angmering and Clapham Wooded Estate Downland iii) I3 – Arun to Adur Downs Scarp iv) J3 – Arun to Adur Scarp Footslopes v) R1 – South Downs Upper Coastal Plain.	
2.8	2.8 There is no relevant planning history given that the DCO limits within the National Park largely encompass greenfield land.	
3. The Proposal		
3.1	3.1 The applicant's Environmental Statement, at Chapter 4 (Document Reference APP-045) details the proposal. Approximately one-third of the cable route is within the SDNP. The construction compound at Washington and the offshore array are in the setting of the SDNP. A series of plans have been provided in Appendix A to show the proposed scheme in the context of the SDNP.	The Applicant has no further comments at this time on these paragraphs (references 3.1 – 3.3) of South Downs National Park Authority's Local Impact Report.
3.2	3.2 A summary of the key points of the scheme of particular relevance to the National Park are set out below (and shown on some of the Plans in Appendix A):	

Ref	Local Impact Report Comment	Applicant's Response
	<ul style="list-style-type: none"> • Up to 90 wind-turbine generators (WTG) of a maximum height of 325m to blade tip, • Up to 3 offshore substations, • Buried onshore cable corridor comprising a maximum of 4 transmission cables, installed primarily through open-cut methods, • Small areas of discrete or trenchless crossing with associated drilling launch and exit pits (in accordance with application document 7.2 Appendix 1), • Joint bays – subsurface structures with associated subsurface link box and junction box (number within the SDNP currently not confirmed), • Temporary haul road and construction accesses, • 5 construction compounds, of which the central compound (Washington) would comprise an area of approximately 3.91 hectares within 10 metres of the National Park boundary, • Removal of hedgerows and tree belts to facilitate cable corridor construction and programme for replanting where possible, and • Permanent operational access from numerous points along the cable corridor, which may include minor works to access points and the surfacing of routes. 	
3.3	<p>3.3 For purposes of comparison, the WTG associated with Rampion 1 reach a maximum height of 140m to blade tip, with the array located between 13km and 25km from the Sussex Coast. The landfall point for Rampion 1 is at Broadwater, approximately 16km from the proposed landfall point, whilst the existing and proposed cable corridors would be approximately 7.5km apart at their nearest point.</p>	
<h4>4. The South Downs National Park</h4>		
4.1	<p>Designation of the South Downs National Park (SDNP)</p> <p>4.1 The South Downs National Park was established as a National Park in 2010 and the SDNPA became the Planning Authority for the National Park on 1 April 2011. The South Downs National Park contains over 1,600 sq km of England's most iconic and valued lowland landscapes, stretching from Winchester in the west to Eastbourne in the east.</p>	<p>The Applicant has no further comments at this time on these paragraphs (references 4.1 – 4.5) of South Downs National Park Authority's Local Impact Report (LIR). The Applicant refers to the responses to Section 6 of this LIR for further detailed consideration of the effects on the South Downs National Park.</p>
4.2	<p>4.2 As a result of the offshore array being visible from many locations, there is potential for widespread impacts across the SDNP. For the purpose of the Local Impact Report, the SDNPA has focussed on those areas closest to the array (i.e. along the Heritage Coast) and the area directly affected by the cable corridor. The open downland and shoreline to the east of the proposed array, given the opportunity it affords for open-air recreation and its position in relation to centres of population, make it particularly desirable and available to experience the natural beauty and cultural heritage of the National Park. This is particularly significant given the dramatic chalk cliffs and wave-cut platform, combined with the seascape and chalk grassland, which make it instantly recognisable as well as being a dramatic and outstanding feature.</p>	

Ref	Local Impact Report Comment	Applicant's Response
4.3	4.3 The close relationship between the scarp footslopes, woodland and upper coastal plain with the Chalk Downs themselves, in the area directly affected by the cable corridor, is also of fundamental importance. Statutory Purposes and Duty	
4.4	<p>4.4 The National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995, sets the following statutory purposes and duty for National Parks:</p> <ol style="list-style-type: none"> 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2. To promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public. 	
4.5	<p>4.5 The SDNPA also has a duty when carrying out these statutory purposes:</p> <p>To seek to foster the economic and social well-being of the local communities within the National Park</p>	
4.6	<p>4.6 In addition, under Section 11 of the National Parks and Access to the Countryside Act 1949, recently amended by Part 12, Section 245 (3) of the Levelling Up and Regeneration Act 2023, there is a duty placed on any relevant authority, such as the Planning Inspectorate, in carrying out their functions to 'seek to further' the purposes of the National Park. This ensures that relevant authorities take account of these purposes when coming to decisions or carrying out their activities relating to or affecting land within these areas. It recognises that a wide range of bodies have a direct influence over the future of National Parks in terms of policy, project implementation, casework decisions, land ownership and management. It also acknowledges that the fulfilment of National Parks' statutory purposes rests not only with those bodies directly responsible for their management but that it also relies on effective collaborative working. This is an active duty, which goes beyond mitigation and like-for-like measures or replacement.</p>	<p>Section 11A(3) of the 1949 Act (as amended) states that "<i>For the purposes of this section "relevant authority" means— (a)any Minister of the Crown, (b)any public body, (c)any statutory undertaker, or (d)any person holding public office.</i>" Therefore, it is noted that the 'relevant authority' would include Planning Inspectorate (who appoint the Examining Authority) and ultimately the relevant Secretary of State as the decision taker. The duty on relevant authorities to 'seek to further' the purposes of National Parks was included in amendments to the 1949 Act following the submission of the DCO Application.</p> <p>The Applicant will continue to engage with the South Downs National Park Authority with regards to the mitigation and additional enhancement opportunities including those that could be secured by development consent obligation to further the purposes of the National Park and seek to reach agreement on these matters during the course of the Examination.</p>
4.7	<p>4.7 Where there is a conflict between the statutory purposes, statute (section 11A(2) of the 1949 Act requires any relevant authority, when exercising or performing functions which relate to or affect land in a National Park, to attach greater weight to the purpose of 'conserving and enhancing'. Giving priority to the first purpose of the National Park is known as the Sandford Principle.</p>	<p>The Applicant notes that the Levelling-up and Regeneration Act 2023 Section 245 3(b) inserts Section 11A(1A) into the 1949 Act which states: "<i>In exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority other than a devolved Welsh authority must seek to further the purposes specified in section 5(1) and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.</i>"</p>
4.8	<p>4.8 Within the SDNP boundary area, the SDNPA is the Local Planning Authority and responsible for all planning decisions. There are Section 101 agreements under the Local Government Act (1972) with Horsham District Council (as well as other Councils outside of the remit of the DCO) who determine some planning applications within Horsham District on behalf of the SDNPA. Highest Status of Protection</p>	<p>The Applicant has no further comments at this time on these paragraphs (4.8 – 4.10) of South Downs National Park Authority's Local Impact Report (LIR). The Applicant refers to the responses to Section 6 of this LIR for further detailed consideration of the effects on the South Downs National Park and in relation to policy.</p>
4.9	<p>4.9 National Parks have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (Overarching National Policy Statement for Energy (EN-1), 2011 paragraph 5.9.9 and NPPF 2023, paragraph 182).</p>	

Ref	Local Impact Report Comment	Applicant's Response
4.10	<p>4.10 The Overarching National Policy Statement for Energy (EN-1) states at paragraph 5.9.12 that the duty to have regard to the purposes of nationally designated areas, such as National Parks, also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. Paragraph 5.9.12 states that the aim should be to avoid compromising the purposes of the designation and that development proposals should be designed sensitively given the various siting, operational and other relevant constraints.</p>	
4.11	<p>4.11 A suite of revised draft National Policy Statements for Energy were published in November 2023. Overarching National Policy Statement EN-1 states at paragraph 1.6.2 that for any application accepted for examination prior to the publication of the 2023 amendments – as is the case here – the 2011 suite of NPS's should have effect in accordance with the terms of those NPS.</p>	<p>Section 1.6 of National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a), which came into force in 2024, confirms that: 'for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS' and that the 2023 amendments will therefore have effect 'only in relation to those applications for development consent accepted for examination, after the designation of those amendments'. The DCO Application was accepted for Examination in September 2023 and therefore the 2011 suite of NPS have effect.</p> <p>However, the Applicant considers that the 2023 NPSs designated in 2024 are important and relevant considerations that the relevant Secretary of State should consider within the framework of the Planning Act 2008, as required by Section 104(2)(d).</p> <p>At the request of the Examining Authority, the Applicant has submitted a NPS accordance tracker showing compliance with the 2011 and 2023 NPS, which came into force in 2024, at Deadline 2.</p>
4.12	<p>English National Parks and the Broads: UK Government Vision and Circular 2010</p> <p>4.12 This DEFRA Circular sets out a vision for the English National Parks for 2030 and guidance on the key statutory duties of the National Park Authorities and how they should be taken forward, together with the contributions needed from others. The Circular recognises that whilst the lead role in the achievement of National Park purposes rests with National Park Authorities, the active support and co-operation of all Government and public bodies and statutory undertakers whose activities affect the Parks is also vital to the achievement of Park purposes. The Circular notes that many of these will be 'relevant authorities' with obligations under section 11A of the 1949 Act to have regard to the relevant Park purposes when coming to decisions or carrying out their activities relating to or affecting land within the Parks. The Circular states that the Government expects those bodies affected to give due weight to their obligations under this legislation.</p>	<p>The Applicant has no further comments at this time on this paragraph (reference 4.12) of South Downs National Park Authority's Local Impact Report.</p>
4.13	<p>Special Qualities</p>	<p>With respect to special qualities, the Applicant refers to the submission at Deadline 1 of the post hearing submission Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p>
4.14	<p>4.13 A crucial starting point for managing change in the future is capturing the essence of what makes the National Park important now – its special qualities. Every National Park has developed a list of the things that make it special, both as a baseline for measuring changes over time and to hold the National Park Authority - and its partners - to account for their contributions to its future. Documenting the Park's 8 special qualities is required by paragraph 21 of the English National Parks and the Broads: UK Government Vision and Circular 2010.</p> <p>4.14 The 7 special qualities of the South Downs National Park are given below in Figure One (Document Reference APP-036). The special qualities do not sit in isolation, rather,</p>	<p>The South Downs Local Plan and relevant policies have been referred to in the Planning Statement [APP-036] in Section 4.4 when considering exceptional circumstances for development taking place in the South Downs National Park, Section 4.6 covering assessment of offshore, and Section 4.7 covering the assessment against the policy requirements for onshore. Key local planning policies have informed the assessment set out in the Environmental Statement (ES).</p>

Ref	Local Impact Report Comment	Applicant's Response
	<p>they are interconnected and mutually reinforcing. Landscape is the key to all of the other special qualities and is therefore shown at the centre of Figure One. In SDNPA's view the aim behind National Park designation must be to conserve and enhance all seven special qualities together. The South Downs Local Plan and Partnership Management Plan (both referenced below) are the two statutory documents produced by the SDNPA to deliver this conservation and enhancement.</p>	<p>The South Downs National Park Partnership Management Plan 2020-2025 is discussed under reference 5.7 below of this Local Impact Report.</p>
5. South Downs Local Plan and Other Relevant Local Policy		
5.1	<p>South Downs Local Plan (Document Reference APP-036)</p> <p>5.1 The SDNPA is the Local Planning Authority for the National Park and the statutory development plan for the National Park is the South Downs Local Plan. This was adopted in July 2019 and sets out how the SDNPA will manage development to 2033. This Local Plan is the first to plan for the South Downs National Park as a single entity.</p>	<p>The Applicant has considered the planning matters set out by the South Downs National Park Authority in response to Section 6 of the Local Impact Report.</p>
5.2	<p>5.2 Section 6 of this LIR sets out the planning issues associated with the proposed development and the Local Plan policies that are relevant. It also sets out the extent to which the proposed development accords, or does not accord, with these Local 9 Plan policies.</p>	
5.3	<p>Relevant Neighbourhood Plan</p> <p>5.3 The proposed development passes through four designated Neighbourhood Plan areas, which are all subject to an adopted Neighbourhood Plan. These are as follows</p> <ul style="list-style-type: none"> • Angmering Neighbourhood Plan 2014 • Patching Neighbourhood Development Plan 2018 • Storrington, Sullington and Washington (SSW) Neighbourhood Plan 2018 – 2031 • Findon Neighbourhood Development Plan 2016 – 2035 (amended 2020) <p>Angmering, Patching and the SSW Neighbourhood Plans cover areas both within and outside of the SDNP. Section 6 of this LIR sets out which policies are relevant and the extent to which the proposed development does or does not accord with these policies, within the SDNP area only.</p>	<p>The Applicant agrees that the relevant Neighbourhood Plans form part of the Development Plan (within the relevant, specific Neighbourhood Plan Areas) for the purpose of determining planning applications.</p> <p>As set out in Section 1.1 of the Applicant's Planning Statement [APP-036] the decision-making process for Nationally Significant Infrastructure Projects (NSIPs) is different, with the Secretary of State (SoS) required to determine NSIP applications in accordance with any relevant NPS unless the exceptions at Section 104(4) to (8) apply. These exceptions include 'any <i>Local Impact Reports</i>' submitted to the Examination as well as any '<i>important and relevant</i>' matters.</p> <p>To the extent that they are important and relevant matters in the determination of an NSIP application, Angmering Neighbourhood Plan is referenced in paragraph 3.4.8 Appendix B of the Planning Statement [APP-036] and the Storrington, Sullington and Washington (SSW) Neighbourhood Plan is referenced in 3.4.11 and Appendix B of the Planning Statement [APP-036] with Section 4.7 including references to policies where relevant. The Applicant did not specifically include Findon Neighbourhood Plan or Patching Neighbourhood Plan within the Planning Statement [APP-036] but notes that the proposed DCO Order Limits does include some elements of the onshore cable corridor that fall within these Neighbourhood Plan Areas. The Applicant notes that no policies from these Neighbourhood Plans are identified in Section 6 of the SDNPA's Local Impact Report.</p> <p>A review of these Neighbourhood Plans has been undertaken. With regards to Findon Neighbourhood Plan, Policy CFW8: Dark Night Skies says that proposals that detract from the unlit environment will not be supported. See response to reference 6.21 of the LIR. Policy ES2: Surface Water Management requires development to not increase the risk of flooding. The</p>

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		<p>SDNPA Local Impact Report reference 6.32 notes compliance with Local Plan policies in relation to flood risk management.</p> <p>With regards to Patching Neighbourhood Plan, Policy Places 1 seeks to conserve and enhance heritage assets and non-designated heritage assets and avoid harm or loss without justification. See response to reference 6.27. Policy Places 5 seeks design to reinforce local character and the landscape. See response to references 6.10 and 6.11. Policy Places 7 seeks to conserve and enhance the natural environment including special landscape character, wildlife, and cultural heritage whilst Places 11 seeks to protect trees, woodland and hedgerows. See responses to reference 6.13. Policy Places 8 seeks to protect higher quality farmland. Policy Places 14 supports achievement of the South Downs International Dark Skies Reserve. See response to references 6.21 of this LIR. The Applicant also refers to the submission at Deadline 1 of the post hearing submission Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p> <p>Given the above, it is considered that when taken as a whole, the Proposed Development complies with these Neighbourhood Plan policies.</p>
5.4	<p>Minerals and Waste Plan (Document Reference APP-036)</p> <p>5.4 The SDNPA and West Sussex County Council (WSCC) formally adopted the joint Waste Local Plan in 2014. The SDNPA and WSCC also worked in partnership to produce the West Sussex Joint Minerals Local Plan (JMLP), which was adopted in 2018 and includes a Soft Sand Review, adopted in 2021.</p>	<p>The Waste Local Plan (2014) and Joint Minerals Local Plan (2018) (including the partial review adopted in 2021) prepared jointly by West Sussex County Council and the SDNPA are referenced in paragraph 3.4.19 of the Planning Statement [APP-036].</p>
5.5	<p>5.5 The relevant Objectives and Policies of the JMLP are:</p> <ul style="list-style-type: none"> • Strategic Objective 5 – To safeguard potential economically viable mineral resources from sterilisation • Policy M2 – Soft Sand (extraction) • Policy M5 – Clay (extraction) • Policy M6 – Building Stone (extraction) • Policy M9 – Safeguarding Minerals (criterion (b)) 	<p>Chapter 24: Ground conditions, Volume 2 of the Environmental Statement [APP-065] considers the potential impact of Rampion 2 on minerals resources and mineral safeguarding areas (MSAs) in Sections 24.9 to 24.14, taking into account the provisions of Policy M9. Paragraphs 4.7.126 - 4.7.134 of the Planning Statement [APP-036] sets out the planning assessment of the impacts on minerals. See responses to the SDNPA WR reference 3.11.1 in Table 2-2 in this document and reference 6.4.2 in this table.</p> <p>Policies related to extraction of minerals are not relevant as this is not part of the Proposed Development.</p>
5.6	<p>5.6 With respect to these Plans, WSCC will provide detailed comments, however the SDNPA have also taken these matters into consideration and those comments are included in the assessment below.</p>	
5.7	<p>Other Relevant Local Policy (Document Reference APP-056)</p> <p><i>The South Downs National Park Partnership Management Plan 2020-2025</i></p> <p>5.7 The Environment Act 1995 requires National Parks to produce a Management Plan setting out strategic management objectives to deliver the National Park Purposes and</p>	<p>The South Downs National Park Partnership Management Plan is specifically referenced in the guidance taken into account in the assessment in Chapter 15: Seascape, landscape and visual impact Assessment, Volume 2 of the Environmental Statement (ES) [APP-056], see paragraph 5.6.57, and paragraph 7.2.7 Chapter 17: Socio-economics, Volume 2 of the ES [APP-058].</p>

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	<p>Duty. The Partnership Management Plan sets out the overarching five-year strategy for the management of the South Downs National Park. It brings together and coordinates the aspirations of many different partners who help contribute towards the purposes for which the National Park was designated.</p>	<p>The Applicant refers to Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] which sets out further information as to how the Applicant has had regard to the statutory purposes in the selected project design (and therefore, implicitly the aims of the South Downs National Park Partnership Management Plan). The natural beauty of the South Downs National Park (SDNP) will remain and opportunities will still be present for understanding and enjoyment of the special qualities of the SDNP. The Proposed Development will not undermine the statutory purpose of the SDNP or compromise the purposes of its designation.</p> <p>The South Downs National Park Partnership Management Plan is not part of the Development Plan or a document that forms part of the Local Development Framework (LDF) however the responses to this Local Impact Report show how the Partnership Management Plan has been taken into account by the Applicant.</p>
5.8	<p>5.8 The Plan consists of a vision of where the National Park Authority would like to get to by 2050, with 10 overarching outcomes and 21 priorities (within those outcomes) for the next five years. The outcomes and priorities work together and have equal importance. The Partnership Management Plan is a material consideration in the determination of planning applications and NSIPs.</p>	<p>Nationally Significant Infrastructure Projects (NSIPs) are to be decided in accordance with the relevant National Policy Statement. The South Downs National Park Partnership Management Plan is not part of the Development Plan or a document that forms part of the Local Development Framework (LDF). It is a matter for the decision taker as to the weight to be attached to the document in the decision.</p>
5.9	<p>5.9 Of particular relevance to this proposal, is under the heading 'The Climate Emergency', where it states, <i>"There is an urgent need to decarbonise transport, and to 10 roll out energy efficiency and renewable energy in ways that are appropriate in these special landscapes"</i>. Furthermore, under the heading 'New Housing and Infrastructure', it states, <i>"National infrastructure schemes must take far better account of protected landscapes: There are an increasing number of proposals for new national infrastructure including road and rail schemes, pipelines and cable routes that could cut through the National Park. Solutions must be found to avoid or reduce the impact of such schemes and to achieve net gain for the environment."</i></p>	<p>The Applicant has had due regard to the nationally designated South Downs National Park (SDNP). The Applicant refers to Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] which sets out further information as to how the Applicant has sought to avoid, minimise, mitigate, and compensate onshore landscape and visual impacts from the onshore cable construction (and associated works such as trenchless crossing construction compounds and construction accesses) which could impact the SDNP or its setting. The response to Action Point 27 includes further information on how these are secured.</p> <p>An overall biodiversity net gain (BNG) will be delivered following the system implemented by the Department for Environment, Food and Rural Affairs (Defra) and Natural England (see Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement [APP-193]). This is secured by Requirement 14 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). See response to reference 6.23.</p>
5.10	<p>5.10 In addition, the following outcomes and priorities are relevant to this proposal:</p> <ul style="list-style-type: none"> ● Outcome 1: Landscape and Natural Beauty <ul style="list-style-type: none"> ▶ Priority 1.1 – Protect Landscape Character. To protect and enhance the natural beauty and character of the SDNP and seek environmental net-gain from any infrastructure projects. ▶ Priority 1.2 – Create Green Infrastructure. To improve green and blue infrastructure to deliver nature recovery networks and connect people to nature within and around the SDNP. ● Outcome 2: Increasing Resilience 	<p>The Applicant will continue to engage with South Downs National Park Authority (SDNPA) on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response to the SDNPA's Written Representation in references 3.2.5 to 3.2.7 regarding Section 106 agreements.</p>

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	<ul style="list-style-type: none"> ▶ Priority 2.2 – Improve Trees and Woodland. To improve the resilience, quality and quantity of trees and woodlands in the National Park, and ensure that the right tree is planted in the right place. • Outcome 3: Habitats and Species <ul style="list-style-type: none"> ▶ Priority 3.1 – Join up Habitats. To create, restore and improve areas of priority habitat to be more, bigger, better, and joined up at a landscape scale. • Outcome 4: Arts and Heritage <ul style="list-style-type: none"> ▶ Priority 4.1 – Conserve Heritage. To increase conservation, awareness, access to and understanding of South Downs cultural heritage. • Outcome 5: Outstanding Experiences <ul style="list-style-type: none"> ▶ Priority 5.2 – Improve Accessibility. To improve accessibility through a network of high quality routes connecting communities with the landscape, heritage, attractions and transport hubs and gateways. 	
<p>5.11</p>	<p><i>South Downs Integrated Landscape Character Assessment</i></p> <p>5.11 The South Downs Integrated Landscape Character Assessment (SDILCA) was last updated in 2020. It is an aid to decision making, helping us to understand the landscape, what is important and special about it, and how it may change in the future. As a document it is intended to guide change and development so that it does not damage the characteristics or value of the landscape. It also helps us to identify ways that we can maintain and improve the character of a place. SDNPA uses the SDILCA to help understand the landscape character of the National Park and ensure that development proposals conserve and enhance landscape character within the National Park. The SDNPA considers it of key relevance to the assessment of this proposed development.</p>	<p>To respond to references 5.11-5.14: the assessment of the likely impacts of the Proposed Development on the special qualities of the South Downs National Park are informed by the South Downs Integrated Landscape Character Assessment and addressed in Sections 15.9 to 15.14 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] and Appendix 18.3: Landscape assessment, Volume 4 of the ES [APP-169] and summarised in Sections 18.9 to 18.13 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059].</p>
<p>5.12</p>	<p>5.12 SDILCA defines 19 general landscape types within the National Park as well as 55 more place-specific 'character areas'. The proposed cable corridor is within 5 general landscape types, namely Open Downland, Wooded Estate Downland, Major Scarps, Scarp Foothills and Upper Coastal Plain; and more specifically, A3 – Arun to Adur Open Downs, B4 – Angmering and Clapham Wooded Estate Downland, I3 – Arun to Adur Downs Scarp, J3 – Arun to Adur Scarp Foothills and R1 – South Downs Upper Coastal Plain. As shown for the National Park in Figure 2 below with 11 the DCO limits shown shaded orange and running broadly north-south.</p>	

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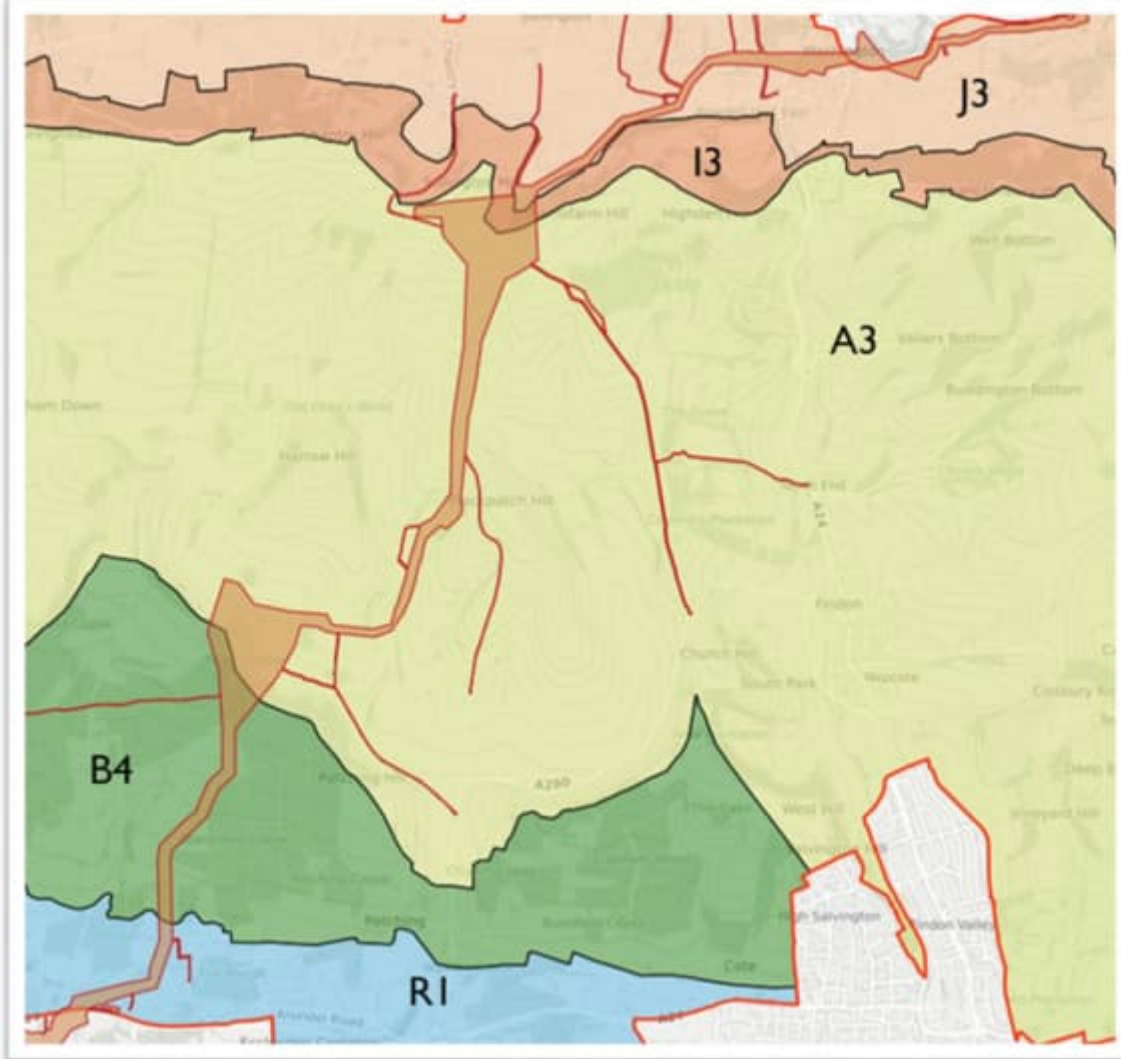


Fig. 2 – Extract from South Downs Integrated Landscape Character Assessment (2020) – Area affected Onshore

- 5.13** 5.13 The proposed WTG and offshore substations are also closely related to several general landscape types, but particularly the Shoreline and Open Downland, as shown in Figure 3 below.

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Fig 3 - Extract from South Downs Integrated Landscape Character Assessment (2020) – Part of Area affected Offshore

5.14 5.14 The SDILCA helps inform the assessment of impacts on landscape character that would be caused by the development proposal. In the case of character areas A1, A3, R1 and S1 offshore windfarms are highlighted as a particular pressure affecting views from the open downs, in the extensive views out across the sea to the horizon, and both to and from the dramatic white cliffs.

5.15 *People and Nature Network (PANN)*

5.15 The People and Nature Network – Green Infrastructure in the South Downs National Park and Wider South East (SDNPA, March 2020)¹ referred to as PANN, sets out how a wide range of partners can work together to plan positively for nature and natural services within and surrounding the protected landscapes of the South East. This is in recognition that nature, and the provision of natural ecosystem services do not follow administrative boundaries.

5.16 5.16 Area 8 – Coastal Plain and Area 12 – Coastal Communities are the most relevant Nature Capital Investment Areas (NCIA) to the proposed development. These NCIA's are identified as 'hot spots' for environmental interventions. The key relevant opportunities for each area are identified below:

Area 8 – Coastal Plain

The Applicant has no further comments on paragraphs 5.15 to 5.16 of the South Downs National Park Authority Local Impact Report at this time.

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	<ul style="list-style-type: none"> • Opportunities for environment to support tourism and the local economy, • Access improvements and circular walks, • Potential to link habitat improvement and flood mitigation • Partnerships to work together in delivering green infrastructure improvements, • Pollination services. <p><i>Area 12 – Coastal Communities</i></p> <ul style="list-style-type: none"> • Potential to improve capacity to regulate local climate, to meet high demand, • Continue to work on the chalk Downland habitats created as part of the DEFRA Nature Improvement Area initiative. 	
5.17	Supplementary Planning Documents	
	<p>5.17 The SDNPA adopted the Design Guide Supplementary Planning Document in July 2022. This is relevant to aspects of the proposal including accesses and services (in terms of the public realm).</p>	<p>The Applicant acknowledges the Design Guide Supplementary Planning Document 2022. The onshore elements of the Proposed Development mainly comprise temporary construction work along the route of the cable corridor and associated construction access which will be reinstated on completion. Nonetheless, the Applicant acknowledges that there may be opportunities to also enhance the appearance of remaining access as part of their restoration and notes the advice provided in paragraphs C.5.2.4, C.5.3.12, and section C.7.1 which aims to minimise visibility splays and avoid creating an 'over engineered' appearance in relation to accesses (including bell-mouths, passing places, and services). The Applicant will review this document further and consider how it may be applied to the design of temporary features within the South Downs National Park including the temporary accesses that are safe for highway users.</p>
5.18	<i>Technical Advice Note: Dark Skies (2021)</i>	
	<p>5.18 The South Downs National Park is an International Dark Sky Reserve, designated in May 2016. This technical advice note sets out guidance on the SDNPA's approach to lighting design and the protection and enhancement of dark skies. Its aim is to provide developers and planners with the necessary information to submit and assess lighting schemes which are appropriate to the landscape.</p>	<p>The South Downs National Park Authority (SDNPA) Local Plan Policy SD8: Dark Night Skies includes specific lighting requirements for developers (SDNPA, 2019), and states: "<i>Wherever possible new development will be required to avoid installing lighting. If new lighting is unavoidable steps must be taken to avoid its impacts on our dark night skies by making sure that it's properly designed, taking into consideration direction of lighting and number of lumens emitted. If that is not possible, adverse impacts of lighting will be required to be mitigated – for example, by installing timing restrictions and making sure that the light emitted is of a colour that won't disturb wildlife.</i>"</p> <p>The detail of any lighting design for all temporary lighting will be developed once contractors are appointed, it is noted that no permanent lighting will be required in the South Downs National Park (SDNP). Where required, construction lighting will be limited to directional task lighting positioned to minimise glare and nuisance to residents and walkers within the SDNP and informed by British Standard (BS) EN 12464-2:2014 Lighting of outdoor workplaces (British Standards Institution (BSI), 2014) and guidance provided by the Chartered Institution of Building Services Engineers (CIBSE) Society of Light and Lighting, The Bat Conservation Trust and the Institution of Lighting Professionals. These measures are provided in the Outline Code of Construction Practice [PEPD-033], Section 4.5, and further information on the design will be provided via the stage specific CoCPs to be submitted pursuant to Requirement 22 of Part 3, Schedule 1 of the Draft Development Consent Order [PEPD-009] (provided at Deadline 2 submission).</p>

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		In addition, the Applicant acknowledges the advice of TAN Dark Skies, 2021 and will consider how this could be added to the Outline Code of Construction Practice [PEPD-033] .
6. Planning Issues and Relevant Policies and Guidance Principle of Development within and in the Setting of a National Park		
6.1	6.1 The Overarching National Policy Statement for Energy EN-1 (paragraph 5.9.9, 2011) and the National Planning Policy Framework (paragraph 182, NPPF, December 2023) set out that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues.	The Applicant notes that the matters referenced by South Downs National Park Authority (SDNPA) from National Policy Statement (NPS) EN-1 (Department of Energy and Climate Change, 2011) are largely reflected in NPS EN-1 (Department for Energy and Net Zero, 2023). The Applicant notes that as per its Statement on the Implications of the 2023 National Policy Statements [REP1-031] , the 2023 NPSs are an important and relevant consideration in the decision making which includes identification of the urgent need for Critical National Priority infrastructure including offshore wind.
6.2	6.2 EN-1 (paragraph 5.9.10), NPPF (paragraph 183) and Policy SD3 of the South Downs Local Plan (SDLP) explain that planning permission will be refused for major developments in the National Park, except in exceptional circumstances, and where it can be demonstrated that they are in the public interest. The policy explains that the consideration of such applications should include an assessment of: a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) The cost of, and scope for, developing elsewhere outside the National Park, or meeting the need for it in some other way; and c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	The Applicant notes that the SDNPA policy described in the Local Impact Report (LIR) is applicable to development within the boundaries of the National Park and this therefore applies to the underground cable route and associated construction including accesses and reinstatement. It would be incorrect for the SDNPA to represent that the South Downs Local Plan forms part of the development plan for development proposed outside of its boundaries. It would be the Applicant's expectation that the development plans of neighbouring authorities would consider the impacts on the National Park from development located outwith its boundaries.
6.3	6.3 Then at paragraph 5.9.11 EN-1 states that if consent were to be given the Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.	The Applicant refers to the further detailed responses in references 6.6 to 6.8 on these matters.
6.4	6.4 SDLP Policy SD3 continues that if it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities of the National Park should be sought.	
6.5	6.5 In response to what is often referred to as the 'major development test', the SDNPA acknowledges there is a critical need for renewable energy developments, which will help the country achieve its net zero targets. The applicant has sought to demonstrate the extent to which the cost of and scope for developing outside of the 14 National Park has been undertaken within their Planning Statement (Document Reference APP-036) as well as the Environmental Statement Alternatives Chapter (Document reference APP-044).	
6.6	6.6 Whilst the SDNPA recognise this has been undertaken, the cost and scope assessment remains superficial in places and substantial weight has not been given to the SDNP designation at every stage of the process, including the amount of onshore infrastructure required (as well as the location) when determining the scale and location of the offshore array. Options such as Fawley have been discounted with little demonstration that the cost and scope of delivering, compared with that associated with the substantial onshore element of the proposed scheme, would leave the project undeliverable. Further, whilst some costs have been attributed to alternative options which would mean a route outside of the National Park, these appear to be based on development parameters that are different to that of the proposed development (e.g. an array generating 1000MW as proposed, rather	The Applicant has considered the cost and scope for development outside the National Park as required by policy and included this within the DCO Application as acknowledged in reference 6.5 . The South Downs National Park (SDNP) designation was given significant weight as with all policy considerations provided in the National Policy Statements (NPSs). The Applicant confirms that the designation was considered during the appraisal of grid connection options alongside other key factors, including the engineering and environmental considerations, and in parallel with the Connections Infrastructure Options Notice (CION) process led by National Grid Electricity Systems Operator (NGESO). This was informed by the likely potential capacity of 1,200MW. The Applicant refers to its post-hearing submission following Issue Specific Hearing 1 (ISH1) Appendix 1 Further Information for Action Point 3 – Fawley and Dungeness [REP1-019] for

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	<p>than the 1200MW scenario referred to in the Alternatives Chapter). The constraints experienced through the current proposed route – and the additional costs these are likely to bring in terms of additional mitigation - also do not seem to have been factored into this element of the assessment. These are detailed in the SDNPA's Written Representation, in particular section 3.</p>	<p>further detail on why these options were discounted. In particular, the Applicant notes that a connection at Fawley would require above ground infrastructure for the onshore substation and likely effects adjacent to or within the New Forest National Park.</p>
6.7	<p>6.7 Policy SD3 and NPS EN-1 require, as part of this major development test, that any detrimental effects on the environment, landscape and recreational opportunities are assessed as well as identifying the extent to which they could be moderated. The SDNPA is concerned over the extent to which the detrimental effects to the environment, landscape and recreational opportunities have been moderated and whether the scheme will be carried out to high environmental standards and includes measures to enhance the environment. It is therefore considered the proposal would not accord with NPS EN-1, the NPPF and policies SD1 and SD3 of the SDLP.</p>	<p>The Applicant has set out the effects on the South Downs National Park (SDNP) and its Special Qualities with the embedded environmental measures included in the DCO Application in detail in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024]. The submission concludes that high environmental standards will be achieved through the measures secured in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) that are further described in the response to Action Point 27. The Applicant will continue to engage with South Downs National Park Authority (SDNPA) on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response to the SDNPA's WR 3.2.5 to 3.2.7 regarding Section 106 agreements.</p> <p>The Applicant concludes on this basis that it has demonstrated the extent to which effects could be moderated and, in this regard, has met the requirements of National Policy Statement (NPS) EN-1 and South Downs Local Plan policies relating to the exceptional circumstances required for major development to take place within the SDNP (noting that all Nationally Significant Infrastructure Projects (NSIPs) are classed as 'major development').</p>
6.8	<p>6.8 NPS EN-1 at paragraph 5.9.12 and the NPPF at paragraph 182 also makes clear that the duty to have regard to the purposes of the SDNP also applies when considering applications for projects outside the Park boundaries, which may have impacts within it. "The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints." Whilst it is acknowledged that simply being visible should not be a reason for refusing consent, the SDNPA is concerned that the offshore array in this location and, particularly, at this scale has not adequately avoided compromising the purposes of designation. On this basis the proposal would not accord with NPS-EN-1, the NPPF and policy SD1 of the SDLP.</p>	<p>The Applicant has acknowledged the residual effects from the offshore array. The evolution of the offshore array area has included reductions in the developable area following first statutory consultation which reduced visual impacts. The Proposed Development has also been developed in accordance with design principles to minimise the impacts. Further detail is provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] in particular paragraphs 1.3.26 to 1.3.30.</p> <p>The Applicant notes that the South Downs National Park Authority (SDNPA) has not stated here that the proposals do (in its opinion) compromise the designation. Nor, should that be the case, does the Local Impact Report (LIR) indicate specifically what has given rise to such a conclusion. SDNPA have commented here on the adequacy of the measures included to avoid compromising the purposes of the designation. The Applicant considers that the Proposed Development has avoided compromising the purposes of the South Downs National P designation and the Proposed Development has been designed sensitively with due regard to its statutory purpose. The Applicant therefore concludes that the Proposed Development has met the requirements of National Policy Statement (NPS) EN-1, the NPPF and South Downs Local Plan policy in this regard.</p>
6.9	<p>Landscape and Seascape</p> <p>6.9 SDLP Policy SD1 explains that planning permission will be refused where development proposals fail to conserve the landscape or natural beauty of the National Park, unless,</p>	<p>South Downs Local Plan Policy SD1 is referenced in Table 18-4 of Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059].</p> <p>National Policy Statement (NPS) EN-1 and EN-3 (2011 and 2023) recognise that "<i>Virtually all nationally significant energy infrastructure projects will have effects on the landscape.</i>"</p>

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	<p>exceptionally, the benefits of the proposal demonstrably outweigh the great weight to be attached to these interests.</p>	<p>In respect of the onshore elements of the Proposed Development the design process and embedded environmental measures (secured in the Draft Development Consent Order [PEPD-009]) in Section 18.7 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] will minimise harm to the landscape. The landscape and visual effects on the South Downs National Park (SDNP) are set out in Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] and the Applicant's post-hearing submission on the special qualities of the SDNP [REP1-024]. These are mostly restricted to the construction phase and will be subject to reinstatement with the onshore cable corridor underground. During operation, there will be no significant long-term effects and, in this respect, the special qualities / natural beauty of the SDNP will be conserved.</p> <p>Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] includes the likely impacts on the perceived landscape character and special qualities of the SDNP in Sections 15.9 to 15.14. Further information is provided in the Applicant's Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p> <p>Additionally, South Downs Local Plan Policy SD1 is identified as a local planning policy relevant to the assessment of the potential effects on historic environment receptors in Table 25-3 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] and Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]). Both assess the effects of the onshore cable route and the extent to which these will be mitigated and are summarised in the Applicant's Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p> <p>There is a demonstrable urgent need for the Proposed Development (as demonstrated in Section 4.2 of the Planning Statement [APP-036] and the infrastructure subject to the DCO Application is identified as a critical national priority (CNP) (in line with the 2023 NPS EN-1 and EN-3, which came into force in 2024). The Planning Statement [APP-036] Section 5.4 summarises the benefits and adverse impacts of the Proposed Development and Section 5.5 notes the reasons for Applicant's conclusion that the benefits of the scheme outweigh the adverse impacts.</p>
6.10	<p>6.10 SDLP Policy SD4 states that development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that, for example, proposals are informed by that landscape character, reflecting the context and type of landscape in which the development is located. The design, layout and scale of proposals should conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape.</p>	<p>South Downs Local Plan Policy SD4 is referenced in Table 18-4 of Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059]. The Applicant considers that it has addressed the key policy imperatives of SD4 in relation to the Proposed Development including the design process and embedded environmental measures in Section 18.7 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] will minimise harm to the landscape character.</p> <p>The above includes application of the embedded measures provided in the Outline Landscape and Ecology Management Plan [APP-232], secured by Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 12 and 13. Paragraph 2.6.6 Outline Landscape and Ecology Management Plan [APP-232] states "<i>Species selection will be confirmed as part of the stage specific LEMP and will be restricted to the use of native species ...</i></p>

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6.11	6.11 SDLP Policy SD5 requires a landscape-led approach and respect given to local character, to ensure proposals make a positive contribution to the overall character and appearance of the area.	<p><i>chosen to meet to design principles and in particular ... to support the landscape design principles for amenity, screening and enhanced landscape character ...</i></p> <p>South Downs Local Plan Policy SD5 is referenced in Table 18-4 of Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059]. The Applicant considers that it has addressed the key policy imperatives of SD5 in relation to the Proposed Development through the design process and embedded environmental measures in Section 18.7 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] maximise opportunities for a high quality 'landscape-led' approach. This has included avoiding sensitive landscape features (Chapter 3: Alternatives, Volume 2 of the ES [APP-044]) and embedded environmental measures (Section 18.7 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]). The Outline Landscape and Ecology Management Plan (LEMP) [APP-232] will ensure reinstatement planting is managed and maintained through a process of stage specific LEMPs as secured by Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
6.12	6.12 SDLP Policy SD6 states proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular, conserving and enhancing key views within the National Park. The importance of and relationship to the Viewshed Characterisation and Analysis Study is flagged, as are the provision and enhancement of sequential views.	<p>South Downs Local Plan Policy SD6 is referenced in Table 18-4 of Chapter 18: Landscape and visual impact Volume 2 of the Environmental Statement (ES) [APP-059]. Visual effects on the South Downs National Park's key views / key landmarks within and just beyond the landscape and visual impact assessment (LVIA) Study Area are assessed in Appendix 18.2: Viewpoint analysis, Volume 4 of the ES [APP-059]. Visual effects on recreational activities within the SDNP (recreational routes, including sequential assessment of the South Downs Way, other public rights of way (PRoWs), Open Access Land, and recreational destinations) are summarised in Sections 18.9 to 18.13 and assessed in Appendix 18.4: Visual assessment, Volume 4 of the ES [APP-170].</p> <p>Significant effects are restricted to the construction phase and some areas of reinstatement planting during the early years of operation. The onshore cable will be underground.</p>
6.13	6.13 SDLP Policy SD11 states development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands and a proposed loss of trees, woodland and hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. In addition, opportunities should be identified and incorporated for planting of new trees, woodland and hedgerows. New planting should be suitable for the site conditions, use native species and be informed by and contribute to local character, and enhance or create new habitat linkages.	<p>South Downs Local Plan Policy SD11 is referenced in Table 18-4 of Chapter 18: Landscape and visual impact, Volume 2 of the Environmental Statement (ES) [APP-059] and Appendix 22.1: Policy and legislation tables, Volume 4 of the ES [APP-179] which outlines the local planning policies relevant to the assessment of the terrestrial ecology and nature conservation contained within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES [APP-062].</p> <p>The design process and embedded environmental measures related to trees woodland and hedgerows have been developed through a combination of landscape, ecology and arboricultural expertise. An arboricultural survey is reported in Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the ES [APP-194].</p> <p>Overall, the design of the Proposed Development has followed the mitigation hierarchy. The embedded environmental measures include commitments to provide protection and avoid sensitive vegetation such as veteran trees (Commitment C-174 Commitments Register [REP1-015]) and ancient woodland (Commitment C-216)) and provide buffer zones exceeding the minimum 15m required in SD11 (see response in reference 6.24). These measures are provided in the Outline Code of Construction Practice [PEPD-033] and secured in Requirement 22 of Part 3, Schedule 1 of the Draft Development Consent Order [PEPD-009]</p>

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		<p>Further details are provided in the Outline Landscape and Ecology Management Plan [APP-232] covering reinstatement / replacement planting. Note that this document is being updated for submission at Deadline 3 with further details on management, monitoring and the process for triggering remedial action in case of localised planting failures. Further detail will be provided in the stage specific Landscape and Ecology Management Plans that would be delivered as part of the detailed design process to the relevant authority for agreement. The delivery of these documents is secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009]. Paragraph 2.6.6 Outline Landscape and Ecology Management Plan [APP-232] states “Species selection will be confirmed as part of the stage specific LEMP and will be restricted to the use of native species ... chosen to meet to design principles and in particular to support the landscape design principles for amenity, screening and enhanced landscape character ...”</p>
6.14	6.14 SDLP Policy SD18 seeks to protect the undeveloped nature of the National Park Coastline both within and outside the Sussex Heritage Coast and ensure that vulnerability to any new development is minimised.	The assessment undertaken in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] has assessed effects on the National Park and Sussex Heritage Coast.
6.15	6.15 SDLP Policy SD42 states that development proposals for new or improved infrastructure will only be permitted where the design minimises the impact on the natural beauty, wildlife and cultural heritage of the National Park.	<p>The Applicant has had due regard to the nationally designated South Downs National Park (SDNP) in the design of the Proposed Development. Chapter 3: Alternatives, Volume 2 of the Environmental Statement (ES) [APP-075] which provides further description and summary of the evolution of the design of Proposed Development. The Applicant refers to Deadline 1 Submission – 8.25.5 Applicant’s Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park which sets out further information. In summary this sets out:</p> <ul style="list-style-type: none"> • How the Applicant has sought to avoid, reduce and minimise onshore landscape and visual impacts from the onshore cable construction which could impact the SDNP or its setting. • The established design and embedded environmental measures, which set out an approach to avoid and/or minimise the effects on heritage assets, through a strategy of evaluation and mitigation (both avoidance through engineering solutions and investigation and recording). • That there are no predicted significant effects on ecology associated with the Proposed Development following the application of the mitigation hierarchy and the embedded environmental measures. <p>The Applicant welcomes discussion of specific enhancement opportunities, particularly within the area of the South Downs National Park.</p>
6.16	6.16 The SDNPA considers the offshore elements of the development proposed are not in accordance with SDLP Policies SD1, SD3, SD4, SD5, SD6, SD18 and SD42 (and the associated Design Guide, Supplementary Planning Document, July 2022) nor would the proposal meet the statutory purpose of conserving and enhancing the National Park.	<p>The Applicant refers to the response provided in references 6.1 to 6.5 with regards to the applicability of South Downs National Park Authority (SDNPA) policies outside the South Downs National Park (SDNP) boundary.</p> <p>With regards to the Statutory Purpose of the SDNP, as concluded in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056], it is considered that the offshore elements of Rampion 2 avoid compromising the purposes of the SDNP designation and have been designed sensitively with due regard to its statutory purpose, despite the fact that it will be visible from within the SDNP and that it may have significant effects on certain special qualities, including its ‘panoramic views to the sea’ defined in Special Quality 1. The assessment</p>

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6.17 a) b)	<p>6.17 The SDNPA considers the onshore elements of the development proposed are not in accordance with SDLP Policies SD1, SD3, SD4, SD5, SD6, SD11 and SD42, nor would the proposal meet the statutory purpose of conserving and enhancing the National Park. Further, the SDNPA considers that in a protected landscape, where effects are considered to be 'moderate adverse' (as is suggested in several chapters within the Environmental Statement) this would be a significant negative effect. The significant negative impacts for both the offshore and onshore aspects are:</p> <p>a) Proximity to and protracted field of view of Wind Turbine Generators (WTG)</p> <p>b) Overall height of WTG</p> <p>Whilst a number of design principles have been proposed these do not resolve the major significant adverse effects derived from the presence of the offshore development in this location. The Requirements do not appear to secure the proposed design principles. The Requirements in the dDCO do not clearly limit the number and height of the WTG in accordance with the worst case scenario used in the Environmental Statement, i.e. 65 turbines at 325m to blade tip. There is reference to a minimum gap between turbines, but it is not clear that this effectively limits the number of turbines permitted.</p>	<p>has found that significant effects would occur to this special quality of the SDNP, however it is considered that Rampion 2 would not undermine the statutory purpose of the SDNP. Harm is caused to one of the SDNP's special qualities and this is limited to certain locations, particularly on the coastal extent of the SDNP and the elevated tops of the downs. Whilst harm would be caused to this quality ('breathtaking views' and 'panoramic views to the sea'), this would not compromise the purpose of the SDNP designation, as the natural beauty of the SDNP will remain and opportunities will still be present for understanding and enjoyment of the special qualities of the SDNP, and Rampion 2 will not therefore undermine the statutory purpose of the SDNP or compromise the purposes of its designation. The Applicant will continue to engage with SDNPA on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response in references 3.2.5 to 3.2.7 regarding Section 106 agreements</p> <p>See responses to references 6.9 – 6.13, 6.15, and the Applicant's post-hearing submission on the special qualities of the South Downs National Park (SDNP) [REP1-019].</p> <p>The landscape and visual impact assessment (LVIA) methodology is set out in Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the Environmental Statement (ES) [APP-167] and the seascape, landscape and visual impact assessment (SLVIA) methodology is set out in Appendix 15.2: Seascape, landscape and visual impact assessment methodology, Volume 4 of the ES [APP-158]. Both were provided to stakeholders for comment at scoping (2020). The Landscape Institute and Institute of Environmental Management and Assessment (IEMA) (2013) <i>Guidelines for Landscape and Visual Impact Assessment, 3rd Edition</i> (GLVIA 3), paragraph 3.32, 5.56 and 6.42-44 advises against a standardised approach to determining significant effects due to varying circumstances related to the receptor and the development. Where assessments place landscape and visual effects between extremes (i.e. a Moderate effect) a professional judgement must be made and explained in narrative terms.</p> <p>The Applicant notes that the SDNP do not specify how the Draft Development Consent Order [PEPD-009] requirements are deficient and the Applicant explained this during Issue Specific Hearing 1 (ISH1). The maximum total rotor swept area is 4,450,000.00m² as secured in Part 3, Requirement 2, Schedule 1 of the Draft Development Consent Order [PEPD-009] and this will not be exceeded, regardless of the choice of wind turbine generator (WTG) in the final Proposed Development. 65 of the larger WTG type (325m tip height, 295m rotor diameter) results in a total rotor swept area of 4,442,702.89 m². 66 of the larger WTG type would result in a total rotor swept area of 4,511,052m², thereby exceeding the maximum set out in the Development Consent Order. Further information on how the number of turbines is limited by the DCO is available in Pre-Exam Procedural Deadline Submission - 8.23 - Examining Authority requested additional information - Revision A [PEPD-041].</p> <p>The Applicant refers to the response provided in references 6.1 to 6.5 with regards to the applicability of SDNP policies outside the SDNP boundary. The Applicant has described how evolution of the design and principles have been secured in post-hearing submission following ISH1 in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024]. These reductions in the developable area and design principles are embedded within the Proposed Development through the proposed DCO Order Limits and Works</p>

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6.17 (c)	<p>c) Cumulative effect of proposed WTG with existing Rampion 1 WTG Rampion 1 should not just be assessed as part of the baseline, as it has a temporary lifespan of approximately 25-30 years, which concludes well in advance of the lifespan associated with the proposed development. An assessment should be made of the cumulative effect of the existing and proposed development and of the proposed development alone. To include Rampion 1 in the baseline would be to underplay the landscape and visual effects.</p>	<p>Areas shown on the Offshore Works Plans [PEPD-004] and Works Area Descriptions provided in full in Schedule 1 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>In accordance with guidance (Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3), Landscape Institute 2013, paragraph 7.13), existing projects (i.e. Rampion 1) and those which are under construction are included in the seascape, landscape and visual impact assessment (SLVIA) baseline and described as part of the baseline conditions. An assessment of the additional effect of Rampion 2 is therefore undertaken against a baseline that includes the operational Rampion 1 as part of the main assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] Section 15.10 (operation and maintenance phase). This includes assessment of the effect of the Proposed Development against magnitude factors such as its size, scale, spread and landscape context, as well as factors relating to the cumulative effect with operational Rampion 1 wind farm, such as its increase in spread, aesthetic relationship and consistencies of perceived scale and spacing in comparison to the Rampion 1 wind turbine generators (WTGs).</p> <p>In undertaking its assessment with Rampion 1, the Applicant has followed the Planning Inspectorate's Advice Note Seventeen: Cumulative Effects Assessment (The Planning Inspectorate, 2019) relevant to nationally significant infrastructure projects, in particular the note under table 2 which states (emphasis added): <i>"Where other projects are expected to be completed before construction of the proposed NSIP and the effects of those projects are fully determined, effects arising from them should be considered as part of the baseline and may be considered as part of both the construction and operational assessment. The ES should clearly distinguish between projects forming part of the dynamic baseline and those in the CEA."</i></p> <p>The Applicant recognises that the assessment undertaken in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] does not include assessment of the potential decommissioning / repowering of the Rampion 1 Offshore Wind Farm. The decommissioning programme for the offshore elements of Rampion 1 (ROW, 2018) (submitted in accordance with Requirement 8 of the Rampion Offshore Wind Farm Order 2014) assumes that <i>'full decommissioning will commence after the design life of the Rampion 1 WTGs (24 years)'</i>, but that Rampion 1 wind farm <i>'may be 're-powered' after 24 years with new wind turbines to take advantage of the available lease period with The Crown Estate (40 years), subject to the findings of a new EIA and consent application'</i>. Under the first scenario, the decommissioning assumption is complete removal of all offshore components of Rampion 1 in 2042 (24 years after April 2018). In this scenario, the 116 WTGs comprising Rampion 1 would be removed from the seascape and would represent a reduced effect on seascape, landscape and visual receptors (one that is less than the worst-case scenario assessed with the presence of Rampion 1). The Applicant therefore considers that based on the published best practice approach of considering operational projects as part of the baseline, and the worst-case scenario being one in which Rampion 1 is present, a separate assessment of the proposed development alone (considering effects after decommissioning of Rampion 1) is not considered necessary, as it would be unlikely to find significant effects beyond those already assessed for the Proposed Development when considered in the context of Rampion 1 and effects arising beyond 2042 are uncertain given the potential for re-powering of Rampion 1.</p>

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6.17 (d)	d) In-combination effects of whole proposed development The lack of adequate sequential testing viewpoints along the top of the South Downs and the route of the South Downs Way (a National Trail) gives rise to a substantial underestimation of the extent of the adverse visual effects arising from the whole proposed development.	<p>The Applicant would highlight that in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] many of the included viewpoints are located on the top of the South Downs and from the route of the South Downs Way, providing adequate representation of the views gained sequentially from the route through the SDNP, including, from east to west: Viewpoint 1 Beachy Head; Viewpoint 2 Birling Gap; Viewpoint 3 Seven Sisters; Viewpoint 15 Willingdon Hill; Viewpoint 16 Firle Beacon; Viewpoint 51 Ditchling Beacon; Viewpoint 17 Devil's Dyke; Viewpoint 55 Beeding Hill; Viewpoint 52 Chanctonbury Ring; Viewpoint 20 Springhead Hill; Viewpoint 21 Bignor Hill; Viewpoint 62 Beacon Hill; and VP31 Butser Hill. The assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] assesses the effects of the offshore elements of Rampion 2 (offshore array) on the South Downs Way across 13 distinct 'sections' that relate to the landform, character and visibility along the route, as assessed in Table 15-31 and mapped with the Zone of Theoretical Visibility (ZTV) in Figure 15.24 in Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 3 of 8), Volume 3 of the ES [APP-090]. As described in this assessment, the array area results in significant effects on 'panoramic views to the sea' over several sections of the route, including from parts of the route through the Sussex Heritage Coast and from the tops of several sections of open downs, however these occur intermittently between sections that are either set back at greater distance or passing through the main valleys, where the effect is assessed as not significant.</p> <p>The effects of the onshore elements of the Proposed Development on the views from the South Downs Way are assessed in Appendix 18.2: Viewpoint analysis, Volume 4 of the ES [APP-059] and Appendix 18.4: Visual assessment, Volume 4 of the ES [APP-170]. Significant effects will be restricted to the construction phase, affecting between 600m-1.5km of the route between Chantry Post near Chantry Hill and Barnsfarm Hill. During operation the onshore cable will be underground. Ten sequential views were agreed with stakeholders along the route of the South Downs Way and illustrated to support the assessment (Figures 18.67 and 18.76 [APP-103], 18.30 [APP 100], 18.48 [APP 101], and 18.49 [APP 102] in Chapter 18: Landscape and visual impact – Figures (Part 3 of 6 to Part 6 of 6), Volume 3 of the ES.</p> <p>Inter-related visual effects of the offshore and onshore elements of the Project are assessed in Chapter 30: Inter-related effects, Volume 2 of the ES [APP-071] (Table 30-14). Views experienced by receptors within localised parts of the Adur to Arun Open Downs (A3) are assessed as having significant inter-related effects including from short sections of the South Downs Way between Chantry Post near Chantry Hill to Barnsfarm Hill including representative views from Viewpoint 20 Springhead Hill (Figure 15.45 [APP-093]), Viewpoint 53 Amberley Mount (Figure 15.66 [APP-094]), and Viewpoint 54 Chantry Hill (Figure 15.67) [APP-094] Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 6 of 8 and Part 7 of 8), Volume 3 of the ES and the associated open access land around Chantry Hill. Effects are assessed as significant where there will be southerly views from these viewpoints and the South Downs Way, over the construction works within the cable route corridor to the Rampion 2 array area in the distant seascape backdrop, simultaneously in the same portion of view. The Applicant notes however that the programming would likely mean there would likely be some degree of separation between the construction of the onshore infrastructure and construction of the offshore elements of Rampion 2. Wind turbine generator (WTG) installation is programmed to start towards the end of the onshore cable corridor construction with less than 1 year overlap as shown in Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] (Graphic 4-24). The period over which potentially significant inter-related effects on during construction is therefore</p>

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		limited to the short-term with inter-related effects being temporary and becoming not significant during the operation and maintenance phase.
6.17 (e)	e) Washington Construction Compound There is a lack of information provided regarding the use and appearance of the compound. There are insufficient views and images provided of the compound, which has the potential to be visible in considerable sequential views and have an adverse impact for a prolonged period of time.	The Applicant notes that Chapter 4 The Proposed Development, Volume 2 of the Environmental Statement (ES) [APP-045] includes description of the use of the five main temporary construction compounds including the storage of materials and equipment, location of cement bound sand (CBS) batching plant, welfare facilities and office space as appropriate. Washington Compound is well screened by perimeter vegetation and adjacent land use. Visibility is illustrated by Figures 18.31 Viewpoint H, 18.32 Viewpoint H1 in Chapter 18 Landscape and visual impact – Figures (Part 3 of 6), Volume 3 of the ES [APP-100]. Additionally, Washington Compound will be screened by vegetation and landform when viewed from Figures 18.49 Viewpoint I, 18.52 Viewpoint J4, 18.53 Viewpoint J5, and 18.58 Viewpoint N Chapter 18 Landscape and visual impact – Figures (Part 5 of 6), Volume 3 of the ES [APP-102]. Significant sequential visibility of the construction compound is assessed in relation the views from the A283 and further significant visibility is assessed in relation to Washington Caravan Park and the views from the edge of Washington Recreation Ground.
6.17 (f)	f) Proposed method of replanting and loss of landscape features	The proposed method of replanting is outlined within the Outline Landscape and Ecology Management Plan [APP-232] . This document is being updated for submission at Deadline 3 to include further information on replanting in the event of failure. Further detail would be provided in the stage specific Landscape and Ecology Management Plans that would be delivered as part of the detailed design process to the relevant authority for agreement. The delivery of these documents is secured through Requirements 12 and 13 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).
6.17 (g)	g) Inadequate mitigation and compensation measures including in respect of soil management	The Applicant notes that this statement has not been expanded upon further within the South Downs National Planning Authority Local Impact Report but refers to the responses to reference 9.2 of the Appendix A in Table 2-4 of this document. The Applicant has provided an Outline Soil Management Plan [APP-226] secured under Requirement 22 (5) of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2), which includes commitment to measures for soil management including those specific to those within the South Downs National Park.
6.17 (h)	The SDNPA has significant concerns over the likely success of the mitigation measures proposed, both in respect of the principle of the methods in this particular climate and landscape typology and based on actual experience from Rampion 1. The latter demonstrated that the timescales associated with reinstatement were frequently longer than has been suggested.	<p>The Applicant advises that the wide range of mitigation measures proposed and set out in the Outline Code of Construction Practice [APP-224] and the Outline Landscape and Ecology Management Plan [APP-232] (secured by Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirements 22 and 12 respectively) have been selected to be resilient to climate change and appropriate to the landscape typology.</p> <p>In terms of landscape mitigation, it is common landscape and visual impact assessment (LVIA) practice to rely on landscape mitigation and reinstatement planting of native species to reduce residual effects of development post-construction. The reinstatement of hedges is a credible and robust technique for mitigation, evidenced by the numerous hedgerows within the landscape baseline and their on-going management.</p> <p>The existence of hedgerows planted and established across the South Downs National Park (SDNP) provides evidence that hedgerows can be established in this area and it is reasonable to suppose that new hedgerow plants, planted, maintained and monitored for up to 10 Years would establish in a similar manner to the existing hedges. The Outline Landscape and Ecology</p>

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6.18	<p>Tranquillity</p> <p>6.18 SDLP Policy SD7 states that direct impacts caused by changes in the visual and aural environment, as well as indirect impacts caused by development remote from the National Park should be taken into consideration.</p>	<p>Management Plan [APP-232] sets out management and maintenance including replanting should any plants fail- this is in the process of being updated to add further clarity and detail for Deadline 3. See also Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 13 in this regard.</p> <p>The Applicant notes and agrees with the South Downs National Park Authority's (SDNPA) description of tranquillity set out in reference 6.18-19.</p>
6.19	<p>6.19 Tranquillity is considered to be a state of calm and quietude and is associated with a feeling of peace. It relates to quality of life and there is good scientific evidence that it also helps to promote health and well-being. It is a perceptual quality to the landscape and is influenced by things that people can both see and hear in the landscape around them. It is one of the SDNP's Special Qualities.</p>	<p>The assessment of tranquillity as a special quality of the South Downs National Park (SDNP) has been recognised and assessed in the Environmental Statement (ES) in terms of the changes to the visual and aural environment. The importance of tranquillity as a special quality of the SDNP is recognised at the highest level of landscape sensitivity and value in these assessments. The assessments include both direct and indirect impacts and the experienced of users of the Public Right of Way (PRoW) network in policy SD7.</p>
6.20	<p>6.20 The route of the cable corridor, as well as the shoreline and open downland of the Heritage Coast, are considered areas of high tranquillity. The significance of this has not been recognised or addressed in the development proposal (see SDNPA Written Representation Appendix A) or dDCO Requirements, therefore the development is not in accordance with policy SD7.</p>	<p>The effect of the offshore elements of Rampion 2 (offshore array) on the tranquillity experienced within the SDNP is assessed as part of the assessment of special quality 3 (SQ3) in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. SQ3 'Tranquil and unspoilt places' is described in Table 15-15 and assessed as part of the perceptual qualities of seascape character, assessments on landscape character in Table 15-29 and as part of the assessment of special qualities in Table 15-32.</p> <p>The effect of the onshore elements of the Proposed Development are assessed in Appendix 18.3: Landscape Assessment, Volume 4 of the ES [APP-169]. The assessment takes account of the landscape effects on landscape character and elements including any perceptual qualities such as tranquillity that are noted as a key characteristic and the range of visual and aural effects recorded at numerous receptors across the SDNP and within its setting.</p> <p>Further consideration of the effect of the Proposed Development on SQ3 tranquil and unspoilt places is also provided in the Applicant's Post Hearing Submission – Issue Specific Hearing 1 (Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024]). This includes the description of embedded environmental measures such as the control of noise and lighting in the Outline Code of Construction Practice [PEPD-033] secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The assessments conclude that there will be no significant effects on special quality 3 of the SDNP (tranquillity) during the operational phase of Rampion 2.</p>
6.21	<p>Dark Night Skies</p> <p>6.21 The SDNP is an International Dark Sky Reserve, designated in May 2016. The quality of dark night skies is also influenced by what takes place beyond the National Park boundary. The SDNPA has worked with many Local Authorities to try to reduce light pollution in locations surrounding the National Park. SDLP Policy SD8 states that all opportunities to reduce light pollutions should be taken and should ensure that measured</p>	<p>The visible lighting requirements (aviation and marine navigational) of the offshore elements of Rampion 2 (offshore array) may be visible in the seascape outside the International Dark Sky Reserve (IDSR) from locations within the IDSR and these effects are assessed in full in Appendix 15.5 Assessment of aviation and navigation night-time lighting, Volume 4 of the Environmental Statement (ES) [APP-161]. The assessment focuses on the core and buffer zone of the IDSR (where the darkest skies can be found) and representative views from the Dark Skies Discovery Sites within the IDSR. The overall finding of the assessment is that the impact of the</p>

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6.22	<p>and observed sky quality in the surrounding area is not negatively affected. This extends to the construction aspects of the scheme, as well as the overall operation.</p> <p>6.22 There is a lack of assessment of lighting effects on the National Park and the commitments/requirements do not acknowledge the need for additional protection measures during construction within the National Park. This includes impacts from the construction compound at Washington, which is on the boundary of the National Park. Lighting will be required during winter working hours and for HDD compounds (where there is a requirement for an onsite presence 24 hours a day).</p> <p>Therefore it is considered the development proposal, as it stands, does not accord with policies SD4 or SD8.</p>	<p>lighting will not harm the continuity of the dark landscape of the IDSR, will not result in obtrusive light (such as glare or skyglow), nor reduce the observed quality of visible astronomical features in the dark skies above the IDSR.</p> <p>The effects of lighting during the construction phase on settlements, transport routes and recreational receptors have been considered at a high level in Sections 1.2 to 1.5 within Appendix 18.4: Visual Assessment, Volume 4 of the ES [APP-170]. Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] summarises the visual effects on views from sensitive receptors during construction in Section 18.11. No 'lighting assessment' has been undertaken in relation to onshore construction works (including Washington Construction Compound and horizontal directional drilling (HDD) Compounds) due to the practical difficulties with such an assessment based on methodology, detailed design, location, duration / timing and specification. The Applicant is not aware of any other examples of a night-time lighting assessment being undertaken for construction lighting along cable corridors / temporary HDD compounds. Rather, the advice from the South Downs National Park Policy SD8: Dark Night Skies has been incorporated into Commitment C-200 to control lighting during construction, provided in the Outline Code of Construction Practice [PEPD-033] secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). These measures will minimise the effects of any night-time construction lighting across all of the onshore works areas.</p> <p>The assessment of no effect on the South Downs International Dark Sky Reserve is based on the fact that none of the Dark Skies Discovery Sites or core areas of the Dark Sky Reserve are located within the landscape and visual impact assessment (LVIA) Study Area (see Figure 15.12 in Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3 [APP-088]). The nearest of these being located beyond 10km distance from the proposed DCO Order Limits. A portion of the onshore cable corridor is however routed through the "E1a - 2km Buffer Zone & Intrinsic Rural Darkness" area and as such the recommendations of the South Downs National Park (SDNP) Local Plan Policy SD8: Dark Night Skies have been followed and incorporated into C-200 (construction lighting limited to directional task lighting where required) in the Commitments Register [REP1-015] These commitments are secured through Requirement 22 (Outline Code of Construction Practice [PEPD-033]) in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>Therefore, the Applicant considers it has addressed the requirements of policy in this regard and notes that the summary of impacts provided by South Downs National Park Authority in reference ES3 considers this a limited or neutral impact.</p>
6.23	<p>Biodiversity</p> <p>6.23 SDLP Policy SD9 states proposals should:</p> <ul style="list-style-type: none"> retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes) and ensure appropriate and long-term management of those features, 	<p>The Applicant has followed the mitigation hierarchy when designing the Proposed Development. The design in the first instance has sought to avoid permanent or temporary loss of the most sensitive habitats, minimise the permanent and temporary loss of sensitive habitats that could not be avoided, provide mitigation aimed at reducing the level of effect and provided a route to the provision of both compensation and Biodiversity Net Gain (BNG). A commitment to delivering BNG of at least 10% has also been made by the Applicant despite it not being mandatory for Development Consent Order projects until April 2025.</p> <p>The Proposed Development will contribute to the restoration, enhancement and management of biodiversity and ecological networks through delivery of BNG. The Biodiversity Net Gain strategy</p>

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	<ul style="list-style-type: none"> contribute to the restoration and enhancement of existing habitats and the creation of linkages between sites to create and enhance local and regional ecological networks, <p>giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation.</p>	<p>is committed to through C-104 (see Commitments Register [REP1-015]) and secured via Requirement 14 of the Draft Development Consent Order [PEPD-009] (provided at Deadline 2 submission). The delivery of BNG will follow the approach described in Appendix 22.15: Biodiversity Net Gain Information, Volume 2 of the Environmental Statement (ES) [APP-193]. The delivery of BNG will be front-loaded and specific to individual phases of development (e.g. substation delivery, grid connection works, cable installation between points A and B). The specific location of BNG delivery is unknown at this stage but identification of suitable units for sale is based on a series of criteria with the first being investigating options on land owned by affected parties within the proposed DCO Order Limits or within 2km of it, followed by a search in the same area for opportunities with emphasis on those that may support local strategic objectives. The Applicant has previously requested information on strategic projects with opportunities for delivery of BNG from the Expert Topic Group on terrestrial ecology (see Section 22.3 of Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement [APP-063]).</p> <p>The Proposed Development will result in the temporary and permanent loss of habitats during the installation of the transmission cables and the construction of the onshore substation and grid connection. As part of the design the degree of habitat loss has been minimised, with the most sensitive habitats avoided wherever possible. All habitats subject to temporary loss will be reinstated as described in the Outline Landscape and Ecology Management Plan [APP-232]. This document is to be updated by the Applicant (at Deadline 3) to reflect discussions held with stakeholders, including incorporation of tree replacements described in the Appendix 22.16: Arboricultural Impact Assessment, Volume 2 of the ES [APP-194] into the wider framework of the Outline Landscape and Ecology Management Plan [APP-232]. The reinstatement has been considered within the assessment as the realistic worst case which is the replacement of habitat like for like (i.e. the opportunity for enhancement is not considered). This is because agreements with individual landowners can only be made when a detailed design is understood and a delivery schedule known. Regardless of the reinstatement, it is likely that there will remain a shortfall of units to reach 'no net loss' (i.e. compensation) and subsequently BNG. This shortfall will be delivered through BNG as secured via Requirement 14 of the Draft Development Consent Order [PEPD-009].</p> <p>Habitat fragmentation has been minimised by measures to reduce the amount of linking habitats lost either temporarily or permanently. This has been done through avoidance, through minimisation (e.g. use of trenchless crossing techniques) and by mitigation (e.g. notching of hedgerows to reduce losses). Measures to reduce fragmentation are described in the Outline Code of Construction Practice [PEPD-033]. In addition, a new commitment (to be included in an update of the Outline Code of Construction Practice [PEPD-033] at Deadline 3) has been adopted to further minimise effects during the construction period. It reads 'C-291 Where hedgerow, tree lines or belts of scrub are temporarily lost to facilitate the installation of cable ducts, suitable material (such as straw bales, dead hedging, willow hurdles etc.) will be placed in the gaps to facilitate bat movement along linear corridors following backfill of cable trenches and until such time as reinstatement begins'.</p>
6.24	<p>6.24 SDLP Policy SD11 states that development proposals must provide adequate protection zones and buffers around hedgerows and other woodland and trees. A minimum buffer of 15 metres will be required between development and ancient woodland.</p>	<p>Commitment C-216 (Commitments Register [REP1-015]) (updated for the Deadline 1 submission) ensures that:</p> <ul style="list-style-type: none"> all ancient woodland will be retained;

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6.25	<p>6.25 In summary, insufficient survey data, ecological assessment and mitigation measures have been compiled to demonstrate that there would be 'no significant effects' on terrestrial ecology features. There has been a conflation of compensation and delivery of biodiversity net gain, which are two distinct and separately required aspects. Whilst the ambition to provide biodiversity net gain is welcomed, it should be clear and distinct from any mitigation and compensatory work required in respect of the scheme.</p>	<ul style="list-style-type: none"> a stand-off of a minimum of 25m from any surface construction works will be maintained in all locations from cable installation works; and <p>construction traffic may operate within 25m of an ancient woodland on existing tracks, with any track maintenance works being restricted to the current width. Works to provide safe access from the highway are required in three locations within 25m of ancient woodland notably accesses A-42, A-56 and A-57. At these locations specific design measures detailed in the Outline Code of Construction Practice [PEPD-033] (secured via Requirement 22 within the Draft Development Consent Order [PEPD-009]) will manage any potential indirect effects on ancient woodland.</p> <p>It is noted that accesses A-42, A-56 and A-57 are not located within the South Downs National Park.</p>
6.26	<p>6.26 Further, there is a lack of evidence to demonstrate the efficacy of mitigation measures such as notching of hedgerows and use of Horizontal Directional Drilling (HDD) will be successful when taking into consideration the specific ecological features and climate conditions of the South Downs National Park. The use of HDD in principle, as an alternative to open-cut trenches is supported, however if this method is not viable, the application documents are not clear on what other options remain, if any. Whilst larger areas are included in the Order Limits, to allow optionality for the routes, these are subject to much of the same ground conditions and it would be expected that the ability to focus the route options should be achievable prior to consent being granted. The dDCO also does not secure the areas proposed for HDD in the National Park, i.e. Michelgrove Park and Sullington Hill. Therefore the proposed development is considered to be contrary to Policies SD9 and SD11.</p>	<p>The Applicant is satisfied that the level of field survey undertaken is proportionate to the type of activity proposed and allows a robust ecological impact assessment to be carried out. The Applicant notes that neither Natural England or other local authorities have highlighted a lack of survey information as an issue, acknowledging that additional survey information on bats and dormouse was provided at the first procedural deadline. It is also noted that the approach to baseline data collection and the interim results of the surveys were shared on a number of occasions with the Expert Topic Group (see Section 22.3 of Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the Environmental Statement (ES) [APP-063]).</p>
		<p>Compensation and biodiversity net gain (BNG) are intertwined in the way that the mandatory BNG system has been conceived by Natural England and Defra (the approach being followed by the Applicant, despite it not being mandatory for DCO projects until April 2025, is described in Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193]). The Statutory Biodiversity Metric (and its predecessors) calculates losses and gains to biodiversity and apply trading rules to a point of 'no net loss' (i.e. compensation), with the remaining shortfall being the portion that makes up BNG. The Applicant notes that Table 4-5 of Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] shows the net unit change between pre and post construction – this represents the amount of additional units that would need to be purchased (or otherwise delivered) to meet no net loss (i.e. to compensate), with the column showing the unit shortfall representing the number of units that would need to be purchased (or otherwise delivered) to meet a 10% biodiversity net gain.</p>
		<p>The Applicant refers to the further justification for the Order Limits at Michelgrove and Sullington Hill in the Applicant's Response to Action Points Arising from Issue Specific Hearing 1 [REP1-018] under AP26 for further detail on the above matters. The use of trenchless crossings in these locations are secured in the Outline Code of Construction Practice (CoCP) [PEPD-033] as per Appendix A – Crossing Schedule within that document and secured by Requirement 22 of the Draft Development Consent Order [PEPD-009]. Further Section 4.2 of the Outline Code of Construction Practice [PEPD-033] explains that if another trenchless technology was required, the stage specific CoCP must be accompanied by confirmation that there are no new or materially different environmental effects arising compared to those assessed in the ES.</p>
		<p>With respect to efficacy of hedgerow mitigation, the Applicant has noted the following in responses to Relevant Representations from other parties including West Sussex County Council [RR-418] and Natural England [RR-265].</p>

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6.27	Cultural Heritage 6.27 SDLP Policy SD16 states that sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance. There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets of equivalent significance. Where there is unavoidable	<p>The realistic worst-case scenario assessed within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES [APP-063] is based on hedgerow notches being cut to the ground, roots excavated and discarded, soil replaced and new planting. This is a typical approach to linear projects; other than here the proposal is for multiple smaller notches as opposed to a single large gap. It is expected that replanting would be successful through the implementation of stage specific Code of Construction Practice CoCP) and stage specific Landscape and Ecological Management Plan (LEMP) secured and via Requirements 12,13 and 22 of the Draft Development Consent Order [PEPD-009].</p> <p>The second part of Commitment C-115 (Commitments Register [REP1-015]) has been updated for Deadline 1 to state that 'Hedgerows subject to temporary translocation will be lifted using a tree spade to maintain diversity and structure and result in more rapid reinstatement. Where chances of success are questionable, notches will be made by removal and reinstatement through planting. The Ecological Clerk of Works (ECoW) will justify the approach being taken in line with the responsibilities of implementing the vegetation retention plan (see C-220)'. This means where chances of success are low then this option will not be exercised and instead a typical approach of re-planting will be specified. This will necessarily be described within the reinstatement measures in the Landscape and Ecological Management Plan. In locations where temporary translocation is appropriate (e.g. soils that are at least 60cm deep and support vegetation that does not appear to be drought stressed) translocated hedgerows would be subject to regular aftercare. Where it appeared that translocated sections are failing new planting would be established along the line of the translocated section (on both sides). These plantings would develop into the hedge with the failed / partially failed translocated section providing a matrix to develop around. The Applicant recognises that the translocation of hedgerow will have more chance of failure than replanting using whips. The translocation has been provided as an option to maintain character and provide more rapid gapping up. However, should this option not be considered relevant then the relevant local authority and Natural England will have the opportunity to request translocation is not used at any given location through approval of the stage specific LEMP and stage specific CoCP in accordance the Outline Code of Construction Practice [PEPD-033] and Outline Landscape and Ecology Management Plan [APP-232] which are in turn secured through Requirements 12, 13 and 22 of the Draft Development Consent Order [PEPD-009].</p> <p>It should be noted that this approach (temporary translocation and replacement of hedgerows) was considered acceptable in the consented Brechfa Forest Connection project (see paragraph 5.2.99 and Requirement 28 of the Examining Authority's Report of Findings and Conclusions to the Secretary of State for Energy and Climate Change (Planning Inspectorate, 2016).</p> <p>The Applicant considers that as per the detail of the responses provided in references 6.23 to 6.26 that it has met the policy requirements of the South Downs Local Plan.</p> <p>SDLP Policy DP34 is identified as a local planning policy relevant to the assessment of the potential effects on historic environment receptors in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020].</p> <p>The design of the Proposed Development has been an iterative process that has sought to avoid direct impacts on designated heritage assets and known heritage assets of significance, and to limit the potential for indirect effects, wherever possible. Relevant embedded environmental</p>

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	<p>harm or loss of an archaeological asset's significance, this will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh the harm.</p>	<p>measures (Table 25-23) are presented in Section 25.7 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. Specifically, commitments C-225 and C-79 in the Commitments Register [REP1-015] (updated at the Deadline 1 submission) provide for mitigation through design and archaeological recording and are secured through Schedule 1, Part 3, Requirement 19 of Draft Development Consent Order [PEPD-009]:</p> <ul style="list-style-type: none"> • C-225 Where previously unknown archaeological remains of high heritage significance are identified through surveys along the cable route, and where these locations have not been possible to avoid during earlier design stage, consideration will be made for engineering solutions (e.g. narrowing of the construction corridor, divert cable route within DCO Order Limits, re-siting stockpiles) to avoid impacts in the first instance. Where impacts are not avoidable, these will be minimised where possible through design solutions and an appropriate programme of mitigation will be undertaken to ensure preservation by record. Such measures will be reviewed in consultation with relevant stakeholders (WSPCC Archaeologist and Historic England). An onshore outline WSI provides detail of appropriate methodologies to be implemented during the evaluation and mitigation stages of the archaeological works (as updated by the Applicant within the Outline Code of Construction Practice [PEPD-033] (submitted at the Procedural A Deadline); and • C-79 Archaeological and paleoenvironmental mitigation will entail an agreed programme of archaeological recording and dissemination to mitigate any significant adverse effects during construction. Provision will be made for appropriate curation/deposition of the site archive. <p>The Planning Statement [APP-036] outlines the position with regards the planning balance with regard to the benefits of the Proposed Development and the potential harm to heritage assets that is identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], as per paragraphs 4.7.66 and 5.4.10 of the Planning Statement [APP-036].</p>
6.28	<p>6.28 There is a high probability that the tract of land between Harrow and Blackpatch Hills contains archaeological features of high significance, however this has not yet been determined. The methods by which they would be preserved in-situ, should substantial or extensive features exist, have not been adequately set out. The 18 SDNPA also consider the significance on a landscape-scale of the area as a prehistoric industrial landscape, with multi-period settlement activity, is of national significance.</p>	<p>The approach to identifying and characterising archaeological remains that may be impacted is set out in Section 25.4 of Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020].</p> <p>Chapter 25: Historic environment, Volume 2 of the ES [APP-066] has considered all available desk-based and geophysical survey data at a landscape scale, drawing on a range of desk-based and survey data to inform an assessment of archaeological potential as well as considering individual sites and identifies a high potential for archaeological remains of high heritage significance within the area of the South Downs, including the section which lies between Harrow Hill and Blackpatch Hill.</p> <p>Archaeological field evaluation has been undertaken within the South Downs in the form of a geophysical survey and the results are described in the Appendix 25.4 Onshore Geophysical Survey Report (Part 1 of 8 to Part 8 of 8), Volume 4 of the ES [PEPD-031, PEPD-113 - PEPD-119]. Specifically, the South Downs is covered by Fields 050-117. Survey in this area identified just two features identified as definite or probable archaeology:</p> <ul style="list-style-type: none"> • (52_1) possible ditch forming part of an enclosure; and • (85_1) a possible barrow.

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6.29	6.29 Therefore, currently, the proposed development has not yet appropriately identified the significance and the package of mitigation measures proposed is inadequate, which leads to negative impacts and would be contrary to policy SD16.	<p>Other features were identified as having a possible archaeological origin, including multiple dispersed pit-type anomalies (e.g. 75_1) or areas of enhanced magnetism with unclear origins (e.g. 73_2, 74_3 and 75_2), weaker linear bands (e.g. 66_1, 66_2, 74_1) and weak curving anomaly (e.g. 62_1), which could be of archaeological origin. However, the geophysical survey did not indicate the presence of extensive or complex archaeological remains.</p> <p>The assessment presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] is based on a worst-case scenario.</p>
6.30	6.30 SDLP Policy SD15 states that development within the setting of a conservation area will only be permitted where they preserve or enhance the character or appearance of the conservation area.	<p>The Applicant refers South Downs National Park Authority (SDNPA) to responses in references 6.27 and 6.28.</p> <p>The Outline Onshore Written Scheme of Investigation (WSI) [APP-231] provides for an appropriate and proportionate programme of evaluation, and subsequent mitigation by avoidance/reducing effects through design, and preservation by record. The evaluation measures set out in the Outline WSI were established through consultation with consultees, including SDNPA. Archaeological interest retained in an asset which is actively conserved is more valuable and actively sought through detailed design, which will be informed by evaluation. The environmental embedded measures were established and adapted through the consultation process. A flow chart will be appended to the Outline Onshore WSI [APP-231] to include procedures following discovery of previously unknown archaeological remains. This will be included in the updated Outline Onshore WSI [APP-231] to be submitted at Examination Deadline 3.</p> <p>In addition to those measures referred to in reference 6.27, embedded environmental measure C-261 in the Commitments Register [REP1-015] provides for an appropriate and proportional programme of public outreach to be developed and implemented by the Applicant. Commitment C-79 provides for appropriate curation/deposition of the site archive and is secured through Requirement 19 of the Draft Development Consent Order [PEPD-009].</p> <p>The requirement for a proportionate programme of public outreach is secured in Section 7 of the Outline Onshore WSI [APP-231].</p>
6.31	6.31 Washington Conservation Area is located adjacent to the Order Limits, which run along its northern extent, with some construction accesses noted within. Whilst the assessment of the impact on the setting of the Conservation Area is questionable, the conclusions in Chapter 25 of the Environmental Statement of the effects being minor adverse are agreed.	<p>The Applicant welcomes the South Downs National Park Authority's agreement with the conclusions here and has no further comments at this time.</p>
6.32	<p>Water Environment including Drainage and Flood Risk</p> <p>6.32 The SDNPA generally agrees with the conclusions of the applicant's Environmental Statement (Chapter 26 Water Environment – Application Reference 6.2.26) and therefore,</p>	<p>The Applicant welcomes the conclusion drawn by South Downs National Park Authority (SDNPA) regarding compliance with policy here. Please refer to references 6.23 to 6.26 within this document with respect to Biodiversity. The Applicant notes that in the SDNPA summary of impacts in reference ES3, limited or neutral impacts have been identified for water environment.</p>

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	the proposal accords with SDLP policies SD17 and SD49. However, please note the relevant comments under Biodiversity.	
6.33	<p>Highways, including Public Rights of Way</p> <p>6.33 The SDNPA acknowledges that West Sussex County Council (WSSCC), as the Local Highways Authority, will be making representations regarding the highway issues, as well as being the body responsible for Public Rights of Way. The SDNPA is the body responsible for the South Downs Way National Trail. The SDNPA wishes to make the following comments regarding the impact on the National Park.</p>	<p>The Applicant notes that in the South Downs National Park Authority summary of impacts in reference ES3, limited or neutral impacts have been identified related to highways and PRoW.</p> <p>The Applicant has undertaken a robust and thorough assessment of the impacts of the Proposed Development on the strategic and local road networks as contained within Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-063] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]. The ES concluded that the Proposed Development would generate only one significant environmental effect on the local and strategic road network in the South Downs National Park on Michelgrove Lane. This significant effect is however temporary in nature and associated with the short-term peak of construction activities along the associated section of the onshore cable route. Furthermore, the Applicant is currently developing a traffic management strategy to support safe movement of construction vehicles and general traffic along Michelgrove Lane for agreement with West Sussex County Council in their role as local highway authority. It is intended that this strategy will be submitted into the Examination at Deadline 3 and appended to the Outline Construction Traffic Management Plan [REP1-010], secured through Requirement 24 of the Draft Development Consent Order [PEPD-009].</p>
6.34	<p>6.34 SDLP Policy SD19 states that development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks, however please also note relevant comments under Landscape. SDLP Policy SD20 states proposals will be permitted provided that they maintain existing public rights of way and conserve and enhance the amenity value and tranquillity of, and views from, non-motorised travel routes and access land.</p>	<p>The Applicant notes the further responses regarding public right of ways under references 6.35 to 6.37 and that impacts arising are temporary and reversible, conserving the amenity value. The Applicant will continue to engage with SDNPA on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response in references 3.2.5 to 3.2.7 regarding Section 106 agreements</p>
6.35	<p>6.35 Chapter 23 of the Environmental Statement concerns Transport. This chapter has not referenced the relevant policies of the SDNP and we are therefore concerned that these policies, where they are specific to the National Park, have not been appropriately taken into account and the proposals are not in accordance with their requirements.</p>	<p>The Applicant notes the omission of policies from the South Downs National Park Local Plan from Chapter 23: Transport, Volume 2 of the Environmental Statement [APP-063] but is cognisant and has demonstrated below the requirements contained within the Local Plan have been accounted for.</p> <p>In relation to Strategic Policy SD19 (Transport and Accessibility) of the South Downs National Park Local Plan an Outline Construction Workforce Travel Plan [APP-229] and Outline Operational Travel Plan [APP-227] have been submitted as part of the DCO Application. These documents, secured by Requirement 24 and 32 of the Draft Development Consent Order [PEPD-009], include measures to support the use of sustainable transport (where practicable) during the construction and operational stages of the Proposed Development, noting that the level of traffic generated during the operational phase will be minimal. A detailed assessment of the highway safety impacts of the Proposed Development is provided within Chapter 23: Transport, Volume 2 of the ES [APP-064], Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]. These assessments concluded that the Proposed Development would not generate any significant effects related to highway safety.</p> <p>Once operational the Proposed Development has no permanent impacts on the walking, cycling and equestrian routes within the South Downs National Park (SDNP) nor impacts upon the specific non-motorised transport routes listed as part of Strategic Policy SD20 (Walking, Cycling and Equestrian Routes). During construction, the Outline Public Rights of Way Management</p>

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		<p>Plan [APP-230] details the managed measures for all Public Rights of Way and Open Access Land impacted by the onshore elements of the Proposed Development. A stage-specific PRowMP will be submitted prior to relevant stage of construction as secured by Requirement 20 of the Draft Development Consent Order [PEDP-009].</p> <p>In relation to Development Management Policy SD21 (Public Realm, Highway Design and Public Art) a number of highway accesses are proposed within the SDNP as part of the Proposed Development:</p> <ul style="list-style-type: none"> • 5x construction accesses; • 3x construction and operational accesses; • 2x light construction accesses; • 2x light construction and operational accesses; and • 8x operational accesses. <p>For the 12 junctions that will form either light construction, light construction and operational or operational only accesses it is not anticipated that modification of existing accesses will be required due to them only being used by Lights Good Vehicles (i.e. vans) for surveys / ground investigation only. The remaining 8 access junctions proposed within the SDNP will be subject to detailed design as part of the stage specific Construction Traffic Management Plan (which accords with the Outline Construction Traffic Management Plan [PEPD-035a]) before that stage can commence, as secured by Requirement 24) of the Draft Development Consent Order [PEPD-009]. Following completion of construction activities, temporary infrastructure including accesses will be reinstated to the extent possible as detailed within the Outline Landscape And Ecology Management Plan [APP-232].</p> <p>Once operational, the Proposed Development will have dedicated car parking spaces will be provided for operational workers to carry out planned maintenance at the onshore substation only which is outside the SDNP. To encourage sustainable travel methods, staff travelling via car share will be given priority over single occupancy spaces. Additionally electric vehicle charging points will be available as part of the substation parking to encourage low emission journeys.</p>
6.36	6.36 Many Public Rights of Way (PRow) will be affected, through temporary closure and diversion, as a result of the proposal. It is not clear from the plans or the DCO how all of these will be affected, or for how long. The DCO also fails to identify which of the affected PRow are in the National Park. This is not in accordance with the requirement to conserve and enhance the amenity value of these routes.	<p>In relation to Public Rights of Way (PRow), it is noted that there will be some disruption to Public Rights of Way and users of such during construction of the Proposed Development. However, this impact will be managed through the embedded environmental measures contained within the Outline Public Rights of Way Management Plan [APP-230]. Section 5 of the Outline Public Rights of Way Management Plan [APP-230] outlines the proposals management measure for impacted PRow including (but not limited to):</p> <ul style="list-style-type: none"> • Temporary closures and diversions; • Managed crossings; • Shared routes; • Inspection and maintenance; Signage managements; and • PRow sequencing. <p>Section 5.4 Outline Public Rights of Way Management Plan [APP-230] also identifies the following commitments made by the Applicant to mitigate impacts on the Public Rights of Way Network:</p>

Ref	Local Impact Report Comment	Applicant's Response
6.37	6.37 There are several public rights of way (PRoW) proposed for use as construction and haul roads, which are accessed via Long Furlong (A280). We are concerned that inadequate assessment has been undertaken regarding the safety of these accesses and the mitigation measures proposed would be in accordance with the above policies.	<ul style="list-style-type: none"> • C-18: A crossing schedule has been prepared which includes crossing methodology of road, rail, Public Rights of Way and watercourses; • C-21: Signage and / or temporary Public Rights of Way / footpath diversions will be provided during construction; • C-161: The South Downs Way and the Down Link Public Rights of Way will be managed in a way that minimises any closures or diversions; • C-162: Public Rights of Way that cross the onshore cable corridor will be managed or diverted over the shortest distance possible with potential to provide adjacent crossings. • C-202: A Public Rights of Way Management Plan will be developed in consultation with West Sussex County Council for stages of the works. These will be developed in accordance with the Outline PRoWMP and include the stage specific details for managing the use of PRoW during construction. <p>These commitments are secured via Requirement 20 of the Draft Development Consent Order [PEDP-009] (updated at Deadline 2) which includes the provision of further detail on the timelines in 20 (a) (i) to (iii) and 20 (b) (i) to (iii).</p> <p>The Applicant will also identify the PRoW within the South Downs National Park in further iterations of the relevant Development Consent Order schedules.</p> <p>The Applicant has assessed Public Rights of Way (PRoWs) directly impacted by construction of the onshore cable route in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058] in Section 17.9 and Tables 17-29 and 17-31. The embedded environmental measures are provided in the Outline Public Rights of Way Management Plan [APP-230] and secured by Requirement 20 in the Draft Development Consent Order [PEPD-009] (updated at deadline 2).</p> <p>In addition, the Applicant is currently preparing a traffic management strategy to support use of Michelgrove Lane by construction traffic, which will include consideration of safety of PRoW users of Footpath 2174 / 2174/3 which connect Michelgrove Lane and Long Furlong. It is expected that this will be provided in the Outline Construction Traffic Management Plan [REP1-010], expected to be updated at Deadline 3 and secured by Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 24.</p> <p>In relation to other Public Rights of Way accessed via Long Furlong the Applicant notes that Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006] provides details of the peak construction traffic impact on the link. Table 2-14 shows that the A280 Long Furlong will experience a maximum increase of 1.7% in total traffic flows and 2.3% increase in heavy goods vehicle (HGV) flows as a result of the Proposed Development. Such increases are unlikely to be discernible in comparison with day-to-day variations in general traffic flow and therefore will not negatively impact upon safety of PRoW users.</p> <p>The Applicant notes that in the South Downs National Park Authority summary of impacts in reference ES3 concludes limited or neutral impacts related to highways and PRoW.</p>
6.38	Residential Amenity 6.38 During construction, it is unfortunately inevitable that the works will give rise to localised disturbances to amenity. Whilst the impact on residential visual amenity is	The residential visual amenity assessment (RVAA), provided in Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the Environmental Statement (ES) [APP 171] . It

Ref	Local Impact Report Comment	Applicant's Response
	<p>considered in the Landscape and Visual Impact Assessment (APP-171), this is mainly concerned with the impacts arising from the substation (outside of the National Park). The impacts on residential amenity for those living in the National Park, for example away from main roads, but affected by the construction routes, or the residents of Washington Village who will be affected by the construction compound on the A283, are considered to have been inadequately assessed and therefore are not in accordance with SDLP Policy SD5 or the Design Guide, Supplementary Planning Document, July 2022.</p>	<p>includes an assessment of properties (outwith settlements) along the route of the cable corridor and includes the impacts on residential amenity for those living in the National Park.</p> <p>Washington settlement is assessed in in Appendix 18.2: Viewpoint Analysis, Volume 4 of the ES [APP-168], Appendix 18.4: Visual Assessment, Volume 4 of the ES [APP-169]. Washington has very limited views of the Proposed Development as indicated by the limited zone of theoretical visibility (ZTV) coverage of the settlement and the trenchless crossing of the playing fields, located just to the north of the village (settlement boundary). Consequently, views from the settlement would not be significant. This also applies to the allotments, located further to the north of the recreation ground at Washington, which would be screened by perimeter hedges and vegetation / buildings associated with Washington Caravan Park. The assessment does however acknowledge that there would be significant views of the Washington construction compound from Viewpoint H1 along the A283 on the northeastern edge of Washington (Figure 18.32 of Chapter 18: Landscape and visual impact – Figures (Part 3 of 6) Volume 3 of the ES [APP-100]).</p> <p>The Applicant notes that in the South Downs National Park Authority summary of impacts in reference ES3, limited or neutral impacts have been identified for residential amenity.</p>
6.39	<p>Open Access Land and Public Open Space 6.39 As a National Park, the SDNPA is the Relevant Authority for Access Land. The area of scarp at Sullington Hill is designated Access Land. Users of this land are receptors when considering accordance with SDLP Policies SD4, SD6, SD7 and SD8 and so this matter is considered in the sections on landscape above.</p>	<p>The Applicant welcomes the conclusion drawn by South Downs National Park Authority (SDNPA) regarding compliance with policy here and notes that in the SDNPA summary of impacts in reference ES3, limited or neutral impacts have been identified for Open Access Land and Public Open Space.</p>
6.40	<p>6.40 There is no loss of public open space in the National Park associated with the proposal, as the Washington Recreation Ground would remain open during construction. Therefore the development complies with SDLP Policy SD46 and Policy 16 of the Storrington, Sullington and Washington Neighbourhood Plan, which both seek the protection of such space.</p>	
6.41	<p>Geology and Soils, including Contaminated Land 6.41 The impacts regarding the impact on geology and soils have been covered in earlier sections relating to landscape and terrestrial ecology. The policy requirements can be found in SDLP Policies SD4 and SD9. There is concern that there would be negative impacts resulting from the proposed development (dealt with above under landscape and ecology).</p>	<p>Please refer to the response under reference 6.17 (g) in this table. The Applicant notes that in the South Downs National Park Authority summary of impacts in reference ES3, limited or neutral impacts have been identified Geology and Soils, including Contaminated Land.</p>
6.42	<p>Material Assets and Waste 6.42 Whilst the SDNPA is the Relevant Planning Authority for these matters, including planning for minerals extraction, we work in partnership with West Sussex County Council on these matters. Parts of the cable route are underlain by minerals, that are safeguarded through the JMLP, notably soft sand aggregate, which is a scarce, safeguarded resource. A Minerals Resource Assessment has not been provided, which would typically be expected upfront in these circumstances. Further, the applicant has only considered impacts to take place during construction, however the presence of a cable and the associated buffer would mean sterilisation of sites throughout the life of the windfarm. This would be contrary to the objectives and policies in the JMLP.</p>	<p>Due to the location of the relevant Minerals Safeguarding Areas (MSAs), it is not possible for the onshore cable route to avoid the MSAs, however the route proposed for the onshore cable has taken the MSAs into account and minimises the extent of impact on the MSAs by running in as direct a line as possible, or for soft sand, running adjacent to the A283 (an existing constraint to extraction). The onshore cable route therefore avoids needless sterilisation as a first principle.</p> <p>In common with other projects of this nature, ground investigations to determine the precise amounts of mineral have not been undertaken at this stage of the project, and this information would not become available until the construction phase. It is therefore not possible for the minerals assessment provided in Chapter 24: Ground conditions, Volume 2 of the Environmental Statement (ES) [APP-065] to provide a formal Minerals Resource Assessment, but</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>where required it does provide proper consideration through a robust assessment based on the information available and, where appropriate, considers worst case scenarios for the quantum of minerals affected by the Proposed Development. The Applicant also notes that a Minerals Resource Assessment would not change the conclusions in the environmental impact assessment (EIA), given that it would not alter the assessment of effects which are already noted to be Significant.</p> <p>The Applicant disagrees that the assessment does not consider the effects beyond the construction phase. Paragraphs 24.10.10 and 23.10.11 of Chapter 24: Ground conditions, Volume 2 of the ES [APP-065] set out the assessment of effects from the Proposed Development on the MSAs, including soft sand, during the operation and maintenance phase noting that due to the presence of the onshore cable, there would be significant effect throughout this period. The Applicant has also carried out an assessment for the decommissioning phase, noting in Paragraphs 24.11.6 and 24.11.7 that the effects identified in regards to the MSAs would be reversed and the resources would become available for extraction.</p> <p>Paragraph 4.7.129 of the Planning Statement [APP-036] states that “with regards to MSA the assessment has found that there will be a significant effect on the soft sand in the construction phase and operation and maintenance phase. In the context of WSCC Joint Mineral Local Plan Policy M9, it is identified that the soft sand MSA cannot be avoided, although the area potentially sterilised in the construction phase and operation and maintenance phase will be a very minor proportion of the overall area. There is a demonstrable overriding and urgent need for the Proposed Development (as demonstrated in Section 4.2 of this Planning Statement) and the infrastructure subject to the DCO Application is identified as a CNP (in line with NPS Draft EN-1 and Draft EN-3). There is no prospect of extracting the small area of sand resource (relative to the overall resource) prior to development and delivering a landform for a viable onshore cable corridor in this location. Furthermore, such an approach would not be environmentally feasible given the likely volume of sand that would need to be extracted and the volume of infill required to then provide a suitable landform for the onshore cable corridor. Additionally, there will be no barrier to a minerals developer accessing the soft sand resource following decommissioning. Therefore, it is considered that the Proposed Development accords with M9 and associated guidance.”</p> <p>The Applicant notes that in the South Downs National Park Authority summary of impacts in reference ES3, limited or neutral impacts have been identified for material assets and waste.</p>
6.43	<p>Socio-Economic</p> <p>6.43 The SDNPA has a statutory duty to ‘foster the economic and social well-being of communities living in the National Park’. SDLP Policy SD34 states that development should promote and protect businesses linked to the National Park’s key sectors of farming, forestry and tourism. It is concerned that this has not been adequately addressed through the submission and therefore it is not clear whether the scheme would accord with this policy. Further known negative impacts on landscape character and access, which are both linked to this matter, are covered in earlier sections of this Report. Renewable Energy</p>	<p>The construction, operation and decommissioning phases will create jobs across the Sussex study area and the rest of the UK. This will primarily be in sectors such as construction, engineering and transport rather than farming, forestry and tourism.</p> <p>The magnitude of impact of Rampion 2 on the tourism economy was assessed as negligible in Chapter 17 Socio-economics, Volume 2 of the ES [APP-058], this includes consideration of the impact on the South Downs National Park. Impacts on tourism accommodation were scoped out of the assessment but there may be a small amount of additional demand for hotel rooms for non-resident construction workers primarily during the construction phase which would represent additional income to hotel businesses, especially during off the peak seasons. The Applicant also conducted a more localised assessment of the impact of Rampion 2 on the volume and value of the tourism sector. The assessment of the impact of Rampion 2 on the</p>

Ref	Local Impact Report Comment	Applicant's Response
		<p>volume and value of the tourism sector found there to be a negligible magnitude of impact on the volume and value of tourism.</p> <p>Impacts on farming and forestry were not scoped into the socio-economic assessment however the impact on employment and GVA in the farming and forestry sector is anticipated to be neutral. Further commentary is provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] in paragraphs 1.3.87 to 1.3.95.</p> <p>The Applicant notes that in the South Downs National Park Authority summary of impacts in reference ES3, limited or neutral impacts have been identified for socio-economics.</p>
6.44	6.44 Policy SD51 deals only with minor-scale renewable energy proposals. The purpose of the policy is to support the development of appropriate new renewable energy that will improve the quality of life for those living in, working in or visiting the National Park, while seeking to conserve and enhance the special qualities. The principle of renewable energy and the need for such provision is recognised and supported in principle.	Noted, the Applicant welcomes this support and has no further comments on this matter at this time.

7. SDNPA Comments on the draft Development Consent Order (PEPD-010)

7.1 The SDNPA consider there are a number of omissions from the Requirements, which are mentioned in this LIR and accompanying Written Representation. The SDNPA also wishes to make the following observations on the draft Development Consent Order (dDCO) Requirements and Schedules. The remarks are set out in table format for ease of reference.

Section / Article	Page	Detail	Comment / Query	Applicant's response
Part 1, Article 2	6	Definition of 'horizontal directional drilling'	This definition needs to be consistent with how the phrase is used elsewhere	Amendments have been made as necessary in the Draft Development Consent Order [PEPD-009] as updated at Deadline 2
Part 1, Article 2	9	Definition of 'relevant planning authority'	Whilst there is nothing in the wording that would exclude the SDNPA as a local planning authority, later sections of the DCO and elsewhere in the application submission have not recognised the SDNPA as such. Further, where aspects of the scheme, such as the Washington Construction Compound, would impact on the setting of the National Park, we would expect to be consulted on the details. This could be added as a criterion.	Updates have been made to the Schedules to the Draft Development Consent Order [PEPD-009] to reflect where streets, public rights of way and hedgerows are located within the administrative areas of SDNPA as local planning authority. An amendment has also been made to Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) to clarify the role of SDNPA in connection with the diversion of the National Trail.
Part 1, Article 2	10	Definition of 'trenchless technologies'	This definition also needs to be reviewed for consistency with how it is used elsewhere and its relationship with the definition of HDD.	Amendments have been made as necessary in the Draft Development Consent Order [PEPD-009] as updated at Deadline 2.

Ref	Local Impact Report Comment		Applicant's Response	
Part 2, Article 6	13	Application and modification of legislative provisions – duty to seek to further the purposes of the National Park	Under Section 11 of the National Parks and Access to the Countryside Act 1949, recently amended by Part 12, Section 245 (3) of the Levelling Up and Regeneration Act 2023, there is duty placed on any relevant authority in carrying out their functions to 'seek to further' the purposes of the National Park. Legislative powers of a number of relevant authorities (including the Highway Authority) would pass to the applicant through the DCO. The SDNPA would therefore like to see this duty to be passed to the applicant as well.	<p>This is not considered appropriate for inclusion in the Draft Development Consent Order [PEPD-009] as updated at Deadline 2.</p> <p>Section 11A(1A) of the National Parks and Access to the Countryside Act 1949 as amended states that '<i>In exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority other than a devolved Welsh authority must seek to further the purposes specified in section 5(1)</i> [i.e. conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas and promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public]. The Secretary of State is required, through the terms of the National Policy Statements (2023 documents), to consider the measures taken to further the purposes of the National Park in their consideration of the application. Consequently, the functions of the relevant authority are exercised through the decision to grant the development consent order, subject to requirements.</p> <p>The applicant is then required by the Planning Act 2008 to comply with the terms of the DCO once made in carrying out the development; this does not amount to the exercise of a function which is susceptible to the application of this provision.</p>
Part 3, Article 12	16	Allowing the undertaker temporarily close public rights of way in accordance with later Schedules.	There appears to be some conflict between these powers and the Requirement later in the dDCO. If a further management/details of closure plan is required for agreement, why is this Article required? Further, it does not recognise that for the purposes of the South Downs Way National Trail, it would be the SDNPA and not the Highways Authority who are responsible.	<p>Article 12 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) provides a power to close public rights of way temporarily, but this widely drafted power is then subject to the application of controls imposed through the requirements; article 3 confirms that the development consent granted for the authorised development is subject to the provisions of the Order and to the requirements.</p> <p>Requirement 20 secures a Public Rights of Way Management Plan to secure how the closures will be managed to minimise effects on users.</p> <p>An amendment to the requirement has been made to reflect that the programme for closure and diversion of the National Trail must be approved by the South Downs National Park Authority.</p>
Part 4, Article 32	29	Temporary use of land for carrying out the authorised project – including removal of vegetation	This is a blanket power without any real constraint on its use. Given the rather arbitrary nature of this power it makes it difficult to understand and assess the actual tree and hedgerow loss associated with the development.	As with Article 12, this article provides a widely drafted power the exercise of which will be controlled by requirements including the Outline Code of Construction Practice [PEPD-033] secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). This includes the vegetation retention plan which controls the extent to which trees and hedgerows may be removed in the construction of the proposed development. The Outline COCP documents are being reviewed in conjunction with detailed design work for key junctions being considered in liaison with the highway authorities.
Part 4, Article 33	31	Temporary use of land for maintaining the authorised project	See comments immediately above and note this also includes the provision of means of access.	As with article 12 this article provides a widely drafted power, the exercise of which will be controlled by requirements including the Landscape and ecology management plan. Control over the creation of operational accesses is secured by requirements 15 and 16 of the Draft Development Consent Order [PEPD-009] updated at Deadline 2. Further removal beyond that identified for construction is not anticipated for operation and maintenance of the authorised project.

Ref	Local Impact Report Comment		Applicant's Response	
Part 7, Article 43	35	Felling or lopping of trees and removal of hedgerows	This is a blanket power without any real constraint on its use. Given the rather arbitrary nature of this power it makes it difficult to understand and assess the actual tree and hedgerow loss associated with the development.	<p>As noted above in relation to article 12, this is a widely drafted power which is then subject to the application of controls imposed through the requirements of the Draft Development Consent Order [PEPD-009] updated at Deadline 2</p> <p>The Outline Code of Construction Practice [PEPD-033] includes a vegetation retention plan and arboricultural statement which control the extent of loss of vegetation. These documents are being reviewed in conjunction with detailed design work for key junctions being considered in liaison with the highway authorities and final stage specific documents will be submitted for approval pursuant to Requirement 22 of the Draft Development Consent Order [PEPD-009].</p>
Part 7, Article 44	35	Trees subject to tree preservation orders	This appears to suggest that trees subject to TPO are able to be felled without any further consideration. This is of significant concern where effort should be made to retain such trees.	As noted above in relation to article 43, this is a widely drafted power which is then subject to the application of controls imposed through the requirements and in particular the Outline Code of Construction Practice [PEPD-033] and Outline Construction Method Statement [APP-255] secured by Requirements 22 and 23 respectively of the Draft Development Consent Order [PEPD-009] updated at Deadline 2.
Schedule 1, Part 3 Requirement 10	56	Programme of Works	The SDNPA requests the addition of the following: The term 'commence' as used in paragraph (1) above includes any site preparation work, ecological mitigation and temporary hardstanding.	<p>Following review of the definition of Commence in response to the request made at Issue Specific Hearing 1 (ISH1), the Applicant has revised this definition in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) and it no longer 'carves out' onshore site preparation works for the onshore works.</p> <p>Requirement 10, which provides for submission of a programme identifying stages of works, now provides for a programme of stages for each of works comprising onshore site preparation works and construction works proper to be submitted and approved prior to commencement of either the onshore site preparation works or other works comprising the authorised project.</p> <p>Consequential amendments have been made to other requirements to reflect this change.</p>
Schedule 1, Part 3, Requirement 12	56	Provision of Landscaping	The SDNPA requests the addition of the following: The term 'commence' as used in paragraph (1) above includes any site preparation work, ecological mitigation and temporary hardstanding.	<p>As noted above, the definition of commence has been amended so that it no longer 'carves out' onshore site preparation works. The amendment to requirement 10 enables programmes of work to identify stages of works for onshore site preparation works separately from other onshore work.</p> <p>Where requirements such as requirement 12 require submission and approval of a plan prior to the commencement of a stage, a plan pertaining to a stage of onshore site preparation works identified pursuant to requirement 10 will need to be submitted and approved before those onshore site preparation works may commence.</p>
Schedule 1, Part 3, Requirement 14	56	Biodiversity Net Gain	Appendix 22.15 as referenced only really deals with the substation so is not fit for purpose for the remainder of the strategy. Add 'Authority' after 'South Downs National Park'.	It is not clear if this response relates to the requirement or the content of Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement (ES) [APP-193] . Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] is not limited to just the substation site but applies project wide and is considered to be fit for purpose. It should be noted that the Appendix requires to be updated to reflect the amend to the Draft Development Consent Order [PEPD-009] that the BNG strategy should be approved by the relevant planning authority in consultation with the statutory nature conservation body.

Ref	Local Impact Report Comment		Applicant's Response		
	Schedule 1, Part 3, Requirement 16	57	Schedule 1, Part 3, Requirement 16	<p>The SDNPA requests the addition of the following: The term 'commence' as used in paragraph (1) above includes any site preparation work, including the removal or cutting back of vegetation. The SDNPA also consider that Manual for Streets would be a more appropriate standard, given the status, location and use of the roads in question.</p>	<p>As noted above the definition of commence has been amended such that it no longer 'carves out' onshore site preparation works. To the extent that any site preparation works may be required in connection with an access, then details for the relevant stage within which the access is located would require to be submitted and approved before those works could commence.</p> <p>WSCC as local highway authority have requested that the requirement be amended to allow that the Design Manual for Roads and Bridges apply unless otherwise agreed with the highway authority; this has been agreed and the further change proposed by SDNPA is not considered necessary.</p>
	Schedule 1, Part 3, Requirement 19	57	Onshore Archaeology	<p>The SDNPA would advise that given the need for high level oversight, this requirement should be approved by West Sussex County Council in consultation with the Relevant Planning Authority.</p>	<p>WSCC have requested not to be involved in the discharge of this requirement and reference to WSCC in requirement 19 of the Draft Development Consent Order [PEPD-009] updated at Deadline 2, has been deleted.</p>
	Article 12, Schedule 4, Part 1,	65	Public Rights of Way to be Temporarily Closed	<p>Those PRoW within the National Park should be highlighted as being within this National Park area, rather than Arun or Horsham District.</p>	<p>Noted; this has been updated</p>
	Article 12, Schedule 4, Part 2	66	Public Rights of Way to be Temporarily Closed and a Temporary Substitute Provided	<p>As immediately above.</p>	<p>Noted; this has been updated</p>
	Article 12, Schedule 4, Part 3	70	Public Rights of Way to be temporarily Closed and a Temporary Substitute to be agreed	<p>As immediately above.</p>	<p>Noted; this has been updated</p>
	Article 43, Schedule 13, Part 1	157	Removal of Hedgerows	<p>As immediately above.</p>	<p>Noted; this has been updated</p>
	Article 43, Schedule 13, Part 2	158	Removal of Important Hedgerows	<p>As immediately above.</p>	<p>Noted; this has been updated</p>

Ref Local Impact Report Comment

Applicant's Response

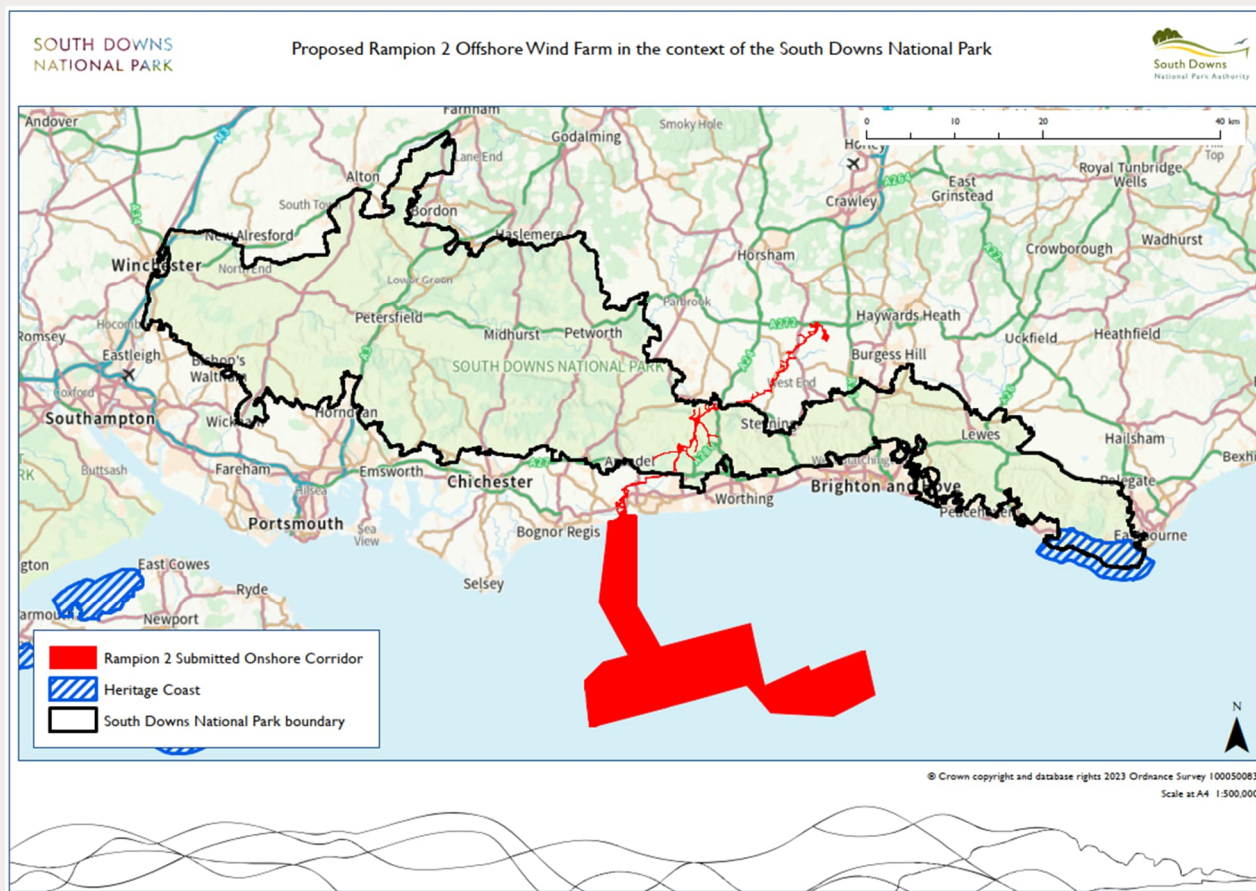
Article 46, Schedule 14 Section 2 159 Further Information

The SDNPA consider that 20 business days would be more appropriate. Although, the alternative is that if the request for further information is not honoured, the Local Planning Authority would be within its rights to refuse to discharge the requirement.

It is considered that the period of 15 business days is sufficient for a discharging authority to identify whether it has sufficient information to discharge the requirement. However, it is acknowledged that where the discharging authority is required to consult a third party there is scope for delay and therefore in these circumstances a period of 20 business days has been accommodated in amendments to the **Draft Development Consent Order [PEPD-009]** updated at Deadline 2.

Appendix A

A1



The Applicant has no further comments on this matter at this time.

Ref Local Impact Report Comment

Applicant's Response

A2

The Applicant has no further comments on this matter at this time.

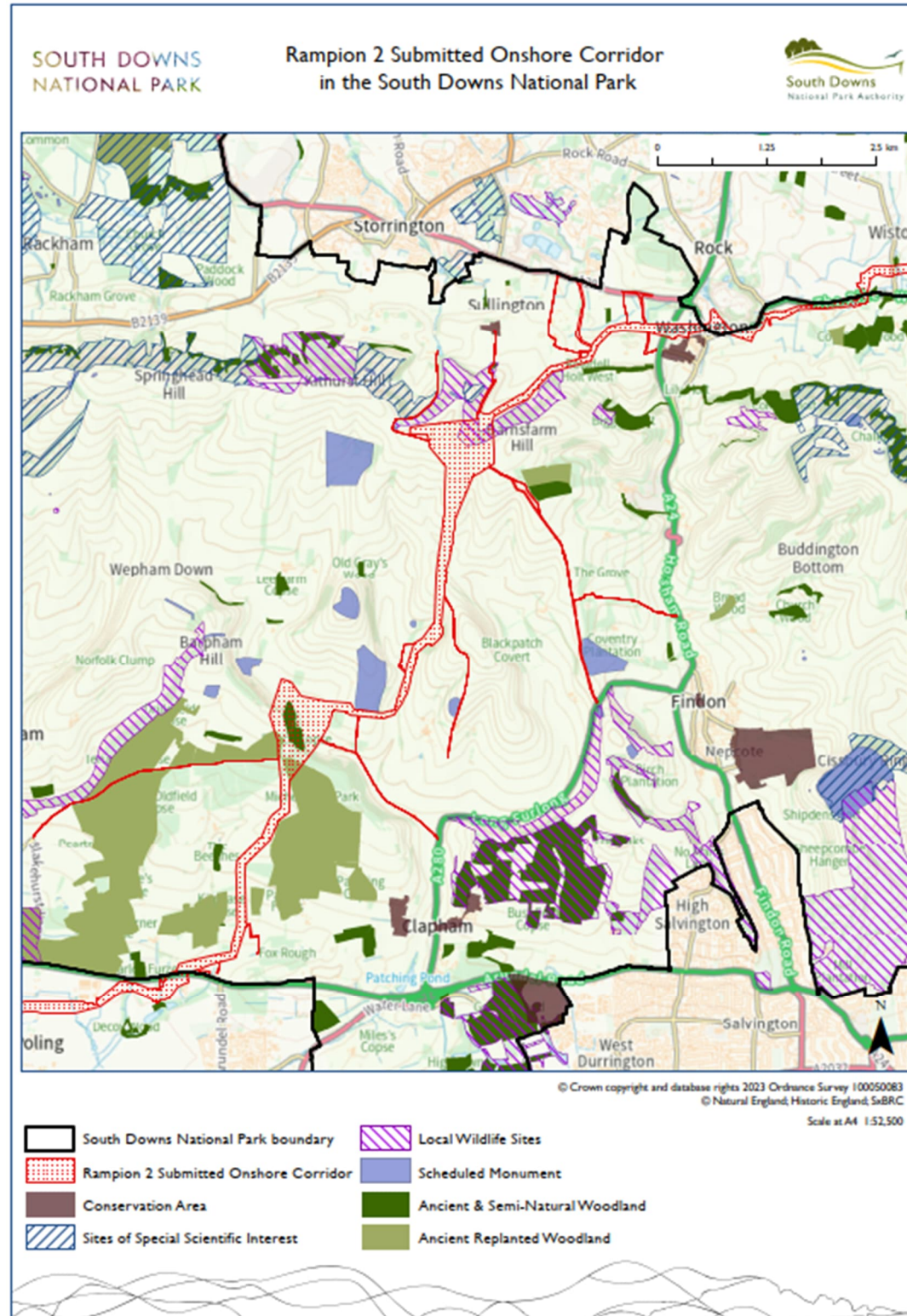


Table 2-2 Applicant's Response to South Downs National Park Written Representation [REP1-052]

Ref	Written Impact Report Comment	Applicant's Comment
1. Summary		
1.1	1.1 The South Downs National Park Authority (SDNPA) objects to the development proposed due to the significant adverse harm the proposal would cause, contrary to the statutory purpose to conserve and enhance the National Park. There is also a lack of mitigation and compensation for the harm caused.	The Applicant refers to the detail responses under section 3 of this table. The Applicant's position that the benefits of the scheme outweigh the adverse impacts is detailed in Section 5.4 and 5.5 of the Planning Statement [APP-036] .
1.2	<p>1.2 The proposal conflicts with South Downs Local Plan policies as well as the Purposes of the National Park and the Special Qualities for which it was designated. Of key concern is:</p> <ul style="list-style-type: none"> • Inadequate demonstration that the onshore cable corridor could not be delivered outside of the National Park, or that the route selected has been successful in moderating the effect on the environment and recreation, • Major adverse harm caused to seascape and landscape as a result of the offshore development, including significant effects on the Heritage Coast, • Significant adverse effects as a result of the onshore cable corridor route on landscape character and visual receptors, • Inadequate assessment of the effects on terrestrial ecology and nature conservation, including key habitats such as Ancient Woodland and Chalk Grassland, • Inadequate assessment and potential significant harm to areas of national archaeological significance, and • Insufficient consideration of public rights of way, including the South Downs Way National Trail, during construction. 	
1.3	1.3 There is an overarching lack of commitment to appropriate mitigation and compensation measures, as well as an apparent failure to learn from the experience during the Rampion 1 construction and operation periods.	
1.4	1.4 Concern is also raised regarding compliance with policies of the South Downs National Park and West Sussex County Council Joint Minerals Local Plan 2018 (and Partial Review 2021).	
1.5	1.5 The SDNPA has highlighted elements within the proposed scheme which could be improved. These would lessen the significant adverse harm caused. However, they do not overcome the issue that despite the positive public benefit a renewable energy scheme of this magnitude would bring in principle, the scheme as proposed would result in residual and significant permanent adverse effects due to the erosion of the Special Qualities of the South Downs National Park, a protected landscape of national importance. The magnitude of harm identified needs to be considered alongside any benefits of the proposal.	
2. Introduction		

Ref	Written Impact Report Comment	Applicant's Comment
2.1	2.1 This written representation is submitted by the South Downs National Park Authority (SDNPA) in response to the application by Rampion Extension Development Limited (the applicant) for the proposed expansion of the existing Rampion offshore wind farm.	The Applicant refers to the detailed responses under section 3 of this table.
2.2	2.2 The South Downs National Park (SDNP) lies to the north of the proposed offshore array, comprising the higher ground and open downland above the Coastal Plain and includes the Heritage Coast east of Seaford to Eastbourne.	
2.3	2.3 One-third of the proposed onshore cable corridor would run through the SDNP. The offshore array and other construction activity including the temporary construction compound at Washington would take place in the setting of the SDNP (see Appendix A of SDNPA Local Impact Report).	
2.4	2.4 The South Downs National Park contains over 1,600 sq. km of England's most iconic lowland landscapes, stretching from Winchester in the west to Eastbourne in the east. The SDNPA is the organisation responsible for promoting the statutory purposes of the National Park and the interests of the people who live and work in it.	
2.5	2.5 The SDNPA is the Local Planning Authority for the National Park, including the parts of the SDNP within the districts of Arun, Horsham and Mid-Sussex. The DCO Application does not always recognise this is the case, most notably in the Planning Statement, Chapter 23 of the Environmental Statement (Transport), the Outline Worker Travel Plan and, importantly, within the DCO Schedules themselves.	
2.6	2.6 As well as the South Downs Local Plan, the SDNPA is responsible for producing (as required by statute) the South Downs National Park Partnership Management Plan 2020-2025. There has been a failure by the applicant to take this document into consideration throughout their application	
2.7	2.7 This written representation should be read in conjunction with: <ul style="list-style-type: none"> • SDNPA's Local Impact Report (LIR) • SDNPA's Principal Areas of Disagreement Summary Statement (PADSS) • The forthcoming draft Statement of Common Ground between the applicant and the SDNPA. 	
2.8	2.8 As recommended in paragraph 23.2 of the Planning Inspectorate's Advice Note 2, where possible we have cross referenced to the above documents in order to assist in keeping submissions as concise as possible and to avoid repetition.	
2.9	2.9 This written representation concentrates on those parts of the DCO application to which the SDNPA objects and those issues which, in the SDNPA's view, remain outstanding or unresolved. This representation refers to amendments to the DCO Requirements and possible obligations secured through a Section 106 Legal Agreement (see Table 1 in section 3.2 of this representation), however, it should also be read in conjunction with the LIR for a full set of amendments and obligations.	

Ref	Written Impact Report Comment	Applicant's Comment
2.10	2.10 Matters of agreement are being recorded in the draft Statement of Common Ground.	
3. The SDNPA's View of the Proposal		
3.1.1	<p>3.1. Principle of Major Development in the National Park</p> <p>3.1.1. As set out in the SDNPA's Local Impact Report (LIR), the overarching National Policy Statement for Energy (EN-1, 2011), the National Planning Policy Framework (updated December 2023) and the South Downs Local Plan (SDLP adopted July 2019, specifically Policy SD3), confirm that National Parks have the highest status of protection in relation to landscape and scenic beauty and that major development should be refused save in exceptional circumstances, and where the development is in the public interest.</p>	<p>The Applicant refers to the detail in the following paragraphs of this response and references 6.6 to 6.8 of South Downs National Park Authority's Local Impact Report.</p>
3.1.2	<p>3.1.2. This 'major development test' (as set out in 5.9.10 of EN-1, para 183 and policy SD3 of the SDLP) states that the consideration of such applications should include an assessment of:</p> <p>a) the need for the development, including in terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy;</p> <p>b) the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and</p> <p>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p>	
3.1.3	<p>3.1.3. Then at paragraph 5.9.11 EN-1 states that if consent were to be given, the Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.</p>	
3.1.4	<p>3.1.4. In response to these requirements and point a), the SDNPA acknowledges that there is a critical need for renewable energy developments, which will help the country achieve its net zero targets.</p>	
3.1.5	<p>3.1.5. Where the SDNPA differs from the applicant, is i) that the scope for and cost of developing outside of the National Park has not been adequately explored and, ii) over the extent to which the detrimental effects to the environment, landscape and recreational opportunities have been moderated (following the mitigation hierarchy).</p>	
3.1.6	<p>3.1.6. As explained in the SDNPA's accompanying LIR (paragraph 6.5) the applicant's assessment in respect of the cost/scope for developing outside the SDNP within the Planning Statement (Document Reference APP-036) has been superficial and focussed on the cost and scope of developing after key decisions have been made (such as landfall and the decision to site an offshore wind farm in such close proximity to a protected landscape). The assessment also appears to have been made prior to many of the requirements for mitigation and compensation in respect of ecology, archaeology or other land-based requirements had been realised. For these reasons, the SDNPA consider the assessment flawed and further consideration of options that do not require extensive onshore cables within the SDNP should be undertaken (for example, Fawley). However, the SDNPA will continue to seek to address these matters with the applicant.</p>	

Ref	Written Impact Report Comment	Applicant's Comment
3.1.7	3.1.7. The choice of final route has not demonstrated that it is the most appropriate option through the protected landscape – and that this route choice is the most effective at moderating the detrimental effects on environment, landscape and recreational opportunities. This point is borne out through the objections raised in respect of landscape, ecology, cultural heritage and public rights of way in later sections of this representation.	The Applicant refers to the response provided under reference 6.6 to 6.8 of the South Downs National Park Authority's Local Impact Report in Table 2-1 of this document.
3.1.8	3.1.8. Further to this, the SDNPA remains unconvinced that the scheme will be carried out to high environmental standards, in respect of the construction of the onshore cable corridor. For example, there is inadequate commitment to the use of Horizontal Directional Drilling (HDD) or trenchless techniques in sensitive areas and work areas will only be 'reinstated to pre-existing conditions as far as reasonably practical'. Nor through reinstatement or offsite opportunities have measures to mitigate and enhance the environment been fully realised.	<p>The Applicant refers to the response provided regarding trenchless crossings under reference 6.26 of South Downs National Park Authority's Local Impact Report in Table 2-1 of this document and those under reference 3.8.6 to 3.8.10 of the Written Representation in this table regarding reinstatement.</p> <p>The Applicant will continue to engage with South Downs National Park Authority on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response to the South Downs National Park Authority's Local Impact Report Written Representation references 3.2.5 to 3.2.7 regarding S106 agreements.</p>
3.1.9	3.1.9. The SDNPA raised the notion during the examination of Rampion 1 Offshore Windfarm of the benefit in 'futureproofing' the onshore cable corridor for any further expansion of the windfarm. Whilst this was not agreed by the Secretary of State, further consideration should have been given in the current proposal to utilising the existing route, so as to minimise the areas and features impacted by a cable corridor. We are disappointed with the response the applicant has provided for not using the Rampion 1 cable corridor and would expect further consideration to have been given to this option.	<p>The Applicant considered using the route of the Rampion 1 export cable for its own export cable, which is described in Section 3.4 of Chapter 3: Alternatives, Volume 2 of the Environmental Statement (ES) [APP-044]. This found that the route was heavily constrained, and it would not have been possible to place new cables alongside the existing – see paragraph 3.4.18 and Table 3-5.</p> <p>At the time of investment in 2015, there was no immediate prospect of future Crown Estate leasing rounds for this area. The Crown Estate first suggested a round for extension proposals in 2018. The industry regulator requires every project to be designed and invested in an economic and efficient manner, to minimise cost to the end consumer, which prevents developers from building speculative/spare capacity. The cables for the original Rampion project were therefore rated at a maximum capacity of 400 MW.</p> <p>There are a number of pinch points where the land is congested with environmental and physical constraints. The original landfall location at Brooklands Pleasure Park, in Lancing, is highly congested with underground pipes and services, as well as cables from the Rampion 1 scheme. There are significant constraints at Teville Stream and at the old landfill site at Brooklands. Further north at Tottington Mount, the original cable route has utilised the available width on the crest of the hill, such that a parallel route would require 'benching' into the side of a hillside (such as used for roads/railways running across slopes), which has potential significant and unacceptable impacts due to visual and habitat sensitivities.</p> <p>The Rampion 1 onshore and offshore transmission assets have been integrated into the National Grid through the OFTO (Offshore Transmission operator) regime and is now owned and operated by TC Rampion OFTO Ltd. Hence the Applicant doesn't own or operate the network.</p>

Ref	Written Impact Report Comment	Applicant's Comment
3.1.10	<p>3.1.10. The applicant has, through the Planning Statement (Document Reference 5.7), stated that the draft National Policy Statements for Energy (most specifically EN-1, EN-3 and EN-5) that were put forward for public consultation in April/May 2023 are “considered to be important and relevant to the determination of the present DCO application”. The updated NPS have now been published (22 November 2023) and it is noted that under the transitional arrangements within these, that this application would still be considered under the 2011 suite of NPS. It is however noted that the Major Development Tests as outlined above remain in place within the new NPS EN-1.</p>	<p>Please see the Applicant's response to South Downs National Park Authority's Local Impact Report reference 4.11 in Table 2-1 of this document regarding the updated NPSs.</p> <p>Section 4.4 of the Planning Statement [APP-036] sets out the consideration of the key policy test regarding nationally significant infrastructure development taking place in the South Downs National Park (SDNP) in line with the requirements of 5.9.10 of NPS EN-1 (Department for Energy and Climate Change (DECC), 2011) and protections for National Parks in paragraph 5.10.32 of the revised NPS EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023). This test is not amended in the designated version of the NPS. The consideration of the need for the development is outlined in paragraphs 4.4.7 – 4.4.21 of the Planning Statement [APP-036]. The consideration of the cost and scope of development alternatives outside the SDNP is outlined in paragraphs 4.4.22 – 4.4.67. This section draws on Chapter 3: Alternatives, Volume 2 of the ES [APP-044] which details the process of site selection and the consideration of alternatives. Section 3.3 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044] outlines the alternatives considered in terms of grid connection and Section 3.4 sets out the alternatives considered in terms of landfall and onshore cable route. Together, these sections outline the cost and scope of delivering the reasonable alternatives outside of the SDNP. Therefore, this has been appropriately considered, as summarised in the Planning Statement [APP-036] and the further detailed information provided in the post-hearing submission for Issue Specific Hearing 1 Appendix 3 – Further Information for Action Point 3 – Fawley and Dungeness [REP1-019].</p> <p>The detrimental effects on the environment, landscape and recreational opportunities and extent to which these could be moderated is considered in paragraphs 4.4.68 – 4.4.90 of the Planning Statement [APP-036]. Specifically, paragraphs 4.4.69 – 4.4.75 considers the environment; paragraphs 4.4.76 – 4.4.84 consider landscape; and paragraphs 4.4.85 – 4.4.88 consider recreational activities. Section 4.4 of the Planning Statement [APP-036] draws on various assessments in the aspect chapters within the ES (particularly Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]; and Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]) to outline the detrimental effects of the onshore cable route and the extent to which these could be avoided, prevented, reduced or offset. The Commitments Register [REP1-015] sets out the full range of embedded environmental measures to minimise or mitigate the environmental effects a number of which are relevant to the South Downs National Park.</p> <p>Paragraph 4.4.4 of the Planning Statement [APP-036] confirms that a judgment as to whether a proposal constitutes major development is not necessary, as all Nationally Significant Infrastructure Projects (NSIPs) are assumed to be major. Therefore, whether development is major or not is a test which does not apply to NSIPs.</p> <p>The Applicant therefore considers that it has appropriately considered the key policy tests in NPS EN 1 5.9.10 (DECC, 2011) and protections for National Parks in</p>



Ref	Written Impact Report Comment	Applicant's Comment
3.1.11	<p>3.1.11. The proposal through both the offshore and onshore aspects of the scheme is considered to result in significant and permanent impacts on the Special Qualities for which the National Park was designated. The Special Qualities include:</p> <ul style="list-style-type: none"> • 'Diverse, inspirational landscapes and breathtaking views' – for example at Cuckmere Haven and Birling Gap, • 'A rich variety of wildlife and habitats including rare and internationally important species' – habitats such as the Ancient Woodland at Michelgrove and the Chalk Scarp at Sullington, • 'Well-conserved historical features and a rich cultural heritage' – including that at and in between Harrow and Blackpatch Hills. 	<p>paragraph 5.10.32 of the revised EN-1 (DESNZ, 2023) relating to development taking place within the SDNP.</p> <p>The Applicant refers to its conclusions drawn within the post-hearing submission for Issue Specific Hearing 1 in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p>
3.1.12	<p>3.1.12. As well as topic-specific concerns, there has been a lack of meaningful assessment of the overall effects of the proposed development on the Special Qualities. To address this matter, there should be a specific and discrete assessment, which goes further than signposting to the individual chapters where the Special Qualities have been assessed. As set out in more detail below (and within the SDNPA's LIR), examples which demonstrate our objection include the significant adverse impact on landscape character, areas of significant cultural heritage and the impact on habitats. The choice of cable corridor has not been demonstrated to have been made on the basis it would moderate the effects on the environment and recreational opportunities.</p>	<p>The Applicant refers to Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] regarding special qualities. The Applicant refers to the detail within Chapter 3: Alternatives, Volume 2 of the Environmental Statement [APP-044] including the options considered and consulted upon for the routes through the South Downs National Park in Section 3.4 of the chapter and the detailed consideration of choice in references 3.4.60 to 3.4.67. The embedded environmental measures are described further with regards to each topic area below.</p>
3.2.1	<p>3.2. Approach to Mitigation, Enhancement and Compensation, including S106 Agreement</p> <p>3.2.1. The package of mitigation measures, as detailed in the Commitments Register (Document Reference APP-254) are frequently vague with non-committal language such as 'where possible'. The considerable areas of uncertainty imply that new or materially different environmental effects may be missing from the Environmental Statement and therefore the impacts of the proposed development may be considerably understated or even incorrect.</p>	<p>The statements such as 'where possible' as referenced in this written representation are commonly used and accepted throughout the industry and in other Development Consent Order applications.</p> <p>The Applicant has identified the appropriate embedded environmental measures to avoid, reduce or minimise effects based on best practice and industry experience. There is the need for some flexibility where a measure may not be applicable in a specific scenario during construction or require slight adjustment, in such instances this would be confirmed in the stage specific documents secured in the Draft Development Consent Order [PEPD-009] such as the detailed Code of Construction Practice (CoCP). The Applicant would need to confirm that no new or materially different environmental effects would arise in this instance.</p>
3.2.2	<p>3.2.2. Where specifically addressing the SDNP, such as C-66 of the Commitments Register, the applicant does not set out in any detail how the commitments will be achieved.</p>	<p>The Applicant has sought to minimise effects on the special qualities (as per the intention of C-66) through design and detailed this within Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p>
3.2.3	<p>3.2.3. In addition, in some of the chapters of the Environmental Statement (for example Transport), there is no acknowledgement of the National Park Purposes, Local Plan or</p>	<p>The Applicant refer to the response in reference 6.35 of the South Downs National Park Authority (SDNPA) Local Impact Report (LIR) in Table 2-1 of this document and further detail in reference 3.9.6 of the Written Representation in this table.</p>

Ref	Written Impact Report Comment	Applicant's Comment
	Partnership Management Plan and therefore the mitigation is failing to conserve and enhance the National Park.	The Applicant notes the omission of policies from the South Downs National Park Local Plan from Chapter 23: Transport, Volume 2 of the Environmental Statement (ES) [APP-063] but has taken account of the requirements contained within the Local Plan. The Applicant refers to the response to reference 6.35 of the SDNPA LIR in this regard.
3.2.4	3.2.4. In many instances, the Commitments have not been secured appropriately through the Requirements in the DCO itself. A critical example of this is in respect of Commitment C-61, which relates to the Design Principles for the offshore array. Whilst the SDNPA object to the proposal on the grounds of seascape and landscape impact (as detailed below and in Appendix A), a strong commitment to a set of robust Design Principles is required in order to attempt to mitigate the harm; the current proposal fails to achieve this.	<p>The Applicant considers that it has had, and is having, due regard to the design principles held in the Rampion 1 Design Plan (Commitment C-61), however it would note that Rampion 2 is a different project that should respond to its own design parameters and principles that respond to its location and surroundings. The topic specific seascape, landscape and visual impact assessment (SLVIA) design principles that have shaped the design of Rampion 2 (Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]) have nevertheless incorporated many elements of the Rampion 1 design principles.</p> <p>Design principles specific to Rampion 2 have shaped the design and spatial extent of the DCO Order Limits (array area), with the aim of reducing the magnitude and geographic extent of seascape, landscape and visual effects of the Proposed Development and minimising harm to the special qualities of nationally designated landscapes, particularly the South Downs National Park and the associated Sussex Heritage Coast. The Applicant explored the potential impacts of the array area boundary in respect of these principles and embedded them within the project design after the Section 42 consultation and through the definition of the proposed DCO Order Limits, which responds to these combined principles.</p>
3.2.5	3.2.5. There is also a requirement within National Parks to not just mitigate harm but enhance their Purposes (as set out in the 1949 Act). This has not been demonstrated through the proposed development. The Levelling Up and Regeneration Act 2023 (LURA) at s245 goes further, and advises relevant authorities must 'seek to further' the purposes. Heads of Terms for a S106 Agreement have been presented to the SDNPA, which seeks to provide public rights of way improvements and hedge management schemes within 5km of the onshore cable route. The SDNPA feel that this, as well as the proposed mitigation within the application, do not meet the high environmental standards expected and, most importantly, is not sufficient to mitigate for the magnitude of harm caused in and to the SDNP.	<p>It is noted that the statutory provision places a duty on relevant authorities, which includes the Secretary of State (SoS), in determining the application for the DCO. EN1 sets out factors which the SoS should take into account when considering applications in National Parks and what an applicant's assessment should include. The Applicant considers that, as set out in the Planning Statement [APP-036], the application complies with these.</p> <p>The Applicant is reviewing the requests for mitigation and/or compensation by way of development consent obligation in relation to the relevant policy set out in EN1 (both 2011 and 2023 versions): any such obligation must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related in scale and kind to the proposed development and reasonable in all other respects. The Applicant will continue to engage with stakeholders in relation to how residual impacts can be mitigated and where compensation is identified as required the Applicant is committed to the programme established in ISH 1 of providing Heads of Terms for Deadline 3.</p>
3.2.6	3.2.6. Through the LIR and the sections below, further areas that require substantially improved mitigation or increased certainty for delivery, have been set out. In addition to this, the SDNPA would expect a S106 Agreement to be entered into by the applicant, providing compensatory measures in respect of several matters as detailed in Table 1.	
3.2.7	3.2.7. The SDNPA consider that such measures would meet the tests of s122 of the Community Infrastructure Regulations 2010 (as amended) in as much as the suggested obligations are necessary to make the development acceptable in planning terms; will be directly related to the development (which has landscape scale impacts) and; will be fairly and reasonably related in scale and kind to the proposed development. The detail and quantum of the contributions are being discussed with other relevant Local Authorities and the applicant.	

Ref	Written Impact Report Comment		Applicant's Comment
3.2.7	Subject Area	Compensatory Measure	Applicant's Response
	Seascape and Landscape Impacts (offshore)	Identified landscape-based project or financial contribution	The Applicant will discuss with SDNPA the extent to which these topic areas are related to identified harms of the development. The Applicant does require the SDNPA to identify projects, or a quantum of financial contribution, that they consider would make the development acceptable in planning terms. These will be considered alongside suggestions from the county and district authorities.
	Landscape Impacts (onshore)	Identified landscape-based project or financial contribution	
	Terrestrial Habitats and Protected Species (including Ancient Woodland)	Habitat creation / Nature recovery-based project or financial contribution	
	Archaeology	Project related to preservation, depositing, storage and interpretation/education opportunities (or financial contribution)	
	Public Access and recreational opportunities	Rights of way improvements or access to the National Park (or financial contribution)	
Construction and ongoing monitoring	Financial contribution to cover monitoring of onshore construction works through the National Park and for 10 years following final completion of the project		

Table 1: Proposed S106 Agreement Heads of Terms

3.3.1	<p>3.3. Lessons Learned from Rampion 1</p> <p>3.3.1. The applicant has heavily relied on the successful reinstatement, in a short period, of the Rampion 1 onshore corridor. The SDNPA carried out an aerial survey of the existing corridor route during the summer of 2021 – over 4 years after some of the areas were reinstated. A visual overview of this survey can be found at Appendix B. In summary, the survey identified several areas where the cable route was still fully visible and where reinstatement clearly had not been successful.</p>	<p>Regarding references 3.3.1 and 3.3.2 The Applicant cannot comment on the reinstatement of land following the Rampion 1 works as this is not a matter for this DCO Application.</p> <p>The methodologies that will be used to ensure construction (including restoration) is undertaken in a sensitive and appropriate way can be found in the Outline Construction Method Statement [APP-255], the Outline Code of Construction Practice [PEPD-033], and the Outline Landscape and Ecology Management Plan (LEMP) [APP-232]. These documents are secured under Requirements 12, 22 and 23 of the Draft Development Consent Order [PEPD-009].</p>
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Ref	Written Impact Report Comment	Applicant's Comment
	 <p data-bbox="385 793 1210 829">Fig. 1 – Aerial view of Rampion 1 Cable Corridor 2021 (Lambleys Farm)</p>  <p data-bbox="385 1333 1210 1369">Fig. 2 – Aerial view of Rampion 1 Cable Corridor 2021 (Edburton Road)</p>	<p data-bbox="1632 325 2760 430">The Applicant also refers to the measures in the Outline Soils Management Plan [APP-226] as secured in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) by Requirement 22 (5) (f).</p>
<p data-bbox="124 1407 356 1438">3.3.2</p>	<p data-bbox="356 1407 1632 1543">3.3.2. Further to this, there have been ongoing issues regarding the management and maintenance of mitigation measures, including wildflower, hedgerow and grass planting and reluctance to remove ‘temporary’ features such as fencing, which have a detrimental impact on the Open Downland landscape.</p>	
<p data-bbox="124 1575 356 1606">3.3.3</p>	<p data-bbox="356 1575 1632 1774">3.3.3. A period of maintenance and monitoring for 10 years following completion is proposed in the Landscape and Ecology Management Plan (Document Reference: APP-232) for reinstated habitats, which is welcomed. However, this will need to be expanded and a clearer definition of the responsibilities of all parties involved (and agreement of these from all relevant parties, including landowners) will be needed in order to demonstrate that the issues experienced in the monitoring period for Rampion 1 can be resolved and avoided.</p>	<p data-bbox="1632 1575 2760 1648">This has been addressed under reference 6.17 (h) of the response to SDNPA LIR reference in Table 2-1 of this document.</p>
<p data-bbox="124 1806 356 1837">3.4.1</p>	<p data-bbox="356 1806 1632 1911">3.4. Seascape, Landscape and Visual Impact (Offshore) 3.4.1. A full consideration of the landscape, seascape and visual effects in respect of the offshore, onshore elements as well as the whole development effects on the SDNP, are</p>	<p data-bbox="1632 1806 2819 1879">The Applicant has considered these key areas of objection and provided responses to these matters in reference 3.4.2 to 3.4.7.</p>

Ref	Written Impact Report Comment	Applicant's Comment
3.4.2	<p>included at Appendix A. A summary of the key areas of objection relating to landscape harm is provided below.</p> <p>3.4.2. There is a substantial underestimation of the effects of an offshore array of this scale, height and spread, in a location as sensitive as this, in close proximity to the SDNP and Heritage Coast. This combination of designated areas is considered to be particularly sensitive, as identified in the Review and Update of Seascape and Visual Buffer Study for Offshore Wind Farms (March 2020)¹, produced as part of the UK Department for Business, Energy and Industrial Strategy's offshore energy SEA programme (SLVIA references Document Ref APP-056).</p>	<p>The Applicant would note that the Rampion 2 array area is located approximately 15.8km from the closest point of the SDNP (near Highdown Hill - an inland location, set back from the coast) and is located 18.3km from the closest coastal part of the SDNP (coastline between Rottingdean and Brighton). Furthermore, the Sussex Heritage Coast coastline of the SDNP is located 23.9km from Seaford Head. The Applicant considers that these distances mean that the array area is not 'in close proximity to the SDNP and Heritage Coast'. It is notable that in its consideration of Rampion 1, in its Report of Findings and Conclusions (PINS, 2014), the ExA accepted a definition of 'remote' as a location over 20km away from the viewing point (para 4.350) and that the Rampion 1 array would be regarded as remote from a number of viewpoint locations (para 4.356). The Applicant considers this is also the case for Rampion 2 given its distance from the Heritage Coast and that it should not be described as being 'in close proximity' to the SDNP and Heritage Coast.</p> <p>The high sensitivity of the heritage coast of the SDNP is recognised in the assessments in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The SLVIA does however assess the sensitivity of these receptors to the offshore elements of Rampion 2 (the specific development proposal) as opposed to assessing the intrinsic sensitivity of the SDNP and Heritage Coast to any form of change. As such, and in line with GLVIA3 (Para 5.46) - '<i>an internationally, nationally or locally valued landscape does not automatically or by definition, have a high sensitivity to all types of change</i>', certain character areas or viewpoints within the SDNP have a slightly reduced susceptibility to change (medium-high rather than high) to this particular type of development, given that it is an extension to an existing offshore wind farm influence, located outside the receptor in a remote or distant context, and often separated by intervening, non-designated and urbanised coastal development.</p> <p>The significance of effects resulting from the offshore elements of Rampion 2 (array area) on parts of the SDNP and Heritage coast are recognised and assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (conclusions page 509 – 517) however it is conclusions of the Applicant's assessment that Rampion 2 (array area) avoids compromising the purposes of the SDNP designation and has been designed sensitively with due regard to its statutory purpose, despite the fact that it will be visible from within the SDNP/Heritage Coast and that it may have significant effects on certain special qualities, including its 'panoramic views to the sea' defined in Special Quality 1.</p>
3.4.3	<p>3.4.3. It is somewhat surprising to see that within the SLVIA (Table 15-29 of APP-056) that residual effects on landscape character and visual receptors have been concluded as 'not significant', despite this combination of highly sensitive designations. Whilst the SDNPA disagree some of these effects are 'moderate' (e.g. at Birling Gap and along LCA S1 and S2 – Shoreline) and consider them to be 'major/moderate' at least and as stated in the LIR, a 'moderate' effect in a designated area should be considered to be significant.</p>	<p>Embedded design measures have focused particularly on reducing effects on views from the Heritage Coast, including from Beachy Head Figure 15.26 and Birling Gap Figure 15.27 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091], focusing on the field of view (lateral spread), proximity and separation with Rampion 1. The design principles shaped the reduction in spatial extent of the offshore array between Scoping, PEIR and ES which is shown in Figure 15.2 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 2 of 8), Volume 3 of the ES [APP-088]. The reduction in</p>

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3.4.4	<p>3.4.4. The SDNPA commissioned a further study into seascape sensitivity as it relates to the proposed development in 2021, which is included at Appendix C. This identifies six seascape character zones of sensitivity associated with the SDNP, as shown in Figure 3 below. The darkest shade (i.e. SCZ1) indicates the area with the highest level of sensitivity, with the lightest shade (i.e. SCZ3) indicating the lower end – in this case medium-low sensitivity. The study identifies different levels of sensitivity, though “a gently curving coast, the iconic chalk cliffs to the east, the special qualities of the breath-taking panoramic views, tranquillity and unspoilt</p>	<p>effect is evident in the comparative wirelines in Figures 15.93 – 15.109 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 8 of 8), Volume 3 of the ES [APP-095]. These changes made to the DCO order limits have reduced the adverse effects of Rampion 2 on the Heritage Coast of the SDNP (which is recognised by Natural England and the SDNPA) with effects on some Heritage Coast views becoming not significant from the more distant areas of the Heritage Coast and effects of ‘major’ significance avoided in these areas. Not significant effects on ‘panoramic views to the sea’ are assessed from the eastern part of the Sussex Heritage Coast area of the SDNP, between Figure 15.27 and Beachy Head ES Figure 15.26 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091] at distances of approximately 29km – 32km, including along LCA S1 and S2 – Shoreline. These high sensitivity receptors experience a medium-low magnitude of change, resulting in moderate (not significant effects). Significant effects on the ‘panoramic views to the sea’ described in Special Quality 1 are assessed from Heritage Coast of the SDNP between Seaford Head, Cuckmere Haven and Seven Sisters at distances of approximately 24km – 29km, including parts of the South Downs Maritime MCA (08), the Ouse to Eastbourne Open Downs (A1) and its adjacent ‘Seaford to Beachy Head Shoreline’ (S1) LCAs (Figure 15.18 and Figure 15.19 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 2 of 8), Volume 3 of the ES [APP-089]); and views experienced by people along this stretch of coastline identified at representative viewpoints including: Seven Sisters Country Park (Viewpoint 3) ES Figure 15.28 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091] (26.6km); Cuckmere Haven (Viewpoint 28) Figure 15.51 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 6 of 8), Volume 3 of the ES [APP-093] (26.2km) and Seaford Head (Viewpoint 4) ES Figure 15.29 in Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091] (23.9km). These high sensitivity receptors experience a medium magnitude of change, resulting in major/moderate (significant) effects.</p> <p>Moderate levels of effect (shaded mid grey) may be significant or not significant subject to the assessor’s professional judgement, with assessments explained in full in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] and Appendix 15.4 Viewpoint Assessment, Volume 4 of the ES [APP-160]. This approach to the assessment of moderate effects as being either significant or not significant, supported by reasoned professional assessment and justification, is typical and widely used in LVIA (which relies on professional judgement) and is supported by guidance in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (Landscape Institute, 2013) and recent draft clarifications (Landscape Institute, Draft Technical Guidance Note 05/23).</p> <p>The Applicant would note that high level ‘buffer studies’ do not replace the need for site specific assessment, which has been undertaken in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056], the findings of which have informed the project design.</p> <p>With regards to the areas of highest level of sensitivity (SCZ1), the Applicant would note that Figure 3 (opposite) shows the Scoping Boundary. The spatial extent of the Offshore</p>

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character, combined with the wildness that the seascape imparts, all contribute with other factors to enhance the value and sensitivity of the area". 1 P23 of OESEA seascape and visual buffer study 2020 (publishing.service.gov.uk)



Fig. 3 South Downs Seascape Sensitivity Summary Map

Array Area of the proposed DCO Order Limits has been reduced substantially since Scoping in response to feedback from stakeholders. The reduction in spatial extent of the Rampion 2 offshore array between Scoping, Preliminary Environmental Information Report (PEIR) and ES is shown in Figure 15.2, **Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3** of the ES [APP-088].

Rampion 2 has applied design mitigation in this regard through the spatial extent of the DCO order limits (array area), which now largely avoids the more sensitive areas of seascape to the east of Rampion 1, with the DCO order limits (array area) being at greater distance from the Heritage Coast of the SDNP, concentrated to the south and west of Rampion 1. The Rampion 2 array area does not extend to the east of Rampion 1 and largely avoids the area of higher sensitivity seascape defined as SCZ01 in the SDNPA buffer study (Figure 3). Only the eastern part of the DCO Order Limits (to the south of Rampion 1) are located in SCZ01, within an area of seascape that was previously consented at part of Rampion 1 and is actually considered by the Applicant to be an optimal location within the Zone 6 area, in seascape, landscape and visual terms due to its position behind and to the south of Rampion 1 at greater distance offshore). The Applicant highlights that much of the Rampion 2 DCO Order Limits (array area) is located within zones SCZ02 and SCZ04 to the south and west of Rampion 1 respectively, which are assessed in the SDNPA buffer study as medium sensitivity seascape zones, likely to have *‘some opportunity for development within it but not necessarily all’* (SDNPA, 2021, para 4.22) and *“may have some potential to accommodate the relevant type of development in some defined situations without significant character change or adverse effects”* (SDNPA, 2021, Table 1).

The Applicant considers that the aim of the report *‘to avoid significant adverse effects on high sensitivity receptors’* (SDNPA, 2021, para 4.3) is unlikely to be achievable and is not in line with National Planning Policy (NPS EN-1) in terms of *“Having regard to siting, operational and other relevant constraints the aim should be minimise harm to the landscape, providing reasonable mitigation where possible and appropriate”* (NPS EN-1, para 5.9.8). Based on a number of recently approved NSIP developments, including Awel y Mor and East Anglia TWO, it is not necessary or possible to develop such low impact projects that avoid significant adverse effects on high sensitivity receptors in order to be considered acceptable and consentable in the planning balance, when weighing up all relevant factors, and it is recognised in NPS EN-1 that *“The fact that a proposed project is visible from within a designated area should not in itself be a reason for refusing consent”* (para 5.9.13).

3.4.5 3.4.5. The study goes on to propose a set of recommendations in respect of the design, layout and height of a proposed array that would go some way to resolving the concern. These include: a) Development should only occur within the Extension Area west of Rampion 1. b) Turbines should not exceed 225m to blade tip in height. c) Clear separation between Rampion 1 and 2 to minimise the horizontal extent. d) Turbine layout is designed in coherent blocks. e) Full north to south extent of the extension area should be utilised to maximise the size of east/west gaps between the arrays.

The Applicant had regard to these recommendations and the statutory purpose of the SDNP designation, and as a result, as part of its review of responses to the statutory consultation and in considering how the project could be refined and presented in the application for DCO, the Zone 6 Area (to the east) and the Extension Area (to the west) were reduced from the PEIR Assessment Boundary (RED, 2021). The reduced area forms the Offshore Array for Rampion 2, as shown in Figure 3.3, **Chapter 3: Alternatives – Figures, Volume 3** of the ES [APP-075] and in the SLVIA chapter in Figure 15.1, **Chapter 15: Seascape, Landscape and Visual Impact Assessment – Figures (Part 1 of 8), Volume 3** of the ES [APP-088].

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		<p>The Applicant has sought to incorporate aspects of these recommendations in the design principles that have shaped the spatial extent of the DCO Order Limits (array area), however there are constraints that prevent the Applicant from adopting these recommendations in full in the project design. The Applicant notes the following with respect to each of the design recommendations suggested by the SDNPA:</p> <p>a) The Applicant cannot currently commit to developing only within the Extension Area west of Rampion 1. Parts of the Zone 6 area were previously considered acceptable as part of the Rampion 1 consented area and these areas to the south of Rampion 1 are considered to afford some opportunity and capacity for development.</p> <p>b) The Applicant cannot commit to WTGs of 225m maximum blade tip height. The parameter-based design envelope approach means that the assessment has considered a MDS with WTGs up to a maximum height of 325m to blade tip. This allows flexibility to make design decisions in the future that cannot be finalised at the time of submission of the Application for development consent. Such design decisions may include the precise models and dimensions of WTG that will be available at the time of procurement for the Proposed Development, final offshore WTG layout design to optimise wind energy capture, and detailed engineering factors. The approach allows the Proposed Development to harness innovation in technology and utilise what is commercially available at the point of delivery. As recognised in NPS EN-1 (DECC, 2011b) (para 5.9.21) <i>“reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity output”</i> and NPS EN-1 (DSNZ, 2023b) (para 2.8.253) <i>“Neither the design nor scale of individual wind turbines can be changed without significantly affecting the electricity generating output of the wind turbines. Therefore, the Secretary of State should expect it to be unlikely that mitigation in the form of reduction in scale will be feasible”</i>.</p> <p>c) The Rampion 2 design principles developed in consultation with stakeholders and applied to the DCO Order Limits (array area) have reduced the spatial extent of the array area and the number of WTGs proposed, minimising the horizontal extent of the layout in views from the SDNP (particularly the Heritage Coast) and providing 'wind farm separation zones' that achieve a separation between Rampion 1 and Rampion 2 arrays in key views from the Heritage Coast. These design principles are set out in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (Section 15.7) and in the Applicant's deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p> <p>d) The Rampion 2 design principles include wind farm separation zones in order to achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. The windfarm separation zones between the Rampion 1 and Rampion 2 arrays (Figure 3.3 in Chapter 3: Alternatives – Figures, Volume 3 of the ES [APP-075]) allows the Rampion 2 array to be viewed with less contrast and as a distinct element in key views from the Heritage Coast, while also avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size.</p> <p>e) The Applicant cannot currently commit to maximising the size of east/west gaps between the Rampion 1 and Rampion 2 arrays beyond that already defined by the wind farm separation zones (Figure 3.3 in Chapter 3: Alternatives – Figures, Volume 3 of</p>

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3.4.6	<p>3.4.6. Through the pre-application process, the applicant reduced the extent of the array, particularly to the east and introduced a set of design principles, however whilst these are welcomed, they do not remove the significant adverse effects identified by the SDNPA. The principles proposed by the applicant would continue to mean that through the combination of the proposed height and the proximity to the coastline, the 'visual layering' that would occur with Rampion 1, inadequate separation zones between the existing and proposed arrays and the extent of the array east-west, there would be visual discord and a substantial loss of open and unspoilt views of the seascape. This is a significant adverse effect on Purpose 1 of the SDNP and directly impacts on the Special Qualities, most notably in respect of the 'breathtaking views'.</p>	<p>the ES [APP-075]) Wider separation zones proposed by the SDNPA "two new arrays separated by at least 4km from each other and Rampion 1 would be preferable" (SDNPA, 2021) would not allow the Applicant sufficient design flexibility to optimise the final offshore WTG layout design for wind energy capture and detailed engineering factors and would impact the viability of the Project in terms of its electricity generating output. Subject to relevant spacing requirements, other constraints and the wind farm separation zones proposed (Figure 3.3 in Chapter 3: Alternatives – Figures, Volume 3 of the ES [APP-075]) WTGs could be located in any area of the proposed DCO Order Limits.</p> <p>The Applicant welcomes the recognition from the SDNPA that the extent of the array has been reduced, particularly to the east and that a set of design principles have been implemented in the design of the spatial extent of the Rampion 2 DCO Order Limits. Natural England have also recognised that changes made to the DCO order limits have reduced the adverse effects of the Proposed Development on the portion of the SDNP contained within the Sussex Heritage Coast. This demonstrates that the Applicant has aimed to minimise harm to the SDNP in line with NPS EN-1 (DECC, 2011a). The design principles embedded in the spatial extent of the DCO Order Limits have had a positive effect on mitigating the impact on the SDNP and Sussex Heritage Coast by increasing its distance away from these sensitive receptors, reducing its horizontal spread and providing separation from Rampion 1 and relative balance in apparent scale and spread in key views from the Heritage Coast.</p> <p>The Applicant recognises that significant effects on 'breathtaking views' and 'panoramic views to the sea' defined in SDNP Special Quality 1 (SQ1) have been identified from representative viewpoints in the SDNP and the Heritage Coast, however, it is the conclusion of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (paragraphs 15.15.9 – 15.15.40) and the position of the Applicant, that the Proposed Development will not compromise the statutory purpose of the SDNP designation.</p>
3.4.7	<p>3.4.7. The SDNPA also raises a significant concern in the method of assessment of effects and would have expected both a combined cumulative impact assessment of Rampion 1 and Rampion 2 together, along with a cumulative impact assessment of the additional effect of Rampion 2. This is a discrete area for cumulative assessment, whereas Advice Note 17 considers a broader and higher-level assessment, applicable to EIA as a whole. This is further explored in both Appendices A and C.</p>	<p>The assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] considers the additional effect of Rampion 2 in the context of Rampion 1 in the baseline.</p> <p>In accordance with guidance (GLVIA3, Landscape Institute 2013, para 7.13), existing projects (i.e. Rampion 1) and those which are under construction are included in the SLVIA baseline and described as part of the baseline conditions. An assessment of the additional effect of Rampion 2 is therefore undertaken against a baseline that includes the operational Rampion 1 as part of the main assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] Section 15.10 (O&M phase). This includes assessment of the effect of the Proposed Development against magnitude factors such as its size, scale, spread and landscape context, as well as factors relating to the cumulative effect with the operational Rampion 1 wind farm, such as its increase in spread, aesthetic relationship and consistencies of perceived scale and spacing in comparison to the Rampion 1 WTGs.</p>

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		<p>In undertaking its assessment with Rampion 1, the Applicant has followed the Planning Inspectorate's Advice Note Seventeen: Cumulative Effects Assessment (PINS, 2019) relevant to nationally significant infrastructure projects, in particular the note under table 2 which states (emphasis added): <i>"Where other projects are expected to be completed before construction of the proposed NSIP and the effects of those projects are fully determined, effects arising from them should be considered as part of the baseline and may be considered as part of both the construction and operational assessment. The ES should clearly distinguish between projects forming part of the dynamic baseline and those in the CEA."</i></p> <p>It is notable that existing development is not included in Table 2 of Advice Note Seventeen (PINS, 2019), which sets out a tiered approach to assessing cumulative effects focusing on <u>proposed developments</u> i.e. permitted and submitted applications (Tier 1); projects where a Scoping Report has been submitted (Tier 2) and projects where a Scoping Report has not been submitted (Tier 3).</p> <p>GLVIA3 (Landscape Institute 2013) (para 7.8) highlights the focus of cumulative effect assessments to consider <u>proposed</u> developments (emphasis added) <i>"Of greater importance for LVIA are the cumulative landscape and visual effects that may result from an individual project that is being assessed interacting with the effects of other proposed developments in the area"</i> and that cumulative effects should then include <i>"potential schemes that are not yet present in the landscape, but are at various stages of the planning process"</i> (para 7.13).</p> <p>NatureScot Guidance on assessing the cumulative landscape and visual impacts (NatureScot, 2021) also states that <i>"The purpose of a Cumulative Landscape and Visual Impact Assessment (CLVIA) is to describe, visually represent and assess the ways in which a proposed wind farm would have additional impacts when considered with other consented or proposed wind farms"</i>.</p> <p>As set out in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] Section 15.12, there are no consented, application stage or scoping stage offshore wind farms within the SLVIA study area (nor within UK waters within approximately 140 km of the array area), therefore it is considered that there is no potential for the Proposed Development (offshore array area) to have cumulative effects with other proposed projects.</p> <p>The assessment of effects undertaken in the main assessment Section 15.10 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] therefore encompass the impacts of Rampion 2 in combination with existing development (Rampion 1), in line with guidance (Landscape Institute, 2013) and Advice Note Seventeen (PINS, 2019). This includes guidance in GLVIA3 (Landscape Institute, 2013) (para 7.10), which states that (emphasis added) <i>"In most cases the focus of the cumulative assessment will be on the additional effect of the project in conjunction with other developments of the same type"</i>. It therefore assesses the additional changes and effects caused by Rampion 2 in the context of Rampion 1 in the baseline, not the totality of the effect of Rampion 1 and Rampion 2 taken together. This other potential cumulative assessment method relates to the total effects of a number of developments taken together i.e. <i>"the 'totality' of the cumulative effect of past,</i></p>

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3.5.1	<p>3.5. Landscape and Visual Impact Assessment (Onshore)</p> <p>3.5.1. Chapter 18: Landscape and Visual Impact of the Environmental Statement (Document Reference: APP-059) frequently downplays the effects on the SDNP affected Landscape Character Areas (LCA), due to the geographical extent of the study area (2km buffer area), lack of consideration of landscape elements and the use of a combined approach to landscape elements that, if considered in isolation, would be significant.</p>	<p><i>present and future proposals</i>" (Landscape Institute, 2013), however this is not commonly assessed in LVIA due to the likelihood that total levels of effect will not be proportionate to the additional effect contributed by the Proposed Development, with the focus of the approach most commonly taken in cumulative LVIA being on the likely significant effects of the Proposed Development and the need to isolate the contribution of the Proposed Development to the total effects of all development.</p> <p>The Applicant disagrees with the assertion that the LVIA downplays the effects on the SDNP.</p> <p>The landscape and visual impact assessment (LVIA) is reported in Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] which is supported by Figures 18.1 to 18.76, Chapter 18 Landscape and visual impact – Figures (Part 1 to 6 of 6), Volume 3 of the ES [APP-098-103] includes 69 viewpoints (viewpoint locations have been discussed and agreed with a number of stakeholders see paragraph 18.4.41 within Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]) illustrating the onshore elements of the Proposed Development. The LVIA draws from the methodology and detailed assessment set out in:</p> <ul style="list-style-type: none"> • Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the ES [APP-167]; • Appendix 18.2: Viewpoint Analysis, Volume 4 of the ES [APP-168]; • Appendix 18.3: Landscape Assessment, Volume 4 of the ES [APP-169]; • Appendix 18.4: Visual Assessment, Volume 4 of the ES [APP-170]; • Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the (ES) [APP-171]; and • Appendix 18.6: Viewpoint directory, Volume 4 of the ES [APP-172] <p>The geographical extent of the Study Area does not limit or 'downplay' the results of the LVIA. Key stakeholders including SDNPA were consulted on the 2km Study Area (approximately 4km wide in total, 2km from the proposed DCO Order Limits) in November and December 2020 along with a supporting Technical Note. SDNPA, WSCC and Horsham District Council provided further comments on a number of additional views but did not comment on the Study Area. No response was received by Arun District Council or Mid-Sussex District Council. Natural England deferred their response to the SDNPA and the High Weald AONB Partnership. The Study Area is greater or equal to the Study Area used for other similar projects set in undulating terrain and close to a National Park, for example, the Awel y Mor Offshore Wind Farm used a Study Area of 1km on either side of the onshore cable corridor. In addition, Figure 18.4a-c and 18.6b, Chapter 18 Landscape and visual impact – Figures (Part 1 to 6 of 6), Volume 3 of the ES [APP-098-103] shows an extended Zone of Theoretical Visibility (ZTV) which has not been cropped to the Study Area and a 5km buffer on either side of the onshore cable corridor.</p>

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		<p>The LVIA Study Area is not intended to encapsulate all areas from which the Proposed Development would be visible, rather it is intended to capture those areas of significant effects. The viewpoint analysis is provided in Appendix 18.2: Viewpoint Analysis, Volume 4 of the ES [APP-168] with a summary in Tables 1.1-3. It should be noted that this part of the LVIA is referred to as 'analysis' and not assessment. There are a total of 60 illustrated, annotated and assessed viewpoints along the onshore cable corridor at varying distances (including some from beyond 5km distance) also agreed through discussions with stakeholders. Each of these viewpoints have been analysed and assessed to determine the likely geographical extent of effects regardless of whether they are located within the 2km Study Area. Consequently, the geographical extent of the 2km Study Area is not a 'limit' on the assessment of the geographical extent of effects.</p> <p>The landscape assessment includes an assessment of the landscape character, its key characteristics and the constituent elements or features. Landscape elements (including woodland / trees / hedgerows) directly affected by the onshore cable corridor have been assessed within Appendix 18.3: Landscape Assessment, Volume 4 of the ES [APP-169]. The assessment has logically grouped landscape elements to align with the relevant landscape character areas within which they are located. Within the SDNP all of the landscape elements directly affected by the onshore elements of the Proposed Development are assessed as significant. Further assessment of individual landscape elements would not alter the findings or conclusions of the LVIA.</p> <p>(Note, these elements are also assessed within Appendix 16: Arboricultural Impact Assessment, Volume 4 of the ES [APP-194]. The loss of these features has been recognised as part of the Biodiversity Net Gain (BNG) as set out in Appendix 22.15: Biodiversity Net Gain information, Volume 4 of the ES [APP-193]. The Draft Development Consent Order [PEPD-009] has requirements 12, 13,14 and 22 securing mitigation, compensation and BNG).</p>
3.5.2	3.5.2. One of the implications of the limited 2km buffer area is demonstrated through the Zone of Theoretical Visibility (ZTV) produced for the SLVIA where visibility extends across a significant area – much greater than the 2km study area. The Open Downland, where openness and expansive views are highly characteristic is one specific area where this is problematic and was highlighted during the pre-application stage.	Please reference response to ref. 3.5.1 above. Note that the ZTV produced for the LVIA is a starting point for the onshore assessment and provides an indication of the theoretical extent of visibility of the onshore elements of the Proposed Development. It does not account for intervening distance or map the magnitude or significance of an effect. That part of the assessment is undertaken in the field (visiting viewpoints, receptor locations and travelling along routes) and reported and illustrated in the ES.
3.5.3	3.5.3. Landscape elements such as tranquillity, historic landscape character, condition and dark skies, have not been appropriately considered. The summary of effects instead focusses on types of vegetation, which largely ignores perceptual qualities or draws on any historic character associated with these features. By either grouping, or omitting proper assessment of these features, there remains a high probability that effects have been underestimated or missed entirely. A further example of this is demonstrated in the section below regarding Dark Night Skies.	Landscape elements and key characteristics such as tranquillity, historic landscape character and condition are described in the source documents for landscape character (<i>South Downs Landscape Character Assessment, 2020</i> and the <i>Sussex Historic Landscape Classification, 2010</i>) and listed as part of the key characteristics for each landscape character area within Appendix 18.3: Landscape Assessment, Volume 4 of the ES [APP-169]. These components of the landscape character contribute to the assessment of landscape value, sensitivity, magnitude and level of effect assessed for each landscape character area. It is not normal LVIA practice to assess the key characteristics of landscape character areas on an individual basis. All of the landscape

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		<p>character areas within the SDNP are assessed as of high sensitivity and all but one are assessed as Major and significant as a result of the onshore cable corridor, therefore the Applicant disagrees with the assertion that there are “<i>underestimated or missed entirely</i>” effects.</p> <p>In respect of tranquillity, this is recognised as one of the Special Qualities of the South Downs National Park (SDNP) and an assessment of the relevant Special Qualities is assessed in Appendix 18.3: Landscape Assessment, Volume 4 of the ES [APP-169]. Further consideration of the effect of the offshore elements of Rampion 2 (offshore array) on SQ3 tranquil and unspoilt places is also provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024].</p> <p>Effects on the historic landscape was assessed Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p> <p>Dark night skies are not noted in the key characteristics and are responded to in reference 3.6.1-3 of this table.</p>
3.5.4	<p>3.5.4. As the SDNP is given the highest status of protection in respect of landscape, the SDNPA consider this is unacceptable and a more thorough assessment should be undertaken so that the effects are fully understood and appropriate mitigation, enhancement and if necessary, compensation, can be secured.</p>	<p>The LVIA accords with GLVIA 3 which refers to nationally designated landscapes, including national parks and their landscape and visual assessment. There is no alternative assessment approach and methodology used to assess development affecting nationally designated landscapes that is promoted by either the Landscape Institute, the Institute of Environmental Management and Assessment or Natural England.</p> <p>Please refer to the Applicant's response to SDNPA WR 3.2.5 to 3.2.7 on compensation and enhancements.</p> <p>The Applicant refers to its earlier response on 3.1.10 on this matter. Further clarification on special qualities including reference to the designating legislation is provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] submitted at Deadline 1. Please also refer to paragraphs 3.25 to 3.2.7 of this table that includes consideration of Section 106.</p>
3.5.5	<p>3.5.5. Further to this, the impact on the Arun to Adur Scarp LCA should be completely reconsidered, as it is incorrect to suggest that works running up to the boundary of and under this LCA, which is an area of Open Access Land, would be a ‘negligible to zero’ magnitude for change.</p>	<p>The construction effects on the I3 Arun to Adur Scarp Down Landscape Character Area (LCA) are assessed as “Negligible to Zero” in Appendix 18.3: Landscape Assessment, Volume 4 of the Environmental Statement [APP-169]. As explained in the assessment, this section of the onshore cable corridor will be underground during construction due to the use of trenchless crossing techniques (as outlined in Appendix A Crossing Schedule of the Outline of Construction Practice [PEPD-033] secured via Required 22 within the Draft Development Consent Order [PEPD-009]).</p> <p>Therefore, there can be no direct significant effect on this LCA or its key characteristics. The only effects will be related to the visibility of the trenchless crossing temporary construction compounds and more distance views of the onshore</p>

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		<p>cable corridor which are located in the adjacent LCAs (A3: Arun to Adur Open Downs and J3: Arun to Adur Scarp Footslopes). Trenchless crossings are identified in Appendix A Crossing Schedule of the Outline Code of Construction Practice [PEPD-033] and secured via Required 22 in the Draft Development Consent Order [PEPD-009]. The assessment examined a 3D model of the onshore cable corridor within the Digital Terrain Model (DTM) to determine specifically the likely visibility of the trenchless crossing temporary construction compounds from areas within the I3 Arun to Adur Scarp Down LCA. This was supplemented with site visits which determined limited visibility due either to landform screening and / or intervening distance. This analysis confirmed the assessment of non-significant effects on the landscape character and key characteristics of this LCA alone.</p> <p>The visual assessment in Appendix 18.4 Visual Assessment, Volume 4 of the ES [APP-170] provides an assessment of the visual effects on views experienced by people from the Open Access Land at Sullington Hill. Significant effects on views are not the same as significant effects on landscape character. For example, the assessment notes significant visual effects on views from the top of the slope, corresponding with the edge of the landscape character area.</p>
3.5.6	<p>3.5.6. The SDNPA are also concerned about the viability of some of the construction and mitigation measures proposed in the development. We welcome the principle of the proposed use of Horizontal Directional Drilling (HDD) in order to avoid the use of open-cut trenching in areas of Ancient Woodland and Chalk Scarp (Sullington Hill Local Wildlife Site). There is however, uncertainty about whether this technique will be successful in such landscapes and it is not clear what the alternative proposals would be if the use of HDD is found not to be viable. Under the current proposals and dDCO, work on the cable corridor could have substantially commenced both outside and within the SDNP before determining whether HDD would work in these specific locations. This would amount to pressure to deliver the cable corridor through these areas as it would now be extremely difficult to find an alternative route. In addition, the use of HDD only in these areas is not explicitly secured in the dDCO at present. Further evidence and investigation is required prior to determination to demonstrate this is a viable method in the above locations and the use of this technique should be explicitly secured by a requirement in the dDCO.</p>	<p>Trenchless crossing (for example horizontal directional drill (HDD) is a mitigation that has been used routinely for linear projects (electrical transmission cables and pipelines (e.g. gas, oil and water) for both large infrastructure and smaller scale applications. Trenchless crossings have been used frequently to cross a range of sensitive ecological features including designated sites, ancient woodland, rivers and other priority habitats. For example, a trenchless crossing of 550m through chalk substrate, with a sizeable change in elevation (80 to 90m difference) was successfully completed at Dunstable Downs on the Kensworth to Rugby Pipeline project for CEMEX in 2008 (including crossing part of Dunstable and Whipsnade Downs Site of Special Scientific Interest). It is also notable that HDD within chalk substrate was carried out successfully on the route of the transmission cable for the Rampion 1 Offshore Wind Farm. The approach to minimising and effectively managing the risks of trenchless crossings is outlined in the Outline Construction Method Statement [APP-255] (as secured by Requirement 23 of the Draft Development Consent Order [PEPD-009]) and the Outline Code of Construction Practice [PEPD-033] which includes the Crossing Schedule at the locations identified and is secured through Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
3.5.7	<p>3.5.7. The effects on tranquillity and dark night skies, as landscape elements, are also considered in Appendix A.</p>	<p>Please refer to response to references 3.6.2-3 below.</p>
3.6.1	<p>3.6. Dark Night Skies</p> <p>3.6.1. The SDNP is designated an International Dark Skies Reserve, throughout which the integrity and quality of these dark skies is particularly sensitive to change. The applicant's landscape assessment (Document Reference APP-059) states there would be no effect on the South Downs International Dark Skies Reserve, largely as a result of a measure embedded within the Commitments Register.</p>	<p>The Applicant refer to the response at reference 6.22 of the SDNP LIR in Table 2-1 of this document and to references 3.6.2-3 below.</p>

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3.6.2	<p>3.6.2. The SDNPA remains unconvinced this would be the case, based on a number of factors. Firstly, the core working hours set out in the Commitments Register includes times extending into periods of darkness during winter months, requiring lighting to assist construction work. The areas where trenchless crossing techniques are proposed to be employed (including areas of intrinsic rural darkness) require lighting 24 hours a day when being undertaken. The experience the SDNPA have had in respect of Rampion 1 construction also leads us to believe that work will be taking place during periods of darkness, requiring further lighting.</p>	<p>In order to avoid construction lighting where possible, core working hours for construction of the onshore components have been revised at Deadline 1 based on feedback and will be 08:00 to 18:00 Monday to Friday, and 08:00 to 13:00 on Saturdays apart from specific circumstances that are set out in the Outline Code of Construction Practice [PEPD-033] where extended and continuous periods of construction are required. Prior to and following the core working hours Monday to Friday, a 'shoulder hour' for mobilisation and shut down will be applied (07:00 to 08:00 and 18:00 to 19:00). The activities permitted during the shoulder hours include staff arrivals and departures, briefings and toolbox talks, deliveries to site and unloading, and activities including site and safety inspections and plant maintenance. The measures to manage lighting and noise are secured in the Outline Code of Construction Practice [PEPD-033] section 4.5 and 5.4, secured through Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at deadline 2).</p>
3.6.3	<p>3.6.3. Lighting is therefore considered to be inevitably required and cannot be considered to be without adverse effects. This therefore needs to be properly taken into consideration as a separate landscape effect.</p>	<p>Construction lighting effects are acknowledged as potential effects in Table 18-14 of the Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059].</p> <p>No 'lighting assessment' has been undertaken in relation to onshore construction works due to the practical difficulties with such an assessment based on methodology, detailed design, location, duration / timing and specification. The Applicant is not aware of any other examples of a night-time lighting assessment being undertaken for construction lighting along cable corridors / temporary HDD compounds. Instead, the advice from the South Downs National Park Policy SD8: Dark Night Skies has been incorporated into C200 as noted in response to reference 3.6.1. These measures will minimise the effects of any temporary, night-time construction lighting across all of the onshore works areas which are secured as per response to reference 3.6.2.</p> <p>The Applicant refers to its response on mitigation for construction lighting in response to reference 5.18 of the SDNP LIR in Table 2-1 of this document.</p>
3.7.1	<p>3.7. Whole Development Landscape Impacts</p> <p>3.7.1. Neither the SLVIA (Ref APP-056) or the LVIA (Ref APP-059) have provided a comprehensive assessment of the whole development landscape impacts.</p>	<p>Inter-related landscape and visual effects of the offshore and onshore elements of the Project are assessed in Chapter 30: Inter-related effects, Volume 2 of the ES [APP-071] (Table 30-14).</p> <p>Views and perceived character experienced by receptors within localised parts of the Adur to Arun Open Downs LCA (A3) are assessed as having significant inter-related effects, including from short sections of the South Downs Way between Chantry Post near Chantry Hill to Barnsfarm Hill such as representative views from Viewpoint 20 Springhead Hill (Figure 15.45, Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 6 of 8), Volume 3 of the ES [APP-093]), Viewpoint 53 Amberley Mount (Figure 15.66, Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 7 of 8), Volume 3 of the ES [APP-094]), and Viewpoint 54 Chantry Hill (Figure 15.67, Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 7 of 8), Volume 3 of the ES [APP-094]) and the associated open access land around Chantry Hill. Effects are assessed as significant where there will be southerly views from these viewpoints around the tops of the Adur to Arun Open Downs LCA (A3), including from the South Downs Way, over the</p>

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3.7.2	<p>3.7.2. The effects of the whole proposed development can be both landscape and visual. The assessment method employed to consider the whole development landscape effects is flawed as it has not taken on board this critical point, particularly where it relates to consideration of the SDNP Special Qualities. These Special Qualities should be an integral part of any landscape assessment, however these do not appear to have been taken into account. This omission - and through use of limited study area – implies that environmental effects may be missing from the assessment, as detailed above.</p>	<p>construction works within the cable route corridor to the Rampion 2 array area in the distant seascape backdrop, simultaneously in the same portion of view. The Applicant notes however that the programming would likely mean there would likely be some degree of separation between the construction of the onshore infrastructure and construction of the offshore elements of Rampion 2. WTG installation is programmed to start towards the end of the onshore cable corridor construction with less than 1 year overlap as shown in Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] (Graphic 4-24). The period over which potentially significant inter-related effects on during construction is therefore limited to the short-term with inter-related effects being temporary and becoming not significant during the operational phase.</p> <p>Further clarification on special qualities including reference to the designating legislation is provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] submitted at Deadline 1.</p> <p>This statement from the SDNP is refuted. The respective LVIA and SLVIA both consider the landscape and visual effects of the Proposed Development and this is a fundamental component of those assessments and this is set out in two sections within Table 30-14 of Chapter 30: Inter-related effects, Volume 2 of the Environmental Statement (ES) [APP-071].</p> <p>An assessment of the effect of the Proposed Development (offshore array area) on the special qualities of the SDNP is provided in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (Table 15-32). The effect of the Proposed Development (offshore array area) on the 'panoramic views of the sea' referred to in Special Quality 1 (SQ1) have been taken into account in the design of the project through the spatial extent of the DCO Order Limits, which have reduced the horizontal spread of WTGs in these panoramic views particularly from the Heritage Coast, as described further in Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] and in the Applicant's Deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p> <p>The Applicant has also identified significant levels of effect on the special qualities (SQs) in Appendix 18.3: Landscape Assessment, Volume 4 of the ES [APP-169]. The assessment takes account of the landscape effects on landscape character and elements including any perceptual qualities such as tranquillity that are noted as a key characteristic and the range of visual effects recorded at numerous receptors across the SDNP and within its setting.</p> <p>Further clarification on special qualities including reference to the designating legislation is provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] submitted at Deadline 1.</p>

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3.7.3	<p>3.7.3. There is also misinterpretation within the assessment of the whole development landscape effects undertaken in Chapter 18, which states that the proposal would not give rise to any landscape effects. This is despite the Seascape, Landscape and Visual Impact Assessment undertaken in Chapter 15 (Document Reference APP056), setting out the effects on landscape character and on the SDNP's Special Qualities and contradicts the conclusion in Chapter 18 that there would be no landscape effects.</p>	<p>The assessment of landscape character and the SDNP's Special Qualities is set out in Appendix 18.3: Landscape Assessment, Volume 4 of the Environmental Statement (ES) [APP-169]. That assessment provides a brief summary of the SLVIA effects only.</p> <p>In assessing the whole development landscape effects, it is important to note the differences in the spatial extent, timescale and nature of the effects assessed within the SLVIA and LVIA. In respect of whole project effects on landscape character the area of overlap (where there will be whole project effects from both the onshore and offshore elements of the Proposed Development) relates to changes to the visual aspects of perceived character as a result of the offshore elements of Rampion 2 affecting the views from outwith the landscape character area. These changes occur to specific aesthetic/perceptual aspects of landscape character, such as the sense of remoteness and tranquillity which are also affected by the onshore elements of the Proposed Development. The timescale or duration of these whole project effects is restricted to approximately 12 months of the construction period for the onshore elements of the Proposed Development. The nature of these effects is also different as the LVIA documents direct elements on the physical and perceptual character, characteristics and elements of the landscape character areas along the onshore cable corridor which are within the landscape character area.</p> <p>Further clarification on special qualities is provided in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] submitted at Deadline 1.</p>
3.7.4	<p>3.7.4. The general lack of consideration of perceptual qualities in the assessment, including historic landscape and tranquillity, is considered to be a substantial omission in the assessment. These qualities underpin the Special Qualities and the incomplete assessment does not allow for appropriate mitigation strategies to have been developed.</p>	<p>Please refer to response to reference 3.5.3 and 3.7.3 above.</p>
3.8.1	<p>3.8. Terrestrial Ecology and Nature Conservation</p> <p>3.8.1. The SDNPA objects to the proposal as it would be contrary to SDLP policies SD2, SD9 and SD45, as set out in the SDNPA's LIR and landscape section above, with one of the main concerns being that the landscape-scale ecological effects have not been properly assessed in Chapter 22 of the Environmental Statement, which could lead to much greater adverse impacts on habitat than have been predicted (APP-063). The data which is available has not been considered in any meaningful way in assessing the direct and indirect, short to medium term effects of removing potential important / key linear features from the landscape. As well as this overarching objection, the SDNPA would like to make the following additional comments.</p>	<p>The potential for fragmentation on a landscape scale will apply differently to different flora and fauna dependent on individual life histories. For example, a local population of common pipistrelle roosting and foraging in and around woodland at Michelgrove will remain unaffected by habitat fragmentation occurring at Chanctonbury Hill. Therefore, if the conservation status of both local populations is maintained then there will be no significant effect overall. Even if the exchange of individuals between local populations is being considered, these are by nature irregular and are likely to cross areas where potential barriers are considerably greater in scale than those associated with the cable duct installation for the Proposed Development (i.e. roads, extensive areas of farmland with limited hedgerows etc.).</p> <p>The design of the Proposed Development has sought to reduce fragmentation wherever possible. This includes direct avoidance, use of trenchless crossings to maintain areas of woodland, hedgerows and watercourses and an approach to hedgerow crossings that removes one or more small sections instead of a longer single stretch (i.e. notching, as described in the Outline Code of Construction Practice [PEPD-033] and secured by Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 22.</p>

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		<p>It is also necessary to consider that cable duct installation happens in discrete sections and therefore, not all potential temporary habitat loss is occurring at the same time. Indeed, it is likely that some areas will have been reinstated prior to the loss of habitats occurring in the final sections. Additionally, during this time the front loading of the delivery of Biodiversity Net Gain (BNG) (see Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement [APP-193]) means that more habitat being positively managed for biodiversity will be being created as per the strategy prior to and during losses occurring to facilitate cable delivery.</p> <p>North of the A27 to the Michelgrove Lane losses will occur to seven hedgerows (dependent on route chosen to cross Michelgrove), a set of parallel tree lines and a piece of woodland connecting Kitpease and Oliver's Copse. Although the loss of a 30m width of woodland may result in a barrier to movement in this location prior to reinstated habitats becoming established, this location is within a large complex of surrounding woodland, tree lines and hedgerows that provide ample opportunity for mobile species to navigate the area.</p> <p>Between Michelgrove Lane and Sullington Hill linear features are limited thereby negating the effects of fragmentation. Sullington Hill itself provides valuable habitat as it supports a mosaic of scrub, woodland and scrub/grassland mosaic but this is to be crossed by trenchless crossing and will therefore, be retained.</p> <p>From Sullington to Washington the main habitat corridor runs parallel to the draft Order Limits (woodland running along the escarpment), with linking habitats both to the south and north still accessible. In most instances losses to access habitats to the north of the cable route (from the south) would require mobile species to cross small gaps akin to the existing state in the area with farm gates, defunct hedgerows and farm tracks.</p> <p>East of Washinton to the crossing of The Pike a series of hedgerows and tree lines are subject to notching. However, as the route runs close to the road in this area, the majority of better habitat for bats lies to the south in Copyhold Wood.</p> <p>Although it is acknowledged that habitat fragmentation will occur, this will be short term and at a scale that will not prevent movements by the majority of mobile species. The gaps are also not great enough to prevent the exchange of genetic material between areas of habitat. New commitments have been adopted to further minimise any potential effects during the construction period and are to be included in an update to the Outline Code of Construction Practice [PEPD-033] to be submitted at Deadline 3) secured by Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>C-291 reads as 'Where hedgerow, tree lines or belts of scrub are temporarily lost to facilitate the installation of cable ducts, suitable material (such as straw bales, dead hedging, willow hurdles etc.) will be placed in the gaps to facilitate bat movement along linear corridors following backfill of cable trenches and until such time as reinstatement begins.'</p>


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3.8.2	<p>3.8.2. Vegetation Survey and Impact Assessment – the Phase 1 habitat survey is not sufficiently detailed to assess type and condition of certain habitats including grassland, river/wetland and woodland and does not therefore allow robust habitat classification, ecological impact assessment (or accurate Biodiversity Net Gain Metric 13 mapping/calculations). Vegetation mapping using UKHab Level 4/5 is required as a minimum along the cable corridor route. This would identify any areas which should be subject to National Vegetation Classification (NVC) survey as potential irreplaceable habitats such as ancient woodland habitats, plus highly distinctive habitats such as chalk grassland. The areas that have been subject to NVC survey are now outside of the DCO Order limits, with the exception of Sullington Hill. The Landscape and Ecology Management Plan (LEMP; APP-232) 4.6.1 states that further NVC survey will only be undertaken prior to construction. Therefore, the impacts of the proposal have not been adequately considered.</p>	<p>C-292 reads as 'During detailed design the mitigation hierarchy will be applied to avoid losses of key habitats (e.g. woodland, hedgerows, scrub, watercourses and semi-improved grassland) where possible, and where not to minimise losses and mitigate for them. At each crossing of sensitive habitats, a suitably qualified and experienced ecologist will provide advice to the design engineers with justification of approach provided. The approach at individual crossings will be detailed in the relevant stage specific Code of Construction Practice'.</p> <p>The Applicant would draw attention to the survey period over which habitat information was collected. The Phase 1 habitat survey began in 2020 at a time when version 1.1 of the UK Habitats Classification had not been released, nor had a voluntary commitment to biodiversity net gain (BNG) been made. In these circumstances, as was the same for the vast majority of planning applications (both DCO and others) Phase 1 habitat survey was the standard. This approach to habitat survey was highlighted during EIA Scoping and was not questioned in the Appendix 5.1: Planning Inspectorate's Scoping Opinion, Volume 4 of the Environmental Statement (ES) [APP-125], nor was it questioned by the Expert Technical Group during multiple meetings where baseline data collection were discussed (see Section 22.3 of Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES [APP-063]). It is also notable that a conversion tool to reach UKHab Level 4 from Phase 1 habitat survey data is provided by Defra (2023) as part of the Statutory Biodiversity Metric.</p> <p>The Applicant notes that as described in Appendix 22.15: Biodiversity Net Gain Information, Volume 2 of the ES [APP-193] further survey will be required to underpin future BNG calculations based on the detailed design (one set of calculations per stage). At this stage current Phase 1 habitat survey data will be verified and new condition assessments done (noting that habitat condition data is noted in APP-193 was based on field notes and professional judgement due to the changes in the process between the start of the survey period (when version 2.0 of the Biodiversity Metric was in use, to the end of the survey period when version 4.0 was in operation).</p> <p>The Applicant is content that the baseline data provided allows for a robust assessment to be undertaken.</p>
3.8.3	<p>3.8.3. Ancient Woodland - Ancient woodland habitat includes trees (above ground and their root systems) and ground flora but most importantly their soils - soil chemistry, soil biota and mycorrhizal fungi. The effects of air and water pollution and hydrological changes can occur to ancient woodland at significant distances away from the proposal. There is insufficient evidence provided to demonstrate that a 25 metre stand-off and use of trenchless drilling 6 metres underneath ancient woodland ground level will not cause the loss or deterioration of this irreplaceable habitat by damaging roots, damaging or compacting soils, increasing levels of air and light pollution, noise and vibration, changing the water table or drainage, damaging functional habitat connections or affecting the function of the woodland edge. Insufficient evidence is provided to support the conclusion of low frac-out risk, as stated in Chapter 22 of the Environmental Statement (APP-063), or whether there has been previous experience of using and monitoring the success of this technique successfully, underneath ancient woodland soils. This also applies in relation to veteran tree buffer zones.</p>	<p>SDLP Policy SD11 requests a stand-off for development proposals of at least 15m from ancient woodland, this being in line with Government guidance (provided by Natural England and the Forestry Commission).</p> <p>The Applicant imposed a larger 25m buffer (within the Outline Code of Construction Practice [PEPD-033] and secured in Draft Development Consent Order [PEPD-009] (updated at Deadline 2)) to ensure that surface construction activity will not affect ancient woodland indirectly (e.g. through light spill from temporary construction lighting, from run-off etc.). The type of surface construction work proposed near ancient woodland would not be expected to change hydrology (see Chapter 26: Water environment, Volume 2 of the Environmental Statement [APP-067]), especially given that excavations are reasonably shallow.</p>

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3.8.4	<p>3.8.4. Hedgerows and Treelines – There are 89 hedgerow and 30 tree-line crossings along the route of the onshore corridor, amounting to ‘temporary’ loss of 1,062 metres of hedgerow & 370 m of treeline (until such time that these features had been successfully reinstated to their former maturity and condition), plus permanent loss of 622 m hedgerow along the onshore cable easement (as stated in APP-063 and updated by PEPD-001). There are a large number of these hedges and treelines which have not yet been assessed due to lack of access. Therefore, the harm associated with the loss of these important habitat features (as well as the impact the loss would have in respect of landscape character) is likely to have been significantly underplayed. Furthermore, there are some tree lines which have been misidentified as hedgerow or missed entirely, such as between Michelgrove Park and heading between Blackpatch and Harrow Hills.</p>	<p>Horizontal directional drilling has been used routinely to cross sensitive habitats in the UK including European sites, Sites of Special Scientific Interest and ancient woodlands.</p> <p>The hedgerows and tree lines shown within the vegetation retention plans within the Outline Code of Construction Practice [PEPD-033] and Appendix 22.16: Arboricultural Impact Assessment, Volume 2 of the Environmental Statement [APP-194] are being reviewed to ensure consistency. The results of this will be submitted at Deadline 3.</p> <p>The Applicant is also looking into the potential for combining the vegetation retention plans to show all relevant habitats on a single map. If feasible this would be submitted at Deadline 3.</p>
3.8.5	<p>3.8.5. Hedges in this Chapter have largely been considered in terms of the Hedgerow Regulations, rather than their intrinsic ecological value, importance within the landscape and their connectivity with associated habitats (woodland, scrub, water). This underestimates their contribution as important habitats.</p>	<p>The Applicant notes that in Chapter 22 Terrestrial Ecology and Nature Conservation, Volume 2 of the ES [APP-063] (Section 22.9) assesses fragmentation in terms of both habitats and the mobile species that use them.</p>
3.8.6	<p>3.8.6. Whilst there has been acknowledgement of the need to mitigate against hedgerow loss and minimise the period of time for reinstatement, the proposed methods for doing so, in particular the ‘notching’ technique have not been tested on dry, free-draining chalk soils, or in the climate associated with the South Downs. The examples provided are from the Lake District and Norfolk Broads, both of which are much wetter landscapes than the application site. It is also noted that tree lines have been earmarked for notching in some instances (as a result of the mis-identification noted above), which is unlikely to be achievable.</p>	<p>The second part of Commitment C 115 (Commitments Register [REP1-015]) has been updated for Deadline 1 to state that ‘Hedgerows subject to temporary translocation will be lifted using a tree spade to maintain diversity and structure and result in more rapid reinstatement. Where chances of success are questionable, notches will be made by removal and reinstatement through planting. The Ecological Clerk of Works (ECoW) will justify the approach being taken in line with the responsibilities of implementing the vegetation retention plan (see C-220)’. This means where chances of success are low then this option will not be exercised and instead a typical approach of re-planting will be specified. This will necessarily be described within the reinstatement measures in the Landscape and Ecological Management Plan. In locations where temporary translocation is appropriate (e.g. soils that are at least 60cm deep and support vegetation that does not appear to be drought stressed) translocated hedgerows would be subject to regular aftercare. Where it appeared that translocated sections are failing new planting would be established along the line of the translocated section (on both sides). These plantings would develop into the hedge with the failed / partially failed translocated section providing a matrix to develop around. The Applicant recognises that the translocation of hedgerow will have more chance of failure than replanting using whips. The translocation has been provided as an option to maintain character and provide more rapid gapping up. However, should this option not be considered relevant then the relevant local authority and Natural England will have the opportunity to request translocation is not used at any given location through approval of the stage specific LEMP and stage specific Code of Construction Practice (CoCP) in accordance the Outline Code of Construction Practice [PEPD-033] and Outline Landscape and Ecology Management Plan [APP-232] which are in turn secured through Requirements 12, 13 and 22 of the Draft Development Consent Order [PEPD-009].</p> <p>It should be noted that this approach (temporary translocation and replacement of hedgerows) was considered acceptable in the consented Brechfa Forest Connection</p>

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3.8.7	<p>3.8.7. Further to this, paragraph 5.6.38 of the Outline Code of Construction Practice (APP-224) states that “Notched hedges would be pruned to 1m prior to translocation and gaps closed using temp fencing. Removed sections would be managed as necessary (including watering during translocation/storage and in the 14 first spring/summer following planting).” This implies that all notched hedgerows would be reduced to 1m height. In assessing no significant effects on hedgerows as a result of the scheme, it appears the applicant is suggesting that notched hedge sections would grow back to their original height and function (denseness) within their assessed 2-year reinstatement period. The SDNPA consider the applicant is over-optimistic in this conclusion, particularly for the hedge sections that are very tall and dense.</p>	<p>project (see paragraph 5.2.99 and Requirement 28 of the Examining Authority’s Report of Findings and Conclusions to the Secretary of State for Energy and Climate Change (Planning Inspectorate, 2016).</p> <p>The realistic worst-case scenario assessed within Chapter 22: Terrestrial ecology and nature conservation, Volume 2 of the ES [APP-063] is based on hedgerow notches being cut to the ground, roots excavated and discarded, soil replaced and new planting. This is a typical approach to linear projects; other than here the proposal is for multiple smaller notches as opposed to a single large gap in order to reduce impacts. It is expected that replanting would be successful through the implementation of stage specific Code of Construction Practice CoCP) and stage specific Landscape and Ecological Management Plan (LEMP) secured and via Requirements 12,13 and 22 of the Draft Development Consent Order [PEPD-009].</p>
3.8.8	<p>3.8.8. The LEMP states that “the reinstatement of habitat will be of the same habitat type and to the same condition”, whilst also accepting that “although in landscape terms the reinstatement of landscape elements will take time to mature and new sections of field boundary fencing and/or hedgerow will be apparent post construction”. The SDNPA queries how both these statements can be true and considers that the latter is more likely to be the reality – as has been demonstrated through the experience with Rampion 1.</p>	<p>The Applicant agrees that habitats will not be returned to previous condition within 2 years. Habitat reinstatement will take time to reach target condition (e.g. as trees / hedgerows will take time to grow and mature) but Commitment C-103 of the Commitments Register [REP1-015] presented in the Outline Code of Construction Practice [PEPD 033] secured through Requirement 22 of the Draft Development Consent Order [PEPD-009] does ensure that in the majority of locations (other than at temporary construction compounds, landfall, substation and cable joint bays) the reinstatement of habitats will begin within two years (e.g. saplings planted). The time for hedgerows, woodland, and other habitats, to become ecologically functional is accounted for within the way the Statutory Biodiversity Metric calculates Biodiversity Net Gain (i.e. temporal risk discounts the value of the proposed habitat) as described in Appendix 22.15 Biodiversity Net Gain Information, Volume 4 of the ES [APP-193]. Biodiversity Net Gain is secured through requirement 14 of the Draft Development Consent Order [PEPD-009].</p> <p>The Applicant notes that the wording in this position can be improved to be in line with other statements. The Outline Landscape and Ecology Management Plan [APP-232] will be updated for Deadline 3. It should be acknowledged however, that the assessment of both woodland and tree lines in Section 22.9 of Chapter 22 Terrestrial Ecology and Nature Conservation, Volume 2 of the Environmental Statement (ES) [APP-063] is clear that large trees cannot be established over the cable ducts due to the potential for tree root damage.</p>
3.8.9	<p>3.8.9. Bats – Sparse bat survey data has been provided to support the application, with patchy and inconsistent coverage between and within seasons (Document References APP-063, APP-186 and APP-195). It is not clear how many survey hours have been carried out per month for transect and static surveys and there is no information on surveyor competence or equipment used. The survey data is not compliant with accepted guidelines produced by the Bat Conservation Trust for professional bat survey (Referenced in APP-063). Large numbers of hedgerows, treelines and individual potential bat roost trees have not been surveyed at all due to access restrictions. Therefore the impact on bats, a protected species, is unclear.</p>	<p>A sampling approach to bat activity surveys was agreed as appropriate with Natural England in April 2020 (see Section 22.3 of Chapter 22 Terrestrial Ecology and Nature Conservation, Volume 2 of the Environmental Statement (ES) [APP-063]) and discussed subsequently on several occasions with the Expert Technical Group which included the South Downs National Park Authority. Due to changes to the cable route additional bat survey information was provided at the pre-examination procedural deadline – Appendix 22.18: Passive and active bat activity report 2023, Volume 4 of the ES [PEPD-029].</p> <p>The Applicant is content that there is a good understanding of the type of bats and levels of activity in the area that can be applied in general along the route of the cable corridor.</p>

Ref	Written Impact Report Comment	Applicant's Comment
3.8.10	<p>3.8.10. The associated spatial and temporal survey data is considered insufficient to inform a robust assessment of the terrestrial effects of the Scheme on bats, both in the short and long term. It is not possible to assess the landscape scale effects of notching in short/medium & long term along important bat corridors that have not yet been identified due to poor survey coverage, therefore the conclusions reached may have been underestimated and the mitigation proposed unacceptable. The data which is available has not been considered in any meaningful way in assessing the direct and indirect, short to medium term effects of removing potential important/key linear features from the landscape. Nor how the failure of proposed reinstatement methods (as discussed in paragraphs 3.8.7-3.8.8 above) could affect the bat assemblage within the Zone of Influence in the longer term. Data from the bat surveys conducted in 2023 for the new areas of cable corridor within the SDNP have not been included in the supporting information. This is particularly critical given the proposed route option is in part selected as it would have a less significant impact on ecology (Document Reference APP-044). If this is not in fact the case, then it again calls into question whether the applicant has demonstrated they have fulfilled their requirements under the Major Development Tests (as discussed in 3.1 of this representation and the LIR).</p>	<p>In most instances the gaps created in hedgerows, tree lines and woodland will be six metres or less in width (e.g. a 14m notched hedgerow is up to four 2m wide trenches for the cables and one 6m gap created for the haul road with sections of hedgerow in between them). The Joint Nature Conservation Committees 'Habitat management for bats: a guide for land managers, landowners and their advisors' (2001) write that 'even gaps as small as 10m may prevent bats using hedgerows and tree lines'. Similarly, the Bat Conservation Trust in their guidance 'Landscape and urban design for bats and biodiversity' recommend avoiding the opening of gaps greater than 10m in extent. Pinaud et al. (2017) modelled landscape connectivity for greater horseshoe bats and recommend that gaps are kept to less than 38m.</p> <p>Therefore, in the majority of instances the gaps created in linear habitat are considered likely to be crossed by bats (just as existing gappy hedgerows are used and farm tracks are crossed). However, to reduce the potential effect during the construction period a new commitment has been adopted and will be published in an update to the Outline Code of Construction Practice [PEPD-033] at Deadline 3. Commitment C-291 states 'Where hedgerow, tree lines or belts of scrub are temporarily lost to facilitate the installation of cable ducts, suitable material (such as straw bales, dead hedging, willow hurdles etc.) will be placed in the gaps to facilitate bat movement along linear corridors following backfill of cable trenches and until such time as reinstatement begins.'</p>
3.8.11	<p>3.8.11. The proposed trenchless crossing locations within the SDNP are in the most vulnerable ecological locations by definition (excepting roads), as otherwise an open-trench method would be proposed. The sensitivity of these locations includes being within a dark skies landscape. As these areas and temporary construction compounds will be lit, up to date BCT/ILP Guidance (2023) must be followed, including provision of a detailed lighting constraints plan or similar, to avoid artificial light spill and glare around sensitive features (woodland/scrub/boundary vegetation). There is currently insufficient commitment to providing these measures.</p>	<p>Commitment C-115 is a commitment to following Bat Conservation Trust/ Institution of Lighting Professionals (BCT/ILP) guidance (noting the 2018 version of the guidance is listed as the application was made before the 2023 version was available). This is secured through Requirements 12, 13 and 22 of the Draft Development Consent Order [PEPD-009].</p>
3.8.12	<p>3.8.12. Dormice – Given the location of known records, the survey coverage to date is considered insufficient to conclude the likely absence of Dormice within or close to the proposed DCO Order limits at locations away from Site 7 (Ashurst).</p>	<p>A sampling approach to dormouse surveys was agreed as appropriate with Natural England in April 2020 (see Section 22.3 of Chapter 22 Terrestrial Ecology and Nature Conservation, Volume 2 of the Environmental Statement (ES) [APP-063]) and discussed subsequently on several occasions with the Expert technical Group which included the South Downs National Park Authority. Due to changes to the cable route additional bat survey information was provided at the pre-examination procedural deadline – Appendix 22.19: Hazel dormouse report 2023, Volume 4 of the ES [PEPD-030].</p> <p>The Applicant also notes that commitment C-232 (see Commitment Register [REP1-015]) ensures further survey will be undertaken pre-construction on all suitable habitat where detailed design highlights losses to ensure legal compliance. This is included in the Outline Code of Construction Practice [PEPD-033] and secured in the Draft</p>

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3.8.13	<p>3.8.13. Biodiversity Net Gain (BNG) – BNG consists of three elements: a) area/length, b) habitat distinctiveness, c) habitat condition. It is not clear which version of the Metric has been used to calculate the BNG figures provided in Table 4.1 of APP-193 (BNG Information). No Metric spreadsheet has been provided, nor a net gain plan showing existing a pre and post development habitat areas/condition, nor completed Condition Assessment tables. It is not possible to demonstrate a 10% net gain in biodiversity, nor for the SDNPA to assess the submitted BNG information without this information</p>	<p>Development Consent Order [PEPD-009] (updated at Deadline 2) by Requirement 22.</p> <p>Appendix 22.15 Biodiversity Net Gain Information, Volume 4 of the Environmental Statement (ES) [APP-193] describes the use of the Biodiversity Metric 4.0 (the most recent version available at the time of application).</p> <p>The Applicant has organised a meeting with relevant stakeholders to discuss approach to BNG, including describing how the calculations have been done.</p> <p>However, it is noted that elements such as 'Condition Assessment Tables' were not available until 2022, two years after data collection began. Therefore, as described in Appendix 22.15 Biodiversity Net Gain Information, Volume 4 of the ES [APP-193] professional judgement has been used to inform the habitat condition assessment (because criteria changed over time). Regardless, detailed Biodiversity Net Gain (BNG) calculations on a stage-by-stage basis will be undertaken following detailed design based on updated survey information that is collected following the Statutory Biodiversity Metric (or a later update).</p>
3.8.14	<p>3.8.14. There appears to have been conflation of compensation measures and biodiversity gains. These are different and separate steps in the mitigation hierarchy and mitigation of harm caused by the proposal must be fully addressed to the point of net zero before there can be any biodiversity gains resulting from the project. For example, habitat reinstatement within 2 years of impact does not represent a biodiversity gain (as there is no enhancement proposed). Also, woodland will not be reinstated but instead will be replaced with managed scrub. Replanting of woodland away from the point of impact (whether within the DCO limits or outside) is compensation for loss, not BNG.</p>	<p>Please see response to reference 6.23 of the SDNP LIR in Table 2-1 of this document.</p>
3.9.1	<p>3.9. Highways, including Public Rights of Way (PRoW)</p> <p>3.9.1. The proposed cable corridor will intersect with a large number of public rights of way within the SDNP. Whilst closure or diversion of these should only be for a short period of time (according to the application documents), it is difficult to fully understand and appreciate the full impact of these closures and diversions on users as the information has not been clearly presented (Document Reference APP-012). This includes the experience of equestrian users on construction haul roads, where they are also bridleways, and the potential interaction with traffic / waiting areas. Further plans, which show highly impacted areas, such as around Sullington LWS, should be provided that clearly show the PRoW, the proposed diversion, the length of time it would be diverted and when (in terms of the works that necessitate the diversion).</p>	<p>The Applicant notes that in addition to the Access, Rights of Way and Streets Plan [APP-012] referenced by South Downs National Park, the Development Consent Order (DCO) Application includes the assessment of effects on users in Chapter 17 Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058]. The Outline Public Rights of Way Management Plan [APP-230] includes measures to minimise impacts on PRoW users and commitments secured by Draft Development Consent Order [PEPD-009] (updated at Deadline 2) Requirement 20 including those specific to the timings for temporary closure and diversion of the South Downs Way National Trail at Sullington Hill under Requirement 20 (2) (b) i to iii.</p> <p>The bridleway pictured is understood to be 2173, which is not proposed for use as a construction access route</p>

Ref	Written Impact Report Comment	Applicant's Comment
	 <p data-bbox="379 930 1050 961">Fig. 4: Bridleway looking south towards Long Furlong Farm</p>	
3.9.2	<p>3.9.2. The effect of operational accesses on some PRow is also unclear, as it would appear these need to be suitable for HGV use, albeit only in exceptional circumstances. There are examples, such as the Bridleway heading north from Long Furlong Farm (sheets 13 and 14 of PEPD-005) and shown below in Fig. 4, where existing landform and vegetation combined with the width of the existing track, mean this would not be possible without significant intervention. This would indicate that the proposed operational access is not fit for purpose. Further clarity of what an operational access is expected to deliver and a strategy for changes that may be needed, should be provided by the applicant.</p>	<p>During operation and maintenance, periodic testing of the cable is likely to be required (every two to five years). This will require access to the link boxes at defined inspection points along the onshore cable route. Unscheduled maintenance or emergency repair visits will typically involve attendance by up to three light vehicles, such as vans, in a day at any one location.</p> <p>In exceptional circumstances during unscheduled maintenance or operational faults, a heavy goods vehicle (HGV) may be required to support cable repair works. This could involve the need to replace a section of cable, for which HGV access may be needed for materials or equipment. However, the design, the construction and the commissioning of static infrastructure such as the onshore export cable are undertaken in a way to ensure that no replacement or repair is necessary over the lifetime of the asset. It is therefore not reasonable to assess the need for HGVs to access operational access associated with such an unlikely scenario as part of this Application. This is discussed in relation to Dragon's Lane at reference 18 and 19 of the Applicant's Response to Action Points Arising from Issue Specific Hearing 1 [REP1-018]</p>
3.9.3	<p>3.9.3. The proposed development would also impact on the South Downs Way National Trail, where the cable corridor would be constructed using open-cut methods, necessitating a temporary closure and diversion. The details of how this would be undertaken are not clearly set out and the SDNPA requires further clarification of this in order to determine the extent of the effect on the ability to use and enjoy this National Trail.</p>	<p>Depending on the final location of the Sullington Hill Horizontal Directional Drilling (HDD), the South Downs Way may be crossed by trenchless crossing or open cut. The Access, Rights of Way and Streets Plan [APP-012] sheets 15 and 19 show the indicative diversions for the crossing of the South Downs Way with further detail on this provided in the Outline Public Rights of Way Management Plan [APP-230] paragraph 5.3.6. The full details will be provided in the stage specific PRowMWP under Requirement 20 (2) (b) i to iii (Draft Development Consent Order [PEPD-009] (updated at Deadline 2)) for approval of the highway authority in consultation with the SDNPA as the relevant planning authority. The Applicant has assessed the impact on users of the SDW as moderate to major adverse (significant) in Chapter 17: Socio-</p>

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3.9.4	<p>3.9.4. There will be long-term effects on visual receptors using the numerous public rights of way within the SDNP and along the Heritage Coast, as a result of the offshore array. The scale of the WTG being so much greater than the existing array (which is already highly visible) and the extended field of view has direct adverse effects on these users in respect of the breathtaking and unspoilt views. This is covered in more detail in Section 3.4 above and Appendix A.</p>	<p>economics, Volume 2 of the ES [APP-058], so this effect is already weighed in the planning balance.</p> <p>An assessment of effects of the offshore elements of Rampion 2 on visual receptors using the public rights of way within the South Downs National Park (SDNP) and Heritage Coast is provided in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056]. This includes detailed assessment of effects arising to the 'panoramic views of the sea' from the South Downs Way across 13 distinct sections, mapped with the Zones of Theoretical Visibility (ZTV) in Figure 15.24 Chapter 15 Seascape, landscape and visual impact assessment – Figures (Part 3 of 8), Volume 3 of the ES [APP-090] and assessed in Table 15-31. Other public rights of way passing through the SDNP are also assessed including the Monarch's Way (para 15.10.42 to 15.10.47).</p> <p>The assessment of the effects of the Proposed Development (offshore array area) on the special qualities of the SDNP provided in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (Table 15-32) includes assessment of the effect of the Proposed Development (offshore array area) on the 'panoramic views of the sea' referred to in Special Quality 1 (SQ1). These have been taken into account in the design of the project through the spatial extent of the DCO Order Limits, which have reduced the horizontal spread of Wind Turbine Generators (WTGs) in these panoramic views particularly from the Heritage Coast, and reduced the apparent scale of the WTGs through their increased distance from the Heritage Coast and separation from Rampion 1, as described further in Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 [APP-056] and in the Applicant's deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p>
3.9.5	<p>3.9.5. We welcome the inclusion of a specific requirement (16) within the dDCO regarding the construction of highway accesses within the SDNP and have provided comment on the wording of this in the LIR. The SDNPA remain concerned however regarding the number of proposed accesses and haul roads from the A280 (Long Furlong), from which there are three construction access points (A-27, A-28 and A-29). The Design Manual for Roads and Bridges is being proposed to inform the design and layout of these access points, which is an excessive measure given the character and level of use of the highway; Manual for Streets would be a more appropriate reference as it is designed for the roads affected by this scheme and the level of use proposed. The applicant is yet to have carried out the actual Speed Surveys (as opposed to surveys based on posted speeds) and Road Safety Audits, which the SDNPA consider could result in the reduction in the number of access points and therefore a reduced impact on the SDNP. These should be undertaken prior to the determination of the DCO, in order to moderate the effects on the environment within the SDNP.</p>	<p>For clarity, the Applicant would like to take the opportunity to confirm the proposed use of proposed accessed along the A280 Long Furlong:</p> <ul style="list-style-type: none"> • Access-26 on Michelgrove Lane is proposed and a construction and operational access; • Access A-27 on Long Furlong Lane is an operational access only; and • Access A-28 at Tolmare Farm) is a construction access only. <p>Access A-29 is located on the A24 north of the A280 and is for operational purposes only.</p> <p>Further details of all proposed accesses is included within the Onshore Works Plan [PEDP-005] and Outline Construction Traffic Management Plan [REP1-010].</p> <p>Use of Design Manual for Roads and Bridges guidance for access junctions has been agreed as appropriate with West Sussex County Council in their role as local highway authority unless otherwise agreed with the highway authority as per the updates to the Draft Development Consent Order [PEPD-009] (updated at deadline 2). Use of Manual for Streets design guidance is generally not appropriate for the majority of access junctions given their rural nature and speed limits of above 40mph.</p>

Ref	Written Impact Report Comment	Applicant's Comment
3.9.6	<p>3.9.6. The lack of consideration of the National Park Purposes in respect of the Transport chapter of the Environmental Statement (Document Reference 6.2.23) and associated supporting documents including the Construction Traffic Management Plan, Construction Workers Travel Plan is of significant concern. These documents and assessments have not recognised the South Downs Local Plan, which includes 17 relevant policies, nor the South Downs Walking and Cycling Strategy. There also appears to have been a lack of acknowledgement, or consideration of the cumulative effects on the SDNP, of onshore traffic generated by offshore works, that will need to access ports through routes in the SDNP (specifically the A26 to Newhaven) and onshore works. Therefore it is considered the totality of transport effects has been underestimated.</p>	<p>The Applicant is currently preparing preliminary access designs for each of the proposed compound locations, which will be subject to speed surveys where possible and independent Road Safety Audits. It is the intention of the Applicant to reach agreement with West Sussex County Council on design of these proposed access junctions before the end of the examination period. The Applicant also notes that, as detailed within WSCC's Local Impact Report, the local highway authority are content that Road Safety Audits of other junctions can take place as part of the detailed design process.</p>
3.10.1	<p>3.10. Historic Environment</p> <p>3.10.1. Matters regarding the historic environment, particularly as it relates to archaeology, have not advanced since our formal consultation response to the Further Supplementary Information Report dated 27 March 2023. The following comments reflect that response.</p>	<p>The Applicant notes the omission of policies from the South Downs National Park Local Plan from Chapter 23:Transport, Volume 2 of the Environmental Statement (ES) [APP-063] and associated supporting documents but is confident that they would not alter the scope of assessment or conclusions of Chapter 23:Transport, Volume 2 of the ES [APP-063] or Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006].</p> <p>A robust and thorough assessment of the impacts of the Proposed Development has been completed in Chapter 23: Transport, Volume 2 of the ES [APP-063] and Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]. This included the completion of nine separate construction traffic scenarios and an assessment of peak construction traffic flows at all identified receptors. This peak construction traffic assessment considered construction traffic movements across the entirety of the study area and construction programme and therefore provided a worst-case cumulative assessment for each individual receptor.</p> <p>Table 23-12 of Chapter 23:Transport Volume 2 of the ES [APP-063] identifies why the construction phase of the offshore works was scoped out of ES assessments. Overall, it is anticipated that such activities would generate a low volume of construction traffic which would not alter conclusions of the ES.</p> <p>The Applicant has taken action to address the matters regarding archaeology raised in South Downs National Park Authority's (and other relevant stakeholders) consultation response to the Further Supplementary Information Report, as follows:</p> <ul style="list-style-type: none"> Archaeological field evaluation in the form of a geophysical survey continued in areas of the South Downs and the results are described in the Appendix 25.4: Onshore Geophysical Survey Report (Part 1 to 8 of 8), Volume 4 of the Environmental Statement (ES) [PEDP-031, PEDP-113 - PEDP-119]. The results of these surveys informed the selection of the cable corridor and the assessment of archaeological potential and effects in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. The Outline Onshore Written Scheme of Investigation (WSI) [APP-231] was drafted and submitted with the Development Consent Order Application. This document provides the overarching methodological approach to further evaluation and subsequent mitigation work in response to impacts of Rampion 2. This document has been informed by the results of surveys and consultation with relevant stakeholders. This includes the application of non-standard

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3.10.2	3.10.2. The proposed route of the cable corridor would come in close proximity to a Scheduled Monument (Itford Down) and through an area of known prehistoric industrial activity (see Fig 5).	<p>evaluation techniques within the part of the proposed DCO Order Limits which falls within archaeologically sensitive areas within the South Downs National Park. The Outline Onshore WSI [APP-231] (secured by Requirement 19 of the Draft DCO [PEPD-009]) provides for the production of site-specific WSIs which will set out the requirements for further investigation where this has not been completed pre-DCO consent. The results of these further investigations will underpin the subsequent design and amendments as required to avoid and/or mitigate harm to heritage assets. The site-specific WSIs will also set out mitigation measures to secure archaeological recording and reporting where an avoidance is not possible. Engagement is ongoing with relevant stakeholders to provide comment/input to the Outline Onshore WSI [APP-231] which will be updated during the Examination.</p> <ul style="list-style-type: none"> In the absence of baseline evidence from recommended evaluation techniques being undertaken pre-DCO Application, the assessment of historic environment effects presented in Sections 25.9 to 25.12 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] considers a worst-case scenario. The potential for nationally significant archaeological remains has been identified within part of the proposed DCO Order Limits which crosses the SDNP. <p>The historic environment baseline presented in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] and in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214] identifies these heritage assets.</p>

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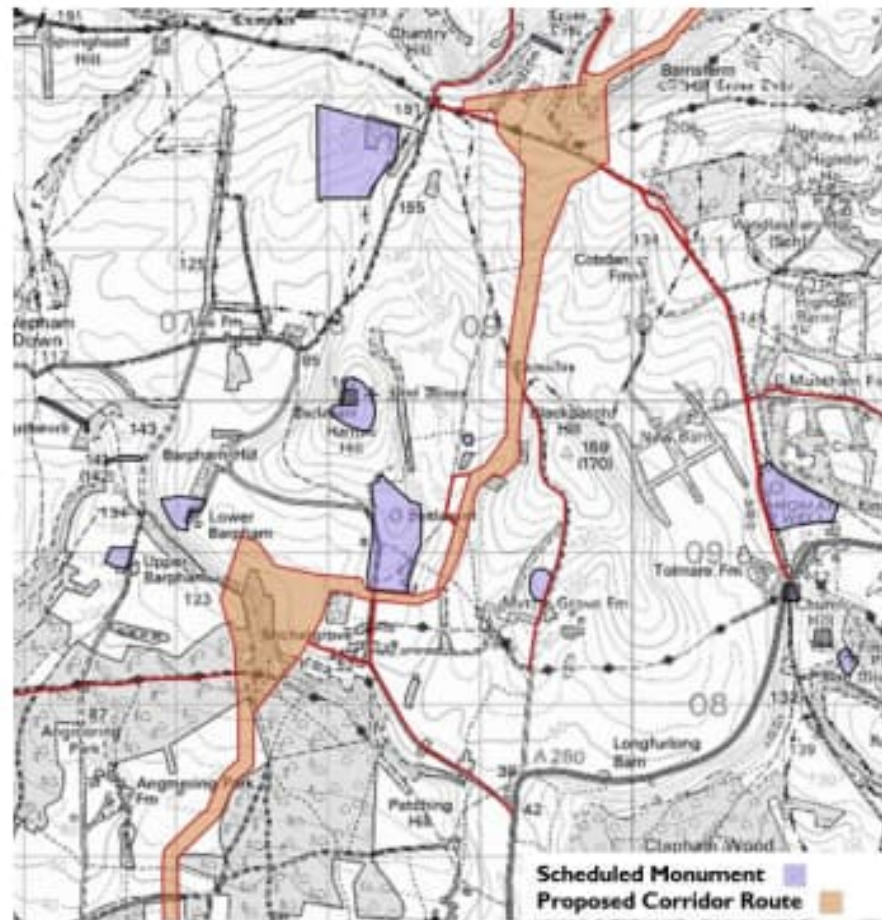


Fig. 5 Scheduled Monuments in relation to Cable Corridor

3.10.3 3.10.3. Blackpatch and Harrow Hills sit on high points either side of the valley containing the proposed route corridor. Given both sites are of a prehistoric industrial nature, it is probable that the valley contains significant potential for settlement evidence from the early prehistoric (and therefore may represent some of the earliest evidence for Neolithic settlement in Britain). The landforms themselves suggest significant sediment build ups within the dry valley between both sites, with potential evidence for Neolithic and other periods lying deep in the valley profiles. This means that geophysical data, which is all that has informed this section of the route (to date) is unlikely to provide a sufficiently detailed evidence base on which to base decisions relating to route options (Document Reference APP-066).

The onshore cable route selection process took into consideration the potential for archaeological remains of high heritage significance to be present across all alternative routes, as evidenced by available baseline data and reflected in the archaeological notification areas. This was balanced against other criteria as described in [Chapter 3: Alternatives, Volume 2](#) of the Environmental Statement (ES) [APP-044].

Section 25.5 of [Chapter 25: Historic environment, Volume 2](#) of the ES [PEPD-020] sets out the methodology for baseline data gathering, which draws on a wide range of sources and data, including results of extensive geophysical survey. The majority of this section of the onshore cable route is not considered to be affected by factors which would prevent detection of the type of cut feature that we would expect to detect (e.g. deep soils or green waste). The geophysical survey has successfully identified anomalies relating to buried features both archaeological and non-archaeological in origin across this section of the onshore cable route, with some anomalies of uncertain origin. However, the geophysical survey did not indicate the presence of extensive or complex archaeological remains. Where the geophysical survey is limited in detecting more ephemeral remains, such as artefact scatters/accumulations, the [Outline](#)

Ref	Written Impact Report Comment	Applicant's Comment
		<p>Onshore Written Scheme of Investigation (WSI) [APP-231] provides for a suite of evaluation techniques to investigate the presence and nature of such remains which might be impacted by the Proposed Development.</p> <p>The onshore cable route has been located away from dry valleys where possible. Where it does cross, this corresponds spatially to the discrete linearly mapped head deposits on the BGS. Appendix 25.3 Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 of the ES [APP-202] provides available geoarchaeological and paleoenvironmental detail and identifies the potential for remains preserved in deposits occupying dry valleys on the Chalk in the South Downs. The actual depth of these accumulated deposits is as yet unknown. Geoarchaeological borehole investigations are proposed as an investigative method in the Outline Onshore Written Scheme of Investigation (WSI) [APP-231], which can be implemented across the dry valley deposits to provide information on the depth and nature of deposits at this location. Results will be considered against the predicted extent of construction impacts of the onshore cable corridor (e.g. typically 1.8m deep trench) to understand if mitigation measures are required. Whilst information from intrusive investigations is not yet available, parallels are drawn from elsewhere on the Chalk uplands of southern Britain where archaeological remains are recorded in dry valley deposits, principally pottery sherds and / or flint artefact (see Section 3.2 in Appendix 25.3 Onshore desk-based geoarchaeological and palaeoenvironmental assessment report, Volume 4 of the ES [APP-202]).</p> <p>The assessment presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] is based on a worst-case scenario, which identifies a high potential for archaeological remains of high heritage significance within the area of the South Downs.</p> <p>See also Applicant's response to South Downs National Park Authority Local Impact Report references 6.27 to 6.29 in Table 2-1 of this document.</p>
3.10.4	<p>3.10.4. Of the excavations that have occurred linked to the flint mining complexes of Blackpatch and Harrow Hill, it is clear that the mines became the focus for Bronze Age burial monuments constructed after mining had ceased. As many Bronze Age barrows and similar funerary monuments were plough damaged during intensive world war and post war agricultural practices, there is also the potential for below ground Bronze Age archaeological evidence not necessarily recorded or known. A summary of significant archaeological sites and finds in the area is included at Appendix D. It would appear highly unlikely that the route could be achieved without substantial permanent destruction of the historic environment.</p>	<p>Known and potential archaeological remains, including those relating to Bronze Age funerary monuments, have been identified and assessed in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020]. These heritage assets, together with all other available baseline data, were taken into consideration in the onshore cable route selection process.</p> <p>Where significant effects are identified in the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] are currently based on a worst-case scenario which identifies a theoretical potential for archaeological remains of high heritage significance, which has not yet been confirmed through the available.</p> <p>Flexibility is retained by the Order to enable the construction of works anywhere within the area identified for those works on the Onshore Works Plans [PEPD-005], within which area there will be a circa 40m construction corridor and 20m permanent easement corridor, save for in certain circumstances such as where HDD techniques are employed. The final routing is not fixed and will be dependent upon matters such as pre-construction surveys, including archaeological investigations. For example, the corridor</p>

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3.10.5	<p>3.10.5. The need for further investigation is acknowledged by the applicant, including field investigation. These need to be provided as a matter of priority – ideally prior to determination - any intrusive investigation must be carried out prior to commencement of any phase, to ensure the route remains viable and the construction period through this sensitive area is not prolonged. In addition, a Written Scheme of Investigation needs to address the approach to preservation and public engagement.</p>	<p>could be further narrowed to avoid impacts on archaeology by siting soil stockpiles elsewhere, as described in commitment C-225.</p> <p>See also Applicant's response to South Downs National Park Authority Local Impact Report reference 6.27 to 6.29 in Table 2-1 of this document with regards to relevant embedded environmental measures to mitigate/minimize effects and the planning balance undertaken with respect to harm.</p> <p>The assessment presented in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] is based on a worst-case scenario. Therefore, the Applicant considers that further investigation would not change the outcome of the assessment.</p> <p>The Outline Onshore WSI [APP-231] (secured by Requirement 19 of the Draft Development Consent Order [PEPD-009]) provides for the production of site-specific WSIs which will set out the requirements for further investigation where this has not been completed pre-DCO consent.</p> <p>See also Applicant's response to reference 6.27 and 6.29 with regards to relevant embedded environmental measure C-225 relating to preservation of archaeological remains.</p> <p>Embedded environmental measure C-261 in the Commitments Register [REP1-015] (updated at the Deadline 1 submission) provides for an appropriate and proportional programme of public outreach to be developed and implemented by the Applicant. Commitment C-79 provides for appropriate curation/deposition of the site archive and is secured through Requirement 19 of the Draft Development Consent Order [PEPD-009].</p> <p>The requirement for a proportionate programme of public outreach is secured in Section 7 of the Outline Onshore Written Scheme Investigation (WSI) [APP-231], which identifies possible methods of providing public outreach. Securing and treatment of a project archive is also provided for in the Outline Onshore WSI [APP-231]. The Applicant invites the SDNPA to provide specific comment/input to this document, which will be updated throughout the Examination. Site specific WSIs are required through Requirement 19 of the Draft Development Consent Order [PEPD-009].</p>
3.10.6	<p>3.10.6. Overall, whilst it is noted that Neolithic Settlement would be of 'high heritage significance' at 25.9.142 of the Historic Environment Chapter (Document ref: APP-066), the overall approach for mitigation is for 'preservation by record'. This would retrieve artefacts, but is in itself a destructive process that would destroy archaeological resource and context. Further, there are additional burdens and requirements related to the depositing and storage of such material. This has been overlooked in the Requirements and commitments and it is considered further mitigation or compensatory measures are required.</p>	<p>Mitigation in the form of preservation by record is proposed where avoidance is not possible. Avoidance and minimising impacts through engineering solutions will be prioritised, see Applicant's response to reference 6.27 and 6.29 with regards to relevant embedded environmental measure C-225. In line with the requirements of NPS EN-1 paragraph 5.8.20 (DECC, 2011a), archaeology at risk of loss or disturbance would be recorded before any loss occurs. This recording would be provided for in a WSI (site-specific, as described in the Outline Onshore Written Scheme Investigation (WSI) [APP-231]) to be approved with the relevant local authority in advance and would have the effect of partially mitigating any loss of archaeological interest.</p>

Ref	Written Impact Report Comment	Applicant's Comment
3.10.7	3.10.7. There are other areas of the route within the SDNP that we consider have underestimated the significance of potential heritage assets. For example, in Table 25-20 the possible mounds at Sullington Hill are considered to be of 'low to medium' significance, despite the proximity to known barrow sites.	Commitment C-79 provides for appropriate curation/deposition of the site archive and is secured through Requirement 19 of the Draft Development Consent Order [PEPD-009] . The significance of potential heritage assets has been assessed based on available information. Where possible mounds have been identified, these were identified as subtly elevated features on LiDAR data but not evident during site walkover. These features are largely ploughed out, and where there is potential for these to be barrow sites, they are anticipated to be of similar nature and condition of other known non-designated examples found commonly across this upland landscape.
3.10.8	3.10.8. Overall, there has also been an apparent compartmentalisation of archaeological impacts away from matters such as groundwater management and pollutants. Artefacts surviving in the ground reach a form of chemical equilibrium with the surrounding soil environment; once any changes happen in the chemical make-up of the soil (or in water levels and moisture), depending on the artefact there can be risks of artefactual decay. If preservation in situ is being proposed as viable mitigation in areas where HDD is taking place, an additional commitment /mitigation/compensation measure is expected in respect of the associated impact on below ground artefacts.	<p>Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] was prepared in consultation with Chapter 26: Water environment, Volume 2 of the ES [APP-067], which confirms that potential impacts on groundwater levels, which may introduce dewatering effects, were scoped out by the water environment assessment. C-77 also ensures dewatering of excavations will be undertaken in line with good practise.</p> <p>The Outline Onshore Written Scheme Investigation (WSI) [APP-231] provides the overarching methodological approach to further evaluation, including the provision for investigating and recording waterlogged deposits. Site-specific WSIs will detail the requirements for each phase of works. The aim will be to understand the burial environment where archaeological remains survive. Information will also be drawn from the results of any relevant ground investigations and geoarchaeological investigations. The results of these investigations will inform the need and scope of mitigation measures (avoidance and/or preservation by record). Where preservation of archaeological remains is considered, the approach will be in accordance with relevant guidance in the following documents:</p> <ul style="list-style-type: none"> • Historic England (2016) Preserving Archaeological Remains; and • Chartered Institute for Archaeologists (CIfA) (2014) Standard and guidance for archaeological field evaluation. <p>The Outline Onshore WSI [APP-231] will be updated at deadline 3 to includes changes relevant to C-225 (see Applicant's response to reference 6.27 and 6.29).</p>
3.11.1	<p>3.11. Ground Conditions (including impact on Minerals Resources)</p> <p>3.11.1. As noted in the SDNPA's LIR, we support the comments made by West Sussex County Council in relation to the effects on minerals and in particular the safeguarding of the Soft Sand resource. Further to this, the SDNPA would add that any potential site sterilisation, such as that at Lower Chancton, that adds to further pressure to identify sites for extraction within the SDNP would be of additional concern.</p>	<p>Due to the location of the relevant Minerals Safeguarding Areas (MSAs), it is not possible for the onshore cable route to avoid the MSAs, however the route proposed for the onshore cable has taken the MSAs into account and minimises the extent of impact on the MSAs by running in as direct a line as possible, or for soft sand, running adjacent to the A283 (an existing constraint to extraction). The onshore cable route therefore avoids needless sterilisation as a first principle.</p> <p>However, given that the onshore cable route does pass through the MSA in the Lower Chancton area, Paragraph 4.7.129 of the Planning Statement [APP-036] states that "<i>with regards to MSA the assessment has found that there will be a significant effect on the soft sand in the construction phase and operation and maintenance phase. In the context of WSCC Joint Mineral Local Plan Policy M9, it is identified that the soft sand MSA cannot be avoided, although the area potentially sterilised in the construction phase and operation and maintenance phase will be a very minor proportion of the overall area.</i> Chapter 24: Ground conditions, Volume 2 of the ES [APP-065] identifies</p>

Ref	Written Impact Report Comment	Applicant's Comment
3.12.1	<p>3.12. Residential Amenity</p> <p>3.12.1. The construction compound at Washington, whilst outside of the SDNP is likely to have a prolonged impact on residents of Washington Village, which is located within the SDNP. The main access to the village is opposite the proposed location to the compound and therefore it is anticipated that matters of noise, vibration and increased traffic are all likely to cause harm to the amenity of residents in the village and users of the facilities.</p>	<p>that the area around Lower Chancton is already subject to some constraints to minerals extraction: from the proximity to the A283 and the proximity to the buildings at Lower Chancton Farm (including Grade II Listed Buildings and residential properties) and the Sussex Timber company. The proposed route of the onshore cable takes advantage of this by being routed, as far as possible, through these pre-constrained areas. It is also relevant to note that although this location is within the MSA for soft sand it is not the case that there is a 'site' here to sterilise. Whilst Rock Quarry to the north of the A283 in this area has permission and is an active working quarry, the area around Lower Chancton Farm to the south of the A283 has no planning permissions or applications in place for minerals extraction, nor is it allocated as a Proposed Minerals Site in the JMLP. Furthermore, the South Downs National Park (SDNP) boundary runs along the A283 in this location so the land at Lower Chancton is itself within SDNP. Given the minor proportion of the overall MSA area being sterilised through to the decommissioning phase and taking into account the existing constraints to extraction and Lower Chancton's National Park location, the Applicant does not consider that the sterilisation that has been identified from the Proposed Development would add any further pressure to extract minerals from within the SDNP beyond that which already exists.</p> <p>The Applicant has undertaken an Environmental Impact Assessment (EIA) which considers and assesses the likely significant effects of the Proposed Development. The Environmental Statement (ES) Volume 2 [APP-042 to APP-072], and Volume 4 [APP-120 to APP-222], reports the findings of the EIA. The ES also provides information about the Proposed Development including its context, a full description of the Proposed Development and its construction and any relevant technical information that has been used to assess the likely significant effects of the Proposed Development. The ES and includes a series of chapters that consider and assess the likely significant effects of the Proposed Development in relation to each relevant environmental aspect. These include the following aspect chapters:</p> <ul style="list-style-type: none"> • Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018]; and • Chapter 23: Transport, Volume 2 of the ES [APP-064]; <p>There have been opportunities for the development of environmental measures which have been adopted to reduce the potential for environmental impacts and effects. These were included directly into the design of The Proposed Development as embedded environmental measures and are detailed in the Commitments Register [REP1-015] (which has been updated at the Deadline 1 submission). The Commitments Register was initially presented in the Scoping Report and subsequently updated throughout the Statutory Consultation exercises and in the Environmental Statement to reflect design evolution and consultation feedback. Further to this, a number of management plans have been included in the DCO Application such as Outline Code of Construction Practice (CoCP) [PEPD-033] which provide the details of the proposed embedded environmental measures to manage effects during the construction phase and is secured by requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>Noise and vibration:</p>

Ref	Written Impact Report Comment	Applicant's Comment
		<p>As presented in Chapter 21: Noise and vibration, Volume 2 of the ES [PEPD-018], unmitigated noise from activity within the Washington Construction Compound is likely to give rise to high magnitude levels of sound on occasion at the Washington Caravan Park. However, residential receptors in Washington Village are not likely to have significant effects with respect to noise or vibration exposure, Embedded mitigation such as localised screening, shrouding of generators, and appropriate positioning of noisy activities within the compound will all be included in the Noise and Vibration Management Plan, part of the stage specific Code of Construction Practice, secured by Requirement 22 of the Draft Development Control Order [PEPD-009] and this will further reduce the magnitude of noise at receptors in the village.</p> <p>Traffic: The Environmental Statement has assessed the effects of each compound for during construction. Though impacts will arise, there are no significant effects arising from noise and traffic impacts when considering the embedded environmental measures secured in the Outline Code of Construction Practice (CoCP) [PEPD-033], the Outline Construction Traffic Management Plan (CTMP) [REP1-010] and the Outline Public Rights of Way Management Plan (PRoWMP) [APP-230]. It is noted that each of the above plans will be subject to submission of stage specific details for approval by the relevant authority, including West Sussex County Council for the CTMP and PRoWMP and the relevant planning authority for the CoCP. This is as per the Draft Development Consent Order [PEPD-009] Requirements 24, 20, and 22 respectively.</p>
3.13.1	<p>3.13. Geology and Soils, including Contaminated Land</p> <p>3.13.1. This matter is covered in the above sections on onshore landscape and terrestrial ecology.</p>	<p>The Applicant has reviewed and not identified further relevant comments in this Written Representation with regards geology or contaminated land but refers to the response under reference 3.11.1 on minerals.</p>
4.1	<p>4. Other Matters</p> <p>4.1 As set out in the SDNPA's LIR the following topics are considered to have neutral or limited impact. Therefore, the SDNPA has no further comments to make at this stage but reserves the right to make additional comments should it become necessary during the examination process.</p> <ul style="list-style-type: none"> • Water Environment; • Air Quality; • Open Access Land and Public Open Space (whilst the offshore array will be visible from multiple such areas there will be no direct use of Open Access Land or Public Open Space for the onshore cable corridor, providing trenchless crossing is used at Sullington Hill Local Wildlife Site and under Washington Recreation Ground); and • Socio-economic (other than where they relate to landscape character and access). 	<p>Noted, the Applicant has no further comments on paragraph 4.1 of the South Downs National Park Authority Written Representation at this time.</p>

Ref	Written Impact Report Comment	Applicant's Comment
5.1	<p>5. Common Ground</p> <p>5.1 The agreed matters, as they currently stand between SDNPA and the applicant, are captured in the draft Statement of Common Ground to be submitted by the applicant by the required deadline and, in the interests of brevity, these are not repeated here.</p>	Noted, the Applicant will update the Statement of Commonality and Statement of Common Ground at the required deadlines.
6.1	<p>Conclusion</p> <p>6.1 The SDNPA objects to the DCO application for the reasons given above.</p>	Noted, the Applicant will continue to engage with South Downs National Park Authority to seek to resolve the objection.
6.2	6.2 The SDNPA will continue discussions with the applicant in an attempt to address the issues raised in this written representation and will continue to engage positively and in a timely fashion during the examination process	Noted, the Applicant will continue to engage with South Downs National Park Authority and submit updates into the Examination.

Table 2-3 Applicant's Response to South Downs National Park Written Representation – Appendix A: Submission Review – Landscape Effects

Ref	Written Impact Report Comment	Written Representation Comment
1.1	<p>Purpose of the Report</p> <p>1.1. This report sets out a review of the Rampion 2 proposals and the ES, specifically looking at aspects that cover landscape character and visual amenity and the effects of the development on these, as assessed in Chapter 15 Seascape, Landscape and Visual Impact Assessment and Chapter 18 Landscape and Visual Impact Assessment.</p> <p>1.2. The report covers a review the methodology for both assessment and specifically concentrates on the proposals and effects that relate to the South Downs National Park and its setting.</p> <p>1.3. The report does not purport to provide an alternative impact assessment.</p>	Noted, the Applicant has responded further in the sections below and in the Applicant's post-hearing submission following Issue Specific Hearing 1 (ISH1) in Deadline 1 Submission – 8.25.5 Applicant's Post Hearing Submission – Issue Specific Hearing 1: Appendix 5 – Further information on Action Point 27 – South Downs National Park [REP1-024] .
2.1	<p>SDNPA Purposes and Special Qualities</p> <p><u>2.1. Statutory purposes</u></p> <p>2.1.1. The statutory purposes of the National Park as set out in the set out in the National Parks and Access to the Countryside Act 1949 Sections 5 and 11A(2)) are:</p> <ul style="list-style-type: none"> • 'Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area. • Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.' • <p>2.1.2. The Statutory Purposes are underpinned in the Overarching National Planning Policy Statement for Energy(EN-1) (para 5.9.9 page 96) which states 'National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.'</p> <p><u>2.2. Special Qualities</u></p>	

Ref	Written Impact Report Comment	Written Representation Comment
	<p>2.2.1. The SDNP seven special qualities (APP-056) define sense of place, distinctiveness and the characteristics that make this place special and valued. The SDNPA consider that all Special Qualities should be conserved and enhanced. The following are the stated summary descriptions about the qualities that support the statutory purposes</p> <ol style="list-style-type: none"> 1. 'Diverse, inspirational landscapes and breathtaking views 2. A rich variety of wildlife and habitats including rare and internationally important species 3. Tranquil and unspoilt places 4. An environment shaped by centuries of farming and embracing new enterprise 5. Great opportunities for recreational activities and learning experiences 6. Well-conserved historical features and a rich cultural heritage 7. Distinctive towns and villages, and communities with real pride in their area' <p>2.2.2. The SDNPA consider that whilst Special Qualities nos. 1,3, and 5 are of key relevance to this review of the seascape, landscape and visual impacts of the Rampion 2 proposal, the other four are still of equal importance in wider considerations</p>	
3.1	<p>3. SUMMARY OF MATTERS OF SIGNIFICANT CONCERN</p> <p>3.1. Overarching significant concerns</p> <p>3.1.1. The SDNPA maintain their previously stated position: that the Rampion 2 development proposals give rise to significant seascape, landscape and visual impacts that cause harm to the Statutory Purposes of the SDNP and its Special Qualities, as defined in the original SDNP Partnership Management Plan (PMP), from both offshore and on-shore development proposals.</p> <p>3.1.2. It should be noted that the Special Qualities are not defined geographically. Any harm to these cannot be downplayed through the defining of a geographically limited Study Area as set out in Section 1.2.13 of the LVIA methodology (APP-167) which states out that 'The Study Area for the LVIA is illustrated in Figure 18.1[APP-098] and extends to a 2km buffer beyond the proposed DCO Order Limits.' The SDNP maintains that any harm to the Special Qualities, as identified will occur in the ES, will harm the Statutory Purposes of the Designation and is of utmost concern. The SDNPA suggest it is of key importance to note that the Rampion 1 windfarm was not constructed when the SDNP Special Qualities were set out and suggest that Rampion 1 has already provided a significant level of harm to the Special Qualities, which is not taken into consideration in the assessment.</p> <p>3.1.3. The SDNPA also considers that these limitations on the geographical study area as well as other reasons set out in this report, leads to a substantial understatement in the seascape, landscape and visual impacts set out in the Chapter 15 Seascape, landscape and visual impact assessment (APP-056) and Chapter 18 Landscape and visual impact (APP-059) of the ES.</p> <p>3.1.4. The SDNPA are also concerned that the ES downplays the effects on the SDNP Landscape Character Areas due to the geographical extents of the Study Area, lack of consideration of some landscape elements and the use of a combined approach to landscape elements that, if considered in isolation, would be significant.</p>	<p>With regards to the offshore elements of Rampion 2, it is the Applicant's position that a degree of 'harm' is likely to arise in relation to the perceived seascape setting of the South Downs National Park (SDNP), however whilst some harm would be caused to 'panoramic views to the sea' defined in Special Quality 1, this would not compromise the statutory purpose of the SDNP. The majority of the SDNP's special qualities would be unaffected by the offshore elements of the Proposed Development; 'panoramic views of the sea' would still be experienced; and opportunities will remain for understanding and enjoyment of the special qualities of the SDNP. There are seven special qualities and it is the combination of these that define the SDNPs sense of place - all but one (SQ1) of these special qualities would either be unaffected or subject to not significant effects in relation to the offshore elements of Rampion 2. Whilst it is accepted that there would be some perceived diminishment to one of the seven special qualities and the natural beauty of the SDNP experienced in 'panoramic views of the sea' from the South Downs Way and the chalk cliffs at Seven Sisters, these effects are not considered to occur to such a degree that it would affect the integrity of the SDNP. Effects would occur in a context where there is already an association between the SDNP and large-scale offshore wind farm development in its setting (Rampion 1) and an understanding of the need for an environment shaped by increasing opportunities for producing alternative energy (as recognised in SQ4). Whilst some harm would be caused to 'breathtaking views' and 'panoramic views to the sea', defined in SQ1, it is the conclusion of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] and the position of the Applicant that this would not compromise the purpose of the SDNP designation. The interest in the SDNP is intrinsic to itself and it would not be harmed to such a degree that it would be compromised by the offshore elements of Rampion 2 outside its area. Although the visible presence of Rampion 2 from parts of the SDNP in its seascape setting would fail to conserve the natural beauty, as well as failing to enhance it, it must be anticipated that any major development would give rise to friction with such purposes. This is acknowledged in EN-1 at paragraph 4.5.1 where it is stated that <i>"the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."</i> The Applicant has aimed to minimise adverse effects on the SDNP insofar as possible, designing Rampion 2</p>

Ref	Written Impact Report Comment	Written Representation Comment
3.2	<p><u>3.2. Incomplete and unevicenced proposals</u> 3.2.1. The Commitments Register (APP-254) has multiple instances of uncertainty and qualification and use of phrases such as 'where practical', 'as far as reasonably practical', 'as far as reasonably possible' and other similar phrases, that do not allow for a maximum design scenario to be established. The considerable areas of uncertainty imply that new or materially different environmental effects may be missing from the ES and therefore the impacts of the Proposed Development may be considerably understated or even incorrect.</p>	<p>sensitively given the various siting, operational and other relevant constraints and through the design of the spatial extent of the DCO Order Limits, has aimed to reduce adverse effects on the SDNP and Heritage Coast (as recognised by both the SDNPA and Natural England) in line with EN-1 (DECC, 2011a).</p> <p>Please reference previous response to Written Representation reference 3.5.1 in Table 2-2 which addresses these references 3.1.2-3.1.4 concerning the geographical extents of the LVIA Study area.</p> <p>The Applicant refers to the response under reference 3.2.1 of Table 2-2 of this document in response to this matter.</p>
3.3	<p><u>3.3. Viability of HDD:</u> 3.3.1. The SDNPA has a significant concern over the viability of that HDD proposed at Michelgrove Park and Sullington Hill.</p> <p>3.3.2. It is understood that DCO approval would be given prior to any investigation is undertaken to firmly establish viability of the HDD proposed at Michelgrove Park and Sullington Hill. The SDNPA finds the uncertainty involved in this approach unacceptable; these two areas of HDD are both key embedded mitigation measures relied on heavily in the LVIA to mitigate adverse impacts on these highly sensitive areas.</p> <p>3.3.3. It should be noted that these two key areas of trenchless crossing are not listed in the Commitment at C-5 and this contributes to SDNPA concerns over the uncertainty of the proposals.</p> <p>3.3.4. There is also concern that if the HDD is deemed to be unviable after construction the cable corridor has already taken place, then significant harm will already have taken place along the cable corridor route and to the SDNP. The SDNPA strongly suggest that no construction along the cable corridor take place until the viability of all propose works is fully confirmed.</p> <p>3.3.5. The DCO does not consent open trenching in areas where HDD is proposed and it is not clear what the alternative proposals would be, if the use of HDD is found not to be viable or fails.</p>	<p>The Applicant refers to the response provided regarding trenchless crossings under reference 6.26 of the South Downs National Park Authority Local Impact Report in Table 2-1 of this document</p>
3.4	<p><u>3.4. Impact on the LCA I3</u> 3.4.1. During construction, the magnitude of change for LCA I3 Arun to Adur Scarp Down is stated to be 'negligible to zero', despite the proposed HDD construction compounds immediately abutting the LCA both above and below scarp. This gives rise to a level of effect on landscape character of 'Minor and Not Significant' and for landscape elements: 'N/A'. The LVIA has not considered the nature of the LCA as open access land, the extent of perceptual and indirect effects and the stated assessed impacts. The resultant harm to the SDNP is considered by the SDNPA to be substantially understated.</p>	<p>Please reference response to Written Representation Reference 3.5.5 (Table 2-2).</p>
3.5	<p><u>3.5. Loss of vegetation</u></p>	<p>Please reference response to LIR reference 6.17 (h) in Table 2-1 of this document.</p>

Ref	Written Impact Report Comment	Written Representation Comment
	<p>3.5.1. The proposed development will lead to loss of considerable area of hedges, tree and woodland and changes to the nature of grassland. Whilst replanting is proposed, trees cannot be replanted over the cable corridor and will bring long term and irreversible harm to the landscape character of the SDNP. This assertion can be reinforced through lessons learnt from the Rampion 1 development (see SDNPA Written Representation Appendix B) where this change of landscape character can be seen.</p> <p>3.5.2. Considerable reliance is placed on the successful establishment of planting. Whilst the dDCO (page 56,section 13) references that works should be carried out in accordance with the LEMP and secures a mechanism for the replanting of removed, dead, damaged or diseased plants, there is no mechanism in the dDCO for addressing poor establishment of planting, which brings considerable and unacceptable uncertainty to the long-term effects of the proposed development.</p> <p>3.5.3. Considerable reliance is placed on reinstatement of vegetation being carried out as soon as possible, which cannot be guaranteed as the detailed works programme is yet to be determined through the development of state specific LEMPs (see Commitments Register C-199). During the construction of Rampion 1 considerable lengths of the cable route, construction haul road and access routes remained in place throughout the construction period to provide access and for cable pulling/jointing activities, preventing prompt reinstatement.</p>	<p>Following discussions with stakeholders the Applicant will provide further detail on vegetation loss, reinstatement, management, monitoring, and the process for delivering remedial actions (i.e. if localised planting fails) within the Outline Code of Construction Practice [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232] when updated at Deadline 3.</p>
3.6	<p><u>3.6. Viability of hedgerow translocation</u></p> <p>3.6.1. The SDNPA has concerns that there is no evidence available to support the assertion that the 'notching' of hedges is viable and will be successful in the climatic conditions and soil of the SDNP. Whilst there has been acknowledgement of the need to mitigate against hedgerow loss and minimise the period of time for reinstatement, the proposed methods for doing so, in particular the 'notching' technique have not been tested on dry, free-draining chalk soils, or in the climate associated with the South Downs. The examples provided are from the Lake District and Norfolk Broads, both of which are much wetter landscapes than the application proposals.</p> <p>3.6.2. Despite this lack of testing this key embedded mitigation measure (Commitments Register C-115) is heavily and over-relied on by the LVIA to mitigate impact. The uncertainty of the likely successful establishment, implies that new or materially different environmental effects may be missing from the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.</p>	<p>The Applicant refers to the response provided regarding hedgerow reinstatement under reference 6.26 of the South Downs National Park Authority Local Impact Report in Table 2-1 of this document.</p>
3.7	<p><u>3.7. Joint bays</u></p> <p>3.7.1. It is understood the joint bays are located at regular intervals (typically 600m – 1,000m) (see Commitment Register C-19) along the cable corridor. No detail of the construction of these is provided and it is assumed that there will need to be some form of marking and fencing to enable identification and prevent damage. These will be a frequent feature along the route and will serve to draw attention to this development. This long-term change of landscape character will be particularly evident in the open downland of the SDNP and give rise to significant landscape and visual impacts that do not appear to have been fully considered in the ES.</p>	<p>Chapter 4 The Proposed Development, Volume 2 of the Environmental Statement [APP-045] describes the joint bays at paragraph 4.5.18 to 4.5.20 and in Table 4-20. These are subsurface structures with manhole access for electrical checks and testing during operation and maintenance. No fencing is proposed.</p> <p>The landscape and visual impact of these features would not be significant and people travelling sequentially through the landscape would not encounter these in sufficient number / frequency to be significant.</p>
3.8	<p><u>3.8. Study areas:</u></p> <p>3.8.1. The LVIA methodology states (APP-16, section 1.2.14 page 7) that 'IEMA Guidance (IEMA, 2015; 2017) recommends a proportionate assessment focused on the likely significant effects of a development, and a proportionate technical aspect chapter. The LVIA Study Area must therefore be large enough to capture all likely significant effects. However, an overly large LVIA Study Area may be</p>	<p>Please reference response to Written Representation reference 3.5.1 in Table 2-2 of this document.</p>

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considered disproportionate if it makes understanding the key impacts of the development more difficult by including extraneous baseline information, and hence receptors which are unlikely to be significantly affected by the Proposed Development.’

3.8.2. The SDNPA understands the need for a proportionate approach, however suggest that the LVIA study area is limited to such a narrow area around the DCO limit that it is likely to fail to assess the full range of landscape and visual receptors likely to be significantly impacted, which will be wide-ranging as indicated by Zones of Theoretical Visibility (ZTVs) in both the SLVIA (APP-090 Figures 15.18- 15.24) and the LVIA (APP-098 Figures 18.4a-18.4d) and have the potential for increased significant and unacceptable effects on the SDNP with its open downland, varied topography and long views.

4.1 4. PROJECT INFORMATION

4.1. Design and Access Statement (AS-003)

4.1.1. A DAS is often a primary source of information for interested parties to assist in gaining an overview and summary understanding of the proposals.

4.1.2. Despite mention of both offshore and onshore elements, including the maximum 38.8km onshore cable route in the ‘Overview of the Proposed Development’ at section 1.1.4, the submitted DAS only covers the Oakendene substation and National Grid Bolney substation extension works.

4.1.3. Design is not all about built form, and the omission of detail on the other aspects of the proposed development is misleading as it does not provide a complete overview or understanding of the whole proposed development, either offshore or onshore.

The Rampion 2 proposals are described in [Chapter 4 The Proposed Development, Volume 2](#) of the Environmental Statement [APP-045].

The Applicant refers to the purpose of the [Design and Access Statement \[AS-003\]](#) as set in Section 1.2 of the document to address the above ground elements of the onshore works at the onshore substation and extension works for the existing National Grid Bolney substation. This provides the design principles with which the detailed design must accord as secured by Requirement 8 and 9 of the [Draft Development Consent Order \[PEPD-009\]](#) (updated at Deadline 2).

4.2 4.2. Maximum Design Scenario for WTGs

4.2.1. The DCO Explanatory Memorandum (APP-020) sets out that at section 6.4 that ‘*The final design of a windfarm depends on a number of factors which include the size, height, and capacity of the chosen turbine type; electrical design; length of cables; areas where development is constrained; and the outcomes of site investigations. All these are considered post-consent at the stage of detailed design and optimisation when the final number and type of turbines and their location will be decided as a function of site constraints and viable layout.*

The maximum total rotor swept area is 4,450,000.00m² as secured in Part 3, Requirement 2, Schedule 1 of the [Draft Development Consent Order \[PEPD-009\]](#) and this will not be exceeded, regardless of the choice of Wind Turbine Generator (WTG) in the final Proposed Development. 65 of the larger WTG type (325m tip height, 295m rotor diameter) results in a total rotor swept area of 4,442,702.89 m². Further information on how the number of WTGs is limited by the Development Consent Order is available in Pre-Exam Procedural Deadline Submission - [8.23 - Examining Authority requested additional information - Revision A \[PEPD-041\]](#).

4.2.2. Schedule 1, part 3 of the DCO (APP-019) sets out maximum parameters for the WTGs:

Detailed offshore design parameters

2.—(1) The total number of wind turbine generators comprised in the authorised project must not exceed 90 and a total rotor swept area of 4.45 square kilometres.

(2) Subject to sub-paragraph (3), each wind turbine generator forming part of the authorised project must not—

- (a) exceed a height of 325 metres when measured from LAT to the tip of the vertical blade;
- (b) exceed a rotor diameter of 295 metres;
- (c) have a distance of less than 22 metres from MHWS to the lowest point of the rotating blade; or
- (d) be less than 830m from the nearest wind turbine generator in all directions.

4.2.3. As set out in the Explanatory Memorandum, ‘*The PINS Advice Note 9 recognises the need for flexibility to address inherent uncertainties for a proposed development, against which the need to ensure*

Ref	Written Impact Report Comment	Written Representation Comment
	<p><i>that the significant effects of a proposed development have been properly assessed must be balanced. It acknowledges at paragraph 5.5 of that advice note that an Applicant may choose to include parameters within the DCO as a practical way to address uncertainty and provide the required flexibility before setting out example parameters which include 'maximum/ minimum number of turbines, or maximum turbine blade tip height, associated with an offshore wind farm.'</i></p>	
	<p>4.2.5. Also as set out in the Explanatory Memorandum, 'As the size of turbine has not yet been established for the Proposed Development the environmental impact assessment undertaken has considered the impacts of 65 'larger' sized turbines and 90 'smaller' sized turbines in order to establish parameters. Each chapter of the Environmental Statement has assessed the worst-case scenario in respect of the potential final design of the project for the aspect under consideration in that chapter, and has also considered whether these worst-case scenarios also apply to a size and number of turbines falling between these two scenarios. Inclusion of a parameter to constrain the maximum rotor swept area for the turbines ensures that a higher number of larger sized turbines cannot be constructed.'</p>	
	<p>4.2.6. Whilst the SDNPA accepts that there is a need for flexibility concerning 'post-consent' decisions regarding the number and size of the turbines, there is still significant concern about the Maximum Design Scenario used as a basis for the ES. (APP-056 Table 15-25 pages 273-279) sets out the 'Maximum parameters and assessment assumptions for impacts on seascape, landscape and visual' as including 'Maximum number of WTGs: 65' and 'Minimum spacing: 1130m'.</p>	
	<p>4.2.7. The DCO sets maximum parameters and therefore it is permissible and indeed possible that the proposed development might consist of 90 larger sized WTGs, at a minimum spacing of 830m. This is likely to give rise to new or materially different environmental effects arising compared to those assessed in the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.</p>	
4.3	<p><u>4.3. Temporary compound information</u></p> <p>4.3.1. There appears to be uncertainty in the need for the temporary construction compounds. The Landscape Assessment (APP-169, page 63), states 'The onshore cable corridor and temporary construction compounds (if either are elected)'. It is unclear whether this uncertainly relates to the number of compounds that will be required or their locations.</p> <p>4.3.2. The DCO (section 23, page 60) sets out maximum sizes for the landfall construction compound and the HDD compounds, but does not secure the maximum size of the temporary construction compounds, although Chapter 4 Proposed Development (APP-045, Table 4-22, page 71) sets out that the approximate size is 3.91ha and the Outline Construction Code of Practice (APP- 224, section 4.3.5, page 24) sets out that the compound will include facilities for welfare, offices, parking, and plant, materials and waste storage.</p> <p>4.3.3. There is a lack of information provided about the temporary compound sites, in terms of use, activities, heights of structures etc. which may give rise to the effects currently identified in the ES being understated or missing and cannot be appropriately considered to inform appropriate mitigation strategy or allow comprehensive consideration of the proposals by stakeholders.</p>	<p>The cited text seems to be in relation to the flexibility of temporary trenchless crossing compounds and associated cable routes at Sullington Hill.</p> <p>The Applicant can clarify that the temporary construction compounds included in the DCO Application are required. The main temporary construction compounds and their location and extent are set out on the Onshore Works Plans [PEPD-005] under Works No.10 and secured in the Draft Development Consent Order [PEPD-009] under Schedule 1 Authorised Project. The Applicant is willing to provide further definition of the works associated with the temporary construction compounds and is considering how this can best be presented.</p> <p>The Applicant refers to the response under 6.17 (e) of the response to the South Downs National Park Authority Local Impact Report in Table 2-1 of this document with regards compounds. With regards the heights of structures, Chapter 18 Landscape and visual impact, Volume 2 of the Environmental Statement [APP-059] sets out the worst-case assessment assumptions at paragraph 18.4.15.</p>

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4.4	<p>4.4. Commitments Register (APP-254)</p> <p>4.4.1. The First Statutory Consultation exercise (APP-027 - 030) included comment from multiple stakeholders setting out that ‘The Applicant should endeavour to refine the Rochdale Envelope and provide as much certainty as possible by the DCO application stage to minimise the risk of unforeseen or location specific effects. The parameters associated with the optionality of smaller and larger WTGs vary significantly. These should be accounted for within the ES.’</p> <p>4.4.2. The Applicant’s response set out in the First Statutory Consultation exercise (RED, 2021) included the statement that ‘Where optionality is present, a maximum design scenario is implemented to inform the technical assessments’.</p> <p>4.4.3. Despite this the Commitments Register has multiple instances of qualification and use of phrases such as ‘where practical’, ‘as far as reasonably practical’, ‘as far as reasonably possible’ and other similar phrases, that do not allow for a maximum design scenario to be established.</p> <p>4.4.4. The considerable areas of uncertainty imply that new or materially different environmental effects may be missing from the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.</p> <p>4.4.5. Key concerns regarding uncertainties relate to:</p> <ul style="list-style-type: none"> • C-1: Burying of the onshore cable • C-5: HDD trenchless crossings • C-9: Joint bay locations • C-37: WTG size • C-115: Hedgerow notching <p>4.4.6. It should also be noted that, whilst WTG rotor size is included, there is no reference in the Commitments relating to the number of WTGs.</p> <p>4.4.7. A full list of concerns in relation to the Commitments Register is set out in Section 13.</p>	<p>The Applicant refers to the response under reference 3.2.1 of Table 2-2 of this document in response to this matter and the following responses under section 13 of the South Downs National Park Authority Written Representation (Table 2-2).</p>
5.1	<p>5. SEASCAPE, LANDSCAPE AND VISUAL: METHODOLOGY</p> <p>Seascape, Landscape and Visual Impact Assessment Methodology (APP-158)</p> <p>5.1. Baseline and Cumulative effects</p> <p>5.1.1. The Executive Summary of the SLVIA (APP-056, page 6) sets out that ‘The existing Rampion 1 offshore wind farm forms a notable visible element in the existing seascape and is part of the baseline for seascape, landscape and visual effects assessments.’</p> <p>5.1.2. The South Downs National Park Partnership Management Plan (PMP), which sets out the Statutory Purposes of the SDNP and the Special Qualities that underpin these, was adopted by the National Park Authority in 2013.</p> <p>5.1.3. The SDNPA suggest it is of key importance to note that the Rampion 1 windfarm was not constructed when the SDNP Special Qualities were set out, and suggest that Rampion 1 has already provided a significant level of harm to the Special Qualities, which is not taken into consideration in the assessment. Table 15-2 of the SLVIA (APP-056, page 15) sets out at that ‘In its Scoping Opinion (The Planning Inspectorate, 2020) summarised in Table 15-6, the Planning Inspectorate agreed that cumulative</p>	<p>The Applicant’s approach to assessing the baseline and cumulative effects is set out above in response to reference 3.4.7 (Table 2-2) and 6.17(c) of the Local Impact Report (Table 2-1). Despite the presence of Rampion 1, the special qualities of the South Downs National Park (SDNP) were found to be strongly expressed and assessed as of high value.</p> <p>The influence of Rampion 1 on seascape, landscape and visual receptors is considered as part of baseline against which assessments are made in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The need to take existing developments such as Rampion 1 into consideration, including its potential influence on the perceived qualities of the SDNP, is expressly the reason for considering it as part of the baseline.</p> <p>Although Rampion 1 was not operating when the SDNP special qualities were set out, its effects on special qualities were given due regard during the Examination for Rampion Offshore Wind Farm, as evidenced by the Examining Authority’s Report of Findings and Conclusions (Planning Inspectorate, 2014) for Rampion Offshore Wind</p>

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	<p>seascape, landscape and visual effects of Rampion 2 with other offshore wind farm projects (with the exception of Rampion 1) can be scoped out of the SLVIA.’ [SDNPA emphasis in bold].</p> <p>5.1.4. Despite this requirement also being also referenced in the SLVIA at Table 15-6 (see below) (APP-056), Rampion 1 is assessed as part of SLVIA baseline and is not considered in terms of cumulative effects.</p>	<p>Farm. The Examining Authority (ExA) recognised its statutory duty to have regard to the purposes of the SDNP including “<i>the understanding and enjoyment of their special qualities by the public</i>”. The Special Qualities of the SDNP were set out in para 4.314 of the Examining Authority’s Report of Findings and Conclusions (Planning Inspectorate, 2014) and the ExA concluded (in para 4.382) (emphasis added): “<i>The panel recognises that no measures are available that would completely mitigate the significant adverse visual effects of the proposed array on the National Park or Heritage Coast. As such the Panel recognises that there would be some change to the special qualities of the National Park, in particular ‘diverse, inspirational landscapes and breathtaking views’ would be changed in parts of the National Park</i>”. This refers specifically to consideration of Special Quality 1 ‘Diverse, inspirational landscapes and breathtaking views’.</p> <p>It is clear that the Examining Authority (paragraph 6.59) “<i>had regard to the statutory purposes of designating the National Parks, together with implications of the proposed project for the acknowledged special qualities of the South Downs National Park</i>” and despite recognising the most significant impacts being “<i>upon the extensive scenic views from the high land within the South Downs National Park, including many parts of the South Downs Way National Trail</i>” (paragraph 6.28) it was the recommendation of the ExA that “<i>the structures exclusion zone would have a limited positive mitigation effect by reducing the horizontal extent of the array</i>” (paragraph 6.32) and its conclusion that “<i>the benefits of the proposed Rampion project would outweigh its negative effects and impacts</i>” (paragraph 6.62).</p>
5.2	<p><u>5.2. Type, location and range of viewpoints</u></p> <p>5.2.1. At the Third Statutory Consultation Exercise the SDNPA advised micro-siting of viewpoints be undertaken in consultation with Stakeholders. The SDNPA accept that micro-siting of viewpoints was agreed for the some of the off-shore views. However, it should be noted that this was not undertaken in relation to the remaining offshore views or the on-shore views and viewpoint locations have not been adjusted.</p>	<p>The Applicant requests confirmation from the South Downs National Park Authority as to which specific offshore viewpoints required further micro-siting. The Applicant notes that six additional viewpoints within the South Downs National Park were discussed, which were included in Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 to 8), Volume 3 of the ES [APP-088 – APP-095] as follows:</p> <ul style="list-style-type: none"> • Viewpoint 30 Halnaker Hill (Figure 15.53) [APP-093]; • Viewpoint 32 Levin Down (Figure 15.55) [APP-094]; • Viewpoint 41 Slindon Folly (Figure 15.60) [APP-094]; • Viewpoint 53 Amberley Mount (Figure 15.66) [APP-094]; • Viewpoint 54 Chantry Hill (Figure 15.67) [APP-094]; and • Viewpoint 58 Wolsonbury Hill (Figure 15.70) [APP-095].
5.3	<p><u>5.3. Quality of visualisations</u></p> <p>5.3.1. The quality of some of the visualisations, where photos were taken in hazy weather conditions, make consideration of the effects difficult i.e. Viewpoint 17 Devils Dyke (APP-092, Figure 15.42e).</p>	<p>Information on the limitation of the photomontage visualisations is provided in Appendix 15.2: Seascape, landscape and visual impact assessment methodology, Volume 4 of the ES [APP-158]. In particular, the Applicant would highlight that there are practical limitations to shooting viewpoint photographs and those shown in the visualisations show the most favourable weather conditions available during photographic survey work, which was particularly extensive for the Project and required photography to be undertaken from 54 viewpoints for the SLVIA across a wide geographic study area. Furthermore, the majority of viewpoints for the SLVIA of the offshore elements of Rampion 2 are south facing, the sun is inevitably captured in some part of the southerly view panorama, which can make photography challenging, yet is illustrative of typical viewing conditions ‘into the sun’ in south facing</p>

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5.4	<p><u>5.4. Offshore substations</u></p> <p>5.4.1. The SLVIA (APP-056, page 275) states the maximum design scenario included 3 offshore substations of a substantial size. It is set out in the Commitments Register that ‘The exact locations, design and visual appearance will be subject to a structural study and electrical design, which is expected to be completed post consent’.</p> <p>5.4.2. Review of the visualisations and associated wire frame images shows that the offshore substations are not included in all the visualisations and not in any of the wire frame images. Despite the terms of C-40, the SDNPA asserts that a likely indication of the substations could have been included to assist with the assessment of a worst-case scenario.</p> <p>5.4.3. These is likely to lead to missing effects cannot be considered to inform appropriate mitigation strategy or allow comprehensive consideration of the proposals by stakeholders.</p>	<p>views. The Applicant considers that the wide range of viewpoints provided and standard of the visualisations accords with guidance (Landscape Institute, 2019) and allows a clear understanding of the visual impacts of the Proposed Development.</p> <p>Offshore substation platforms (OSPs) are shown in key viewpoint photomontage visualisations within 20km of the proposed DCO Order limits (array area) within Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 to 8), Volume 3 of the ES [APP-088 – APP-095] including: Viewpoint 6 Peacehaven (Figure 15.31e) [APP-091] Viewpoint 7 Beacon Hill, Rottingdean (Figure 15.32e) [APP-091] Viewpoint 8 Brighton Sea Front (Figure 15.33e) [APP-091] Viewpoint 10 Worthing Sea Front (Figure 15.35e) [APP-092] Viewpoint 14 Selsey (Figure 15.39e) [APP-092]</p> <p>The Applicant is able to take an action to produce a selection of photomontages or wireframe images showing the OSPs from a number of viewpoints within the South Downs National Park.</p>
5.5	<p><u>5.5. 15.3 Simple Seascape, Landscape and Visual Impact Assessment (APP-159)</u></p> <p>5.5.1. SLVIA Section 15.6.15 (APP-056, page 177) states that ‘The LCAs within these landscape character assessments that are scoped in to the SLVIA are identified in Table 15-8 and in the simple assessment in Appendix 15.3...as those that define the main coastal associated landscapes of the SLVIA study area that have potential to be significantly affected by the offshore elements of Rampion 2’</p> <p>5.5.2. Table 2-1 (APP-159, pages 7-17) sets out a simple assessment of likely visibility from the SDNP Landscape Character Areas, stating various details such as % of areas with ZTV visibility, amount of Rampion 2 visible (no. of WTGs visible) and the ‘simple assessment’.</p> <p>5.5.3. Section 1.1.2 (APP-159, page 3) sets out that ‘low visibility would tend to be 1 to 13 WTGs and high visibility 53 to 65 WTGs’. This gives a range of 13 WTGs in the low category, 40 in the medium category and 10 in the high category. This has the potential to distort the assessed proportions with a far greater chance of visibility falling into the medium range.</p> <p>5.5.4. The assessment identified the LCTs to either have a ‘Potential for significant effects that require detailed assessment’ or ‘No potential for significant effects – scoped out of detailed assessment.’</p> <p>5.5.5. It is of concern that some LCAs have been scoped out of the full assessment despite having a high percentage of area with ZTV visibility and a range of ‘amount of Rampion 2 visible’ that includes high.</p> <p>5.5.6. The implication is that the SLVIA does not assess the full range of landscape and visual receptors likely to be impacted. The lack of consideration of these imply that new or materially different environmental effects may be missing from the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.</p>	<p>The Applicant considers that the assessments undertaken within Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056], its five appendices and volume of figures and visualisations allow comprehensive consideration of the proposals by stakeholders. As described in Appendix 15.2: Seascape, landscape and visual impact assessment methodology, Volume 4 of the ES [APP-158] (para 1.4.6 – 1.4.9) the approach to the appropriate and proportionate level of assessment is tiered, in line with the wider EIA methodology, using a ‘simple’ or ‘detailed’ assessment’. The simple assessment undertaken in Appendix 15.3: Simple Seascape, landscape and visual impact assessment, Volume 4 of the ES [APP-158] identifies which receptors are unlikely to be significantly affected, which are subject to a simple assessment, and those receptors that are more likely to be significantly affected by the offshore elements of Rampion 2, which require a ‘detailed assessment’. The simple assessment is informed by baseline data collection (for example desk-based information) and modelling such as ZTV analysis Figures 15-18 to Figure 15-21, Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 2 of 8 and Part 3 of 8), Volume 3 of the ES [APP-089-090]. Receptors such as LCAs within the wider SLVIA study area may not have been taken forward into the detailed assessment despite having a high percentage of area with ZTV visibility, due to the consideration of other determining factors, such as their distance from the DCO Order Limits (array area), limited areas with visibility, the extent of vegetation cover providing further screening (Figure 15-15 Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 2 of 8 and Part 3 of 8), Volume 3 of the ES [APP-089-090]) or existing development context influences that are such that significant effects on perceived character were considered unlikely. The Applicant considers that the receptors scoped into the detailed assessment represent those from which likely significant effects of Rampion 2 (array area) may occur and as such these are assessed in the detailed assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056],</p>

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5.6	<p><u>5.6. Rampion 1 decommissioning</u> 5.6.1. Despite being requested at an earlier stage, there is still no separate assessment of effects of Rampion 2 proposals after the decommissioning of Rampion 1.</p>	<p>The Applicant's approach to assessing the effects of Rampion 2 proposals after the decommissioning of Rampion 1 is set out above in response to reference 6.17(c) of the Local Impact Report.</p>
6.1	<p>6. SEASCAPE, LANDSCAPE AND VISUAL: IMPACTS <u>6.1. Rampion 2 Design Principles</u> 6.1.1. The SLVIA (APP-056, Table 15-26, page 281-285) includes embedded environmental measures adopted to reduce the potential for impacts on seascape, landscape and visual. 6.1.2. These include C-61 that states that 'Due regard will be given to design principles held in Rampion 1 Design Plan and design principles to be developed for Rampion 2, with consideration of the seascape, landscape and visual impacts on the South Downs National Park and Sussex Heritage Coast.' 6.1.3. The SLVIA also sets out the Rampion 2 design principles (AP-056, Section 15.7.24, page 288-289) and states that the aim of these is to reduce 'the magnitude and geographic extent of seascape, landscape and visual effects of the Proposed Development and minimising harm to the special qualities of nationally designated landscapes, particularly the SDNP and the associated Sussex Heritage Coast.' 6.1.4. The SDNPA are of the opinion that these principles are key to addressing the potential effects of Rampion 2 on the SDNP and have reviewed them accordingly.</p>	<p>The Applicant notes that the South Downs National Park Authority consider that the design principles are key to addressing the potential effects of Rampion 2 on the South Downs National Park. These design principles are set out in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (Section 15.7) and are discussed further in the Applicant's deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p>
6.2	<p>6.2. SDNPA PEIR REVIEW 2021 6.2.1. The SDNPA set out recommendations for five design principles in their August 2021 PEIR Review response to advise on scheme improvements.</p> <ul style="list-style-type: none"> • Development should only occur within the Extension Area west of Rampion 1. • Turbines should not exceed 225m to blade tip in height. • Clear separation between Rampion 1 and 2 to minimise the horizontal extent. • Turbine layout is designed in coherent blocks. • Full north to south extent of the extension area should be utilised to maximise the size of east/west gaps between the arrays. <p>•</p> <p>6.2.2. These were based recommendation in a report commissioned by the SDNPA from White Consultants in January 2021 (Appendix C of SDNPA Written Representation).</p> <p>6.2.3. This report in turn drew on the findings in the Offshore Energy Strategic Environmental Assessment (OESEA): Review and update of Seascape and Visual Buffer study for Offshore Wind farms commissioned by the Department for Business, Energy and Industrial Strategy (BEIS as it was then), undertaken in 2020 (APP056). In particular, this report advised that the combination of National Park and Heritage Coast is particularly sensitive and needs to be given great weight in the planning balance.</p>	<p>The Applicant's comments with regards to how the Proposed Development addresses the design principles recommended by the SDNPA is set out above in response to reference 3.4.5 of the Local Impact Report (Table 2-1).</p>
6.3	<p>6.3. SLVIA: Design Principles 6.3.1. The SLVIA (APP-056, Section 15.7.8 Page 286) sets out the four design principles:</p> <ul style="list-style-type: none"> • 'Field of view' – reducing the field of view or 'horizontal extent/lateral spread' of Rampion 2 and the visually combined lateral spread of Rampion 1 and Rampion 2. 	<p>The Applicant notes these references to the Seascape, landscape and visual impact assessment (SLVIA) Design Principles in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056].</p>

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	<ul style="list-style-type: none"> • 'Proximity' - increasing the distance of Rampion 2 from most sensitive areas of coastline to reduce the apparent height of WTGs and increase sense of remoteness (with consequential benefits to other design principles). • 'Wind farm separation zones' - achieving a separation between Rampion 1 and Rampion 2 arrays, with a clear distinction and clear lines of sight between arrays. • 'Separation foreground' - avoiding juxtaposition of larger Rampion 2 WTGs in front of smaller Rampion 1 WTGs, to balance arrays and apparent turbine size, insofar as possible. <p>6.3.2. The SLVIA (APP-056, Section 15.7.25 Page 286) sets out that 'RED have explored the potential impacts of the array area boundary in respect of these principles and arrived at a project design that responds to these combined principles. The design principles were translated into the array area boundary by exploring the relationship of the spatial extent of WTGs within the array area and the resulting visual impacts with these principles, with the aim of minimising impacts and harm to special qualities of the SDNP, particularly its 'breathtaking views' and showing regard to the statutory purpose of the SDNP'</p>	
<p>6.4</p>	<p><u>6.4. Commentary on Design Principles</u></p> <p>6.4.1. None of the SDNPA recommended Design Principles are reflected in the Proposed Development submitted.</p> <p>6.4.2. Whilst the stated Design Principles appear to be well reasoned and capable of having a positive effect, they only go so far and need more discussion and review to work towards improving the development proposals.</p> <p>6.4.3. On this basis the SDNPA are still of the opinion that the significant adverse effects on the SDNP, its Statutory Purposes and its Special Qualities remain.</p>	<p>The Applicant considers that the seascape, landscape and visual impact assessment (SLVIA) Design Principles are reflected in the spatial extent of the proposed DCO Order Limits (array area) (Figure 15.1 Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3 of the Environmental Statement [APP-088]).</p> <p>The Applicant welcomes feedback that the Design Principles appear to be well reasoned and capable of having a positive effect.</p> <p>The Applicant recognises that the offshore elements of Rampion 2 will result in some significant effects on views and perceived qualities of the South Downs National Park (SDNP) and the Heritage Coast, effects of major significance in EIA terms have been avoided. As noted in response to 3.1 above, the Applicant's position is that whilst some harm would be caused to 'panoramic views to the sea' defined in Special Quality 1, this would not compromise the statutory purpose of the SDNP. The majority of the SDNP's special qualities would be unaffected by the offshore elements of the Proposed Development; '<i>panoramic views of the sea</i>' and '<i>breathtaking views</i>' would still be experienced; and opportunities will remain for understanding and enjoyment of the special qualities of the SDNP.</p>
<p>6.5</p>	<p><u>6.5. Detailed commentary on 'Field of view' principle:</u></p> <p>6.5.1. Whilst the area of the turbines and therefore the field of view has been reduced from that indicated at Scoping and PEIR stages, the FOV is still extensive and gives rise to significant adverse seascape, landscape and visual impacts on the SDNP, its Purposes and Special Qualities.</p> <p>6.5.2. The seascape setting of the SDNP is already adversely affected by the industrialised nature of the seascape provided by the Rampion 1 array. The addition of the Rampion 2 array will cumulatively extend this adverse impact with a considerable number of WTGs extending both westwards and southwards. This does not address the SDNPA recommendations that '<i>Development should only occur within the Extension Area west of Rampion 1</i>'.</p>	<p>The influence of the 'field of view' design principle is discussed further in paragraphs 15.7.29 to 15.7.34 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] with further commentary provided in the Applicant's deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p> <p>In particular, the Applicant would note that particular regard was given to limiting the Horizontal Field of View (HFoV) occupied by Rampion 2 in 'panoramic views to the sea' experienced from the Heritage Coast of the SDNP. This coastline of the SDNP</p>

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	<p>6.5.3. The adverse effects on views are compounded by the layering effects of the proposed Rampion 2 array behind Rampion 1, clearly visible in views from the SDNP.</p> <p>6.5.4. The SLVIA (APP-056, section 15.15.8 page 509) sets out that ‘Significant seascape, landscape and visual effects of the offshore elements of Rampion 2 are contained within the areas of the SDNP, West Sussex, East Sussex and the City of Brighton & Hove.’</p> <p>6.5.5. The proposals give rise to a substantial increase in the loss of open and unspoilt views of the seascape, significantly adversely affecting the Statutory Purpose 1 of the SDNP to ‘conserve and enhance the natural beauty’ and SDNP Special Qualities ‘breathtaking views’ and ‘tranquil and unspoilt places’ and are therefore not in line with the requirement of NPS EN-1.</p>	<p>has the most prominent association with the seascape along its section of coastal cliffs forming the maritime edges of the SDNP, from which there are ‘panoramic views of the sea’ defined in SDNP Special Quality 1. The Applicant considers that the additional HFoV added by Rampion 2 is not ‘extensive’ and that it occupies a relatively narrow portion of the overall view - an additional 6.5° from Beachy Head and 7.3° from Birling Gap. Significant effects on these more distant viewpoints from the Heritage Coast are avoided.</p> <p>The way that the Applicant has done that is to characterise the seascape and landscape character, and to identify and assess viewpoints that are specific to the special qualities of the SDNP, with these assessments informing the embedded design measures needed to reduce effects/harms. The design principles shaped the reduction in spatial extent of the offshore array between Scoping, PEIR and ES is shown in Figure 15.2 Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3 of the ES [APP-088]. The reduction in effect is evident in the comparative wirelines in Figures 15.93 – 15.109 Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 8 of 8), Volume 3 of the ES [APP-095].</p> <p>The Applicant cannot commit to developing only within the Extension Area west of Rampion 1. Parts of the Zone 6 area were previously considered acceptable as part of the Rampion 1 consented area and these areas to the south of Rampion 1 are considered to afford some opportunity and capacity for development. It is recognised that ‘layering effects’ occur where the larger Rampion 2 WTGs are viewed behind the smaller Rampion 1 WTGs, however these areas to the south of Rampion 1 are considered to avoid the adverse scale juxtaposition of larger Rampion 2 WTGs in front of Rampion 1 (which has been avoided through the ‘separation foreground’ principle i.e. avoiding WTGs to the east of Rampion 1.</p> <p>The Applicant notes that offshore elements of Rampion 2 are located outside the SDNP and are visible from within it, and that in itself should not be a reason for refusing consent as stated in NPS-EN-1 (para 5.9.13). The aim has to been to reduce effects on the SDNP special qualities, insofar as possible around various siting, operational, viability constraints; and to avoid compromising the purposes of designation in line with NPS-EN-1 (paragraph 5.9.12). These changes made to the DCO order limits have reduced the adverse effects of Rampion 2 on the Heritage Coast of the SDNP (which is recognised by Natural England and the SDNP). As noted in response to 6.4 above, the Applicant’s position is that whilst some harm would be caused to ‘panoramic views to the sea’ defined in Special Quality 1, this would not compromise the statutory purpose of the SDNP.</p>
6.6	<p><u>6.6. Detailed commentary on ‘Proximity’ principle:</u></p> <p>6.6.1. Whilst it is agreed that the proximity to the most sensitive areas of coastline to the east has been reduced in the development proposals from that set out in the PEIR by increasing their distance from the coastline, proximity to other areas remains unchanged, and the substantial height of the proposed WTGs remains a significant effect, particularly in combination with the Rampion 1 array.</p>	<p>The influence of the ‘proximity’ design principle is discussed further in paragraphs 15.7.35 to 15.7.40 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] with further commentary provided in the Applicant’s deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p>

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	<p>6.6.2. The maximum design scenario sets out that the WTGs will be substantially taller in height at 325m than the Rampion 1 turbines at 140m. This is 100m taller than the SDNPA recommendations, and more than double the height of the existing array.</p>	<p>In particular, the Applicant would note that the spatial extent of the array area has been reduced considerably through the removal of part of the eastern Zone 6 area and as a result, wind turbine generators (WTGs) within the proposed DCO Order Limits are located at notably greater distance from the Heritage Coast of the South Downs National Park (SDNP). The increased distance of Rampion 2 from the Heritage Coast is evident in Figure 15.13 Comparative zone of theoretical visibility (ZTV) Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 1 of 8), Volume 3 of the ES [APP-088] with the increased distance offshore being in the order of 7km from viewpoints in the Heritage Coast (Table 15-27 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]).</p>
	<p>6.6.3. In comparison to the Rampion 1 WTG heights, the proposed WTG height of 325m is too substantial for the reduced proximity to the most sensitive coastline to mitigate the significant effects of the WTGs. This is most clearly illustrated in the following figures (not an exhaustive list):</p>	<p>The Applicant would note that the proximity of the array area to ‘other areas’ of the SDNP does not ‘remain unchanged’ and the proximity has been reduced from the Open Downs of Landscape Character Area (LCA) A1 to north-east including from Viewpoint 15, 16, 17, 27, 51, 57 and 58 (Table 15-27) and the closest coastline of the SDNP is now located 18.3km from the array area at the coastal cliffs between Brighton and Rottingdean (LCA S2).</p>
	<ul style="list-style-type: none"> • Figure 15.26e Viewpoint 1 Beachy Head (APP-091) • Figure 15.27e Viewpoint 2 Birling Gap (APP-091) • Figure 15.28e Viewpoint 3 Seven Sisters Country Park (APP-091) • Figure 15.29e Viewpoint 4 Seaford Head (APP-091) • Figure 15.51e Viewpoint 28 Cuckmere Haven Beach (APP-093) 	<p>With regards to the apparent scale of the WTGs, the Applicant notes that the reduced proximity to the most sensitive coastline (together with other design measures) has contributed to avoiding significant effects on the more distant areas and viewpoints of the Heritage Coast (including from Beachy Head at 31.9km Figure 15.26 Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091] and Birling Gap at 28.8km Figure 15.27 Chapter 15: Seascape, landscape and visual impact assessment – Figures (Part 4 of 8), Volume 3 of the ES [APP-091], where there will be a relative balance in appearance of the Rampion 1 and Rampion 2 arrays, and effects of ‘major’ significance avoided in these areas.</p>
	<p>6.6.4. In comparison to the Rampion 1 WTG heights, the proposed WTG height of 325m is too substantial for the reduced proximity to the SDNP to mitigate the significant effects of the WTGs. This is most clearly illustrated in the following figures (not an exhaustive list):</p>	<p>The significance of effects on views from the range of inland vantage points along the open tops of the downs (such as those listed by the South Downs National Park Authority) is recognised in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056], due in part to the lateral spread of the western extension area and the apparent scale of the Rampion 2 WTGs.</p>
	<ul style="list-style-type: none"> • Figure 15.41e Viewpoint 16 Firle Beacon (APP-092) • Figures 15.43 e and 15.43f Viewpoint 18 Cissbury Ring (APP-093) • Figure 15.46e Viewpoint 21 Bignor Hill (APP-093) • Figure 15.50e Viewpoint 27 Hollingbury Golf Course / Hill Fort (APP-093) • Figure 15.63e Viewpoint 50 The Trundle (APP-094) • Figure 15.65e Viewpoint 52 Chanctonbury Ring (APP-094) 	<p>While it is accepted that WTGs of smaller scale than proposed by the Applicant would reduce differences in apparent scale/contrasts in size when compared to Rampion 1 and reduce the magnitude of change and likely significance of effects, the Applicant cannot commit to WTGs of 225m maximum blade tip height recommended by the South Downs National Park Authority (as set out above in response to 3.4.5 of the Local Impact Report). The Applicant would highlight that offshore WTGs of 225m maximum blade tip height would not be commercially available at the point of delivery and material planning policy in National Policy Statement (NPS) EN-1 (DESNZ, 2023b) (para 2.8.253) states that “Neither the design nor scale of individual wind turbines can be changed without significantly affecting the electricity generating output of the wind turbines. Therefore, the Secretary of State should expect it to be unlikely that mitigation in the form of reduction in scale will be feasible”.</p>
	<p>6.6.5. Other viewpoints within the SDNP are included but without visualisations to assist consideration by stakeholders. Review of these relies on wire frames and in indicative line showing the extent of the Rampion 2 proposed development in comparison to Rampion 1. This is most clearly illustrated in the following figures (not an exhaustive list):</p>	
	<ul style="list-style-type: none"> • Figure 15.45b Viewpoint 20 Springhead Hill (APP-093) • Figure 15.53b Viewpoint 30 Halnaker Windmill North of Chichester [incorrectly described as east of Chichester] (APP-093) 	
	<p>6.6.6. Section 15.7.37 (APP-056, page 291) states that ‘The increase in distance offshore and reduction in apparent scale that has been achieved by the revised spatial extent of the array area is evident in the comparative wirelines presented in Figures 15.93 to 15.109 (APP-095). The scale of the Rampion 2 WTGs will appear smaller relative to the scale of the receiving seascape compared with the apparent scale of the PEIR MDS’.</p>	
	<p>6.6.7. Whilst the SDNPA accept that reductions have been achieved, there are still significant seascape, landscape and visual effects.</p>	

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	<p>6.6.8. The contrast in size with the Rampion 1 WTGs, combined with the close proximity and visual layering of the two arrays leads to visual discord and incoherence, gives rise to significant adverse effects on the Statutory Purpose 1 of the SDNP to 'conserve and enhance the natural beauty' and SDNP Special Qualities 'breathtaking views' and 'tranquil and unspoilt places' and are therefore not in line with the requirement of NPS EN-1.</p> <p>6.6.9. The close proximity to the coast gives rise to significant adverse effects on the Statutory Purpose 1 of the SDNP to 'conserve and enhance the natural beauty' and SDNP Special Qualities 'breathtaking views' and 'tranquil and unspoilt places' and are therefore not in line with the requirement of NPS EN-1.</p>	<p>As set out above in response to reference 3.4.2 of the Local Impact Report (Table 2-1), the Applicant does not agree that the array area is in 'close proximity' to the SDNP or Heritage Coast as described by the South Downs National Park Authority and it is the position of the Applicant that whilst some harm would be caused to 'breathtaking views' and 'panoramic views to the sea', this would not compromise the purpose of the SDNP designation and that the Applicant has aimed to minimise harm to the South Downs National Park in line with NPS EN-1 (DECC, 2011a).</p>
6.7	<p>6.7. Detailed commentary on 'Wind farm separation zones' principle:</p> <p>6.7.1. Whilst separation zones are shown between Rampion 1 and the proposed Rampion 2 WTG locations, the separations are only apparent in a small proportion of views; of 69 viewpoints, the separations are visible in 15.</p> <p>6.7.2. Looking westwards from the heritage coast the north-south separation is clear in Viewpoints 1, 2 (APP-091) and 28 (APP-093) from the heritage coast, with visible separation in Viewpoint 3 (APP-091) present but less pronounced than with the other views.</p> <p>6.7.3. Looking south from the elevated area of the SDNP the east-west separation is visible in Viewpoints 17 (APP092), 18, 19 (APP-093), 52, 53, 54, 55 (APP-094) from elevated areas of the SDNP. 6.7.4. It should be noted that:</p> <ul style="list-style-type: none"> • Viewpoint 18 (APP-093): both the visualisations and the wireframe images are split across two pages without a clear overlap, so the full extent of the separation is unclear. • Viewpoint 52 (APP-094): only the wider wireframe image shows the extent of the separation, with the visualisations and corresponding wireframe images again split across two pages. • Viewpoints 53, 54 and 55 (APP-094): Review of these viewpoints relies on wire frames and in indicative line showing the extent of the proposed Rampion 2 development in comparison to Rampion 1; no visualisations are provided to assist consideration by stakeholders. <p>6.7.5. The east-west separation is also clear in Viewpoints 9, 10 (APP-092), E, F (APP-095) from the coastline of West Sussex.</p> <p>6.7.6. However, it should be also noted that there are no views that show a clear separation of the two wind farms:</p> <ul style="list-style-type: none"> • In views where the separation lies south of Rampion 1, the western WTGs of Rampion 2 are visible behind Rampion 1. • In views where the separation lies west of Rampion 1, the eastern WTGs of Rampion 2 are visible behind Rampion 1. <p>6.7.7. The lack of separation and overlap of the Rampion 1 and proposed Rampion 2 arrays gives rise to visual incoherence that has significant adverse effects on the Statutory Purpose 1 of the SDNP to 'conserve and enhance the natural beauty' and SDNP Special Qualities 'breathtaking views' and 'tranquil and unspoilt places' and are therefore not in line with the requirement of NPS EN-1.</p>	<p>The influence of the 'wind farm separation zones' design principle is discussed further in paragraphs 15.7.41 to 15.7.46 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] with further commentary provided in the Applicant's deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p> <p>In particular, the Applicant would note that the inclusion of the 'wind farm separation zones' design principle successfully acts to significantly reduce seascape and visual effects on the most sensitive views from parts of the Heritage Coast of the South Downs National Park (with which Natural England are in agreement) [RR-265].</p> <p>The Rampion 2 design principle focused on providing wind farm separation zones between each of the western and eastern array areas with Rampion 1, so that they will in particular key views, be viewed with a clear distinction and so that the apparent scale difference of the Rampion 1 and Rampion 2 wind turbine generators (WTGs) would be minimised, insofar as possible. These key views from which separations are apparent are noted by the S South Downs National Park Authority and in the Applicant's Deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p>

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6.8	<p><u>6.8. Detailed commentary on 'Separation foreground' principle</u></p> <p>6.8.1. This principle is welcomed, but there are still adverse effects due to the substantial contrast between the size of the Rampion 2 and Rampion 1 WTGs and the close proximity of the two arrays.</p> <p>6.8.2. The SLVIA (APP-056, Section 15.7.51, page 300) states that 'In views from central areas of SDNP, such as Viewpoints 17, 18, 19, 52, 53, 54 and 55 the southern Rampion 2 array will be viewed behind Rampion 1, taking advantage of the greater distance offshore and the effects of perspective to reduce the apparent scale differences between Rampion 1 and Rampion 2 WTGs. Rampion 2 WTGs sited behind Rampion 1 have less scale difference than if they were located to the fore of Rampion 1.'</p> <p>6.8.3. The effects of perspective may be found to reduce adverse effects where there is less contrast between sizes of the WTGs, however the substantial size difference between the Rampion 1 and 2 WTGs and close proximity of the two arrays give little benefit from perspective effects.</p> <p>6.8.4. This leads to visual discord and incoherence, gives rise to significant adverse effects on the Statutory Purpose 1 of the SDNP to 'conserve and enhance the natural beauty' and SDNP Special Qualities 'breathtaking views' and 'tranquil and unspoilt places' and are therefore not in line with the requirement of NPS EN-1.</p>	<p>The influence of the 'separation foreground' design principle is discussed further in paragraphs 15.7.47 to 15.7.52 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] with further commentary provided in the Applicant's deadline 1 submission – 8.35 SLVIA Maximum Design Scenario and Visual Design Principles Clarification Note [REP1-037].</p> <p>The Applicant notes that this principle is welcomed by the South Downs National Park Authority and accepts that contrasts in the size/apparent scale of the Rampion 2 WTGs compared to the smaller Rampion WTGs contributes to the magnitude of change and significance effects, as reported in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] and the detailed viewpoint assessment undertaken in Appendix 15.4: Viewpoint assessment, Volume 4 of the ES [APP-160].</p> <p>While it is accepted that WTGs of smaller scale than proposed by the Applicant would reduce differences in apparent scale/contrasts in size when compared to Rampion 1 and reduce the magnitude of change and likely significance of effects, the Applicant cannot commit to WTGs of 225m maximum blade tip height recommended by the SDNPA (as set out above in response to reference 3.4.5 of the Local Impact Report (Table 2-1)).</p>
6.9	<p><u>6.9. Size of turbines</u></p> <p>6.9.1. The Commitments Register C-37 sets out that the 'maximum blade tip height will be 325m from lowest astronomical tide (LAT) and the maximum rotor diameter will be 295m.' In comparison the Rampion 1 turbines are substantially smaller, with the tip of the turbine blade reaching 140m above the lowest astronomical tide and the rotor diameter at 112m. The maximum sizes are substantially greater than the Rampion 1 turbines.</p> <p>6.9.2. Where the proposed turbines are seen in conjunction with the Rampion 1 turbines, the difference in size will be clearly visible, as demonstrated by the visualisations in both Chapter 18 the SLVIA and the layering of Rampion 2 behind Rampion 1 in views gives rise to considerable visual incoherence about distances and heights in views. The juxtaposition of Rampion 1 and proposals will make the bigger Rampion 2 turbines appear to be closer to the viewer.</p> <p>6.9.3. Should a smaller WTG be used, the SDNP would welcome this, but still consider that this will also result in significant adverse seascape, landscape and visual effects.</p>	<p>The Applicant notes that the Rampion 1 turbines (140m to blade tip) are substantially smaller than the maximum height Rampion 2 WTGs proposed (325m to blade tip), and that where they are seen in conjunction, the difference in size will be notable to viewers particularly from the range of inland vantage points along the open tops of the downs, however it is considered that this scale difference appears less notable and more balanced in key views from the Heritage Coast of the South Downs National Park due to the design principles embedded with the Project. These design measures have reduced effects on views from the Heritage Coast in particular, but also from wider parts of the South Downs National Park, in particularly reducing the field of view occupied by Rampion 2, reducing its proximity (increasing its distance) and providing separation with Rampion 1 such that the arrays are viewed with less contrasts in scale and as distinct elements from the Heritage Coast.</p> <p>The Applicant notes that the South Downs National Park Authority recommends that a smaller WTG should be used, yet that it still considers this would result in significant adverse seascape, landscape and visual effects. The benefits of reducing the scale of the WTGs are therefore not clear to the Applicant if such a reduction in WTG scale would be unlikely to provide mitigation. Reductions in the scale of WTGs proposed would significantly affect the electricity generating output of the Project and WTGs of the scale recommended by the SDNPA would not be commercially available at the point of delivery.</p>
7.1	<p>7. LANDSCAPE AND VISUAL: METHODOLOGY</p> <p><u>Landscape and Visual Assessment Methodology (APP-167)</u></p> <p><u>7.1. Consideration of all adverse effects</u></p>	<p>Please see responses to the South Downs National Park Authority Local Impact Report Section 6 in Table 2-1 of this document.</p>

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	<p>7.1.1. NPPF Para 176 sets out that ‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks 58 Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.’ [SDNPA emphasis in bold]</p> <p>7.1.2. SDNP Local Plan 2019 Strategic Policy SD4: Landscape Character sets out that ‘1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that: a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located; b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape; c) They will safeguard the experiential and amenity qualities of the landscape’.</p> <p>7.1.3. The implications of these national and regional policy are that any adverse effects should be avoided, not simply significant effects. The SDNPA understand that a project such as Rampion 2 will inevitably have adverse effects and that the planning balance has to be considered.</p>	
7.2	<p><u>7.2. Baseline</u></p> <p>7.2.1. The SDNPA suggest it is of key importance to note that the Rampion 1 windfarm was not constructed when the SDNP Special Qualities were set out, and suggest that Rampion 1 has already provided a significant level of harm to the Special Qualities, which is not taken into consideration in the assessment.</p>	<p>The Applicant’s approach to assessing the baseline and cumulative effects is set out above in response to reference 3.4.7 and 6.17(c) of the South Downs National Park Authority Local Impact Report in Table 2-1 and Written Representation reference 5.1 in Table 2-2.</p> <p>With respect to the landscape and visual impact assessment (LVIA) (see Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059], the Rampion 1 windfarm forms part of the baseline within the timescales for the LVIA assessment covering construction and the early years of operation.</p> <p>Despite the presence of the Rampion 1 windfarm, the special qualities of the South Downs National Park were found to be strongly expressed and assessed as of high value.</p>
7.3	<p><u>7.3. Consideration of Whole Development effects:</u></p> <p>7.3.1. The methodology (APP-167, Section 1.2.5, page 5) sets out that ‘The assessment has also considered the whole Proposed Development or combined effects of the offshore and onshore elements of the Proposed Development, as well as the cumulative effects likely to result from the Proposed Development and other similar committed developments’.</p> <p>7.3.2. The methodology (APP-167, Section 1.2.8, page 6) sets out that ‘The LVIA also refers to potential interrelated effects likely to result from any areas where the construction, operation and maintenance, and decommissioning of the offshore and onshore elements combine, or inter-relate to affect receptors within the LVIA Study Area. An example includes effects on views where both offshore and onshore elements are visible, potentially resulting in whole Proposed Development landscape and visual effects as a result of the construction, operation and decommissioning of the onshore and offshore elements. In those instances, the LVIA provides whole Proposed Development assessment focusing on the onshore</p>	<p>The Applicant’s approach to assessing the baseline and cumulative effects is set out above in response to the South Downs National Park Authority Written Representation in reference 3.4.7 and 5.1 in Table 2-2 of this document.</p> <p>The Applicant’s approach to whole project effects is set out above in response to reference 3.7.1-4 of the Written Representation in Table 2-2 of this document.</p>

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	<p>elements that will be referenced for consistency in the SLVIA. The SLVIA also provides Whole Proposed Development assessment focusing on the offshore elements.'</p> <p>7.3.3. This is also mentioned in the SLVIA at section 15.8.8 (APP-056).</p> <p>7.3.4. The SLVIA (APP-056, Section 15.6.27, page 179) states that 'The ZTV in Figure 15.22, Volume 3, of the ES (Document Reference: 6.3.15) shows areas where Rampion 2 and the existing Rampion 1 wind farm will be visible in combination (green areas on ZTV); and where they will be visible alone (i.e. without the other). Rampion 2 will often be viewed in combination with the operational Rampion Offshore Wind Farm (green areas), in particular from the main areas of higher theoretical visibility (i.e., from the immediate coastal edges and hinterland of Sussex Bay between Selsey Bill and Beachy Head; the coastal plateau; the white cliffs of the Sussex Heritage Coast and slopes of the South Downs). In views from these areas, Rampion 2 will result in visual effects arising from the appearance of Rampion 2 when viewed in combination with Rampion 1. The apparent height of the larger Rampion 2 turbines (up to 325m) relative to the smaller operational turbines (140m) is likely to be central to the potential for cumulative visual effects arising from these areas.</p> <p>7.3.5. Given the substantial geographic extent illustrated on Figure 15.22 (APP-090) where Rampion 2 has theoretical visibility from in combination with Rampion 1, the SDNPA considers that the use of the Study Area alone in considering the Whole Proposed Development landscape and visual effects is inadequate. The SDNPA understand the need for a proportionate approach, however suggest that the LVIA study area is limited to such a narrow area around the DCO limit that it is likely to fail to assess the full range of landscape and visual receptors likely to be significantly impacted, which will be wide-ranging as indicated by Zones of Theoretical Visibility (ZTVs) in both the SLVIA (APP-090 Figures 15.18- 15.24) and the LVIA (APP-098 Figures 18.4a-18.4d) and have the potential for increased significant and unacceptable effects on the SDNP with its open downland, varied topography and long views. This lack of consideration implies that new or materially different environmental effects may be missing from the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.</p>	
7.4	<p><u>7.4. Landscape effects of the Whole Proposed Development</u></p> <p>7.4.1. It should be noted that the effects of the Whole Proposed Development can be both landscape and visual.</p> <p>7.4.2. The Landscape Assessment (APP-169) does not consider that Whole Proposed Development will give rise to any landscape effects and states in the SDNP LCA tables (Tables 2-9 to 2-13, pages 49-76) that 'The offshore elements of the Proposed Development including the wind turbines and offshore substations will be limited to visual effects as reported in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES (Document Reference: 6.2.15).'</p> <p>7.4.3. This is a misinterpretation of the SLVIA which does indeed set out effects on landscape character and the SDNP Special Qualities. The landscape effects are summarised (APP-056, Table 15-29 (pages 343-361) showing there are significant effects on LCA A1 Ouse to Eastbourne Open Downs, LCA A2 Adur to Ouse Open Downs, LCA A3 Arun to Adur Open Downs, LCA S1 Seaford to Beachy Head Shoreline and LCA S2 Brighton to Rottingdean. It should be noted that there are other effects states as not significant, however these are still adverse effects on the SDNP.</p>	<p>The Applicant's approach to whole project effects is set out above in response to reference 3.7.1-4 in Table 2-2 of this document.</p> <p>The Applicant's approach to the consideration of factors that contribute to landscape value (including scenic quality, aesthetic qualities, tranquillity, historic landscape character) is set out above in response to reference 3.5.3-4 of the Written Representation (Table 2-2). These factors are listed as part of the key characteristics of the landscape character areas and in all cases the value of these qualities has been assessed in the landscape and visual impact assessment as high.</p>

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	<p>7.4.4. The Landscape Institute's Technical Guidance Note 02-21 forms part of industry guidance for professionals (Appendix A1 of this Review). Whilst it states it does not apply to national landscape designations, it provides a far more in-depth range of factors for consideration in respect of landscape value, which the SDNPA fee is helpful for explaining the range of perceptual effects that should be also considered when providing assessments that relate to national landscape designations, such as the SDNP.</p> <p>7.4.5. There is no consideration of scenic perceptual landscape effects, set out in the Landscape Institute's Technical Guidance Note 02-21 as 'Landscape that appeals to the senses, primarily the visual sense: Distinctive features such as dramatic or striking landform or harmonious combinations of land cover; strong aesthetic qualities such as scale, form, colour, and texture; presence of natural lines in the landscape; visual diversity or contrasts which contribute to appreciation; memorable/ distinctive views and landmarks, or landscape which contributes to such.'</p> <p>7.4.6. There is no consideration of perceptual landscape effects (wildness and tranquillity) set out in the Landscape Institute's Technical Guidance Note 02-21 as 'Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies: High levels of tranquillity or perceptions of tranquillity, including perceived links to nature, presence of wildlife / birdsong and relative peace and quiet; presence of wild land and perceptions of relative wildness (resulting from a high degree of perceived naturalness, rugged or otherwise challenging terrain, remoteness from public mechanised access and lack of modern artefacts); sense of particular remoteness, seclusion or openness; dark skies'.</p> <p>7.4.7. There is no consideration of the effects of the proposed development on historic landscape character. set out in the Landscape Institute's Technical Guidance Note 02-21 as 'Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape. Presence of historic landmark structures or designed landscape elements (e.g., follies, monuments, avenues, tree roundels) Presence of historic parks and gardens, and designed landscapes Landscape which contributes to the significance of heritage assets, for example forming the setting of heritage assets (especially if identified in specialist studies) Landscape which offers a dimension of time depth. This includes natural time depth, e.g. presence of features such as glaciers and peat bogs and cultural time depth e.g. presence of relic farmsteads, ruins, historic field patterns, historic rights of way (e.g. drove roads, salt ways, tracks associated with past industrial activity)'</p> <p>7.4.8. The SDNPA considers this to be a substantial omission in the assessment. These are perceptual qualities that underpin the SDNP's Special Qualities that support the SDNP Statutory Purposes. The lack of consideration of these Whole Proposed Development landscape effects implies that new or materially different environmental effects may be missing from the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.</p>	
7.5	<p><u>7.5. Visual effects of the Whole Proposed Development</u></p> <p>7.5.1. In respect of the SDNP, visual effects would be experienced in areas where both onshore cable route and offshore WTGs can be seen from the same position.</p> <p>7.5.2. Many of the viewpoint figures in the LVIA include views of the sea, however whilst they show indicative wireframe locations of onshore elements, the location of offshore elements is not shown. This does not give the opportunity to consider the visual effects of the Whole Proposed development.</p>	<p>Visual effects of the Whole Proposed Development: (References 7.5.1-3)</p> <p>A large number of viewpoints have been provided and it is considered that when taken together these provide sufficient information to inform whole project effects.</p> <p>Defining the Study Area: (references 7.5.4-15) - Please refer to the Applicant's response in Reference 3.5.1-2 (Table 2-2).</p>

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7.5.3. In addition, a side-by-side comparison of the onshore and off-shore elements from viewpoints is not possible as different viewpoint locations have been used for the SLVIA and the LVIA.

Defining the Study Area:

7.5.4. The SLVIA (APP-056, Sections 15.8.15 and 15.8.16, page 307) states 'The geographic extent over which the seascape/landscape and visual effects will be experienced is also assessed, which is distinct from the size or scale of effect. This evaluation is not combined in the assessment of the level of magnitude, but instead expresses the extent of the receptor that will experience a particular magnitude of change and therefore the geographical extents of the significant and not significant effects' and 'The extent of the effects varies depending on the specific nature of Rampion 2 and is principally assessed through analysis of the extent of perceived changes through visibility of the Rampion 2 Offshore Wind Farm.'

7.5.5. The SDNPA would expect the SLVIA and the LVIA to have a jointly considered approach to their Study Areas, however this does not appear to be the case.

7.5.6. The SDNPA accepts that there needs to be a proportional approach to the LVIA, however the LVIA methodology (APP-167, Section 1.2.13, page 7) states out that 'The Study Area for the LVIA is illustrated in Figure 18.1, Volume 3 (Doc. Ref. 6.3.18) and extends to a 2km buffer beyond the proposed DCO Order Limits.' The LVIA methodology (APP-167, Section 1.2.14, page 7) sets out that a proportional approach has been taken and that the 'study area must be large enough to capture all likely significant effects'.

7.5.7. GLVIA para 5.2 (page 70) sets out that 'the study area should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner' [SDNPA emphasis in bold]

7.5.8. The SDNP are concerned that by limiting the LVIA study zone to such an extent prior to assessment is unlikely to 'capture all likely significant effects'.

7.5.9. The implication of using a 2km buffer for the LVIA is clearly seen when considering the ZTV produced for the SLVIA (SLVIA (APP-090 Figures 15.18- 15.24) where the visibility of Rampion 2 extends across a substantial area of the south coast and the ZTV produced for the LVIA (APP-098 Figures 18.4a-18.4d)) which show that the visibility of the onshore cable corridor extends across a substantial area of the SDNP.

7.5.10. Despite the wide geographical extents shown on the ZTVs, Figure 18.1 (APP-098) which shows a very limited the buffer zone, at 2km, set from the centre of the proposed DCO Order Limits, which appears to form the basis for other figures going forwards.

7.5.11. The limitations of such a restricted Study Area imply that new or materially different environmental effects may be missing from the ES. This in turn does not allow for appropriate mitigation strategies to be developed or allow comprehensive consideration of the proposals by stakeholders.

7.5.12. The DCO Order Limits include areas around all access routes, as well as the cable route, however the indicated buffer zone does not included the full extent required, , for example there are access roads close to Findon that lie outside the 2km buffer zone.

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	<p>7.5.13. The LVIA methodology (APP-167, Section 1.2.16, page 8) states that 'The LVIA Study Area therefore defines a limit, based on...knowledge of similar projects including East Anglia TWO and THREE, Rampion 1, Norfolk Vanguard and Thanet Extension offshore wind farms.</p> <p>7.5.14. With the exception of Rampion 1, the SDNPA do not consider these other projects to be similar, given the low lying nature of the topography of these areas compared to the distinctly varied topography and coastline of the SDNP.</p> <p>7.5.15. The SDNPA understand the need for a proportionate approach, however suggest that the LVIA study area is limited to such a narrow area around the DCO limit that it is likely to fail to assess the full range of landscape and visual receptors likely to be significantly impacted, which will be wide-ranging as indicated by Zones of Theoretical Visibility (ZTVs) in both the SLVIA (APP-090 Figures 15.18- 15.24) and the LVIA (APP-098 Figures 18.4a-18.4d) and have the potential for increased significant and unacceptable effects on the SDNP with its open downland, varied topography and long views</p>	
	<p>7.6. Definition of timescales</p> <p>7.6.1. Section 5.51 of GLVIA sets commentary on 'Duration and reversibility of landscape effects', and states 'duration can usually be judged on a scale such as short term, medium term or long term, where, for example., short term might be zero to five years, medium term five to ten years and long term ten to twenty five years. There is no fixed rule on these definitions and so in each case it must be made clear how the categories are defined and the reasons for this.'</p> <p>7.6.2. Chapter 5 Approach to the EIA (APP-078, Section 5.8.13, page 52) sets out that 'The temporal scope refers to the time periods over which impacts and effects may be experienced by sensitive receptors which may be permanent, temporary, long term or short term. This has been established for each aspect in discussion with relevant consultees.'</p> <p>7.6.3. The LVIA Methodology (APP-167, Section 1.5.17, page 22) states 'The duration or time period over which a landscape effect is effect is likely to occur is judged on a scale of 'short', 'medium' or 'long' term and is assessed for the onshore elements of the Proposed Development as follows: long-term – more than 10 years; medium-term – 6 to 10 years; and short-term – 1 to 5 years.'</p> <p>7.6.4. The SDNPA have not agreed on the temporal scope to date and there does not appear to be any explanation of the reasoning behind the length of the timescales used.</p> <p>7.6.5. It is unclear if the short-term period of time allows for the considerable survey and investigation work still required to establish the feasibility of the proposals, particularly the HDD.</p> <p>7.6.6. The SDNPA consider that the considerable timescale of 5 years is inappropriate to be a short term for a project with such a finite timescale for the construction phase. The SDNPA suggest that the terminology 'short-term' should apply to construction works only on a rolling basis as the construction works are completed, with all establishment phases falling under the 'long-term'. With the inclusion of establishment phases in the short-term assessment, this leads to an understatement of the assessed landscape and visual effects.</p> <p>7.6.7. Chapter 4 Proposed Development (APP-045, Graphic 4-24, page 83), sets out an indicative construction programme.</p>	<p>References 7.6.1-4: The landscape and visual impact assessment (LVIA) methodology (Appendix 18.1: Landscape and visual impact assessment methodology, Volume 4 of the Environmental Statement (ES) [APP-167]) accords with GLVIA 3 which also describes the duration of 'short term' effects as up to 5 years duration, 'medium term' effects as 6-10 years, and 'long term' effects as greater than 10 years. The LVIA methodology was provided to consultees to comment on at scoping.</p> <p>Reference 7.6.5: Survey and investigation work to prepare for trenchless crossings is included in the LVIA and forms part of the works described in the construction period in paragraph 4.5.39 of Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045].</p> <p>Reference 7.6.6: It is normal LVIA practice to assess construction effects separately from the operational effects. The LVIA construction effects are described as adverse and short term, involving the construction activities described in Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045]). These would be of a markedly different nature and geographical extent to the operational effects resulting from reinstatement. Replacement plants will grow and become established over a 5 Year period with maintenance continued until Year 10 with the nature, level and significance of these effects progressively reducing over this period.</p> <p>References 7.6.7-9: The LVIA assessment has assumed a 'worst case' that the maximum magnitude and level of effect assessed during construction will occur for a duration of 3.5-4 years. This is set out in the summary Tables 18.40-46 of Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059]. The LVIA also acknowledges that in practice the nature of the effects during construction are likely to fluctuate due to progressive restoration. As further detail on programme is develop during detailed design there will be greater certainty around phasing, duration and timing of the assessed effects which currently occur within the overall construction phase.</p>

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	<p>7.6.8. The programme shows the construction period for the HDD onshore cable route and commissioning is a period of at least 4 years. The construction compounds are deemed to be ‘temporary’ but the phasing of the works appears to set out that these would be in place for the duration of the HDD and onshore cable construction work which is a period of 3.5-4 years. If they remain in place during the commissioning works, this extends the duration further.</p> <p>7.6.9. The SDNPA would suggest that considerable lengths of the cable route, construction haul road and access routes are likely to remain in place throughout the construction period to provide access and for cable pulling/jointing activities, which further extend the duration of the landscape and visual effects.</p> <p>7.6.10. The SDNPA would suggest that, given previous experience of the construction of Rampion 1, with its shorter length of cable and construction period of 4 years, the indicative programme would appear to be underestimated</p>	<p>Reference 7.6.10: An outline programme with regards to the construction programme is provided in Section 4.7 of Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045]. The final construction programme will be determined during the detailed design phase post-consent. Whilst the outlined timeline for the total construction is 3.5-4 years, the actual construction activities on the cable corridor at any specific location along the route are expected to be substantially shorter, as the construction of the cable corridor is expected to be undertaken in stages. If the DCO is awarded a detailed construction schedule for the entire onshore cable route will be developed.</p>
7.7	<p>7.7. Range of landscape effects</p> <p>7.7.1. The LVIA Methodology (APP-167, Section 1.3.3, page 9) sets out that the potential effects include ‘effects on landscape character and key characteristics, including perceptual characteristics and qualities’.</p> <p>7.7.2. There appears to be no consideration of effects on individual landscape elements in the LVIA. As a result of this combined approach, it is inevitable that some aspects are downplayed, in particular perceptual and indirect effects that, if considered in isolation, would be significant. This is particularly important to be considered in respect of landscape elements, such as tranquillity and openness, which contribute to the SDNP Special Qualities.</p> <p>7.7.3. The LVIA gives a ‘Summary landscape assessment: Part 2: SDNP’ (APP-059, Sections 18.11.32 to 18.11.41, page 224-226) which sets out a summary of the effects, however these are focussed purely on effects different types of vegetation, with no consideration of direct or indirect effects on other landscape elements, such perceptual factors, condition, distinctiveness, historic landscape character, lighting and tranquillity or dark skies which all are particularly important in relation to the SDNP and contribute to its Special Qualities.</p> <p>7.7.4. Industry guidance document ‘GLVIA 3’ Box 5.1 (page 84) sets out a ‘Range of factors that can help in the identification of valued landscapes which include ‘Perceptual aspects: a landscape may be valued for its perceptual qualities, notably wildness and / or tranquillity’.</p> <p>7.7.5. The Landscape Institute’s Technical Guidance Note 02-21 ‘Assessing landscape value outside national designations’ sets out a range of factors that can be considered when identifying landscape value. It states at 2.4.4 ‘As with Box 5.1 in GLVIA3, Table 1 is not intended to be an exhaustive list of factors to be considered when determining the value of landscapes, but to provide a range of factors and indicators that could be considered. This TGN is intended to be complementary to GLVIA3’.</p> <p>7.7.6. Whilst it is acknowledged that the guidance is for assessment ‘outside national designations’, the table (page 10-11) provides a useful guide to the different perceptual qualities (reproduced below):</p>	<p>Reference 7.7.1-2: Please refer to the Applicant’s response in references 3.5.1-3 in Table 2-2 of this document.</p> <p>Reference 7.7.3-6: The Applicant’s approach to the consideration of factors that contribute to landscape value (including scenic quality, aesthetic qualities, tranquillity, historic landscape character) is set out above in response to references 3.5.3-4 in Table 2-2. These factors are listed as part of the key characteristics of the landscape character areas within the South Downs National Park and in all cases the value of these qualities has been assessed in the landscape and visual impact assessment as high.</p>

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Factor	Definition (and examples where more clarity is useful)
Perceptual (scenic)	Landscape that appeals to the senses, primarily the visual sense: Distinctive features such as dramatic or striking landform or harmonious combinations of land cover; strong aesthetic qualities such as scale, form, colour, and texture; presence of natural lines in the landscape; visual diversity or contrasts which contribute to appreciation; memorable/ distinctive views and landmarks, or landscape which contributes to such.
Perceptual (wildness and tranquillity)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies: High levels of tranquillity or perceptions of tranquillity, including perceived links to nature, presence of wildlife / birdsong and relative peace and quiet; presence of wild land and perceptions of relative wildness (resulting from a high degree of perceived naturalness, rugged or otherwise challenging terrain, remoteness from public mechanised access and lack of modern artefacts); sense of particular remoteness, seclusion or openness; dark skies

7.8 7.8. Lack of assessment of effects of ash dieback.
 7.8.1. The SDNPA is concerned that the potential for increased landscape and visual effects as a result of ash dieback, a serious and increasing issue in the SDNP, is not considered in the LVIA.

It is not possible to assess a reasonable worst case in relation to ash dieback as the spatial and temporal extent of any changes associated cannot be estimated. Please refer to the Applicant’s response in **reference 13.13** in Table 2-2 of this document.

7.9 7.9. Type, location and range of viewpoints
 7.9.1. At the Third Statutory Consultation Exercise the SDNPA advised micro-siting of viewpoints be undertaken in consultation with Stakeholders. It should be noted that this has not taken place and viewpoint locations have not been adjusted.

Reference 7.9.1-2: The landscape and visual impact assessment (LVIA) is reported in **Chapter 18: Landscape and visual impact, Volume 2** of the Environmental Statement (ES) [APP-059] which is supported by Figures 18.1 to 18.76, **Chapter 18: Landscape and visual impact – Figures (Parts 1 to 6 of 6), Volume 3** of the ES [APP-098-APP-103] includes 69 viewpoints (viewpoint locations have been discussed and agreed with a number of stakeholders see paragraph 18.4.41 within **Chapter 18: Landscape and visual impact, Volume 2** of the ES [APP-059]) illustrating the onshore elements of the Proposed Development. There are 29 viewpoints within the South Downs National Park (SDNP) and others within the setting that view both towards the SDNP and from within the SDNP viewing out. A number of these have been repositioned / micro-sited at the request of consultees. In February 2024, a meeting was convened with interested stakeholders to understand and discuss the detailed concerns around individual viewpoints within the SDNP. The Applicant is considering further requests to micro-site some viewpoints.

7.9.2. The LVIA Methodology (APP-167, Section 1.2.13, page 7) states that states the Study Area is ‘supported by a number of elevated, long-distance panoramic viewpoint locations within the wider landscape, beyond 2km, as agreed with consultees, in particular the South Downs National Park to demonstrate any visibility at these distances’. The SDNPA is not aware of any agreement on these and is of the opinion that there are insufficient views from the Downs, in particular the South Downs Way, and those chosen downplay the wide visibility of the proposed development.

7.9.3. The SDNPA is concerned that sequential testing of viewpoints along the route of the South Downs Way has not been adequately undertaken. The limited number of views illustrated (see APP-103, Figures 18.76 a-c) do not adequately reflect the nature of the continuous views afforded to a visual receptor as they travel along the South Downs Way.

7.9.4. The SDNPA is concerned that there is a lack of range of different views of the Washington Construction Compound from the surrounding area particularly from high ground to the south; only one viewpoint includes a view towards the compound (APP-102, Figure 18.49a).

7.9.5. The SDNPA is concerned that there is a lack of consideration of visual effects of visibility splays.

Reference 7.9.3: Ten sequential views were agreed with consultees along the route of the South Downs Way and illustrated to support the assessment (Figures 18.67 and 18.76 in **Chapter 18: Landscape and visual impact – Figures (Part 6 of 6), Volume 3** of the ES [APP-103], 18.30 [APP 100], 18.48 [APP 101], and 18.49 [APP 102] **Chapter 18: Landscape and visual impact – Figures (Parts 3 to 5 of 6), Volume 3** of the ES. The LVIA has also had access to a 3D model of the onshore cable corridor and Digital Terrain Model (DTM) to determine theoretical visibility in relation of specific receptors.

7.9.4: Please refer to the Applicant’s response to LIR **reference 6.17 (e)** (Table 2-1).

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7.10 7.10. Mapping and presentation
 7.10.1. Mapping used in LVIA follows the route of cable, however there is insufficient overlap of the sheets leading to the omission of potential areas of cable corridor visibility. For example, Amberley Mount / Rackham Hill omitted in inadequate overlap between Figures 18.4a and 18.4b (APP-098), with potential lack of consideration of effects on the South Downs Way the nationally important trail.

7.9.5: The viewpoints illustrated in Figures 18.10-76, **Chapter 18: Landscape and visual impact – Figures (Part 1 to 6 of 6), Volume 3** of the ES [APP-098 – APP-103] do not show the details of vegetation removal or visibility splays. Where vegetation removal is indicated in Appendix B Vegetation Retention Plans of the **Outline Code of Construction Practice [PEPD-033]** this is included in the LVIA. The Applicant is reviewing the Vegetation Retention Plans and if the outcome of this exercise requires updates to the Vegetation Retention Plans or other application documents including the LVIA, the Applicant currently envisages presenting this information by Deadline 3. Further to this, the Applicant is also in discussion with West Sussex County Council on the visibility splays requirements at key accesses, with speed surveys being completed to inform visibility splay requirements. These speed surveys will be used to inform the requirements set out in the **Outline Construction Traffic Management Plan [PEPD-035a]** and access designs where these are being undertaken.

7.11 7.11. Residential Visual Amenity Assessment
 7.11.1. The RVAA (APP-171, Section 1.4.1 page 5) sets out that a 'Study Area of 1km distance from the Proposed Development has been selected for the RVAA (Figure 18.1, Volume 3 (Document Reference: 6.3.18.1). Only those residential properties within the 1km Study Area, which can be identified on the Ordnance Survey (OS) 1:25,000 scale map, and are overlapped by the Zone of Theoretical Visibility (ZTV) are included in the assessment.'

The Applicant advises that this point relates to viewpoints outwith the landscape and visual impact assessment (LVIA) Study Area and that wider mapping is provided in Figures 18.1, and 18.6a-b **Chapter 18: Landscape and visual impact – Figures (Part 1 of 6), Volume 3** of the ES [APP 098], albeit at a reduced scale. The LVIA has had access to wider digital mapping and site survey. The figures illustrating the LVIA provide coverage of the significant effects.

7.11.2. The SDNPA suggest that the reasoning behind this is not explained and that this approach leads to consideration of only these residential properties that are closest and most impacted.

The methodology for Residential Visual Amenity Assessment (RVAA) accords with the advice in the Landscape Institute's Residential Visual Amenity Assessment Technical Note 2/19, 15 March 2019 and full details of this are provided in **Appendix 18.5: Residential Visual Amenity Assessment, Volume 4** of the Environmental Statement (ES) [APP-171] including Annex A.

7.11.3. The ZTVs for the LVIA (APP-098, Figures 18.4a- 18.4d) show a far wider range of influence for the onshore cable corridor route than RVAA's 1km distance and includes a large number of residential properties. The baseline for the RVAA cannot, therefore, be considered as the worst-case scenario. The limitation of the Study Area of the RVAA gives considerable cause for concern that without considering the greater number of properties impacted this significantly understates the adverse effects.

The RVAA addresses the private views from residential properties and the Landscape Institute's Residential Visual Amenity Assessment Technical Guidance Note 2/19 ('the LI guidance' CD009.003) advises that the planning system is designed to act in the public interest when making planning decisions. It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.

7.11.4. It is also unclear why the study area is limited to 1km when the Study Area for the LVIA extends to 2km (which the SDNPA suggest is inadequate. The SDNPA consider this very brief Residential Visual Amenity Assessment to be inadequate.

In summary, there are essentially two stages to a RVAA concerning the identification of significant effects and the consideration of RVAA. The RVAA (Stage 1) identifies those properties which are likely to be significantly affected and subjects these to RVAA (Stage 2) which is summarised in Table 1-2 and detailed for each property in Annex A of **Appendix 18.5: Residential Visual Amenity Assessment, Volume 4** of the ES [APP-171]. The Viewpoint analysis confirms that significant visual effects

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		<p>(during the construction phase) are likely to affect limited locations within approximately 650m distance from the onshore cable corridor.</p> <p>By assessing those properties which are 'most affected' or closest to the onshore cable corridor the RVAA has included the 'worst case'. If these properties are assessed as not breaching the residential visual amenity threshold, it can be reasonably assumed that properties less affected or further distance from the onshore cable corridor would not breach that threshold either. Furthermore, the RVAA makes a clear distinction between visual effects (Stage 1) and effects on residential visual amenity (Stage 2).</p> <p>Table 1-1 of the RVAA (Appendix 18.5: Residential Visual Amenity Assessment, Volume 4 of the ES [APP-171]) provides information / rationale for how residential properties were selected for RVAA and included in the RVAA. This has allowed a proportionate approach which takes account of the main living rooms and garden areas within each residential property included in the RVAA.</p>
8.1	<p>8. LANDSCAPE AND VISUAL: IMPACTS</p> <p><u>8.1. General Comments</u></p> <p>8.1.1. The SDNP feel that as a result of a flawed methodology there are likely to be substantially more significant adverse effects as a result of the onshore cable corridor route on landscape character and visual receptors that stated in the LVIA.</p> <p>8.1.2. The LVIA (APP-059) consistently understates the effects on the SDNP Landscape Character Areas (LCA), due to the limited geographical extents of the study area, lack of consideration of a wide range of landscape elements including perceptual effects and the use of a combined approach to landscape elements that, had they been considered as individual elements, effects would be significant.</p> <p>8.1.3. One of the implications of the limited 2km buffer area is demonstrated through the LVIA Zone of Theoretical Visibility (ZTV) (APP-098, Figures 18.4a- 18.4d) where visibility extends across a significant area – much greater than the 2km study area. In particular the nature of the open downland, where openness and expansive views are highly characteristic is one specific area where this limited study area is not appropriate.</p> <p>8.1.4. Landscape elements such as tranquillity, historic landscape character, condition and dark skies, have not been appropriately considered. The summary of effects instead focusses on types of vegetation, which largely ignores perceptual qualities or draws on any historic character associated with these features or the wider landscape character. By either grouping, or omitting proper assessment of these features, there remains a high probability that effects have been underestimated or missed entirely.</p>	<p>Please refer to the Applicant's response to the South Downs National Park Authority Written Response reference 3.5.1 – 3 in Table 2-2 of this document.</p>
8.2	<p><u>8.2. Whole Proposed Development visual effects</u></p> <p>8.2.1. With regards to Whole Proposed Development effects, the Visual Assessment (APP-170) sets out that there will be significant visual effects as a result of both the onshore and offshore elements of the Proposed Development at viewpoints A (outside the SDNP) (APP-168, page 38), H7d (APP-168, page 80), H7h (APP-168, page 84) and LD2 (APP-168, page 114).</p>	<p>Please refer to the Applicant's response to whole project assessment in South Downs National Park Authority Written Response reference 3.7.1-4 in Table 2-2 and reference 7.3 of this table.</p> <p>Please refer to the Applicant's response to sequential assessment in reference to South Downs National Park Authority Written Response reference 7.9.3 in this table.</p>

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	<p>8.2.2. However, the Visual Assessment (APP-170, section 1.4.33, page 114), it states that the 'Section 7 of the South Downs Way: Arun to Adur Downs, overlaps with the LVIA Study Area for the onshore cable corridor and the SLVIA reports a Significant (Moderate) effect on the southern views from the tops of the downs between the Adur and Arun Valleys passing Chanctonbury Ring, Chantry Hill and Amberley Mount.'</p> <p>8.2.3. The Visual Assessment goes on to state (APP-170, section 1.4.34, page 115), that 'the likelihood of significant visual effects occurring concurrently due to the visibility of the offshore elements of the Proposed Development (installation and commissioning of the offshore substation and wind turbines) and the construction of the onshore cable corridor will be limited to approximately 12 months due to the overlap of the indicative construction programme'.</p> <p>8.2.4. The lack of adequate sequential testing viewpoints along the top of the South Downs and the route of the South Downs Way gives rise to a substantial underestimate of the extent of adverse visual effects arising from the Whole Proposed Development in the LVIA, despite this being alluded to in the SLVIA. The SDNPA suggest that had an adequate assessment been undertaken then this was likely to identify a for a far wider range of significant effects.</p>	<p>By way of example, the seascape, landscape and visual impact assessment (SLVIA) reports a Significant (Moderate) effect, resulting from the offshore elements of the Proposed Development on the southern views from the tops of the downs between the Adur and Arun Valleys passing Chanctonbury Ring, Chantry Hill and Amberley Mount. Contrary to the South Downs National Park analysis in 8.2.4, significant visual effects resulting from the onshore elements of the Proposed Development, would not affect the illustrated views from Viewpoint Ia: Chanctonbury Ring (Figure 18.76 [APP 103]), Viewpoint G: Chantry Hill (Figure 18.30 [APP-100]) and Viewpoint G5: Amberley Mount (Figure 18.76 [APP103]) (Chapter 18: Landscape and visual impact – Figures (Parts 3 and 6 of 6), Volume 3 of the Environmental Statement (ES)) and assessed in Appendix 18.2: Viewpoint Analysis, Volume 4 of the ES [APP-168].</p> <p>It is not agreed that inclusion and illustration of numerous landscape and visual impact assessment (LVIA) viewpoints in the assessment is insufficient or otherwise leads to an underestimate of the whole project effects. On the contrary the combined volume of LVIA viewpoints (supported by further SLVIA viewpoints) provides a more than adequate basis to analysis and illustrated the assessed effects.</p>
8.3	<p><u>8.3. Landscape and Visual Effects on the SDNP LCA I3</u></p> <p>8.3.1. The SDNPA has substantial concerns over assessment of effects on the LCA I3 Arun to Adur Scarp Down (APP-169, Table 2-9, pages 67-69).</p> <p>8.3.2. During construction, the magnitude of change for LCA I3 Arun to Adur Scarp Down is state to be 'negligible to zero', despite the proposed HDD construction compounds immediately abutting the LCA both above and below scarp. This give rise to a level of effect on landscape character of 'Minor and Not Significant' and for landscape elements: 'N/A'. The LVIA has not considered the nature of the LCA as open access land, the extent of perceptual and indirect effects and the stated assessed impacts. The resultant harm to the SDNP are considered by the SDNPA to be substantially understated.</p> <p>8.3.3. The LVIA has also not considered the nature of the LCA as open access land and any resultant visual effects, which the SDNPA consider is a considerable omission and that the effects are likely to be significant.</p>	<p>Please refer to the Applicant's response to South Downs National Park Authority Written Representation reference 3.5.5 in Table 2-2 of this document.</p>
8.4	<p><u>8.4. Landscape and Visual Effects of the Construction Compounds</u></p> <p>8.4.1. There is a lack of information provided regarding the use and appearance of the compounds.</p> <p>8.4.2. There are insufficient views and wireframe images provided of the Washington Compound which has the potential to be visible in considerable sequential views as a visual receptor moves along the recreational routes on the Downs.</p> <p>8.4.3. The construction compounds are stated as being 'temporary' (APP-045, Section 4.5.1, page 60) but it is clear that these would be in place for the duration of the construction work and not removed until the end of the construction activities; this is a period of over 3 years. The period is considered short-term.</p> <p>8.4.4. The Washington Compound is stated as having a maximum area of 3.91ha (APP-045, Table 4-22, page 71).8.4.5. Activity stated for the compounds (APP-045, Section 4.5.35, page 71) includes 'logistics;</p>	<p>Please refer to the Applicant's response to South Downs National Park Authority Local Impact Report references 6.17e and 6.22 in Table 2-1 of this document.</p>

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	<p>storage of materials and equipment, location of cement bound sand (CBS) batching plant, also includes welfare facilities and office space as appropriate'</p> <p>8.4.6. The compound lighting is described (APP-045, Section 4.5.48, page 74) as 'At temporary construction compounds and specific locations where night working is required or in poor light conditions during normal working hours, portable lighting units will be used where necessary to ensure safe working and / or site security.'</p> <p>8.4.7. The SDNPA has concerns that, given the lack of information and the long-term duration of their use, the landscape and visual impacts of these compounds are understated in the LVIA, given the close proximity to the SDNP, the considerable size of the compounds, the associated lighting, vehicle movement, structures within the compound and visibility from the downs, that the effects are substantially understated and are likely to be significant.</p>	
8.5	<p>8.5. Effects of Lighting</p> <p>8.5.1. The Landscape Assessment (APP-169, Section 3.3.20, page 122) states that 'There would be no effect on the South Downs International Dark Sky Reserve or 'dark skies' within the SDNP due to the implementation of embedded environmental measures within the Commitments Register (Document Reference: 7.22) (C-22, C66, and C-200)'</p> <p>8.5.2. Commitment C-22 sets out core working hours, which in winter months would extend into periods of darkness, requiring lighting to assist construction work.</p> <p>8.5.3. Commitment C-66 is an overarching statement and provides no indication of detail regarding lighting.</p> <p>8.5.4. Whilst Commitment C-200 sets out that 'construction lighting will be limited to directional task lighting' the SDNPA would suggest that this would not be the case, based on a number of factors. Firstly, the core working hours set out in the Commitments Register include times extending into periods of darkness during winter months, requiring lighting to assist construction work. The areas where trenchless crossing techniques are proposed to be employed (including areas of intrinsic rural darkness) require lighting 24 hours a day when being undertaken. The experience the SDNPA have had in respect of Rampion 1 construction also suggests that work will be taking place during periods of darkness, requiring further lighting.</p> <p>8.5.5. Lighting is therefore considered to be inevitably required and cannot be considered to be without adverse effects. These therefore need to be properly taken into consideration as a separate landscape effect.</p> <p>8.5.6. The SDNPA suggest that any additional lighting can affect dark skies and have concerns that the adverse effects of lighting are not considered in the LVIA as a separate effect, which is a substantial omission in the ES in light of the SDNP's status as an International Dark Sky Reserve.</p>	<p>Please refer to the Applicant's response to South Downs National Park Authority Local Impact Report references 5.18 and 6.21 in Table 2-1 of this document and Written Representation references 3.6.1 – 3.6.3 in Table 2-2 of this document.</p>
9.1	<p>9. LANDSCAPE AND VISUAL: MITIGATION</p> <p>9.1. Outline Landscape and Ecology Management Plan (APP-232):</p> <p>9.1.1. The following points relate to the consideration of landscape and visual effects only and should be read in conjunction with other comments, particularly in relation to Ecology considerations.</p>	<p>References 9.1.1- 9.1.3: The Applicant has no further comments at this time on these paragraphs of South Downs National Park Authority's Written Representation.</p> <p>Reference 9.1.4: Advance Planting</p>

Ref	Written Impact Report Comment	Written Representation Comment
	<p>9.1.2. The LEMP (APP-232, Section 1.2.5, page 6) sets out that ‘The draft DCO requires stage specific LEMPs for areas of habitat creation and reinstatement along the onshore cable corridor, including associated areas such as temporary compounds.’</p>	<p>The Applicant agrees that the detail in the Code of Construction Practice (CoCP) and the Landscape and Ecological Management Plan (LEMP) will need to be stage and location specific and provide information on scheduling (including advance planting), establishment, management and monitoring. Stage specific LEMPs and CoCPs are secured through Requirement 12 and 22 of the Draft Development Consent Order [PEPD-009] (updated at deadline 2).</p>
	<p>9.1.3. The LEMP (APP-232, Sections 2.6.4 and 2.6.5, page 13) sets out that ‘A programme of landscape works will be provided setting out the programme according to relevant planting seasons and maximising opportunities for advance planting prior to construction to allow trees to mature during the construction works and in advance of completion of the onshore substation.’ and ‘Some of the landscaping will be established prior to the beginning of construction (advance planting), with the remainder being delivered following the completion of the substation and the decommissioning of temporary construction compounds.’</p>	<p>Following discussions with stakeholders the Applicant will provide further detail on vegetation loss, reinstatement, management, monitoring, and the process for delivering remedial actions (i.e. if localised planting fails) within the Outline Code of Construction Practice [PEPD-033] and the Outline Landscape and Ecology Management Plan [APP-232] when updated at Deadline 3.</p>
	<p>9.1.4. The DCO does not make allowance for advance planting, and there is no reference to this in the Commitments Register. The SDNPA would therefore like to understand how this is to be secured and implemented.</p>	<p>References 9.1.6-6: Hedge Notching Please reference responses regarding hedgerows at 6.26 of the responses to the SDNPA LIR reference 6.17 (h) Table 2-1 of this document and WR reference 3.8.6 in Table 2-2.</p>
	<p>9.1.5. The LEMP (APP-232, Section 4.5.2, Page 23) sets out that hedgerow ‘may be removed and reinstated with new plants or temporarily translocated to a pre-prepared planting trench and returned to its original position in the first available planting period.’ This is also referenced in the Commitments Register at C-115.</p>	<p>Reference 9.1.7: Watering The Applicant will review this request on watering within the Outline Landscape and Ecology Management Plan [APP-232] when updated at Deadline 3.</p>
	<p>9.1.6. The SDNPA has significant concerns over likely success of proposed hedge ‘notching’. The example of successful notching (APP-063, section 22.9.102, page 166) is not relevant to South Downs; the examples provided are from the Lake District and Norfolk Broads, both of which are much wetter landscapes than the application proposals. There has not been any proven testing in the vicinity of the proposed development in respect of the particular climatic conditions and dry, free-draining soils found in the SDNP undertaken to evidence that the proposals will allow for successful vegetation establishment.</p>	<p>References 9.1.8-9: Woodland Clearance The LVIA has assessed the effects of woodland clearance as significant adverse landscape effects and makes no reference to “<i>visual diversity of landscape character and elements</i>”. As reinstatement planting establishes there would be changes to the age / species structure and diversity of affected areas of vegetation which would gradually reduce and mitigate the construction effects. The LVIA recognises that trees cannot be replaced above the cables resulting in a permeant effect in comparison to the baseline.</p>
	<p>9.1.7. The LEMP places significant reliance on the ability to water reinstated habitat (dense scrub and hedgerows)(APP-232, sections 4.3.3, page 22 and section 4.5.6 page 24) to assist establishment, however it is unclear how this work in practice over such a vast, and in places remote, area along the onshore cable corridor. The SDNPA would therefore like to understand how this is to be secured and implemented.</p>	<p>References 9.1.10-11: The Commitments Register [REP1-015] (update at Deadline 1 submission) includes a column for the securing mechanism for each embedded environmental measure and its related commitment reference. This cross-refers to the mechanism, for example a requirement in the Draft Development Consent Order (DCO) [PEPD-009] Schedule 1 Part 3. Planting plans will be provided and where there is an accompanying document such as an outline plan submitted with the DCO Application with which works must be undertaken in accordance with, this is also referred to under the ‘Relevant Application Documents’ column. The Applicant provided the Commitments Register [REP1-015] (updated at Deadline 1 submission) as part of the DCO Application and have provided an update to this at Deadline 1 to include further detail e.g. the full reference to DCO requirements and addition of the location of further information within the Application documents.</p>
	<p>9.1.8. The LEMP (APP-232, Section 4.4.1, page 23) sets out that ‘Where woodland is lost (approximately 0.4ha) the reinstatement will be in the form of scrub to prevent damage to the transmission cables. This scrub will provide visual diversity of landscape character and elements’.</p>	
	<p>9.1.9. The SDNPA would suggest that in woodland areas where clearance could be a width of at least 20m to accommodate the 4 trenches (see APP-232, Graphic A-4, Page A6) this cannot be regarded as ‘visual diversity of landscape character’ and cannot be mitigated and therefore should be regarded as a significant adverse effect.</p>	
	<p>9.1.10. The LEMP (APP-232, Section 4.5.4, page 24) sets out that ‘Landscape plans for hedgerow and treeline reinstatement may need to be produced in sensitive areas such as the SDNP and included within the stage specific LEMP.’ [SDNP emphasis in bold]</p>	<p>The Outline Landscape and Ecology Management Plan [APP-232] will be updated to refer to planting plans at Deadline 3.</p>

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	<p>9.1.11. The SDNPA finds this statement to be unacceptable due to the use of the word 'may'. The planting plans are essential, not just for purposes of consultation and approval but also to enable accurate implementation and effective monitoring.</p>	
9.2	<p><u>9.2. Outline Soils management plan (APP-226):</u></p> <p>9.2.1. THE OSMP (APP-226, Section 1.2.5, page 7) states 'Most of the affected land is within the South Downs National Park where provisional Agricultural Land Classification (ALC) mapping shows mainly Grades 2 and 3, and the likelihood of best and most versatile land is assessed by Natural England (Natural England, 2017) to be moderate or high.'</p> <p>9.2.2. The Natural England website states that 'Agricultural Land Classification map London and the South East (ALC007)' forms 'part of a series at 1:250 000 scale derived from the Provisional 1" to one mile ALC maps and is intended for strategic uses. These maps are not sufficiently accurate for use in assessment of individual fields or sites and any enlargement could be misleading. The maps show Grades 1-5, but Grade 3 is not subdivided.'</p> <p>9.2.3. The 'Predictive BMV Landscape Assessment' explanatory note sets out that the mapping carries a proviso that 'the map is intended for strategic planning purposes only and is not suitable for use below scale 1:250 000 or for the definitive classification of any local area or site'.</p> <p>9.2.4. It will be important to provide a full assessment of the agricultural land classification for the area of the proposed DCO Order Limits to allow review prior to any construction work. 9.2.5. THE OSMP (APP-226, Section 1.2.6, page 7) states that the 'Soils Resource Plan (SRP) – which will be produced during pre-construction to detail the type and volume of soils to be stripped, haul routes and stockpile arrangements and be produced in conjunction with the MMP [Materials Management Plan] and will interact with the stage specific SMP [Soils Management Plan].'</p> <p>9.2.6. If there are still elements of the proposals to be developed, especially haul routes (which it was assumed were already covered by the DCO Order Limits area) this is likely to lead to missing effects cannot be considered to inform appropriate mitigation strategy or allow comprehensive consideration of the proposals by stakeholders.</p> <p>9.2.7. THE OSMP (APP-226, Section 2.1.1, page 9) sets out that a 'soil resource survey was carried out in February 2022. It was based on observations at 100m intervals along the cable route corridor and including areas of permanent development (e.g., the onshore substation at Oakendene) within the proposed DCO Order Limits.'</p> <p>9.2.8. The Agricultural Quality report summary (APP-226, Appendix A, Page 5) states 'The survey work covers approximately 40% of the proposed DCO Order Limits. The remaining land could not be surveyed due to health and safety risks associated with an elevated (moderate or higher) risk of encountering UXO and land access restrictions.'</p> <p>9.2.9. The accompanying plans (APP-226, Appendix A, Map 1A to Map 1G) suggest that the percentage of the proposed DCO Order Limits covered by the survey work may be lower still as many of the auger observations do not lie within the DCO Order Limits.</p> <p>9.2.10. There is a considerable area of the proposed DCO Order Limits that is missing between (APP-226, Appendix A) Maps 1B and 1C (survey observations), and Maps 2B and 2C (Agricultural land classification) most of which is the section of the DCO Order limits within the SDNP. This is due to the possible presence of UXO</p>	<p>The Applicant provides a summary of the sources of baseline data on agricultural land classification used for the assessment in paragraph 20.5.3 in Chapter 20: Soils and agriculture, Volume 2 of the Environmental Statement (ES) [APP-061]. This states that 231 hectares of land within the proposed DCO Order Limits has been covered by agricultural land classification (ALC) survey commissioned by the Applicant for Rampion 2. The total area surveyed for Rampion 2 to confirm the ALC grades was 409.5 hectares, however the assessment only uses ALC survey data for land within the proposed DCO Order Limits. For land within the proposed DCO Order Limits where ALC survey data was not available during the assessment, reference is made to post-1988 agricultural land classification mapping, and where this was unavailable, to preliminary agricultural land classification mapping. The additional ALC survey data obtained for Rampion 2, which due to design changes occurs outside the preliminary proposed DCO Order Limits, is presented in Figure 20.2, Chapter 20: Soils and agriculture – Figures, Volume 3 of the ES [APP-105] accompanying Chapter 20: Soils and agriculture, Volume 2 of the ES [APP-061]. This is provided for information and context only, with the post-1988 agricultural land classification and preliminary agricultural land classification maps, to show the ALC grades in the area surrounding the proposed DCO Order Limits, given its linear shape. Where ALC survey data was not available for land within the proposed DCO Order Limits due to the elevated UXO hazard, the Applicant has assumed that all land shown provisionally as ALC Grade 3 is Subgrade 3a i.e., best and most versatile land. This is to provide a conservative assessment of the effects of Rampion 2 on soils and agricultural land.</p> <p>The assessment of the effects of Rampion 2 on soils and agricultural land in Chapter 20: Soils and agriculture, Volume 2 of the ES [APP-061] applies a 40m wide onshore cable corridor which includes haul routes and temporary construction accesses, as detailed in Table 20-15 Maximum assessment assumptions for effects on soils and agriculture: breakdown of project elements and affected areas. The potential effects of temporary works within the cable corridor on soils and agricultural land are assessed for the construction phase in Section 20.9 of Chapter 20: Soils and agriculture, Volume 2 of the ES [APP-061].</p> <p>The Applicant is committed to full soil and agricultural land classification survey coverage during pre-construction, including of the areas with elevated unexploded ordnance (UXO) risk, and Natural England has agreed to this approach of stage specific ALC surveys being undertaken post consent. Agricultural land that may be affected by the Proposed Development and which has not been included in the recent ALC survey (Appendix 20.1: Detailed Agricultural Land Classification Report, Volume 4 of the ES [APP-175]) will be surveyed to confirm its current ALC status during pre-construction, to inform the stage-specific Soils Management Plans (SMPs) in accordance with the Outline Soils Management Plan [APP-226]. The Applicant will provide the results of the ALC surveys to stakeholders, including the SDNPA, during pre-construction. This is secured through the Outline Code of</p>

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	<p>9.2.11. The SDNP would expect that this missing information be fully provided in due course to allow review prior to any construction work.</p>	<p>Construction Practice [PEPD-033] and Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant is also committed to developing a Soil Resource Plan (as defined in the Outline Soils Management Plan [APP-226]), during pre-construction, which will form part of the suite of management plans including the stage specific Soils Management Plan (SMP), Materials Management Plan (MMP), and Site Waste Management Plan (SWMP). Commitment C-183 of the Commitments Register [REP1-015] (provided at Deadline 1 submission) states that an ‘<i>Outline Soils Management Plan (SMP) has been developed (included in the Outline CoCP) to enable construction works to be completed in accordance with the Defra Code of Construction Practice for the Sustainable Use of Soils on Construction Sites 2009 to protect soil resources from damage during the construction phase</i>’ and is secured by Requirement 22 of the Draft Development Consent Order [PEPD-009].</p> <p>In accordance with Section 5.1 of the Defra Construction Code of Practice (Defra, 2009), the Soil Resource Plan will include:</p> <ul style="list-style-type: none"> • maps showing topsoil and subsoil types, and the areas to be stripped and left in-situ; • schedules of volumes for each material; • expected after-use for each soil whether topsoil to be used on site, used or sold off site, or subsoil to be retained for landscape areas, used as structural fill or for topsoil manufacture; and • identification of the person responsible for supervising soil management.
10.1	<p>10. LANDSCAPE AND VISUAL: ENHANCEMENTS</p> <p>10.1. The SDNPA welcomes the approach to BNG, however will be keen to see further information about the delivery of habitat compensation and enhancement, including how it will be secured.</p> <p>10.2. Where habitats are lost in the SDNP, the SDNPA expects that any biodiversity net gain provision, landscape enhancements and biodiversity enhancements to be provided within the SDNP.</p>	<p>Appendix 22.15: Biodiversity Net Gain Information, Volume 4 of the Environmental Statement [APP-193] describes the approach to delivering biodiversity net gain (BNG). BNG delivery is secured through Requirement 14 of the Draft Development Consent Order [PEPD-009]. The Requirement allows for a BNG strategy to be provided for each of the stages of development. This ensures that the agreements to be reached with the relevant planning authorities in consultation with Natural England will be localised (e.g. associated with specific lengths of cables, the substation, the landfall etc.).</p>
11.1	<p>11. RAMPION 1: LESSONS LEARNT</p> <p>11.1. ‘Lessons Learnt’ were discussed at a workshop that included representatives from WSCC, SDNPA and Rampion Offshore Wind Ltd in 2019. Some of the points discussed (in italics) and commentary on these from the SDNPA in relation to the Rampion 2 proposals are as follows:</p>	<p>Noted, the Applicant has no further comments on this paragraph of the South Downs National Park WR at this time.</p>
11.2	<p>11.2. Project Scope:</p> <p>11.2.1. ‘Whilst it is recognised that there is a requirement for some flexibility in design, it is helpful to provide authorities with realistic project information e.g. clearer parameters for cable route, number of river crossings, constraints, construction methodologies’</p> <p>11.2.2. The Rampion 2 proposals still include a substantial amount of uncertainty and qualification that implies that new or materially different seascape, landscape and visual effects may be missing from the ES.</p>	<p>Chapter 3: Alternatives, Volume 2 of the Environmental Statement (ES) [APP-044] details how the design of the Proposed Development has evolved and demonstrates that all aspects of site selection, site access and future access requirements have been incorporated into the design of the Proposed Development to minimise and mitigate adverse impacts. The chapter explains the reasonable alternatives considered. At this stage, the description of the Proposed Development is indicative and a ‘design envelope’ approach has been adopted which takes into account the</p>

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		<p>Planning Inspectorate's Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2018).</p> <p>The provision of a design envelope is intended to identify key design assumptions to enable the environmental assessment to be carried out whilst retaining enough flexibility to accommodate further refinement during detailed design. Further details on the use of the Rochdale Envelope for Nationally Significant Infrastructure Projects are provided in line with the Planning Inspectorate Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2018), and is further described in Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] in paragraphs 4.1.4 to 4.1.6. The use of the Rochdale Envelope approach is recognised in paragraph 4.2.8 of NPS EN-1 (DECC, 2011a), and is also reflected in the newly designated NPS (Department of Energy Security and Net Zero 2023a; 2023b and 2023c). This approach has been adopted. Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] provides a detailed description of the offshore infrastructure in Section 4.3. A description of specific locations along the route where optionality has been retained is also provided.</p>
11.3	<p>11.3. More focus on enhancements, not impacts</p> <p>11.3.1. 'Place greater emphasis on enhancements without appearing to appease the community. Care should be taken to strike the right balance and work within the parameters of the Planning system to ensure that positives are emphasised.'</p> <p>11.3.2. The SDNPA feel that there is little indication of enhancement in the submission; opportunities for enhancement are missed, and C-7 sets out that the work area is to be 'reinstated to pre-existing conditions'.</p>	<p>In relation to references 11.3. – 11.4, the Applicant will continue to engage with South Downs National Park Authority on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response in references 3.2.5 to 3.2.7 regarding Section 106 agreements</p>
11.4	<p>11.4. Targeted enhancements, public visibility</p> <p>11.4.1. 'Consider enhancements that target the community, rather than broad actions which may not have same impact e.g. target popular or visible areas for enhancement'</p> <p>11.4.2. The SDNPA feel that there is little indication of enhancement in the submission.</p>	
11.5	<p>11.5. After care period</p> <p>11.5.1. 'The "After Care" period of the project was changed from 5 years to 10 years.'</p> <p>11.5.2. The SDNP welcome the proposals for a 10 year aftercare period for the landscape maintenance and monitoring.</p>	<p>The Applicant notes the agreement from South Downs National Park Authority on the aftercare period which is secured in Requirement 13 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p>
11.6	<p>11.6. Other points outside Lessons Learnt Workshop</p> <p>11.6.1. The SDNPA has concern over claims that Rampion 1 was successfully reinstated; this was not the case. In particular areas of the cable corridor across agricultural land remain visible to date and fencing is still in place(see Appendix B of Written Representation).</p>	<p>The Applicant cannot comment on the reinstatement of land following the Rampion 1 works as this is not a matter for this DCO Application.</p> <p>The methodologies that will be used to ensure construction (including restoration) is undertaken in a sensitive and appropriate way can be found in the Outline Construction Method Statement [APP-255], the Outline Code of Construction</p>

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	<p>11.6.2. During the construction of Rampion 1 working hours were extended, giving rise to increased adverse effects from lighting. Commitment C-22 only sets out 'core hours' which implies the possibility for extension, which the SDNPA would suggest has the potential to again increase adverse effects of lighting, given the experience with Rampion 1.</p> <p>11.6.3. Drainage issues and wet conditions meant working practices for Rampion 1 had to be altered to make areas workable, altering both habitats and landscape character. The potential issues that might arise with Rampion 2 are as yet undetermined and have the potential to again increase adverse effects.</p> <p>11.6.4. During the construction of Rampion 1 there was alteration to topography that had adverse effects on landscape character, with some sunken lanes infilled and ridges levelled. There are not detailed plans to evidence that Rampion 2 will avoid these types of issues.</p> <p>11.6.5. During the construction of Rampion 1 considerable lengths of the cable route, construction haul road and access routes remained in place throughout the construction period to provide access and for cable pulling/jointing activities, which further extended the duration of the landscape and visual effects. There is no evidence to suggest that Rampion 2 can be dealt with any differently.</p> <p>11.6.6. The SDNPA would suggest that, given previous experience of the construction of Rampion 1, with its shorter length of cable and construction period of 4 years, the indicative programme would appear to be underestimated.</p>	<p>Practice [PEPD-033], and the Outline Landscape and Ecology Management Plan (LEMP) [APP-232]. These documents are secured under Requirements 12, 22 and 23 of the Draft Development Consent Order [PEPD-009].</p> <p>The Applicant notes the continuous working hours required for activities for trenchless crossing (e.g. horizontal directional drilling (HDD) and that effects are assessed in the Environmental Statement.</p>
12.1	12. DOCUMENTS REVIEWED	The Applicant has no further comments on section 12 of the information shown in this section of the SDNPA WR at this time
13.1	<p>13. COMMENTARY ON COMMITMENTS REGISTER (APP-254) 13.1. C-1 13.1.1. 'The onshore cable route will be completely buried underground for its entire length where practicable.'</p> <p>13.1.2. The description of the Proposed Development (APP-045) makes no reference to any of the cable route not being buried. Should there be sections of unburied cable, then locations need to be identified and acknowledged as part of the 'worst case scenario'.</p> <p>13.1.3. The wording for C-1 should be amended to remove the phrase 'where practicable to be acceptable to the SDNPA.'</p>	The Applicant has updated C-1 at Deadline in the Commitments Register [REP1-015] to remove 'where practicable'. The burial of the cable is secured in Draft Development Consent Order [PEPD-009] (updated at Deadline 2) in Schedule 1, Part 1, The Authorised Development, Work No. 6, 7, 8, 9, 19.
13.2	<p>13.2. C-5 13.2.1. 'Main rivers, watercourses, railways and roads that form part of the Strategic Highways Network will be crossed by Horizontal Directional Drill (HDD) or other trenchless technology where this represents the best environment solution and is financially and technically feasible'.</p> <p>13.2.2. This commitment omits areas of trenchless crossing in other areas (under woodlands, vegetation and chalk scarp)</p> <p>13.2.3. The SDNPA also does not consider the financial feasibility of trenchless crossings to be a consideration in this process.</p>	<p>The Applicant has updated C-5 at Deadline 1 in the Commitments Register [REP1-015] to make it clear that trenchless crossings are to be provided in accordance with Appendix 1 Crossing Schedule of the Outline Code of Construction Practice [PEPD-033] and secured by Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). This includes the crossings within the SDNPA including TC-12 and TC-15 at Michelgrove and Sullington Hill.</p> <p>Appendix 1 of the Outline Code of Construction Practice [PEPD-033] identifies the routes where flexibility has been sought at Sullington Hill and Michelgrove. The final crossing schedule will be provided in each stage specific CoCP, in accordance with</p>

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	<p>13.2.4. Alternative options for HDD routes and compounds are included in the proposals. It is not clear how these will be decided upon.</p> <p>13.2.5. The DCO does not consent open trenching methods in areas where HDD is being proposed (should HDD fail additional consent would be required to deliver an alternative solution). This is referenced in the DCO at Item 6 (4) (page 54) 'Trenchless installation techniques must be used to install the transmission cables where identified in the crossings schedule (comprising part of the code of construction practice approved pursuant to requirement 22) for the purpose of passing under a relevant obstruction unless otherwise agreed by the relevant planning authority, following consultation with the lead local flood authority, Natural England, the highway authority or Network Rail as relevant.'</p> <p>13.2.6. The description of the Proposed Development (APP-045 Section 4.5.26, page 68) that 'For trenchless crossings, HDD has been assessed in the DCO Application as this is the likely preferred option based on their reduced complexity and relatively low cost compared to other techniques. The detailed methodology and design of the trenchless crossing will be determined following site investigation and confirmed within stage specific Onshore Construction Method Statements including confirmation that there are no new or materially different environmental effects arising compared to those assessed in the ES.'</p> <p>13.2.7. It is unclear what the approach will be if 'new or materially different environmental effects' do arise.</p> <p>13.2.8. It is not acceptable to the SDNPA that the construction of the onshore cable route should commence prior to the viability of the sections of trenchless crossing HDD being confirmed as possible to implement, due to the extensive landscape and visual effects along the route. If the HDD is not confirmed as possible at any point, and an alternative is sought to be agreed, then the SDNP is of the opinion that effects of the proposed development have the potential to be prolonged and, depending on the alternatives, different and possibly more extensive than those set out in the ES.</p> <p>13.2.9. For Commitment C-5 to be acceptable to the SDNPA, reference needs to be made to the use of HDD in other areas, particularly under the scarp and prior to construction, a fixed proposal needs to be identified and acknowledged as part of the 'worst case scenario' with an amended ES if appropriate.</p>	<p>the content of the Outline CoCP. This is secured by Requirement 22 (5) (q) of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2).</p> <p>The Applicant seeks to clarify that a fundamental principle of delivering a project under a DCO is that this must be delivered with no new or materially different effects compared to those assessed in the ES. It would be necessary to address such an instance with mitigation to be included in the stage specific CoCP for approval of the relevant planning authority.</p> <p>The Applicant has a high degree of confidence that all trenchless crossings on the Crossing Schedule in Appendix A of the Outline Code of Construction Practice [PEPD-033] are feasible, including those at ecologically and visually sensitive sites.</p> <p>The Outline Construction Method Statement [APP-255] provides further information regarding the detailed design of the trenchless crossings in Section 3.4 and the further information required to inform this (e.g., ground investigation). The detailed design of a trenchless crossing will be undertaken within the established parameters assessed in the Environmental Statement (ES) as detailed in 4.5.27 of Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045] and secured in Schedule 1 Part 3, Requirement 23 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) to be approved by the relevant planning authority Any assessment required at the detailed design stage would be undertaken in accordance with the established methodologies outlined in the ES.</p>
13.3	<p>13.3. C-7</p> <p>13.3.1. 'Post construction, the work area will be reinstated to pre-existing conditions as far as reasonably practical'.</p> <p>13.3.2. Pre-existing conditions need to be established prior to construction. It may be that an area is in poor condition, badly drained or have some other issue, whereby reinstatement to an equally poor condition would not be desirable and that the opportunity for some form of enhancement would be welcomed.</p> <p>13.3.3. The wording for C-7 should be amended to remove the phrase 'as far as reasonably practical' to be acceptable to the SDNPA and further consideration given to opportunities for enhancement in areas where existing conditions are found to be poor and could be improved.</p>	<p>The Applicant notes this commitment is in relation to pre-existing condition of soils only, as secured in the Outline Soils Management Plan [APP-226] as secured through the Outline Code of Construction Practice [PEPD-033] at Requirement 22 of the Draft Development Consent Order [PEPD-009] (updated at Deadline 2). The Applicant will continue to engage with SDNPA on potential enhancement opportunities within the National Park including those that may be achieved through development consent obligations. See the Applicant's response to the SDNPA's WR 3.2.5 to 3.2.7 regarding S106 agreements</p>
13.4	<p>13.4. C-9</p>	<p>The detailed design of the onshore cable route including the precise siting of joint bay locations is subject to information from the Site Investigation as well as confirmation</p>

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	<p>13.4.1. 'Joint bays will be completely buried, with the land above reinstated to pre-construction ground level, with the exception of link box chambers where access will be required from ground level (via manholes).'</p> <p>13.4.2. The description of the Proposed Development (APP-045, Section 4.5.45, page 73) states that 'Typically, they are located every 750 to 950m', however Commitment C-19 states that 'At regular intervals (typically 600m –1,000m) along the route joint bays/pits will be installed to enable the cable installation and connection process.' No plans showing locations of joint bays has been provided.</p> <p>13.4.3. In agricultural land it is assumed that there will need to be some form of marking or fencing to enable identification land to ensure farming practices, such as ploughing, do not damage manholes, however there is no mention of this in APP-045.</p> <p>13.4.4. The Soils Management Plan (APP-226, Section 3.1.6, page 12) sets out that 'ALC grades should be used to inform 'micro-siting' in the final design so that where practicable, temporary or permanent development on the best quality agricultural land is avoided. Where there is flexibility for a final joint bay location to be positioned in areas of agricultural land with different ALC grades, consideration will be given in the final design to locating the joint bay in the land with the lowest ALC grade (with the highest being Grade 1).'</p> <p>13.4.5. This is welcomed, but it is suggested that for C-9 to be acceptable to SDNPA this should be taken to a greater level of detail and the micro-siting of joint bays to edges of fields would reduce impact on agricultural land further.</p>	<p>of technical parameters, for example final cable dimension and the information from the final pre-construction environmental surveys.</p>
<p>13.5</p>	<p><u>13.5. C-26</u></p> <p>13.5.1. 'Where noisy activities are planned and may cause disturbance, the use of mufflers, acoustic barriers (or shrouds) and other suitable solutions will be applied.'</p> <p>13.5.2. No identification of location of acoustic barriers has been provided. Should these be required, then the SDNPA suggest that locations need to be identified and acknowledged as part of the 'worst case scenario' to be assessed.</p>	<p>The use of acoustic barriers including shrouds at the source of noise such as horizontal directional drilling (HDD) plant is part of typical construction activity and is not considered to alter the overall appearance of the wider construction site.</p>
<p>13.6</p>	<p><u>13.6. C-27</u></p> <p>13.6.1. 'Following construction, construction compounds will be returned to previous conditions as far as reasonably possible.'</p> <p>13.6.2. Pre-existing conditions need to be established prior to construction. It may be that an area is in poor condition, badly drained or have some other issue, whereby reinstatement to an equally poor condition would not be desirable; the SDNP would welcome the opportunity for some form of enhancement.</p> <p>13.6.3. The wording for C-27 should also be amended to remove the phrase 'as far as reasonably possible' to be acceptable to the SDNPA.</p>	<p>This is noted and the feedback is being considered by the Applicant, should any amendment be required, this would be updated for Deadline 3.</p>
<p>13.7</p>	<p><u>13.7. C-40</u></p>	<p>Please see response to the South Downs National Park Authority Written Representation reference 5.4 in this table.</p>

Ref	Written Impact Report Comment	Written Representation Comment
	<p>13.7.1. 'There will be up to three offshore substations installed to serve the Proposed Development. The exact locations, design and visual appearance will be subject to a structural study and electrical design, which is expected to be completed post consent. The offshore substations will be installed on multi-leg or monopile foundations, similar to those described for the wind turbine generators (WTGs) themselves'.</p> <p>13.7.2. See commentary above in Section 5.4.</p>	
<p>13.8</p>	<p><u>13.8. C-61</u></p> <p>13.8.1. 'Due regard will be given to design principles held in Rampion 1 Design Plan and design principles to be developed for Rampion 2, with consideration of the seascape, landscape and visual impacts on the South Downs National Park and Sussex Heritage Coast.</p> <p>13.8.2. Rampion Offshore Wind Farm and connection works Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy and Climate Change Section 4.357 states 'The Panel considers the offshore design parameters provide an important contribution to reducing the visual effect of the offshore wind farm on the National Park and Heritage Coast.'</p> <p>13.8.3. SLVIA Design Principles supplementary document in the above document sets out that the design principles are:</p> <ul style="list-style-type: none"> (a) To limit as far as possible the horizontal degree of view of wind turbine generators from the key sensitive visual receptor within the SDNP and the HC through a more compact layout; (b) To increase as far as possible the distance of the wind turbine generators from the key sensitive visual receptor within the SDNP and the HC; (c) To locate the largest turbines, in any hybrid scheme, to the south-western portion of the Order limits maximising distance from the key sensitive visual receptor within the SDNP and the HC; (d) Provide clear sight lines through the wind turbine layout to the open sea horizon from the key sensitive visual receptor within the SDNP and the HC; (e) Consider use of colour tones to minimise visibility, specifically in relation to the key sensitive visual receptor within the SDNP and the HC; (f) The key sensitive visual receptor from the SDNP and HC is Beachy Head. Other sensitive visual receptors, which the undertaker should have regard to in applying the design principles, are Birling Gap, Cuckmere Haven and inland sea views from the downs. <p>13.8.4. It is accepted that the Rampion 2 design principles do not include principle (c) which relates to a hybrid scheme.</p> <p>13.8.5. Principle (e) is not adopted in the Rampion 2 principles.</p> <p>13.8.6. Principle (f) is not relevant to Rampion 2.</p>	<p>The Applicant can confirm that the summary provided by South Downs National Park Authority of the Rampion 1 and Rampion 2 design principles is correct.</p>
<p>13.9</p>	<p><u>13.9. C- 67</u></p> <p>13.9.1. 'The onshore cable route will avoid the brows of hills as far as is reasonably practical and is likely to follow the established pattern of the landscape i.e. routed to closely follow the line of existing field boundaries as far as is practicable.'</p> <p>13.9.2. Study of the aerial mapping of the route of the onshore cable shows that this commitment cannot be met adequately with the current proposed route.</p>	<p>The Applicant considers that during the design process, this has been considered and applied as far as is practical.</p>

Ref	Written Impact Report Comment	Written Representation Comment
13.10	<p><u>13.10. C-103</u> 13.10.1. '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. Habitat restoration (i.e. planting and seeding) will take place at an appropriate time of year dependent on habitat type. In general habitat restoration will seek to deliver the same habitat type as the baseline, unless there is an opportunity to deliver enhancements. Woodland cannot be replaced above the cable ducts and in these situations woodland ride habitats will be delivered'.</p> <p>13.10.2. For C-103 to be acceptable to the SDNPA prior to construction, a fixed programme needs to be identified and acknowledged as part of the 'worst case scenario' with an amended ES if appropriate.</p>	<p>The Applicant will confirm through an update to the Outline Landscape and Ecology Management Plan [APP-232] at Deadline 3 the timeframe for when replanting will take place, this is likely to be implemented by stage. This would not change the Environmental Statement.</p>
13.11	<p><u>13.11. C-115</u> 13.11.1. 'Hedgerows/tree lines crossed by the cable route will be 'notched' to reduce habitat loss and landscape and heritage impacts wherever possible. This is defined as temporarily displacing one or more short sections (i.e. notches) within the same hedgerow/tree line. Hedgerow/tree line losses will thereby be kept to approximately 14m total width at each hedgerow crossing point where notching can take place. Hedgerows deemed "important" under the Hedgerows Regulations 1997 (or where there are other considerations), losses will be reduced to a 6m notch for the temporary construction haul roads only, by trenchless installation of the cable ducts under them. Where appropriate, hedgerows will be temporarily translocated using a tree spade to maintain diversity and structure and result in more rapid reinstatement. Where chances of success are questionable, notches will be made by removal and reinstatement through planting. The ECoW will justify the approach being taken in line with the responsibilities of implementing the vegetation retention plan (see C-220)'</p> <p>13.11.2. See sections 3.6 and 9.15 above.</p>	<p>The Applicant refers to its responses regarding hedgerows in reference 6.26 of the responses to the South Downs National Park Authority Local Impact Report Table 2-1 of this document.</p>
13.12	<p><u>13.12. C-193</u> 13.12.1. 'Replacement planting will be characteristic of the area and resilient to climate change. Plant species will be selected carefully at detailed design stage with appropriate management and maintenance techniques established to support the development of these species in line with the environmental requirements'</p> <p>13.12.2. The SDNPA suggest that plant species that are both characteristic of the area and resilient to climate change will need to be carefully selected and may lead to a smaller range of plants to select from.</p>	<p>A list of native plant species is provided in Table 2-1 of the Outline Landscape and Ecology Management Plan [APP-232]. Paragraph 2.6.6 states "Species selection will be confirmed as part of the stage specific LEMP and will be restricted to the use of native species selected from Table 2-1. Not all British natives will be suitable, and the species selection will be made to suit the local environmental conditions of where the plants are to be planted and chosen to meet to design principles and in particular the following objectives:</p> <ul style="list-style-type: none"> • Ecological objectives for habitat creation and enhanced biodiversity; • Landscape objectives to support the landscape design principles for amenity, screening and enhanced landscape character; and • Provide reasonable climate change resilience according to their location within the detailed landscape plan." <p>This is secured via Draft Development Consent Order [PEPD-009] Requirement 12.</p>
13.13	<p><u>13.13. C-286</u> 13.13.1. 'Mitigation planting for the removal of trees and hedgerow will be designed in accordance with the principles set out in the Arboricultural Impact Assessment (Document reference: 6.4.22.16) and Outline Landscape and Ecology Management Plan (LEMP) (Document Reference: 7.10)'</p>	<p>Mitigation is included within Commitment C-107 (Commitments Register [REP1-015]) included within the Outline Code of Construction Practice [PEPD-033] states that 'Tried and tested invasive species control and biosecurity measures will be used to avoid the spread of infested materials' and is secured via Requirement 22 within the Draft Development Consent Order [PEPD-033].</p>

Ref	Written Impact Report Comment	Written Representation Comment
	13.13.2. The SDNPA suggest that the Commitments Register should also make some reference to the presence of ash dieback and any compensatory measures required.	

Table 2-4 Applicant’s Response to South Downs National Park Written Representation – Appendix A1 – Landscape Institute Technical Note

Ref	Written Impact Report Comment	Written Representation Comment
	This appendix contains a copy of the Landscape Institutes technical note entitled “Assessing landscape value outside national designations”, the Applicant has no further comments on the matter at this time.	

Table 2-5 Applicant’s Response to South Downs National Park Written Representation – Appendix B: Rampion 1 Onshore Windfarm Cable Corridor Officer Explanatory Note to Accompany Aerial Photography


Ref	Written Impact Report Comment	Written Representation Comment
1	In July 2021, aerial photography was taken of the existing Rampion windfarm onshore cable route (Rampion 1), as it runs through the South Downs National Park. The photography was taken at both close and wide range. This note provides some narrative to be read alongside the full range of photography, however some images have been selected to support the comments. Unless stated, the photography follows the cable route from north to south, and is taken looking in a westerly direction. This note does not make any assumptions regarding the reasons for successful/unsuccessful recovery.	<p>The Applicant cannot comment on the reinstatement of land following the Rampion 1 works as this is not a matter for this DCO Application.</p> <p>The methodologies that will be used to ensure construction (including restoration) is undertaken in a sensitive and appropriate way can be found in the Outline Construction Method Statement [APP-255], the Outline Code of Construction Practice [PEPD-033], and the Outline Landscape and Ecology Management Plan (LEMP) [APP-232]. These documents are secured under Requirements 12, 22 and 23 of the Draft Development Consent Order [APP-019].</p> <p>The Applicant also refers to the measures in the Outline Soils Management Plan [APP-226] as secured in the Draft Development Consent Order [PEPD-009] (updated at Deadline 2) by Requirement 22 (5) (f).</p>
2	<p>The cable route enters the National Park south of Horn Lane, Henfield and continues south past Truleigh Manor Farm and onwards to Edburton Road. In this section, the cable route is visible above ground and significant runs of fencing remain on either side of the cable corridor. Further divisions along this part of the route appear to be intensively grazed (Fig.1) Hedgerows and other field boundary planting still demonstrate visible gaps, where new planting has either not been implemented or has not been successful.</p> 	

Fig.1

Ref	Written Impact Report Comment	Written Representation Comment
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3 As the corridor travels up the scarp slope and over to towards the South Downs Way (past Tottington Mount and the Site of Special Scientific Interest), there remains clear evidence of the works. However this is where further works following the failure of previous attempts at reinstatement have recently taken place and so there has been less time to recover. Parts of this section also remain fenced (Fig.2).



Fig.2 – looking east

4 Fencing appears to have been partially removed and the cable corridor managed as part of the wider land use between the South Downs Way and Mill Hill (Fig.3). Despite this, the cable route remains evident above ground.



Fig.3

5 As it crossed Mill Hill (south of Shoreham Cement Works) and into the Adur Valley, the route is not readily discernible (Fig.4 and 5). This is also where it moves through the Old Erringham Farm and Road Cutting Local Wildlife Site. It remains relatively discreet it moves up the western valley side.

Ref	Written Impact Report Comment	Written Representation Comment
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Fig.4



Fig.5 – looking north

6 The cable route becomes more visible as it crosses Coombes Road – due to the gaps in the hedgerow and differentiation in the grassland quality (Fig.6). This improves as the corridor becomes less obvious before it heads south at Beggars Bush/Titch Hill (Fig.7), skirting round Applesham Farm Bank and Steep Down Local Wildlife Sites, at which point the route is easier to follow.



Fig.6



Fig.7 – looking east

7 As the corridor passes Lambleys Farm, despite a mix of crops and uses, the cable route is clear and gaps in the hedgerow are highly visible (Fig.8).



Fig.8

8 Prior to leaving the National Park at the A27 east of Lyons Farm, the route crosses Lambleys Lane, through the fields where the corridor is only notable as a result of the gaps in hedgerow (Fig.9).

Ref **Written Impact Report Comment**

Written Representation Comment



Fig.9

9



Table 2-6 **Applicant’s Response to South Downs National Park Written Representation – Appendix C: Offshore Wind Farm Buffer Study**

Ref **Written Impact Report Comment**

Written Representation Comment

See full details in SDNP WR.

The Applicant notes the study provided in Appendix C by South Downs National Park Authority and has responded in the relevant sections of the Local Impact Report and/or Written Representation (**Table 2-1** and **Table 2-2**).

Table 2-7 Applicant’s Response to South Downs National Park Written Representation – Appendix D: Significant Archaeological Sites and Finds at Blackpatch and Harrow Hills

Ref	Written Impact Report Comment	Written Representation Comment
	See full details in SDNP WR.	The Applicant notes the summary information provided in Appendix D by South Downs National Park Authority. Please refer to the Applicant’s response to the Written Representation in references 3.10.1 to 3.10.8 in Table 2-2 of this document

3. References

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